

**SUPPORT  
APPEAL**

**APPEAL OF NW DISTRICT NEIGHBORHOOD ASSOCIATION AND SCHWARTZ  
BLOCK 162 APARTMENTS AT 1727 NW HOYT ST LU 18-187493 HRM AD**

IF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME.

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2	✓ Jill Warren	97209	
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9	✓ JESSICA RICHMAN	97209	
10	✓ Allen Buller	97209	

**OPPOSE  
APPEAL**

**APPEAL OF NW DISTRICT NEIGHBORHOOD ASSOCIATION AND SCHWARTZ  
BLOCK 162 APARTMENTS AT 1727 NW HOYT ST LU 18-187493 HRM AD**

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(not to leave)  
Date 11-29-2018

Julie Garver, Innovative Housing, Inc.  
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Number	Name (please print)	Address & Zip Code (optional)	Email (optional)
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16			
17			
18			
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29 November, 2018

Portland City Council  
C/O Council Clerk

RE: Case File # LU 18-187493 HRM, AD-1727 NW Hoyt (Block 162 Apartments)

Dear Members of the City Council,

Portland has long been a place where people could actually live in the urban core, knowing that a vibrant community, complete with all the services they needed, was just out their front door.

The Alphet Historic District is an inner-city neighborhood that is within walking distance of downtown businesses, shopping, dining and a multitude of services. The Northwest District itself is rich with services and amenities, including medical, food and entertainment. It is a complete neighborhood that allows residence to live and work, car free if they choose, in a healthy environment. It represents everything that we as Portlanders want in neighborhoods throughout our City.

I believe that the Northwest District and specifically the Alphet Historic District has the capacity, infrastructure, and proximity to accommodate the density that this project brings. I believe that it does a disservice, and even a harm to our City to draw lines around certain areas and restrict the density to that of a suburban neighborhood.

The appeals filed against Landmark Commission's approval of this project are based largely on a question of scale. The concern is that the proposed buildings will overshadow the single-family homes to the north and south. They state that larger buildings do not belong in close proximity to the smaller homes in the immediate area.

I would like to cite the Statement of Significance included in the Nomination to have the Alphet District listed in the National Register as a Historic District. This represents the broad understanding of what makes the District worthy of Historic designation.

*The Historic Alphet District, located in the northwest area of Portland, Oregon, is locally significant under Criterion A as the birthplace of important local institutions. It is additionally significant under Criterion A as the secondary center of Portland's Jewish and Scandinavian population in the early twentieth century. It also satisfies Criterion BN as a residential district in which a large number of locally prominent merchants, professionals, civic leaders and politicians lived. The Historic Alphet District is further eligible under Criterion C for its expression of early residential architecture in the city of Portland, characterized by buildings of various types, styles and eras. Indeed, the Historic Alphet District is unique in Portland for its concentration of early twentieth century multi-family structures – many of which were designed and constructed by the city's premier architects and developers. The district's multi-family dwellings are noteworthy for their appearance in an area that retains buildings from its early development period. Grand single-family homes sit next to first-class apartment buildings in a physical representation of the sociocultural transition experienced by one of Portland's oldest neighborhoods.*



There are two very important take-aways from this statement. The first is that the Historic District is noted for its diversity of architecture and the success derived from having a mixture of large and small, residential and institutional. In many instances, these buildings of differing size and use are adjacent to each other. The second is that it was the introduction of the apartment building that allowed the neighborhood to achieve economic and social diversity. The apartment building gave the neighborhood both architectural texture and social texture. This is a neighborhood currently under threat of gentrification, and it is rental housing such as the project being proposed that will allow the neighborhood to remain diverse, vibrant, and the epitome the Livable City.

Originally established as a neighborhood of single-family residents, the first apartment buildings were built in the early 1900's. Since those early apartment buildings, the Alphabet Historic District has been a neighborhood of diversity and mixed density types. It has seamlessly integrated single-family homes and five story apartments, often time adjacent to each other. This mixture has given the neighborhood a unique and inviting texture. It is the epitome of "livability", that quality of services, amenities, safety, diversity, and connection between neighbors.

I am not promoting density at all cost. I firmly believe that in special neighborhoods such as the Alphabet District, special care must be taken to respect the historic patterns of development. We strive to honor and preserve the development pattern of this historic neighborhood. I believe this project does that as well as any larger scale project built in the recent past. The design of this project goes to extraordinary lengths to respect the neighborhood in scale, design, and preservation. While doing all this, it also taps into the benefits and potential of one of Portland's first-class neighborhoods.

Thank you for your consideration,

Brian Carleton, AIA, Principal

November 29, 2018

Testimony in support of LU 18-187493 HRM AD Appeal (1727 NW Hoyt, Block 162 Apartments)

My name is Vicki Skryha and I live across the street from the project site. I am an ardent affordable housing supporter and also believe in historic preservation. I have worked in the affordable housing field for forty years and have been an affordable housing consultant, housing and homeless services manager, and director of a permanent supportive housing evaluation project.

**I am asking that you reverse the HLC decision and deny the proposed design.** I have commented extensively on how the design does not meet the review criteria and others have already discussed these points. The choice before you today is not between affordable housing and historic preservation; it really is about a design that cannot realistically materialize into affordable housing units any time soon. This is because the project does not follow required guidelines.

People talk about how expensive it is to build affordable housing these days. When I was a housing consultant in the 1980s and 1990s, I had a straightforward, no frills approach. Roll up your sleeves, study all of the requirements and do everything you can to dot the i's and cross the t's so the housing can become a reality as quickly as possible. That is not the process undertaken for this project. If it was, we would all be celebrating a groundbreaking rather than the contentious two year design process with a lot of attorneys present and neighbor NIMBY accusations – all because the project, from the beginning has not followed requirements. I can tell you that neighbors surrounding this project site support affordable housing. Many of us contributed to affordable housing bond measure campaigns or work to support low income persons and social services.

In previous testimony, I shared the story of the recently completed St. Charles Senior Living in Aurora, Illinois. When I read about St Charles, it made me think of what this project could be. The St Charles project preserved a historic hospital building and provides 60 units of senior housing that include spacious studios, one-bedroom and two-bedroom units. There was a collaborative approach and close attention to historic preservation requirements. This facilitated a successful financing campaign and the award of project-based rental subsidies. St. Charles was successfully developed because rules were followed, criteria were met and there was a collaborative process with the community.

I and my neighbors would much rather be involved in such a collaborative approach. Sit back for a moment and think of where we would be if the project was designed according to the required hierarchy of compatibility? All of us put in the position of opposing the design would be enthusiastically supporting the project. What would such a project look like? Perhaps it would be similar in scale to two recent NHA senior housing developments:

- The Oakridge project in Lake Oswego offers 45 rent-subsidized, spacious one-bedroom apartments on a 29,254 square foot lot.
- The Alma Gardens project in Hillsboro, right near the MAX stop also has 45 spacious one-bedroom apartments and is situated on a 31,555 square foot lot.

I think NW residents deserve apartment homes similar to these projects. Compare them to the current project's 148 studio units squished into conjoined buildings on a 20,000 square foot lot, surrounded by one-way streets, with no parking or resident drop-off space. A project at the scale of the successful Oakridge or Alma Gardens could easily be adapted to a historically compatible design and offer much better accommodations for residents.

The proposed Block 162 design clearly does not meet several applicable historic resource review criteria. If you uphold the design decision, the design problems do not end. There may be appeals. When funding resources are applied for, additional obstacles will be encountered because Low Income Housing Tax Credit projects must meet historic preservation criteria. And if project-based subsidies are applied for to make the units affordable, as promised, a Section 106 consultation process, using the more stringent federal historic preservation standards is required.

It's a fallacy that a more reasonably scaled project would result in a 'loss of units'. You can't lose something that doesn't exist. The only units truly lost by this project are six existing apartments that would be essentially thrown away with the existing residents displaced. It's well known that the city and other public affordable housing sources are limited and insufficient to cover the costs of all of the projects in line waiting to be developed. We have a lot of good affordable housing in the works in Portland! In reality, any potential units not funded at this site will be developed elsewhere and will most likely provide better accommodation. If this project were properly designed, it would qualify for Historic Tax Credit financing and the use of CDBG funds – these resources expand the pool of affordable housing resources in Portland -- wouldn't that be better?

So please deny the proposed incompatible design and facilitate a move toward a more successful development plan for this site.

Thank you.

Respectfully,

Vicki Skryha  
1728 NW Hoyt



Jill Warren  
607 NW 18<sup>th</sup> Ave.  
1815 NW Hoyt Ave.  
Portland, OR 97209

November 29, 2018

case file LU 18-187493 HRM, AD - 1727 NW Hoyt Block 162 Apartments

Dear Mayor Wheeler and Council Members,

When we bought our buildings across the street from the Buck Prager building we received a 59-page document from the Department of the Interior "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings".

**Recommended**

Limiting any new excavations adjacent to historic foundations to avoid undermining the structural stability of the building or adjacent buildings. (p. 36)

Minimizing disturbance of terrain around buildings or elsewhere on the site. (p. 46)

When Park 19 was pile driving for new construction the pounding loosened the pipes in my building on Hoyt, causing leaks. I had to hire a plumber to tighten them up. My historic church is across the street on NW 18<sup>th</sup> Ave. and I'm concerned about damage to the stained glass windows that were brought over on a boat in the late 1800's, or other structural damage. My historic buildings are fragile and hopefully construction won't affect them.

**Not Recommended**

Introducing a new design that is incompatible in size, scale, material and color. (p. 33)

Carrying out excavations or re-grading adjacent to or within a historic building which could cause the historic foundation to settle, shift, or fail; or could have a similar effect on adjacent historic buildings. (p. 36)

Creating a false historical appearance because the replaced feature is based on insufficient historical, pictorial, and physical documentation. (p. 48)

Introducing a new building or site feature that is out of scale or otherwise inappropriate. (p. 48)

Introducing new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships on the site. (p.48)

Destroying streetscape and landscape features by widening existing streets, changing paving material, or introducing inappropriately located new streets or parking lots. (p. 49)

Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the district or neighborhood. (p. 51)

Attaching a new addition so that the character-defining features of the historic building are obscured damaged or destroyed. (p. 58)

Imitating a historic style or period of architecture in new additions especially for contemporary uses. (p. 58)

Designing and constructing new additions that result in the diminution or loss of the historic character of the resource. (p. 59)

### **Affordable Housing**

My rents are below market value. Park 19 has 2-br. units for over \$4,500.00 month. My 2 -br. units rent between \$1,500.00 - \$1,650.00 a month, Park 19's rent for \$4,515.00/month. My historic buildings are the last bastions of affordable housing inside the urban core. I am not allowed to alter my structures due to historic restrictions so the owners of this property need to abide by the restrictions too. We are caretakers of these historic landmarks.

The applicants claim they will use the buildings for affordable housing, however, the use is inconsequential. What matters is size and architectural compatibility with the neighborhood.

### **Conclusion**

The size of the buildings are incompatible with the neighborhood and will diminish the Buck/Prager building's historical status. The size and bulk need to be scaled back and design needs to be more in conformance with surrounding structures and guidelines outlined by the Dept. of the Interior. The proposed design does not match the immediate neighborhood, in previous agreement with the Historic Landmarks Commission.

Thank you for your consideration and support for preserving the historic value of our neighborhood.

Respectfully submitted,

Jill Warren

The Secretary of the Interior's  
**Standards for  
Rehabilitation**

and Guidelines for  
Rehabilitating Historic Buildings

U.S. Department of the Interior  
National Park Service  
Preservation Assistance Division  
Washington, D.C.

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For sale by the Superintendent of Documents, U.S. Government Printing Office  
Washington, D.C. 20402



# Contents

Introduction to the Standards and Guidelines .....	5
<b>BUILDING EXTERIOR</b>	
<i>Masonry: Brick, stone, terra-cotta, concrete, adobe, stucco, and mortar</i>	
Preservation of Historic Features (maintenance, repair, replacement) .....	12
Design for Missing Historic Features .....	15
<i>Wood: Clapboard, weatherboard, shingles, and other wooden siding and decorative elements</i>	
Preservation of Historic Features (maintenance, repair, replacement) .....	16
Design for Missing Historic Features .....	18
<i>Architectural Metals: Cast iron, steel, pressed tin, copper, aluminum, and zinc</i>	
Preservation of Historic Features (maintenance, repair, replacement) .....	19
Design for Missing Historic Features .....	21
<i>Roofs</i>	
Preservation of Historic Features (maintenance, repair, replacement) .....	22
Design for Missing Historic Features .....	23
Additions/Alterations for the New Use .....	24

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## **Windows**

Preservation of Historic Features (maintenance, repair, replacement) .....	25
Design for Missing Historic Features .....	26
Additions/Alterations for the New Use .....	27

## **Entrances and Porches**

Preservation of Historic Features (maintenance, repair, replacement) .....	28
Design for Missing Historic Features .....	29
Additions/Alterations for the New Use .....	29

## **Storefronts**

Preservation of Historic Features (maintenance, repair, replacement) .....	31
Design for Missing Historic Features .....	33

## **BUILDING INTERIOR**

### **Structural Systems**

Preservation of Historic Features (maintenance, repair, replacement) .....	34
Alterations/Additions for the New Use .....	36

### **Interior Spaces, Features, and Finishes**

Preservation of Historic Spaces, Features, and Finishes (maintenance, repair, replacement) .....	37
Design for Missing Historic Features and Finishes .....	40
Alterations/Additions for the New Use .....	41

***Mechanical Systems***

Preservation of Historic Features (maintenance, repair, replacement) ..... 43  
Alterations/Additions for the New Use ..... 44

**BUILDING SITE**

Preservation of Historic Features (maintenance, repair, replacement) ..... 45  
Design for Missing Historic Features ..... 48  
Alterations/Additions for the New Use ..... 48

**DISTRICT/NEIGHBORHOOD**

Preservation of Historic Features (maintenance, repair, replacement) ..... 49  
Design for Missing Historic Features ..... 51  
Alterations/Additions for the New Use ..... 51

**HEALTH AND SAFETY CODE REQUIREMENTS**

53

**ENERGY RETROFITTING**

55

**NEW ADDITIONS TO HISTORIC BUILDINGS** ..... 58



## INTRODUCTION

The Secretary of the Interior is responsible for establishing standards for all program under Departmental authority and for advising Federal agencies on the preservation of historic properties listed or eligible for listing in the National Register of Historic Places. In partial fulfillment of this responsibility, the Secretary of the Interior's Standards for Historic Preservation Projects have been developed to guide work undertaken on historic buildings—there are separate standards for acquisition, protection, stabilization, preservation, rehabilitation, restoration, and reconstruction. **The Standards for Rehabilitation** (codified in 36 CFR 67) comprise that section of the overall preservation project standards and addresses the most prevalent treatment. "Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values."

Initially developed by the Secretary of the Interior to determine the appropriateness of proposed project work on registered properties within the Historic Preservation Fund grant-in-aid program, the **Standards for Rehabilitation** have been widely used over the years—particularly to determine if a rehabilitation qualifies as a Certified Rehabilitation for Federal tax purposes. In addition, the Standards have guided Federal agencies in carrying out their historic preservation responsibilities for properties in Federal ownership or control; and State and local officials in reviewing both Federal and nonfederal rehabilitation proposals. They have also been adopted by historic district and planning commissions across the country.

The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. They also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction. To be certified for Federal tax purposes, a rehabilitation project must be determined by the Secretary to be consistent with the historic character of the structure(s), and where applicable, the district in which it is located.

## THE SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATION

The following Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

- (1) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- (2) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- (3) Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
- (4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
- (5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
- (6) Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
- (7) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- (8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- (9) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- (10) New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

As stated in the definition, the treatment "rehabilitation" assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alteration must not damage or destroy materials, features or finishes that are important in defining the building's historic character. For example, certain treatments—if improperly applied—may cause or accelerate physical deterioration of historic building. This can include using improper repointing or exterior masonry cleaning techniques, or introducing insulation that damages historic fabric. In almost all of these situations, use of these materials and treatments will result in a project that does not meet the Standards. Similarly, exterior additions that duplicate the form, material, and detailing of the structure to the extent that they compromise the historic character of the structure will fail to meet the Standards.

## **Technical Guidance Publications**

The National Park Service, U.S. Department of the Interior, conducts a variety of activities to guide Federal agencies, States, and the general public in historic preservation project work. In addition to establishing standards and guidelines, the Service develops, publishes, and distributes technical information on appropriate preservation treatments, including Preservation Briefs, case studies, and Preservation Tech Notes.

A Catalog of Historic Preservation Publications with stock numbers, prices, and ordering information may be obtained by writing: Preservation Assistance Division, Technical Preservation Services, P.O. Box 37127, Washington, D.C. 20013-7127.

## GUIDELINES FOR REHABILITATING HISTORIC BUILDINGS

The Guidelines were initially developed in 1977 to help property owners, developers, and Federal managers apply the Secretary of the Interior's "Standards for Rehabilitation" during the project planning stage by providing general design and technical recommendations. Unlike the Standards, the Guidelines are *not* codified as program requirements. Together with the "Standards for Rehabilitation" they provide a model process for owners, developers, and Federal agency managers to follow.

It should be noted at the outset that the Guidelines are intended to assist in applying the Standards to projects generally; consequently, they are not meant to give case-specific advice or address exceptions or rare instances. For example, they cannot tell an owner or developer which features of their own historic building are important in defining the historic character and must be preserved—although examples are provided in each section—or which features could be altered, if necessary, for the new use. This kind of careful case-by-case decisionmaking is best accomplished by seeking assistance from qualified historic preservation professionals in the planning stage of the project. Such professionals include architects, architectural historians, historians, archeologists, and others who are skilled in the preservation, rehabilitation, and restoration of historic properties.

The Guidelines pertain to historic buildings of all sizes, materials, occupancy, and construction types; and apply to interior and exterior work as well as new exterior additions. Those approaches, treatments, and techniques that are consistent with the Secretary of the Interior's "Standards for Rehabilitation" are listed in the "**Recommended**" column on the left; those approaches, treatments, and techniques which could adversely affect a building's historic character are listed in the "**Not Recommended**" column on the right.

To provide clear and consistent guidance for owners, developers, and federal agency managers to follow, the "Recommended" courses of action in each section are listed in order of historic preservation concerns so that a rehabilitation project may be successfully planned and completed—one that, first, assures the preservation of a building's important or "character-defining" architectural materials and features and, second, makes possible an efficient contemporary use. Rehabilitation guidance in each section begins with protection and maintenance, that work which should be maximized in every project to enhance overall preservation goals. Next, where some deterioration is present, repair of the building's historic materials and features is recommended. Finally, when deterioration is so extensive that repair is not possible, the most problematic area of work is considered: replacement of historic materials and features with new materials.

To further guide the owner and developer in planning a successful rehabilitation project, those complex design issues dealing with new use requirements such as alterations and additions are highlighted at the end of each section to underscore the need for particular sensitivity in these areas.

### Identify, Retain, and Preserve

The guidance that is basic to the treatment of all historic buildings—**identifying, retaining, and preserving** the form and detailing of those architectural materials and features that are important in *defining the historic character*—is always listed first in the "Recommended" column. The parallel "Not Recommended" column lists the types of actions that are most apt to cause the diminution or even loss of the building's historic character. It should be remembered, however, that such loss of character is just as often caused by the cumulative effect of

a series of actions that would seem to be minor interventions. Thus, the guidance in *all* of the "Not Recommended" columns must be viewed in that larger context, e.g., for the total impact on a historic building.

### Protect and Maintain

After identifying those materials and features that are important and must be retained in the process of rehabilitation work, then **protecting and maintaining** them are addressed. Protection generally involves the least degree of intervention and is preparatory to other work. For example, protection includes the maintenance of historic material through treatments such as rust removal, caulking, limited paint removal, and re-application of protective coatings; the cyclical cleaning of roof gutter systems; or installation of tencing, protective plywood, alarm systems and other temporary protective measures. Although a historic building will usually require more extensive work, an overall evaluation of its physical condition should always begin at this level.

### Repair

Next, when the physical condition of character-defining materials and features warrants additional work **repairing** is recommended. Guidance for the repair of historic materials such as masonry, wood, and architectural metals again begins with the least degree of intervention possible such as patching, piecing-in, splicing, consolidating, or otherwise reinforcing or upgrading them according to recognized preservation methods. Repairing also includes the limited replacement in kind—or with compatible substitute material—of extensively deteriorated or missing *parts* of features when there are surviving prototypes (for example, brackets, dentils, steps, plaster, or portions of slate or tile roofing). Although using the same kind of material is always the preferred option, substitute material is acceptable if the form and design as well as the substitute material itself convey the visual appearance of the remaining parts of the feature and finish.

### Replace

Following repair in the hierarchy, guidance is provided for **replacing** an entire character-defining feature with new material because the level of deterioration or damage of materials precludes repair (for example, an exterior cornice; an interior staircase; or a complete porch or storefront). If the essential form and detailing are still evident so that the physical evidence can be used to re-establish the feature as an integral part of the rehabilitation project, then its replacement is appropriate. Like the guidance for repair, the preferred option is always replacement of the entire feature in kind, that is, with the same material. Because this approach may not always be technically or economically feasible, provisions are made to consider the use of a compatible substitute material.

It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature under certain well-defined circumstances, they *never* recommend removal and replacement with new material of a feature that—although damaged or deteriorated—could reasonably be repaired and thus preserved.

### Design for Missing Historic Features

When an entire interior or exterior feature is missing (for example, an entrance, or cast iron facade; or a principal staircase), it no longer plays a role in physically defining the historic character of the building unless it can be accurately recovered in form and detailing through the proc-

ess of carefully documenting the historical appearance. Where an important architectural feature is missing, its recovery is always recommended in the guidelines as the *first* or preferred, course of action. Thus, if adequate historical, pictorial, and physical documentation exists so that the feature may be accurately reproduced, and if it is desirable to re-establish the feature as part of the building's historical appearance, then designing and constructing a new feature based on such information is appropriate. However, a *second* acceptable option for the replacement feature is a new design that is compatible with the remaining character-defining features of the historic building. The new design should always take into account the size, scale, and material of the historic building itself and, most importantly, should be clearly differentiated so that a false historical appearance is not created.

#### **Alterations/Additions to Historic Buildings**

Some exterior and interior alterations to the historic building are generally needed to assure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes. Alterations may include providing additional parking space on an existing historic building site; cutting new entrances or windows on secondary elevations; inserting an additional floor; installing an entirely new mechanical system; or creating an atrium or light well. Alteration may also include the selective removal of buildings or other features of the environment or building site that are intrusive and therefore detract from the overall historic character.

The construction of an exterior addition to a historic building may seem to be essential for the new use, but it is emphasized in the guidelines that such new additions should be avoided, if possible, and considered *only* after it is determined that those needs cannot be met by altering secondary, i.e., non character-defining interior spaces. If, after a thorough evaluation of interior solutions, an exterior addition is still judged to be the only viable alternative, it should be designed and constructed to be clearly differentiated from the historic building and so that the character-defining features are not radically changed, obscured, damaged, or destroyed.

Additions to historic buildings are referenced within specific sections of the guidelines such as Site, Roof, Structural Systems, etc., but are also considered in more detail in a separate section, NEW ADDITIONS TO HISTORIC BUILDINGS.

#### **Health and Safety Code Requirements; Energy Retrofitting**

These sections of the rehabilitation guidance address work done to meet health and safety code requirements (for example, providing barrier-free access to historic buildings); or retrofitting measures to conserve energy (for example, installing solar collectors in an unobtrusive location on the site). Although this work is quite often an important aspect of rehabilitation projects, it is usually not part of the overall process of protecting or repairing character-defining features; rather, such work is assessed for its potential negative impact on the building's historic character. For this reason, particular care must be taken not to radically change, obscure, damage, or destroy character-defining materials or features in the process of rehabilitation work to meet code and energy requirements.

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Specific information on rehabilitation and preservation technology may be obtained by writing to the National Park Service, at the addresses listed below:

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Preservation Assistance Division  
National Park Service  
P.O. Box 37127  
Washington, D.C. 20013-7127

National Historic Preservation  
Programs  
Western Regional Office  
National Park Service  
450 Golden Gate Ave.  
Box 36063  
San Francisco, CA 94102

Division of Cultural Resources  
Rocky Mountain Regional Office  
National Park Service  
655 Parfet St.  
P.O. Box 25287  
Denver, CO 80225

Preservation Services Division  
Southeast Regional Office  
National Park Service  
75 Spring St. SW., Room 1140  
Atlanta, GA 30303

Office of Cultural Programs  
Mid-Atlantic Regional Office  
National Park Service  
Second and Chestnut Streets  
Philadelphia, PA 19106

Cultural Resources Division  
Alaska Regional Office  
National Park Service  
2525 Gambell St.  
Anchorage, AK 99503



## BUILDING EXTERIOR

### **Masonry: Brick, stone, terra cotta, concrete, adobe, stucco and mortar**

Masonry features (such as brick cornices and door pediments, stone window architraves, terra cotta brackets and railings) as well as masonry surfaces (modelling, tooling, bonding patterns, joint size, and color) may be important in defining the historic character of the building. It should be noted that while masonry is among the most durable of historic building materials, it is also the most susceptible to damage by improper maintenance or repair techniques and by harsh or abrasive cleaning methods. Most preservation guidance on masonry thus focuses on such concerns as cleaning and the process of repointing.

#### Recommended

Identifying, retaining, and preserving masonry features that are important in defining the overall historic character of the building such as walls, brackets, railings, cornices, window architraves, door pediments, steps, and columns; and joint and unit size, tooling and bonding patterns, coatings, and color.

Protecting and maintaining masonry by providing proper drainage so that water does not stand on flat, horizontal surfaces or accumulate in curved decorative features.

Cleaning masonry only when necessary to halt deterioration or remove heavy soiling.

#### Not Recommended

Removing or radically changing masonry features which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Replacing or rebuilding a major portion of exterior masonry walls that could be repaired so that, as a result, the building is no longer historic and is essentially new construction.

Applying paint or other coatings such as stucco to masonry that has been historically unpainted or uncoated to create a new appearance.

Removing paint from historically painted masonry.

Radically changing the type of paint or coating or its color.

Failing to evaluate and treat the various causes of mortar joint deterioration such as leaking roofs or gutters, differential settlement of the building, capillary action, or extreme weather exposure.

Cleaning masonry surfaces when they are not heavily soiled to create a new appearance, thus needlessly introducing chemicals or moisture into historic materials.

Recommended

Carrying out masonry surface cleaning tests after it has been determined that such cleaning is necessary. Tests should be observed over a sufficient period of time so that both the immediate effects and the long range effects are known to enable selection of the gentlest method possible.

Cleaning masonry surfaces with the gentlest method possible, such as low pressure water and detergents, using natural bristle brushes.

Inspecting painted masonry surfaces to determine whether repainting is necessary.

Removing damaged or deteriorated paint only to the next sound layer using the gentlest method possible (e.g., handscraping) prior to repainting.

Applying compatible paint coating systems following proper surface preparation.

Repainting with colors that are historically appropriate to the building and district.

Not Recommended

Cleaning masonry surfaces without testing or without sufficient time for the testing results to be of value.

Sandblasting brick or stone surfaces using dry or wet grit or other abrasives. These methods of cleaning permanently erode the surface of the material and accelerate deterioration.

Using a cleaning method that involves water or liquid chemical solutions when there is any possibility of freezing temperatures.

Cleaning with chemical products that will damage masonry, such as using acid on limestone or marble, or leaving chemicals on masonry surfaces.

Applying high pressure water cleaning methods that will damage historic masonry and the mortar joints.

Removing paint that is firmly adhering to, and thus protecting, masonry surfaces.

Using methods of removing paint which are destructive to masonry, such as sandblasting, application of caustic solutions, or high pressure waterblasting.

Failing to follow manufacturers' product and application instructions when repainting masonry.

Using new paint colors that are inappropriate to the historic building and district.

Recommended

Evaluating the overall condition of the masonry to determine whether more than protection and maintenance are required, that is, if repairs to the masonry features will be necessary.

Repairing masonry walls and other masonry features by repointing the mortar joints where there is evidence of deterioration such as disintegrating mortar, cracks in mortar joints, loose bricks, damp walls, or damaged plasterwork.

Removing deteriorated mortar by carefully hand-raking the joints to avoid damaging the masonry.

Duplicating old mortar in strength, composition, color, and texture.

Duplicating old mortar joints in width and in joint profile.

Repairing stucco by removing the damaged material and patching with new stucco that duplicates the old in strength, composition, color, and texture.

Using mud plaster as a surface coating over unfired, unstabilized adobe because the mud plaster will bond to the adobe.

Not Recommended

Failing to undertake adequate measures to assure the preservation of masonry features.

Removing nondeteriorated mortar from sound joints, then repointing the entire building to achieve a uniform appearance.

Using electric saws and hammers rather than hand tools to remove deteriorated mortar from joints prior to repointing.

Repointing with mortar of high portland cement content (unless it is the content of the historic mortar). This can often create a bond that is stronger than the historic material and can cause damage as a result of the differing coefficient of expansion and the differing porosity of the material and the mortar.

Repointing with a synthetic caulking compound.

Using a "scrub" coating technique to repoint instead of traditional repointing methods.

Changing the width or joint profile when repointing.

Removing sound stucco; or repairing with new stucco that is stronger than the historic material or does not convey the same visual appearance.

Applying cement stucco to unfired, unstabilized adobe. Because the cement stucco will not bond properly, moisture can become entrapped between materials, resulting in accelerated deterioration of the adobe.

Recommended

Repairing masonry features by patching, piecing-in, or consolidating the masonry using recognized preservation methods. Repair may also include the limited replacement in kind—or with compatible substitute material—of those extensively deteriorated or missing parts of masonry features when there are surviving prototypes such as terra-cotta brackets or stone balusters.

Applying new or non-historic surface treatments such as water-repellent coatings to masonry only after repointing and only if masonry repairs have failed to arrest water penetration problems.

Replacing in kind an entire masonry feature that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. Examples can include large sections of a wall, a cornice, balustrade, column, or stairway. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Replacing an entire masonry feature such as a cornice or balustrade when repair of the masonry and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the masonry feature or that is physically or chemically incompatible.

Applying waterproof, water-repellent, or non-historic coatings such as stucco to masonry as a substitute for repointing and masonry repairs. Coatings are frequently unnecessary, expensive, and may change the appearance of historic masonry as well as accelerate its deterioration.

Removing a masonry feature that is unrepairable and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

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The following work is highlighted to indicate that it represents the particularly complex technical or design aspects of rehabilitation projects and should only be considered after the preservation concerns listed above have been addressed.

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**Design for Missing Historic Features**

**Designing and installing a new masonry feature such as steps or a door pediment when the historic feature is completely missing. It may be an accurate restoration using historical, pictorial, and physical documentation; or be a new design that is compatible with the size, scale, material, and color of the historic building.**

Creating a false historical appearance because the replaced masonry feature is based on insufficient historical, pictorial, and physical documentation.

Introducing a new masonry feature that is incompatible in size, scale, material and color.

**Wood: Clapboard, weatherboard, shingles, and other wooden siding and decorative elements**

Because it can be easily shaped by sawing, planing, carving, and gouging, wood is the most commonly used material for architectural features such as clapboards, cornices, brackets, entablatures, shutters, columns and balustrades. These wooden features—both functional and decorative—may be important in defining the historic character of the building and thus their retention, protection, and repair are of particular importance in rehabilitation projects.

Recommended

Identifying, retaining, and preserving wood features that are important in defining the overall historic character of the building such as siding, cornices, brackets, window architraves, and doorway pediments; and their paints, finishes, and colors.

Protecting and maintaining wood features by providing proper drainage so that water is not allowed to stand on flat, horizontal surfaces or accumulate in decorative features.

Not Recommended

Removing or radically changing wood features which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Removing a major portion of the historic wood from a facade instead of repairing or replacing only the deteriorated wood, then reconstructing the facade with new material in order to achieve a uniform or "improved" appearance.

Radically changing the type of finish or its color or accent scheme so that the historic character of the exterior is diminished.

Stripping historically painted surfaces to bare wood, then applying clear finishes or stains in order to create a "natural look."

Stripping paint or varnish to bare wood rather than repairing or reapplying a special finish, i.e., a grained finish to an exterior wood feature such as a front door.

Failing to identify, evaluate, and treat the causes of wood deterioration, including faulty flashing, leaking gutters, cracks and holes in siding, deteriorated caulking in joints and seams, plant material growing too close to wood surfaces, or insect or fungus infestation.

Recommended

Applying chemical preservatives to wood features such as beam ends or outriggers that are exposed to decay hazards and are traditionally unpainted.

Retaining coatings such as paint that help protect the wood from moisture and ultraviolet light. Paint removal should be considered only where there is paint surface deterioration and as part of an overall maintenance program which involves repainting or applying other appropriate protective coatings.

Inspecting painted wood surfaces to determine whether repainting is necessary or if cleaning is all that is required.

Removing damaged or deteriorated paint to the next sound layer using the gentlest method possible (handscraping and handsanding), then repainting.

Using with care electric hot-air guns on decorative wood features and electric heat plates on flat wood surfaces when paint is so deteriorated that total removal is necessary prior to repainting.

Using chemical strippers primarily to supplement other methods such as handscraping, handsanding and the above-recommended thermal devices. Detachable wooden elements such as shutters, doors, and columns may—with the proper safeguards—be chemically dip-stripped.

Applying compatible paint coating systems following proper surface preparation.

Repainting with colors that are appropriate to the historic building and district.

Not Recommended

Using chemical preservatives such as creosote which can change the appearance of wood features unless they were used historically.

Stripping paint or other coatings to reveal bare wood, thus exposing historically coated surfaces to the effects of accelerated weathering.

Removing paint that is firmly adhering to, and thus, protecting wood surfaces.

Using destructive paint removal methods such as a propane or butane torches, sandblasting or waterblasting. These methods can irreversibly damage historic woodwork.

Using thermal devices improperly so that the historic woodwork is scorched.

Failing to neutralize the wood thoroughly after using chemicals so that new paint does not adhere.

Allowing detachable wood features to soak too long in a caustic solution so that the wood grain is raised and the surface roughened.

Failing to follow manufacturers' product and application instructions when repainting exterior woodwork.

Using new colors that are inappropriate to the historic building or district.

Recommended

Evaluating the overall condition of the wood to determine whether more than protection and maintenance are required, that is, if repairs to wood features will be necessary.

Repairing wood features by patching, piecing-in, consolidating, or otherwise reinforcing the wood using recognized preservation methods. Repair may also include the limited replacement in kind—or with compatible substitute material—of those extensively deteriorated or missing parts of features where there are surviving prototypes such as brackets, moldings, or sections of siding.

Replacing in kind an entire wood feature that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. Examples of wood features include a cornice, entablature or balustrade. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Failing to undertake adequate measures to assure the preservation of wood features.

Replacing an entire wood feature such as a cornice or wall when repair of the wood and limited replacement of deteriorated or missing parts are appropriate.

Using substitute materials for the replacement part that does not convey the visual appearance of the surviving parts of the wood feature or that is physically or chemically incompatible.

Removing an entire wood feature that is unrepairable and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

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**Design for Missing Historic Features**

Designing and installing a new wood feature such as a cornice or doorway when the historic feature is completely missing. It may be an accurate restoration using historical, pictorial, and physical documentation; or be a new design that is compatible with the size, scale, material, and color of the historic building.

Creating a false historic appearance because the replaced wood feature is based on insufficient historical, pictorial, and physical documentation.

Introducing a new wood feature that is incompatible in size, scale, material, and color.



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**Architectural Metals: Cast iron, steel, pressed tin, copper, aluminum, and zinc**

Architectural metal features—such as cast-iron facades, porches, and steps; sheet metal cornices, roofs, roof cresting and storefronts; and cast or rolled metal doors, window sash, entablatures, and hardware—are often highly decorative and may be important in defining the overall historic character of the building. Their retention, protection, and repair should be a prime consideration in rehabilitation projects.

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Recommended

Identifying, retaining, and preserving architectural metal features such as columns, capitals, window hoods, or stairways that are important in defining the overall historic character of the building; and their finishes and colors.

Protecting and maintaining architectural metals from corrosion by providing proper drainage so that water does not stand on flat, horizontal surfaces or accumulate in curved, decorative features.

Cleaning architectural metals, when necessary, to remove corrosion prior to repainting or applying other appropriate protective coatings.

Not Recommended

Removing or radically changing architectural metal features which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Removing a major portion of the historic architectural metal from a facade instead of repairing or replacing only the deteriorated metal, then reconstructing the facade with new material in order to create a uniform, or "improved" appearance.

Radically changing the type of finish or its historical color or accent scheme.

Failing to identify, evaluate, and treat the causes of corrosion, such as moisture from leaking roofs or gutters.

Placing incompatible metals together without providing a reliable separation material. Such incompatibility can result in galvanic corrosion of the less noble metal, e.g., copper will corrode cast iron, steel, tin, and aluminum.

Exposing metals which were intended to be protected from the environment.

Applying paint or other coatings to metals such as copper, bronze, or stainless steel that were meant to be exposed.

Recommended

Identifying the particular type of metal prior to any cleaning procedure and then testing to assure that the gentlest cleaning method possible is selected or determining that cleaning is inappropriate for the particular metal.

Cleaning soft metals such as lead, tin, copper, terneplate, and zinc with appropriate chemical methods because their finishes can be easily abraded by blasting methods.

Using the gentlest cleaning methods for cast iron, wrought iron, and steel—hard metals—in order to remove paint buildup and corrosion. If handscraping and wire brushing have proven ineffective, low pressure dry grit blasting may be used as long as it does not abrade or damage the surface.

Applying appropriate paint or other coating systems after cleaning in order to decrease the corrosion rate of metals or alloys.

Repainting with colors that are appropriate to the historic building or district.

Applying an appropriate protective coating such as lacquer to an architectural metal feature such as a bronze door which is subject to heavy pedestrian use.

Evaluating the overall condition of the architectural metals to determine whether more than protection and maintenance are required, that is, if repairs to features will be necessary.

Not Recommended

Using cleaning methods which alter or damage the historic color, texture, and finish of the metal; or cleaning when it is inappropriate for the metal.

Removing the patina of historic metal. The patina may be a protective coating on some metals, such as bronze or copper, as well as a significant historic finish.

Cleaning soft metals such as lead, tin, copper, terneplate, and zinc with grit blasting which will abrade the surface of the metal.

Failing to employ gentler methods prior to abrasively cleaning cast iron, wrought iron or steel; or using high pressure grit blasting.

Failing to re-apply protective coating systems to metals or alloys that require them after cleaning so that accelerated corrosion occurs.

Using new colors that are inappropriate to the historic building or district.

Failing to assess pedestrian use or new access patterns so that architectural metal features are subject to damage by use or inappropriate maintenance such as salting adjacent sidewalks.

Failing to undertake adequate measures to assure the preservation of architectural metal features.

Recommended

Protecting a leaking roof with plywood and building paper until it can be properly repaired.

Repairing a roof by reinforcing the historic materials which comprise roof features. Repairs will also generally include the limited replacement in kind—or with compatible substitute material—of those extensively deteriorated or missing parts of features when there are surviving prototypes such as cupola louvers, dentils, dormer roofing; or slates, tiles, or wood shingles on a main roof.

Replacing in kind an entire feature of the roof that is too deteriorated to repair—if the overall form and detailing are still evidence—using the physical evidence to guide the new work. Examples can include a large section of roofing, or a dormer or chimney. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Permitting a leaking roof to remain unprotected so that accelerated deterioration of historic building materials—masonry, wood, plaster, paint and structural members—occurs.

Replacing an entire roof feature such as a cupola or dormer when repair of the historic materials and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the roof or that is physically or chemically incompatible.

Removing a feature of the roof that is unrepairable, such as a chimney or dormer, and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

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**Design for Missing Historic Features**

Designing and constructing a new feature when the historic feature is completely missing, such as a chimney or cupola. It may be an accurate restoration using historical, pictorial and physical documentation; or be a new design that is compatible with the size, scale, material, and color of the historic building.

Creating a false historical appearance because the replaced feature is based on insufficient historical, pictorial, and physical documentation.

Introducing a new roof feature that is incompatible in size, scale, material, and color.

Recommended

**Alterations/ Additions for the New Use**

Installing mechanical and service equipment on the roof such as air conditioning, transformers, or solar collectors when required for the new use so that they are inconspicuous from the public right-of-way and do not damage or obscure character-defining features.

Designing additions to roofs such as residential, office, or storage spaces; elevator housing; decks and terraces; or dormers or skylights when required by the new use so that they are inconspicuous from the public right-of-way and do not damage or obscure character-defining features.

Not Recommended

Installing mechanical or service equipment so that it damages or obscures character-defining features; or is conspicuous from the public right-of-way.

Radically changing a character-defining roof shape or damaging or destroying character-defining roofing material as a result of incompatible design or improper installation techniques.

Recommended

**Repairing** architectural metal features by patching, splicing, or otherwise reinforcing the metal following recognized preservation methods. Repairs may also include the limited replacement in kind—or with a compatible substitute material—of those extensively deteriorated or missing parts of features when there are surviving prototypes such as porch balusters, column capitals or bases; or porch cresting.

**Replacing** in kind an entire architectural metal feature that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. Examples could include cast iron porch steps or steel sash windows. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Replacing an entire architectural metal feature such as a column or a balustrade when repair of the metal and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the architectural metal feature or that is physically or chemically incompatible.

Removing an architectural metal feature that is unrepairable and not replacing it; or replacing it with a new architectural metal feature that does not convey the same visual appearance.

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**Design for Missing Historic Features**

**Designing** and installing a new architectural metal feature such as a sheet metal cornice or cast iron capital when the historic feature is completely missing. It may be an accurate restoration using historical, pictorial and physical documentation; or be a new design that is compatible with the size, scale, material, and color of the historic building.

Creating a false historic appearance because the replaced architectural metal feature is based on insufficient historical, pictorial, and physical documentation.

Introducing a new architectural metal feature that is incompatible in size, scale, material, and color.

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## **Roofs**

The roof—with its shape; features such as cresting, dormers, cupolas, and chimneys; and the size, color, and patterning of the roofing material—can be extremely important in defining the building's overall historic character. In addition to the design role it plays, a weathertight roof is essential to the preservation of the entire structure; thus, protecting and repairing the roof as a "cover" is a critical aspect of every rehabilitation project.

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### Recommended

**Identifying, retaining, and preserving** roofs—and their functional and decorative features—that are important in defining the overall historic character of the building. This includes the roof's shape, such as hipped, gambrel, and mansard; decorative features such as cupolas, cresting, chimneys, and weathervanes; and roofing material such as slate, wood, clay tile, and metal, as well as its size, color, and patterning.

**Protecting and maintaining** a roof by cleaning the gutters and downspouts and replacing deteriorated flashing. Roof sheathing should also be checked for proper venting to prevent moisture condensation and water penetration; and to insure that materials are free from insect infestation.

**Providing adequate anchorage** for roofing material to guard against wind damage and moisture penetration.

### Not Recommended

Radically changing, damaging, or destroying roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Removing a major portion of the roof or roofing material that is repairable, then reconstructing it with new material in order to create a uniform, or "improved" appearance.

Changing the configuration of a roof by adding new features such as dormer windows, vents, or skylights so that the historic character is diminished.

Stripping the roof of sound historic material such as slate, clay tile, wood, and architectural metal.

Applying paint or other coatings to roofing material which has been historically uncoated.

Failing to clean and maintain gutters and downspouts properly so that water and debris collect and cause damage to roof fasteners, sheathing, and the underlying structure.

Allowing roof fasteners—such as nails and clips—to corrode so that roofing material is subject to accelerated deterioration.

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**Windows**

A highly decorative window with an unusual shape, or glazing pattern, or color is most likely identified immediately as a character-defining feature of the building. It is far more difficult, however, to assess the importance of repeated windows on a facade, particularly if they are individually simple in design and material, such as the large, multi-paned sash of many industrial buildings. Because rehabilitation projects frequently include proposals to replace window sash or even entire windows to improve thermal efficiency or to create a new appearance, it is essential that their contribution to the overall historic character of the building be assessed together with their physical condition before specific repair or replacement work is undertaken.

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*Recommended*

**Identifying, retaining, and preserving windows**—and their functional and decorative features—that are important in defining the overall historic character of the building. Such features can include frames, sash, muntins, glazing, sills, heads, hoodmolds, panelled or decorated jambs and moldings, and interior and exterior shutters and blinds.

**Protecting and maintaining** the wood and architectural metal which comprise the window frame, sash, muntins, and surrounds through appropriate surface treatments such as cleaning, rust removal, limited paint removal, and re-application of protective coating systems.

*Not Recommended*

Removing or radically changing windows which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Changing the number, location, size or glazing pattern of windows, through cutting new openings, blocking-in windows, and installing replacement sash which does not fit the historic window opening.

Changing the historic appearance of windows through the use of inappropriate designs, materials, finishes, or colors which radically change the sash, depth of reveal, and muntin configuration; the reflectivity and color of the glazing; or the appearance of the frame.

Obscuring historic window trim with metal or other material.

Stripping windows of historic material such as wood, iron, cast iron, and bronze.

Failing to provide adequate protection of materials on a cyclical basis so that deterioration of the windows results.



Recommended

Making windows weathertight by recaulking and replacing or installing weatherstripping. These actions also improve thermal efficiency.

Evaluating the overall condition of materials to determine whether more than protection and maintenance are required, i.e. if repairs to windows and window features will be required.

Repairing window frames and sash by patching, splicing, consolidating or otherwise reinforcing. Such repair may also include replacement in kind of those parts that are either extensively deteriorated or are missing when there are surviving prototypes such as architraves, hoodmolds, sash, sills, and interior or exterior shutters and blinds.

Replacing in kind an entire window that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

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**Design for Missing Historic Features**

Designing and installing new windows when the historic windows (frame, sash and glazing) are completely missing. The replacement windows may be an accurate restoration using historical, pictorial, and physical documentation; or be a new design that is compatible with the window openings and the historic character of the building.

Not Recommended

Retrofitting or replacing windows rather than maintaining the sash, frame, and glazing.

Failing to undertake adequate measures to assure the preservation of historic windows.

Replacing an entire window when repair of materials and limited replacement of deteriorated or missing parts are appropriate.

Failing to reuse serviceable window hardware such as brass lifts and sash locks.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the window or that is physically or chemically incompatible.

Removing a character-defining window that is unrepairable and blocking it in; or replacing it with a new window that does not convey the same visual appearance.

Creating a false historical appearance because the replaced window is based on insufficient historical, pictorial, and physical documentation.

Introducing a new design that is incompatible with the historic character of the building.

Recommended

Alterations/Additions for the New Use

Designing and installing additional windows on rear or other non character-defining elevations if required by the new use. New windows openings may also be cut into exposed party walls. Such design should be compatible with the overall design of the building, but not duplicate the fenestration pattern and detailing of a character-defining elevation.

Providing a setback in the design of dropped ceilings when they are required for the new use to allow for the full height of the window openings.

Not Recommended

Installing new windows, including frames, sash, and muntin configuration that are incompatible with the building's historic appearance or obscure, damage, or destroy character-defining features.

Inserting new floors or furred-down ceilings which cut across the glazed areas of windows so that the exterior form and appearance of the windows are changed.

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**Entrances  
and Porches**

Entrances and porches are quite often the focus of historic buildings, particularly when they occur on primary elevations. Together with their functional and decorative features such as doors, steps, balustrades, pilasters, and entablatures, they can be extremely important in defining the overall historic character of a building. Their retention, protection, and repair should always be carefully considered when planning rehabilitation work.

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Recommended

Identifying, retaining, and preserving entrances—and their functional and decorative features—that are important in defining the overall historic character of the building such as doors, fanlights, sidelights, pilasters, entablatures, columns, balustrades, and stairs.

Protecting and maintaining the masonry, wood, and architectural metal that comprise entrances and porches through appropriate surface treatments such as cleaning, rust removal, limited paint removal, and re-application of protective coating systems.

Evaluating the overall condition of materials to determine whether more than protection and maintenance are required, that is, if repairs to entrance and porch features will be necessary.

Not Recommended

Removing or radically changing entrances and porches which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Stripping entrances and porches of historic material such as wood, iron, cast iron, terra cotta, tile and brick.

Removing an entrance or porch because the building has been re-oriented to accommodate a new use.

Cutting new entrances on a primary elevation.

Altering utilitarian or service entrances so they appear to be formal entrances by adding panelled doors, fanlights, and sidelights.

Failing to provide adequate protection to materials on a cyclical basis so that deterioration of entrances and porches results.

Failing to undertake adequate measures to assure the preservation of historic entrances and porches.

Recommended

Repairing entrances and porches by reinforcing the historic materials. Repair will also generally include the limited replacement in kind—or with compatible substitute material—of those extensively deteriorated or missing parts of repeated features where there are surviving prototypes such as balustrades, cornices, entablatures, columns, sidelights, and stairs.

Replacing in kind an entire entrance or porch that is too deteriorated to repair—if the form and detailing are still evident—using the physical evidence to guide the new work. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Replacing an entire entrance or porch when the repair of materials and limited replacement of parts are appropriate.

Using a substitute material for the replacement parts that does not convey the visual appearance of the surviving parts of the entrance and porch or that is physically or chemically incompatible.

Removing an entrance or porch that is unrepairable and not replacing it; or replacing it with a new entrance or porch that does not convey the same visual appearance.

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**Design for Missing Historic Features**

Designing and constructing a new entrance or porch if the historic entrance or porch is completely missing. It may be a restoration based on historical, pictorial, and physical documentation; or be a new design that is compatible with the historic character of the building.

Creating a false historical appearance because the replaced entrance or porch is based on insufficient historical, pictorial, and physical documentation.

Introducing a new entrance or porch that is incompatible in size, scale, material, and color.

**Alterations/Additions for the New Use**

Designing enclosures for historic porches when required by the new use in a manner that preserves the historic character of the building. This can include using large sheets of glass and recessing the enclosure wall behind existing scrollwork, posts, and balustrades.

Enclosing porches in a manner that results in a diminution or loss of historic character such as using solid materials such as wood, stucco, or masonry.

Recommended

Designing and installing additional entrances or porches when required for the new use in a manner that preserves the historic character of the building, i.e., limiting such alteration to non-character-defining elevations.

Not Recommended

Installing secondary service entrances and porches that are incompatible in size and scale with the historic building or obscure, damage, or destroy character-defining features.

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**Storefronts**

Storefronts are quite often the focus of historic commercial buildings and can thus be extremely important in defining the overall historic character. Because storefronts also play a crucial role in a store's advertising and merchandising strategy to draw customers and increase business, they are often altered to meet the needs of a new business. Particular care is required in planning and accomplishing work on storefronts so that the building's historic character is preserved in the process of rehabilitation.

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Recommended

**Identifying, retaining, and preserving storefronts**—and their functional and decorative features—that are important in defining the overall historic character of the building such as display windows, signs, doors, transoms, kick plates, corner posts, and entablatures.

**Protecting and maintaining** masonry, wood, and architectural metals which comprise storefronts through appropriate treatments such as cleaning, rust removal, limited paint removal, and reapplication of protective coating systems.

Not Recommended

**Removing or radically changing storefronts**—and their features—which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

**Changing the storefront** so that it appears residential rather than commercial in character.

**Removing historic material** from the storefront to create a recessed arcade.

**Introducing** coach lanterns, mansard overhangings, wood shakes, nonoperable shutters, and small-paned windows if they cannot be documented historically.

**Changing the location** of a storefront's main entrance.

**Failing to provide adequate protection** to materials on a cyclical basis so that deterioration of storefront features results.

Recommended

Protecting storefronts against arson and vandalism before work begins by boarding up windows and installing alarm systems that are keyed into local protection agencies.

Evaluating the overall condition of storefront materials to determine whether more than protection and maintenance are required, that is, if repairs to features will be necessary.

**Repairing** storefronts by reinforcing the historic materials. Repairs will also generally include the limited replacement in kind—or with compatible substitute material—of those extensively deteriorated or missing parts of storefronts where there are surviving prototypes such as transoms, kick plates, pilasters, or signs.

**Replacing** in kind an entire storefront that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.

Not Recommended

Permitting entry into the building through unsecured or broken windows and doors so that interior features and finishes are damaged through exposure to weather or through vandalism.

Stripping storefronts of historic material such as wood, cast iron, terra cotta, carrara glass, and brick.

Failing to undertake adequate measures to assure the preservation of the historic storefront.

Replacing an entire storefront when repair of materials and limited replacement of its parts are appropriate.

Using substitute material for the replacement parts that does not convey the same visual appearance as the surviving parts of the storefront or that is physically or chemically incompatible.

Removing a storefront that is unrepairable and not replacing it; or replacing it with a new storefront that does not convey the same visual appearance.



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The following work is highlighted to indicate that it represents the particularly complex technical or design aspects of rehabilitation projects and should only be considered after the preservation concerns listed above have been addressed.

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Recommended

Not Recommended

**Design for Missing Historic Features**

Designing and constructing a new storefront when the historic storefront is completely missing. It may be an accurate restoration using historical, pictorial, and physical documentation; or be a new design that is compatible with the size, scale, material, and color of the historic building. Such new design should generally be flush with the facade; and the treatment of secondary design elements, such as awnings or signs, kept as simple as possible. For example, new signs should fit flush with the existing features of the facade, such as the fascia board or cornice.

Creating a false historical appearance because the replaced storefront is based on insufficient historical, pictorial, and physical documentation.

Introducing a new design that is incompatible in size, scale, material, and color.

Using new illuminated signs; inappropriately scaled signs and logos; signs that project over the sidewalk unless they were a characteristic feature of the historic building; or other types of signs that obscure, damage, or destroy remaining character-defining features of the historic building.

## BUILDING INTERIOR

### **Structural System**

If features of the structural system are exposed such as loadbearing brick walls, cast iron columns, roof trusses, posts and beams, vigas, or stone foundation walls, they may be important in defining the building's overall historic character. Unexposed structural features that are not character-defining or an entire structural system may nonetheless be significant in the history of building technology; therefore, the structural system should always be examined and evaluated early in the project planning stage to determine both its physical condition and its importance to the building's historic character or historical significance. See also Health and Safety Code Requirements.

#### Recommended

Identifying, retaining, and preserving structural systems—and individual features of systems—that are important in defining the overall historic character of the building, such as post and beam systems, trusses, summer beams, vigas, cast iron columns, above-grade stone foundation walls, or loadbearing brick or stone walls.

#### Not Recommended

Removing, covering, or radically changing features of structural systems which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Putting a new use into the building which could overload the existing structural system; or installing equipment or mechanical systems which could damage the structure.

Demolishing a loadbearing masonry wall that could be augmented and retained and replacing it with a new wall (i.e., brick or stone), using the historic masonry only as an exterior veneer.

Leaving known structural problems untreated such as deflection of beams, cracking and bowing of walls, or racking of structural members.

Utilizing treatments or products that accelerate the deterioration of structural material such as introducing urea-formaldehyde foam insulation into frame walls.

### Recommended

**Protecting and maintaining** the structural system by cleaning the roof gutters and downspouts; replacing roof flashing; keeping masonry, wood, and architectural metals in a sound condition; and assuring that structural members are free from insect infestation.

Examining and evaluating the physical condition of the structural system and its individual features using non-destructive techniques such as X-ray photography.

**Repairing** the structural system by augmenting or upgrading individual parts or features. For example, weakened structural members such as floor framing can be spliced, braced, or otherwise supplemented and reinforced.

**Replacing in kind**—or with substitute material—those portions or features of the structural system that are either extensively deteriorated or are missing when there are surviving prototypes such as cast iron columns, roof rafters or trusses, or sections of loadbearing walls. Substitute material should convey the same form, design, and overall visual appearance as the historic feature; and, at a minimum, be equal to its loadbearing capabilities.

### Not Recommended

Failing to provide proper building maintenance on a cyclical basis so that deterioration of the structural system results.

Utilizing destructive probing techniques that will damage or destroy structural material.

Upgrading the building structurally in a manner that diminishes the historic character of the exterior, such as installing strapping channels or removing a decorative cornice; or damages interior features or spaces.

Replacing a structural member or other feature of the structural system when it could be augmented and retained.

Installing a replacement feature that does not convey the same visual appearance, e.g., replacing an exposed wood summer beam with a steel beam.

Using substitute material that does not equal the loadbearing capabilities of the historic material and design or is otherwise physically or chemically incompatible.

The following work is highlighted to indicate that it represents the particularly complex technical or design aspects of rehabilitation projects and should only be considered after the preservation concerns listed above have been addressed.

Recommended

Not Recommended

Alterations/Additions for the New Use

Limiting any new excavations adjacent to historic foundations to avoid undermining the structural stability of the building or adjacent historic buildings.

Correcting structural deficiencies in preparation for the new use in a manner that preserves the structural system and individual character-defining features.

Designing and installing new mechanical or electrical systems when required for the new use which minimize the number of cutouts or holes in structural members.

Adding a new floor when required for the new use if such an alteration does not damage or destroy the structural system or obscure, damage, or destroy character-defining spaces, features, or finishes.

Creating an atrium or a light well to provide natural light when required for the new use in a manner that assures the preservation of the structural system as well as character-defining interior spaces, features, and finishes.

Carrying out excavations or regrading adjacent to or within a historic building which could cause the historic foundation to settle, shift, or fail; or could have a similar effect on adjacent historic buildings.

Radically changing interior spaces or damaging or destroying features or finishes that are character-defining while trying to correct structural deficiencies in preparation for the new use.

Installing new mechanical and electrical systems or equipment in a manner which results in numerous cuts, splices, or alterations to the structural members.

Inserting a new floor when such a radical change damages a structural system or obscures or destroys interior spaces, features, or finishes.

Inserting new floors or furred-down ceilings which cut across the glazed areas of windows so that the exterior form and appearance of the windows are radically changed.

Damaging the structural system or individual features; or radically changing, damaging, or destroying character-defining interior spaces, features, or finishes in order to create an atrium or a light well.

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**Interior: Spaces, Features,  
and Finishes**

An interior floor plan, the arrangement of spaces, and built-in features and applied finishes may be individually or collectively important in defining the historic character of the building. Thus, their identification, retention, protection, and repair should be given prime consideration in every rehabilitation project and caution exercised in pursuing any plan that would radically change character-defining spaces or obscure, damage or destroy interior features or finishes.

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Recommended

Not Recommended

**Interior Spaces**

Identifying, retaining, and preserving a floor plan or interior spaces that are important in defining the overall historic character of the building. This includes the size, configuration, proportion, and relationship of rooms and corridors; the relationship of features to spaces; and the spaces themselves such as lobbies, reception halls, entrance halls, double parlors, theaters, auditoriums, and important industrial or commercial use spaces.

Radically changing a floor plan or interior spaces—including individual rooms—which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Altering the floor plan by demolishing principal walls and partitions to create a new appearance.

Altering or destroying interior spaces by inserting floors, cutting through floors, lowering ceilings, or adding or removing walls.

Relocating an interior feature such as a staircase so that the historic relationship between features and spaces is altered.

Recommended

**Interior Features and Finishes**

Identifying, retaining, and preserving interior features and finishes that are important in defining the overall historic character of the building, including columns, cornices, baseboards, fireplaces and mantles, paneling, light fixtures, hardware, and flooring; and wallpaper, plaster, paint, and finishes such as stenciling, marbling, and graining; and other decorative materials that accent interior features and provide color, texture, and patterning to walls, floors, and ceilings.

Protecting and maintaining masonry, wood, and architectural metals which comprise interior features through appropriate surface treatments such as cleaning, rust removal, limited paint removal, and reapplication of protective coatings systems.

Not Recommended

Removing or radically changing features and finishes which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Installing new decorative material that obscures or damages character-defining interior features or finishes.

Removing paint, plaster, or other finishes from historically finished surfaces to create a new appearance (e.g., removing plaster to expose masonry surfaces such as brick walls or a chimney piece).

Applying paint, plaster, or other finishes to surfaces that have been historically unfinished to create a new appearance.

Stripping historically painted wood surfaces to bare wood, then applying clear finishes or stains to create a "natural look."

Stripping paint to bare wood rather than repairing or reapplying grained or marbled finishes to features such as doors and paneling.

Radically changing the type of finish or its color, such as painting a previously varnished wood feature.

Failing to provide adequate protection to materials on a cyclical basis so that deterioration of interior features results.

Recommended

Protecting interior features and finishes against arson and vandalism before project work begins, erecting protective fencing, boarding-up windows, and installing fire alarm systems that are keyed to local protection agencies.

Protecting interior features such as a staircase, mantel, or decorative finishes and wall coverings against damage during project work by covering them with heavy canvas or plastic sheets.

Installing protective coverings in areas of heavy pedestrian traffic to protect historic features such as wall coverings, parquet flooring and panelling.

Removing damaged or deteriorated paints and finishes to the next sound layer using the gentlest method possible, then repainting or refinishing using compatible paint or other coating systems.

Repainting with colors that are appropriate to the historic building.

Limiting abrasive cleaning methods to certain industrial or warehouse buildings where the interior masonry or plaster features do not have distinguishing design, detailing, tooling, or finishes; and where wood features are not finished, molded, beaded, or worked by hand. Abrasive cleaning should *only* be considered after other, gentler methods have been proven ineffective.

Evaluating the overall condition of materials to determine whether more than protection and maintenance are required, that is, if repairs to interior features and finishes will be necessary.

Not Recommended

Permitting entry into historic buildings through unsecured or broken windows and doors so that interior features and finishes are damaged by exposure to weather or through vandalism.

Stripping interiors of features such as woodwork, doors, windows, light fixtures, copper piping, radiators; or of decorative materials.

Failing to provide proper protection of interior features and finishes during work so that they are gouged, scratched, dented, or otherwise damaged.

Failing to take new use patterns into consideration so that interior features and finishes are damaged.

Using destructive methods such as propane or butane torches or sandblasting to remove paint or other coatings. These methods can irreversibly damage the historic materials that comprise interior features.

Using new paint colors that are inappropriate to the historic building.

Changing the texture and patina of character-defining features through sandblasting or use of other abrasive methods to remove paint, discoloration or plaster. This includes both exposed wood (including structural members) and masonry.

Failing to undertake adequate measures to assure the preservation of interior features and finishes.

Recommended

Repairing interior features and finishes by reinforcing the historic materials. Repair will also generally include the limited replacement in kind—or with compatible substitute material—of those extensively deteriorated or missing parts of repeated features when there are surviving prototypes such as stairs, balustrades, wood paneling, columns; or decorative wall coverings or ornamental tin or plaster ceilings.

Replacing in kind an entire interior feature or finish that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. Examples could include wainscoting, a tin ceiling, or interior stairs. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

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**Design for Missing Historic Features**

Designing and installing a new interior feature or finish if the historic feature or finish is completely missing. This could include missing partitions, stairs, elevators, lighting fixtures, and wall coverings; or even entire rooms if all historic spaces, features, and finishes are missing or have been destroyed by inappropriate "renovations." The design may be a restoration based on historical, pictorial, and physical documentation; or be a new design that is compatible with the historic character of the building, district, or neighborhood.

Not Recommended

Replacing an entire interior feature such as a staircase, panelled wall, parquet floor, or cornice; or finish such as a decorative wall covering or ceiling when repair of materials and limited replacement of such parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts or portions of the interior feature or finish or that is physically or chemically incompatible.

Removing a character-defining feature or finish that is unrepairable and not replacing it; or replacing it with a new feature or finish that does not convey the same visual appearance.

Creating a false historical appearance because the replaced feature is based on insufficient physical, historical, and pictorial documentation or on information derived from another building.

Introducing a new interior feature or finish that is incompatible with the scale, design, materials, color, and texture of the surviving interior features and finishes.



Recommended

Not Recommended

Alterations/Additions for the New Use

Accommodating service functions such as bathrooms, mechanical equipment, and office machines required by the building's new use in secondary spaces such as first floor service areas or on upper floors.

Reusing decorative material or features that have had to be removed during the rehabilitation work including wall and baseboard trim, door moulding, panelled doors, and simple wainscoting; and relocating such material or features in areas appropriate to their historic placement.

Installing permanent partitions in secondary spaces; removable partitions that do not destroy the sense of space should be installed when the new use requires the subdivision of character-defining interior spaces.

Enclosing an interior stairway where required by code so that its character is retained. In many cases, glazed fire-rated walls may be used.

Placing new code-required stairways or elevators in secondary and service areas of the historic building.

Dividing rooms, lowering ceilings, and damaging or obscuring character-defining features such as fireplaces, niches, stairways or alcoves, so that a new use can be accommodated in the building.

Discarding historic material when it can be reused within the rehabilitation project or relocating it in historically inappropriate areas.

Installing permanent partitions that damage or obscure character-defining spaces, features, or finishes.

Enclosing an interior stairway with fire-rated construction so that the stairwell space or any character-defining features are destroyed.

Radically changing, damaging, or destroying character-defining spaces, features, or finishes when adding new code-required stairways and elevators.

Recommended

Creating an atrium or a light well to provide natural light when required for the new use in a manner that preserves character-defining interior spaces, features, and finishes as well as the structural system.

Adding a new floor if required for the new use in a manner that preserves character-defining structural features, and interior spaces, features, and finishes.

Not Recommended

Destroying character-defining interior spaces, features, or finishes; or damaging the structural system in order to create an atrium or light well.

Inserting a new floor within a building that alters or destroys the fenestration; radically changes a character-defining interior space; or obscures, damages, or destroys decorative detailing.

**Mechanical Systems:  
Heating, Air Conditioning,  
Electrical, and Plumbing**

The visible features of historic heating, lighting, air conditioning and plumbing systems may sometimes help define the overall historic character of the building and should thus be retained and repaired, whenever possible. The systems themselves (the compressors, boilers, generators and their ductwork, wiring and pipes) will generally either need to be upgraded, augmented, or entirely replaced in order to accommodate the new use and to meet code requirements. Less frequently, individual portions of a system or an entire system are significant in the history of building technology; therefore, the identification of character-defining features or historically significant systems should take place together with an evaluation of their physical condition early in project planning.

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Recommended

**Identifying, retaining, and preserving** visible features of early mechanical systems that are important in defining the overall historic character of the building, such as radiators, vents, fans, grilles, plumbing fixtures, switchplates, and lights.

**Protecting and maintaining** mechanical, plumbing, and electrical systems and their features through cyclical cleaning and other appropriate measures.

**Preventing accelerated deterioration** of mechanical systems by providing adequate ventilation of attics, crawlspaces, and cellars so that moisture problems are avoided.

**Repairing** mechanical systems by augmenting or upgrading system parts, such as installing new pipes and ducts; rewiring; or adding new compressors or boilers.

**Replacing in kind**—or with compatible substitute material—those visible features of mechanical systems that are either extensively deteriorated or are missing when there are surviving prototypes such as ceiling fans, switchplates, radiators, grilles, or plumbing fixtures.

Not Recommended

**Removing or radically changing** features of mechanical systems that are important in defining the overall historic character of the building so that, as a result, the character is diminished.

**Failing to provide adequate protection** of materials on a cyclical basis so that deterioration of mechanical systems and their visible features results.

**Enclosing mechanical systems** in areas that are not adequately ventilated so that deterioration of the systems results.

**Replacing a mechanical system** or its functional parts when it could be upgraded and retained.

**Installing a replacement feature** that does not convey the same visual appearance.

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Recommended

Not Recommended

Alterations/Additions for the New Use

Installing a completely new mechanical system if required for the new use so that it causes the least alteration possible to the building's floor plan, the exterior elevations, and the least damage to historic building material.

Installing the vertical runs of ducts, pipes, and cables in closets, service rooms, and wall cavities.

Installing air conditioning units if required by the new use in such a manner that the historic materials and features are not damaged or obscured.

Installing heating/air conditioning units in the window frames in such a manner that the sash and frames are protected. Window installations should be considered only when all other viable heating/cooling systems would result in significant damage to historic materials.

Installing a new mechanical system so that character-defining structural or interior features are radically changed, damaged, or destroyed.

Installing vertical runs of ducts, pipes, and cables in places where they will obscure character-defining features.

Concealing mechanical equipment in walls or ceilings in a manner that requires the removal of historic building material.

Installing "dropped" acoustical ceilings to hide mechanical equipment when this destroys the proportions of character-defining interior spaces.

Cutting through features such as masonry walls in order to install air conditioning units.

Radically changing the appearance of the historic building or damaging or destroying windows by installing heating/air conditioning units in historic window frames.

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## BUILDING SITE

The relationship between a historic building or buildings and landscape features within a property's boundaries—or the building site—helps to define the historic character and should be considered an integral part of overall planning for rehabilitation project work.

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### *Recommended*

**Identifying, retaining, and preserving** buildings and their features as well as features of the site that are important in defining its overall historic character. Site features can include driveways, walkways, lighting, fencing, signs, benches, fountains, wells, terraces, canal systems, plants and trees, berms, and drainage or irrigation ditches; and archeological features that are important in defining the history of the site.

**Retaining the historic relationship** between buildings, landscape features, and open space.

**Protecting and maintaining** buildings and the site by providing proper drainage to assure that water does not erode foundation walls; drain toward the building; nor erode the historic landscape.

### *Not Recommended*

Removing or radically changing buildings and their features or site features which are important in defining the overall historic character of the building site so that, as a result, the character is diminished.

Removing or relocating historic buildings or landscape features, thus destroying the historic relationship between buildings, landscape features, and open space.

Removing or relocating historic buildings on a site or in a complex of related historic structures—such as a mill complex or farm—thus diminishing the historic character of the site or complex.

Moving buildings onto the site, thus creating a false historical appearance.

Lowering the grade level adjacent to a building to permit development of a formerly below-grade area such as a basement in a manner that would drastically change the historic relationship of the building to its site.

Failing to maintain site drainage so that buildings and site features are damaged or destroyed; or, alternatively, changing the site grading so that water no longer drains properly.

Recommended

Minimizing disturbance of terrain around buildings or elsewhere on the site, thus reducing the possibility of destroying unknown archeological materials.

Surveying areas where major terrain alteration is likely to impact important archeological sites.

Protecting, e.g. preserving in place known archeological material whenever possible.

Planning and carrying out any necessary investigation using professional archeologists and modern archeological methods when preservation in place is not feasible.

Protecting the building and other features of the site against arson and vandalism before rehabilitation work begins, i.e., erecting protective fencing and installing alarm systems that are keyed into local protection agencies.

Providing continued protection of masonry, wood, and architectural metals which comprise building and site features through appropriate surface treatments such as cleaning, rust removal, limited paint removal, and re-application of protective coating systems; and continued protection and maintenance of landscape features, including plant material.

Not Recommended

Introducing heavy machinery or equipment into areas where their presence may disturb archeological materials.

Failing to survey the building site prior to the beginning of rehabilitation project work so that, as a result, important archeological material is destroyed.

Leaving known archeological material unprotected and subject to vandalism, looting, and destruction by natural elements such as erosion.

Permitting unqualified project personnel to perform data recovery so that improper methodology results in the loss of important archeological material.

Permitting buildings and site features to remain unprotected so that plant materials, fencing, walkways, archeological features, etc. are damaged or destroyed.

Stripping features from buildings and the site such as wood siding, iron fencing, masonry balustrades; or removing or destroying landscape features, including plant material.

Failing to provide adequate protection of materials on a cyclical basis so that deterioration of building and site features results.

Recommended

Evaluating the overall condition of materials to determine whether more than protection and maintenance are required, that is, if repairs to building and site features will be necessary.

**Repairing** features of buildings and the site by reinforcing the historic materials. Repair will also generally include replacement in kind—with a compatible substitute material—of those extensively deteriorated or missing parts of features where there are surviving prototypes such as fencing and paving.

**Replacing** in kind an entire feature of the building or site that is too deteriorated to repair—if the overall form and detailing are still evident—using the physical evidence to guide the new work. This could include an entrance or porch, walkway, or fountain. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Failing to undertake adequate measures to assure the preservation of building and site features.

Replacing an entire feature of the building or site such as a fence, walkway, or driveway when repair of materials and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the building or site feature or that is physically or chemically incompatible.

Removing a feature of the building or site that is unrepairable and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

The following work is highlighted to indicate that it represents the particularly complex technical or design aspects of rehabilitation project work and should only be considered after the preservation concerns listed above have been addressed.

Recommended

Not Recommended

Design for Missing Historic Features

Designing and constructing a new feature of a building or site when the historic feature is completely missing, such as an outbuilding, terrace, or driveway. It may be based on historical, pictorial, and physical documentation; or be a new design that is compatible with the historic character of the building and site.

Creating a false historical appearance because the replaced feature is based on insufficient historical, pictorial, and physical documentation.

Introducing a new building or site feature that is out of scale or otherwise inappropriate.

Introducing a new landscape feature or plant material that is visually incompatible with the site or that destroys site patterns or vistas.

Alterations/Additions for the New Use

Designing new onsite parking, loading docks, or ramps when required by the new use so that they are as unobtrusive as possible and assure the preservation of character-defining features of the site.

Placing parking facilities directly adjacent to historic buildings where automobiles may cause damage to the buildings or landscape features or be intrusive to the building site.

Designing new exterior additions to historic buildings or adjacent new construction which is compatible with the historic character of the site and which preserve the historic relationship between a building or buildings, landscape features, and open space.

Introducing new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture or which destroys historic relationships on the site.

Removing nonsignificant buildings, additions, or site features which detract from the historic character of the site.

Removing a historic building in a complex, a building feature, or a site feature which is important in defining the historic character of the site.



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**DISTRICT/  
NEIGHBORHOOD**

The relationship between historic buildings, and streetscape and landscape features within a historic district or neighborhood helps to define the historic character and therefore should always be a part of the rehabilitation plans.

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*Recommended*

**Identifying, retaining, and preserving** buildings, and streetscape, and landscape features which are important in defining the overall historic character of the district or neighborhood. Such features can include streets, alleys, paving, walkways, street lights, signs, benches, parks and gardens, and trees.

Retaining the historic relationship between buildings, and streetscape and landscape features such as a town square comprised of row houses and stores surrounding a communal park or open space.

**Protecting and maintaining** the historic masonry, wood, and architectural metals which comprise building and streetscape features, through appropriate surface treatments such as cleaning, rust removal, limited paint removal, and reapplication of protective coating systems; and protecting and maintaining landscape features, including plant material.

Protecting buildings, paving, iron fencing, etc. against arson and vandalism before rehabilitation work begins by erecting protective fencing and installing alarm systems that are keyed into local protection agencies.

*Not Recommended*

Removing or radically changing those features of the district or neighborhood which are important in defining the overall historic character so that, as a result, the character is diminished.

Destroying streetscape and landscape features by widening existing streets, changing paving material, or introducing inappropriately located new streets or parking lots.

Removing or relocating historic buildings, or features of the streetscape and landscape, thus destroying the historic relationship between buildings, features and open space.

Failing to provide adequate protection of materials on a cyclical basis so that deterioration of building, streetscape, and landscape features results.

Permitting buildings to remain unprotected so that windows are broken; and interior features are damaged.

Stripping features from buildings or the streetscape such as wood siding, iron fencing, or terra cotta balusters; or removing or destroying landscape features, including plant material.

Recommended

Evaluating the overall condition of building, streetscape and landscape materials to determine whether more than protection and maintenance are required, that is, if repairs to features will be necessary.

**Repairing** features of the building, streetscape, or landscape by reinforcing the historic materials. Repair will also generally include the replacement in kind—or with a compatible substitute material—of those extensively deteriorated or missing parts of features when there are surviving prototypes such as porch balustrades, paving materials, or streetlight standards.

**Replacing** in kind an entire feature of the building, streetscape, or landscape that is too deteriorated to repair—when the overall form and detailing are still evident—using the physical evidence to guide the new work. This could include a storefront, a walkway, or a garden. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Not Recommended

Failing to undertake adequate measures to assure the preservation of building, streetscape, and landscape features.

Replacing an entire feature of the building, streetscape, or landscape such as a porch, walkway, or streetlight, when repair of materials and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the building, streetscape, or landscape feature or that is physically or chemically incompatible.

Removing a feature of the building, streetscape, or landscape that is unrepairable and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

The following work is highlighted because it represents the particularly complex technical or design aspects of rehabilitation projects and should only be considered after the preservation concerns listed above have been addressed.

Recommended

Not Recommended

Design for Missing Historic Features

Designing and constructing a new feature of the building, streetscape, or landscape when the historic feature is completely missing, such as row house steps, a porch, streetlight, or terrace. It may be a restoration based on historical, pictorial, and physical documentation; or be a new design that is compatible with the historic character of the district or neighborhood.

Alterations/Additions for the New Use

Designing required new parking so that it is as unobtrusive as possible, i.e., on side streets or at the rear of buildings. "Shared" parking should also be planned so that several business can utilize one parking area as opposed to introducing random, multiple lots.

Designing and constructing new additions to historic buildings when required by the new use. New work should be compatible with the historic character of the district or neighborhood in terms of size, scale, design, material, color, and texture.

Removing nonsignificant buildings, additions, or streetscape and landscape features which detract from the historic character of the district or the neighborhood.

Creating a false historical appearance because the replaced feature is based on insufficient historical, pictorial and physical documentation.

Introducing a new building, streetscape or landscape feature that is out of scale or otherwise inappropriate to the setting's historic character, e.g., replacing picket fencing with chain link fencing.

Placing parking facilities directly adjacent to historic buildings which cause the removal of historic plantings, relocation of paths and walkways, or blocking of alleys.

Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the district or neighborhood.

Removing a historic building, building feature, or landscape or streetscape feature that is important in defining the overall historic character of the district or the neighborhood.

Although the work in these sections is quite often an important aspect of rehabilitation projects, it is usually *not* part of the overall process of preserving character-defining features (maintenance, repair, replacement); rather, such work is assessed for its potential negative impact on the building's historic character. For this reason, particular care must be taken not to obscure, radically change, damage, or destroy character-defining features in the process of rehabilitation work to meet new use requirements.

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## HEALTH AND SAFETY CODE REQUIREMENTS

As a part of the new use, it is often necessary to make modifications to a historic building so that it can comply with current health, safety and code requirements. Such work needs to be carefully planned and undertaken so that it does not result in a loss of character-defining spaces, features, and finishes.

---

### Recommended

Identifying the historic building's character-defining spaces, features, and finishes so that code-required work will not result in their damage or loss.

Complying with health and safety code, including seismic codes and barrier-free access requirements, in such a manner that character-defining spaces, features, and finishes are preserved.

Working with local code officials to investigate alternative life safety measures or variances available under some codes so that alterations and additions to historic buildings can be avoided.

Providing barrier-free access through removable or portable, rather than permanent, ramps.

Providing seismic reinforcement to a historic building in a manner that avoids damaging the structural system and character-defining features.

Upgrading historic stairways and elevators to meet health and safety codes in a manner that assures their preservation, i.e., so that they are not damaged or obscured.

Installing sensitively designed fire suppression systems, such as a sprinkler system for wood frame mill buildings, instead of applying fire-resistant sheathing to character-defining features.

### Not Recommended

Undertaking code-required alterations to a building or site before identifying those spaces, features, or finishes which are character-defining and must therefore be preserved.

Altering, damaging, or destroying character-defining spaces, features, and finishes while making modifications to a building or site to comply with safety codes.

Making changes to historic buildings without first seeking alternatives to code requirements.

Installing permanent ramps that damage or diminish character-defining features.

Reinforcing a historic building using measures that damage or destroy character-defining structural and other features.

Damaging or obscuring historic stairways and elevators or altering adjacent spaces in the process of doing work to meet code requirements.

Covering character-defining wood features with fire-resistant sheathing which results in altering their visual appearance.

Recommended

Applying fire-retardant coatings, such as intumescent paints, which expand during fire to add thermal protection to steel.

Adding a new stairway or elevator to meet health and safety codes in a manner that preserves adjacent character-defining features and spaces.

Placing a code-required stairway or elevator that cannot be accommodated within the historic building in a new exterior addition. Such an addition should be located at the rear of the building or on an inconspicuous side; and its size and scale limited in relationship to the historic building.

Not Recommended

Using fire-retardant coatings if they damage or obscure character-defining features.

Radically changing, damaging, or destroying character-defining spaces, features, or finishes when adding a new code-required stairway or elevator.

Constructing a new addition to accommodate code-required stairs and elevators on character-defining elevations highly visible from the street; or where it obscures, damages or destroys character-defining features.

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## ENERGY RETROFITTING

Some character-defining features of a historic building or site such as cupolas, shutters, transoms, skylights, sun rooms, porches, and plantings also play a secondary energy conserving role. Therefore, prior to retrofitting historic buildings to make them more energy efficient, the first step should always be to identify and evaluate the existing historic features to assess their inherent energy conserving potential. If it is determined that retrofitting measures are necessary, then such work needs to be carried out with particular care to insure that the building's historic character is preserved in the process of rehabilitation.

---

### Recommended

### Not Recommended

#### **District/Neighborhood**

Maintaining those existing landscape features which moderate the effects of the climate on the setting such as deciduous trees, evergreen wind-blocks, and lakes or ponds.

Stripping the setting of landscape features and landforms so that the effects of the wind, rain, and the sun result in accelerated deterioration of historic materials.

#### **Building Site**

Retaining plant materials, trees, and landscape features, especially those which perform passive solar energy functions such as sun shading and wind breaks.

Removing plant materials, trees, and landscape features, so that they no longer perform passive solar energy functions.

Installing freestanding solar collectors in a manner that preserves the historic property's character-defining features.

Installing freestanding solar collectors that obscure, damage, or destroy historic landscape or archeological features.

Designing attached solar collectors, including solar greenhouses, so that the character-defining features of the property are preserved.

Locating solar collectors where they radically change the property's appearance; or damage or destroy character-defining features.

#### **Masonry/Wood/Architectural Metals**

Installing thermal insulation in attics and in unheated cellars and crawlspaces to increase the efficiency of the existing mechanical systems.

Applying urea of formaldehyde foam or any other thermal insulation with a water content into wall cavities in an attempt to reduce energy consumption.

Recommended

Installing insulating material on the inside of masonry walls to increase energy efficiency where there is no character-defining interior moulding around the window or other interior architectural detailing.

Installing passive solar devices such as a glazed "trombe" wall on a rear or inconspicuous side of all the historic building.

**Roofs**

Placing solar collectors on noncharacter-defining roofs or roofs of nonhistoric adjacent buildings.

**Windows**

Utilizing the inherent energy conserving features of a building by maintaining windows and louvered blinds in good operable condition for natural ventilation.

Improving thermal efficiency with weatherstripping, storm windows, caulking, interior shades, and, if historically appropriate, blinds and awnings.

Installing interior storm windows with airtight gaskets, ventilating holes, and/or removable clips to insure proper maintenance and to avoid condensation damage to historic windows.

Not Recommended

Resurfacing historic building materials with more energy efficient but incompatible materials, such as covering historic masonry with exterior insulation.

Installing passive solar devices such as an attached glazed "trombe" wall on primary or other highly visible elevations; or where historic material must be removed or obscured.

Placing solar collectors on roofs when such collectors change the historic roofline or obscure the relationship of the roof to character-defining roof features such as dormers, skylights, and chimneys.

Removing historic shading devices rather than keeping them in an operable condition.

Replacing historic multi-paned sash with new thermal sash utilizing false muntins.

Installing interior storm windows that allow moisture to accumulate and damage the window.



Recommended

Installing exterior storm windows which do not damage or obscure the windows and frames.

Considering the use of lightly tinted glazing on non-character-defining elevations if other energy retrofitting alternatives are not possible.

**Entrances and Porches**

Utilizing the inherent energy conserving features of a building by maintaining porches, and double vestibule entrances in good condition so that they can retain heat or block the sun and provide natural ventilation.

**Interior Features**

Retaining historic interior shutters and transoms for their inherent energy conserving features.

**New Additions to Historic Buildings**

Placing new additions that have an energy conserving function such as a solar greenhouse on non-character-defining elevations.

**Mechanical Systems**

Installing thermal insulation in attics and in unheated cellars and crawlspaces to conserve energy.

Not Recommended

Installing new exterior storm windows which are inappropriate in size or color, which are inoperable.

Replacing windows or transoms with fixed thermal glazing or permitting windows and transoms to remain inoperable rather than utilizing them for their energy conserving potential.

Using tinted or reflective glazing on character-defining or other conspicuous elevations.

Enclosing porches located on character defining elevations to create passive solar collectors or airlock vestibules. Such enclosures can destroy the historic appearance of the building.

Removing historic interior features which play a secondary energy conserving role.

Installing new additions such as multistory solar greenhouse additions which obscure, damage, destroy character-defining features.

Apply urea formaldehyde foam or any other thermal insulation with a water content or that may collect moisture into wall cavities.

## NEW ADDITIONS TO HISTORIC BUILDINGS

An attached exterior addition to a historic building expands its "outer limits" to create a new profile. Because such expansion has the capability to radically change the historic appearance, an exterior addition should be considered only after it has been determined that the new use cannot be successfully met by altering non-character-defining *interior* spaces. If the new use cannot be met in this way, then an attached exterior addition is usually an acceptable alternative. New additions should be designed and constructed so that the character-defining features of the historic building are not radically changed, obscured, damaged, or destroyed in the process of rehabilitation. New design should always be clearly differentiated so that the addition does not appear to be part of the historic resources.

### Recommended

Placing functions and services required for the new use in non-character-defining interior spaces rather than installing a new addition.

Constructing a new addition so that there is the least possible loss of historic materials and so that character-defining features are not obscured, damaged, or destroyed.

Locating the attached exterior addition at the rear or on an inconspicuous side of a historic building; and limiting its size and scale in relationship to the historic building.

Designing new additions in a manner that makes clear what is historic and what is new.

### Not Recommended

Expanding the size of the historic building by constructing a new addition when the new use could be met by altering non-character-defining interior spaces.

Attaching a new addition so that the character-defining features of the historic building are obscured, damaged, or destroyed.

Designing a new addition so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character.

Duplicating the exact form, material, style, and detailing of the historic building in the new addition so that the new work appears to be part of the historic building.

Imitating a historic style or period of architecture in new additions especially for contemporary uses such as drive-in banks or garages.

Recommended

Considering the attached exterior addition both in terms of the new use and the appearance of other buildings in the historic district or neighborhood. Design for the new work may be contemporary or may reference design motifs from the historic building. In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass, materials, relationship of solids to voids, and color.

Placing new additions such as balconies and greenhouses on non-character-defining elevations and limiting the size and scale in relationship to the historic building.

Designing additional stories, when required for the new use, that are set back from the wall plane and are as inconspicuous as possible when viewed from the street.

Not Recommended

Designing and constructing new additions that result in the diminution or loss of the historic character of the resource, including design, materials, workmanship, location, or setting.

Using the same wall plane, roof line, cornice height, material siding lap or window type to make additions appear to be a part of the historic building.

Designing new additions such as multistory greenhouse additions that obscure, damage, or destroy character-defining features of the historic building.

Constructing additional stories so that the historic appearance of the building is radically changed.

**From:** [Saxon Mullaney](#)  
**To:** [Council Clerk – Testimony](#)  
**Date:** Thursday, November 29, 2018 5:03:13 PM

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Personally I think that the Buck Prager building should not be turned into low income housing due to the fact that it was built in 1918 and is historic. I think the low income housing here is all the same and it has no culture and/or culture behind it. why not repair the building and use it instead of spending money demolishing it and having to rebuild something else? it would be a building with an interesting past instead of just another construction project around here.

**From:** [Zoe Keliher](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** #LU 18-187493 HRM, AD-1727  
**Date:** Thursday, November 29, 2018 2:54:12 PM  
**Attachments:** [Tourism.pdf](#)  
[Historical Trenkmann.pdf](#)  
[Distances.pdf](#)  
[1727 proposal\\_Redacted.pdf](#)  
[1727 proposal.pdf](#)

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Hello~ My email seems to not have gone to Karla Moore-Love and I was forwarded to resubmit to this email.

Please see attached for my objection.

Thank you.

Good Morning City Council Members~

I am writing on behalf of Case File #LU 18-187493 HRM, AD-1727 NW Hoyt (Block 162 Apartments). Below is my written testimony in opposition to the proposal. Given my employment as a Federal Agent, I request to have my address and name redacted from my testimony if it is made public (I have attached a redacted copy).

I am the property owner of [REDACTED], and because I work from home, I have the unique opportunity to see the public impact of the historic Trenkmann houses<sup>1</sup> on a daily basis. Prior to purchasing the property at 1734 NW Hoyt, I rented the house next door at [REDACTED], fell in love with the historic neighborhood, and finally convinced my neighbor to sell me his house. After reading the Landmark Commission's approval decision of the 1727 NW Hoyt development, I was saddened to learn that the group charged with the important task of maintaining and enhancing Portland's historic and architectural heritage had indeed overlooked the significance of this neighborhood's contribution to this heritage.

During the past few months this fall, I have observed the many tourists who frequent my neighborhood block, delighting in the historic architecture, as well as the numerous photographers using the historic landmark homes as their backdrop. Just walking out of my house to go to the corner store, I have been stopped by people from Japan, Ireland, Australia and South Africa all wanting to know about the history of my block and, inevitably, wanting me to take their picture in front of one of these homes. Even madeinpx did a photo shoot for an autumn with the Trenkmanns as a backdrop.

Doing a google search of Portland historic architecture tours [REDACTED] [REDACTED]! Our neighborhood is an advertisement for this city, with the Trenkmann houses seen on endless pictures on Instagram, Landmark Hunters, Pinterest and Facebook.<sup>2</sup> It is definitely hard to imagine that the Hoyt and Irving blocks would stay on the tour routes or be desirable destinations when a 60-foot wall of cement and balconies are towering less than 60 feet away.<sup>3</sup>



Picture 01: Slabtowntours.com

The Trenkmann homeowners before us were wise in that they created an HOA of the 7 houses on the block, where we all share a common area in back. If homeowners want to make any exterior changes/improvements, we have to receive neighbors' permission and input before even taking the

<sup>1</sup> See attached file "Trenkmann" on the history of the Trenkmann Properties

<sup>2</sup> See attached file "Tourism"

<sup>3</sup> See attached file "Distances"

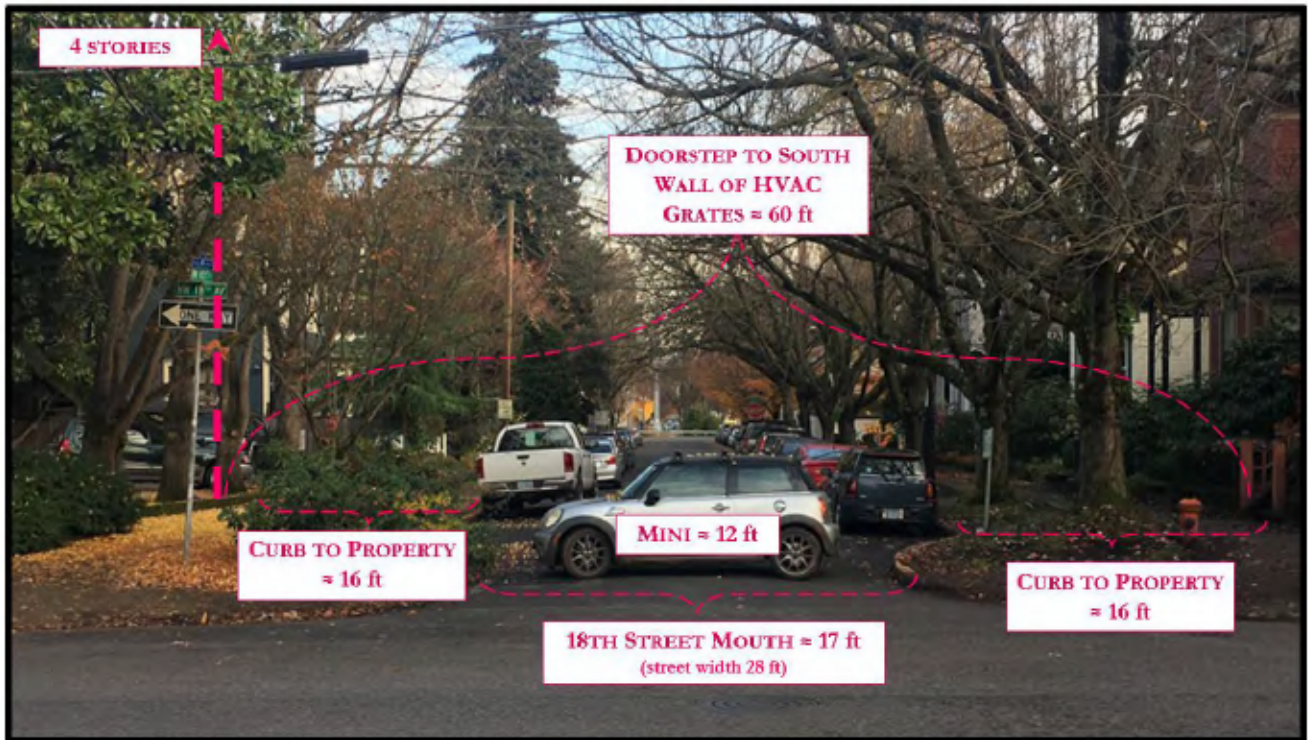




**DISTANCES**



Picture 01: Distances Showing Street Widths



Picture 02: Hoyt Street Perspective





Picture 03: Carleton Hart Comparison

PH0507237

DATA SHEET

UNITED STATES DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE

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DATE ENTERED JAN 30 1978

NATIONAL REGISTER OF HISTORIC PLACES  
INVENTORY -- NOMINATION FORMSEE INSTRUCTIONS IN HOW TO COMPLETE NATIONAL REGISTER FORMS  
TYPE ALL ENTRIES -- COMPLETE APPLICABLE SECTIONS**1 NAME**

HISTORIC \*\*

Trenkman Houses (preferred)

AND/OR COMMON

Hoyt Street Group

**LOCATION**

STREET &amp; NUMBER

525 NW 17th Ave., 526 NW 18th Ave., 1704, 1710, 1716, 1720, 1728, 1734 NW Hoyt St.

CITY, TOWN

Portland

VICINITY OF

CONGRESSIONAL DISTRICT

First

STATE

Oregon

COUNTY CODE

41

COUNTY

Multnomah

CODE

051

**CLASSIFICATION****CATEGORY** DISTRICT BUILDING(S) <sup>LED</sup> STRUCTURE <sup>1/16/78</sup> SITE OBJECT**OWNERSHIP** PUBLIC PRIVATE BOTH**PUBLIC ACQUISITION** IN PROCESS BEING CONSIDERED**STATUS** OCCUPIED UNOCCUPIED WORK IN PROGRESS**ACCESSIBLE** YES: RESTRICTED YES: UNRESTRICTED NO**PRESENT USE** AGRICULTURE COMMERCIAL EDUCATIONAL ENTERTAINMENT GOVERNMENT INDUSTRIAL MILITARY MUSEUM PARK PRIVATE RESIDENCE RELIGIOUS SCIENTIFIC TRANSPORTATION OTHER:**OWNER OF PROPERTY**

NAME

See Continuation Sheet

STREET &amp; NUMBER

CITY, TOWN

STATE

VICINITY OF

**LOCATION OF LEGAL DESCRIPTION**COURTHOUSE,  
REGISTRY OF DEEDS, ETC.

Multnomah County Courthouse

STREET &amp; NUMBER

1021 SW Fourth Avenue

CITY, TOWN

Portland

STATE

Oregon 97204

**6 REPRESENTATION IN EXISTING SURVEYS**

TITLE

City of Portland Designation as Portland Historic Landmark

DATE

November 8, 1976

 FEDERAL  STATE  COUNTY  LOCALDEPOSITORY FOR  
SURVEY RECORDSPortland Historic Landmark Commission  
City Hall Annex - 424 SW Main

CITY, TOWN

Portland

STATE

Oregon 97204

## 7 DESCRIPTION

CONDITION		CHECK ONE	CHECK ONE
<input checked="" type="checkbox"/> EXCELLENT	<input type="checkbox"/> DETERIORATED	<input type="checkbox"/> UNALTERED	<input checked="" type="checkbox"/> ORIGINAL SITE
<input checked="" type="checkbox"/> GOOD	<input type="checkbox"/> RUINS	<input checked="" type="checkbox"/> ALTERED	<input type="checkbox"/> MOVED      DATE _____
<input checked="" type="checkbox"/> FAIR	<input type="checkbox"/> UNEXPOSED		

### DESCRIBE THE PRESENT AND ORIGINAL (IF KNOWN) PHYSICAL APPEARANCE

The eight houses in this proposed district are all balloon frame construction on brick foundations. The exteriors of the structures above the foundations begin with a belt course, followed by seven-inch tongue-and-groove siding covering the first story; the second stories of 1710, 1716, 1728 and 1734 NW Hoyt are covered with cedar shingles in various shapes: square, fish-scale, octagon, Gothic arch, etc. 526 NW 18th has tongue-and-groove siding on the first story, followed by a five-foot belt of fish-scale (octagon) shingles which is followed in turn by more tongue-and-groove siding and shingles removed prior to this. The current owners, assuming the original exterior was like the Hoyt Street houses, considered duplication of the original appearance too costly and opted to follow the design used on 526 NW 18th and have just a belt of fish-scale shingles with tongue-and-groove siding below and above belt. This was accomplished in 1976. The residence at 525 NW 17th still is covered with asbestos shingles; the basic structure of the house remains unaltered but it is difficult to determine precisely what is left under the shingles.

The cornice moldings are simple, making use of flat facing boards with cove moldings. Each house has at least one slanted bay window and four of them (1704, 1710, 1728 and 1734 NW Hoyt) have two slanted bays. There are arched brackets on the porch pillars of each house. Some porch pillars are square with routed corners and three houses have turned pillars (1716 and 1720 NW Hoyt and 526 NW 18th). Each house has added, in 1976, an uncovered back porch with railings similar to the front porch railings. The houses at 1704, 1710, 1728 and 1734 NW Hoyt have the same floor plan except that 1704 NW Hoyt is a reverse of the others. Each of these houses has friezes over the windows on the first floor, trimmed with inserted parallel vertical half-round pieces. 525 NW 17th and 1716 NW Hoyt have the same floor plan.

Each structure has two ornate brick chimneys except for 1716 NW Hoyt and 525 NW 17th, each of which has one chimney covered with ornate sheet metal over brick and one exposed brick chimney; all are original except for those on 1710 NW Hoyt, which were rebuilt in 1976, and one of the two on 526 NW 18th, built in 1976 on an existing chimney to replace a metal jack.

There have been no alterations to the fronts of any of the houses except 1704 NW Hoyt where (as mentioned previously) it was necessary to replace original tongue-and-groove siding and cedar shingles.

The interior spaces vary from house to house. In all cases the owners of the seven houses involved in the Hoyt Street Group (i.e., not including 525 NW 17th) have kept, where existing, the original door and window trim moldings, baseboards, stair railings, hardware and stained-glass or clear-glass leaded windows. 1728 NW Hoyt still has a "disclaimer plate" over the front door which reads E. TRENMANN, 424 Market Street. This was attached prior to 1930, as that was the year when Portland street numbers were changed.

The site is almost half of the city block. The houses are set back from the sidewalk and a low concrete wall (constructed to resemble cut sandstone blocks) retains soil excavated from the basements intervening between the sidewalk and the houses. This provides a grade separation between the curb level and the houses' foundation lines. The backyards of the properties have, by notations on each deed, been combined and will be developed as a common space to be used by occupants of the seven houses in the Hoyt Street Group (excluding 525 NW 17th). This common space is now surrounded by a board-and-batten cedar fence, constructed in October 1976 as a means of defining the property, providing privacy and security, and establishing an area in which children of occupants are safe from the street. When the Trenkman Houses were constructed, their backyards were all separated from each other by wooden fences.

UNITED STATES DEPARTMENT OF THE INTERIOR  
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**NATIONAL REGISTER OF HISTORIC PLACES  
INVENTORY -- NOMINATION FORM**

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Trenkman Houses, Portland, Multnomah County, Oregon

CONTINUATION SHEET

ITEM NUMBER 4 PAGE 1

OWNER OF PROPERTY: Multiple Ownerships

✓ Fred Langlois Estate  
525 NW 17th Avenue  
Portland, OR 97209

✓ Christopher M. Spence et al  
526 NW 18th Avenue  
Portland, OR 97209

✓ Philip A. Pincus &  
Lauriette C. Nielson  
1704 NW Hoyt  
Portland, OR 97209

✓ Robert F. Phillips, Jr.  
1710 NW Hoyt St.  
Portland, OR 97209

✓ William D. LaCour  
1716 NW Hoyt  
Portland, OR 97209

✓ Spencer B. & Jane M. Beebe  
1720 NW Hoyt Street  
Portland, OR 97209

William R. Jamison &  
Emlyn S. Thomas  
1728 NW Hoyt St.  
Portland, OR 97209

Harold J. Folberg  
1734 NW Hoyt St.  
Portland, OR 97209

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CONTINUATION SHEET

ITEM NUMBER 7 PAGE 1

The Hoyt Street Group has joined its neighbors on the north side of NW Hoyt Street to apply for a street modification project on NW Hoyt between NW 17th and 18th Avenues; the proposal has been approved in concept, but details are sketchy at the time of this application. Purpose of the modification will be to discourage (and reduce) vehicular traffic on the street between the NW 16th-18th Ave. one-way couplet, and thereby enhance the residential character of the block. It is worth noting that there is no evidence of any early improvement of Hoyt Street in this area, i.e., unlike the street east of NW 13th Avenue, this segment had no cobblestone or paving brick characteristic of early city street improvement; in 1890 and subsequent years until the asphalt paving program reached the area, the street was dirt or gravel. The Hoyt Street Group will consult with the State Historic Preservation Office to assure that the modification design will be appropriate.

The six house fronting Hoy Street are oriented to the north. Those at 525 NW 17th Avenue and 526 NW 18th Avenue face east and west, respectively. The entire group forms a kind of horseshoe-shaped development around the north half of the block.



## 8 SIGNIFICANCE

PERIOD	AREAS OF SIGNIFICANCE -- CHECK AND JUSTIFY BELOW			
<input type="checkbox"/> PREHISTORIC	<input type="checkbox"/> ARCHEOLOGY-PREHISTORIC	<input type="checkbox"/> COMMUNITY PLANNING	<input type="checkbox"/> LANDSCAPE ARCHITECTURE	<input type="checkbox"/> RELIGION
<input type="checkbox"/> 1400-1499	<input type="checkbox"/> ARCHEOLOGY-HISTORIC	<input type="checkbox"/> CONSERVATION	<input type="checkbox"/> LAW	<input type="checkbox"/> SCIENCE
<input type="checkbox"/> 1500-1599	<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> ECONOMICS	<input type="checkbox"/> LITERATURE	<input type="checkbox"/> SCULPTURE
<input type="checkbox"/> 1600-1699	<input checked="" type="checkbox"/> ARCHITECTURE	<input type="checkbox"/> EDUCATION	<input type="checkbox"/> MILITARY	<input type="checkbox"/> SOCIAL/HUMANITARIAN
<input type="checkbox"/> 1700-1799	<input type="checkbox"/> ART	<input type="checkbox"/> ENGINEERING	<input type="checkbox"/> MUSIC	<input type="checkbox"/> THEATER
<input checked="" type="checkbox"/> 1800-1899	<input type="checkbox"/> COMMERCE	<input type="checkbox"/> EXPLORATION/SETTLEMENT	<input type="checkbox"/> PHILOSOPHY	<input type="checkbox"/> TRANSPORTATION
<input type="checkbox"/> 1900-	<input type="checkbox"/> COMMUNICATIONS	<input type="checkbox"/> INDUSTRY	<input type="checkbox"/> POLITICS/GOVERNMENT	<input type="checkbox"/> OTHER (SPECIFY)
		<input type="checkbox"/> INVENTION		

SPECIFIC DATES 1890

BUILDER/ARCHITECT Herman Trenkmann

### STATEMENT OF SIGNIFICANCE

By their proximity to each other, and because of the care and accuracy with which they were restored to their original appearance, the eight homes being nominated comprise a small homogenous enclave exemplifying the Eastlake style of Victorian architecture. These homes are situated in an older, non-descript and (until recently) declining neighborhood, but one which is relatively rich in surviving Victorian residences. It is to be expected that the striking success realized by the owners of the nominated structures in restoring their homes will encourage others to do the same, thus serving the multiple purposes of preserving worthy structures, assisting in improvement of the surrounding neighborhood and checking encroachment into a residential area by commercial enterprises.

In 1890, Herman Trenkmann constructed eight houses on the north half of a city block in Northwest Portland defined by NW Glisan Street on the south, NW 18th Avenue on the west, NW Hoyt Street on the north, and NW 17th Avenue on the east. They were built with wood frame, balloon construction on brick foundations, in the Eastlake style of Victorian architecture, for use as single-family residential rental units.

Herman Trenkmann was born Feb. 9, 1843, in Altenberg, Germany. Prior to coming to the United States, he learned the blacksmithing and machinist trades. On arrival in America, he worked in New York, Chicago and San Francisco before moving to Portland some time between 1868 and 1870. He came to Portland on the stagecoach, setting up his first shop as a contractor at Front and Ash Streets (according to the Oregonian of Feb. 25, 1913), although he is not listed in the Portland City Directory until 1873. In the City Directory of that year, Trenkmann is listed as a machinist and toolmaker, located at 157 Front Street; he maintained a residence on the SE corner of H (now Hoyt) and N. (now NW) 14th Streets. (A contradiction appears in the Oregonian's Jan. 8, 1874 death notice of Herman Trenkmann's young (22 years, 8 months) wife, Emma. It listed their residence as N. (now NW) 13th and H (now Hoyt) Streets).

In 1881 Trenkmann's business address was 62 Front Street, near Pine. His residence then was 267 First Street. Trenkmann joined with F. Wolff in 1882 to form Trenkmann & Wolff Machinists, and they moved the firm to the north side of F (now Flanders) Street between 3rd and 4th. 1888 is the last year Trenkmann & Wolff is listed as a firm in the City Directory. A Feb. 25, 1913 Oregonian article on Trenkmann said he had been retired for 25 years, which may account for the lack of a City Directory listing after 1888.

Trenkmann did extensive work on the new penitentiary (corner laid in May, 1871) in Salem and other state and municipal construction over the years. He died on March 1, 1913, at St. Vincent's Hospital in Portland of heart disease, asthma and kidney failure.

In 1975, seven of the eight 1890 Trenkmann houses were purchased, each by separate buyers who agreed to the stipulation that the exterior elements be restored to as close to the original as possible, and that the back yard area be held in common by the group so it could be landscaped and utilized by all occupants.



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CONTINUATION SHEET

ITEM NUMBER 8 PAGE 1

For the most part, the exteriors of the structures had not been extensively altered, although they had been covered, either with "fake brick" celotex-asphalt siding or with asbestos shingles (probably in the 1930s or 1940s), and prior to application many cornice and other moldings were removed. Fortunately, however, nothing was removed from the 1710 NW Hoyt house, so it served as a guide for restoration of the others.

The eighth 1890 Trenkmann house, 525 NW 17th Ave., is standing but at the present time is not part of the Hoyt Street Group because at the time the Group was formed, it was occupied by an elderly couple who could neither relocate nor participate in the objectives of the Hoyt Street Group. The elderly man died in early 1976 and the house is not in an estate settlement, but is included in the application for nomination to the National Register.

The 525 NW 17th house is covered with asbestos shingles, but does not appear to have any structural alterations. The present members of the Hoyt Street Group are disposed to welcome consideration of inclusion of the eighth house in the Group.

It is significant that in 1977, seven of the eight houses contiguous to each other and built in 1890 by the same builder are still standing in Portland, and that they are all now in the process of restoration and renovation, with some prospect that the eighth house may subsequently receive similar treatment.





*Trenkonnann Houses*

Residences at 1704, 1710, 1716, 1720,  
1728 and 1734 NW Hoyt St.  
Portland, Multnomah County, Oregon  
North elevations subsequent to restora-

tions, 1976

William R. Jamison  
1728 NW Hoyt St.  
Portland, OR 97209

NOV 16 1977

JAN 30 1978

*Photo #*

*194*

PROPERTY OF THE NATIONAL REGISTER



PROPERTY OF THE NATIONAL REGISTER

*Photo # 204*

Trenkman Houses  
Portland, Multnomah County, Oregon  
525 NW 17th Avenue  
East elevation, Dec., 1977

Christopher M. Spence  
526 NW 18th Avenue  
Portland, OR 97209

JAN 30 1978

JAN 11 1978



**PROPERTY OF THE NATIONAL REGISTER**

*Photo # 3074*

Trenkman Houses  
Portland, Multnomah County, Oregon  
526 NW 18th Avenue  
West elevation, December 1977

Christopher M. Spence  
526 NW 18th Avenue  
Portland, OR 97209

JAN 30 1978

JAN 24 1978



PROPERTY OF THE NATIONAL REGISTER

*Trenkmann Houses*

Residences at 1704, 1710, 1716, 1720,  
1728 and 1734 NW Hoyt St.  
Portland, Multnomah County, Oregon

*Photo # 424*

North elevations prior to restoration

1976

William R. Jamison  
1728 NW Hoyt St.  
Portland, OR 97209

NOV 16 1977

JAN 30 1978



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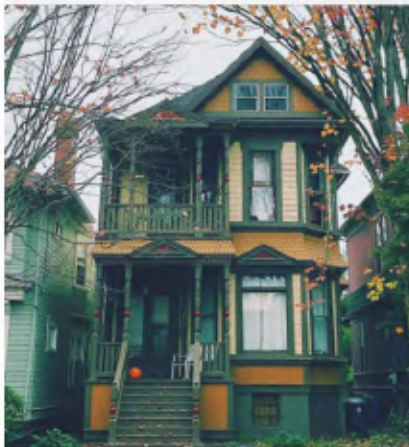


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**From:** [Harold Forman](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)  
**Date:** Thursday, November 29, 2018 2:48:58 PM

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I was extremely disappointed to see a massive complex covering an entire block being planned for the NW historic district. The Block 162 apartment complex being planned for 17<sup>th</sup> and Hoyt is shortsighted and appalling.

It is shortsighted because that which makes the Northwest area appealing and adds to the attractiveness of Portland as a place to live will suffer as a result of the NW Historic District losing its character and charm. This shortsightedness will adversely affect all Portlanders. Recall that the construction of the huge condo and apartment high-rises in the Pearl were built in an area where there were no classic homes nor a long-term residential neighborhood that would suffer as a result of their construction.

The design of the building, including the visible HVAC, will be a neighborhood eyesore. It is difficult to believe that a less obtrusive complex could not be conceived that would both prove commercially rewarding and preserve the character and life-style of the NW district.

Harold Forman  
1150 NW Quimby Street  
Portland OR 97209

**From:** [Thomas Mullaney](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Case File #LU 18-187493 HRM, AD-1727 NW Hoyt (Block 162 Apartments)  
**Date:** Thursday, November 29, 2018 2:20:50 PM

---

Hello,

As I cannot make it to testify can you please have City Council consider my statement.  
Thank you



November 28th, 2018

City of Portland, Oregon  
1221 SW Fourth Avenue  
Portland, OR 97204

Case File # LU 18-187492 HRM, AD-127 NW Hoyt (Block 162 Apts.)

My name is Thomas Mullaney and I live with my partner Zoe Keliher and our two daughters at 1734 NW Hoyt Street, Lot (1) of the Historic Trenkman Homes. Our residence rests on the SE corner of 18th & Hoyt directly facing the South Tower of the proposed Block 162 Apartments. The conformity of the Historic residences along the narrow, one-way, streets of Hoyt and Irving initially generated my desire to live in the immediate neighborhood which was ultimately piqued by my day-to-day interactions within my profession. I am a Certified Real Estate Appraiser in the State of Oregon/Idaho (CR01049) and over the past 20 years, I have been completing assignments surrounding Historic Zonings and development. I am not rendering any opinion of value in this statement per my ethical obligation as it relates to Uniform Standards of Professional Appraisal Practice. I attended all meetings and DAR's as they pertained to the submission of the Block 162 apartment project by Carlton Harlton-HWHA. I am entirely in support of future development on the proposed site and support low income housing on the immediate site, given the condition requested by the NWDA requiring the housing to be affordable is implemented.

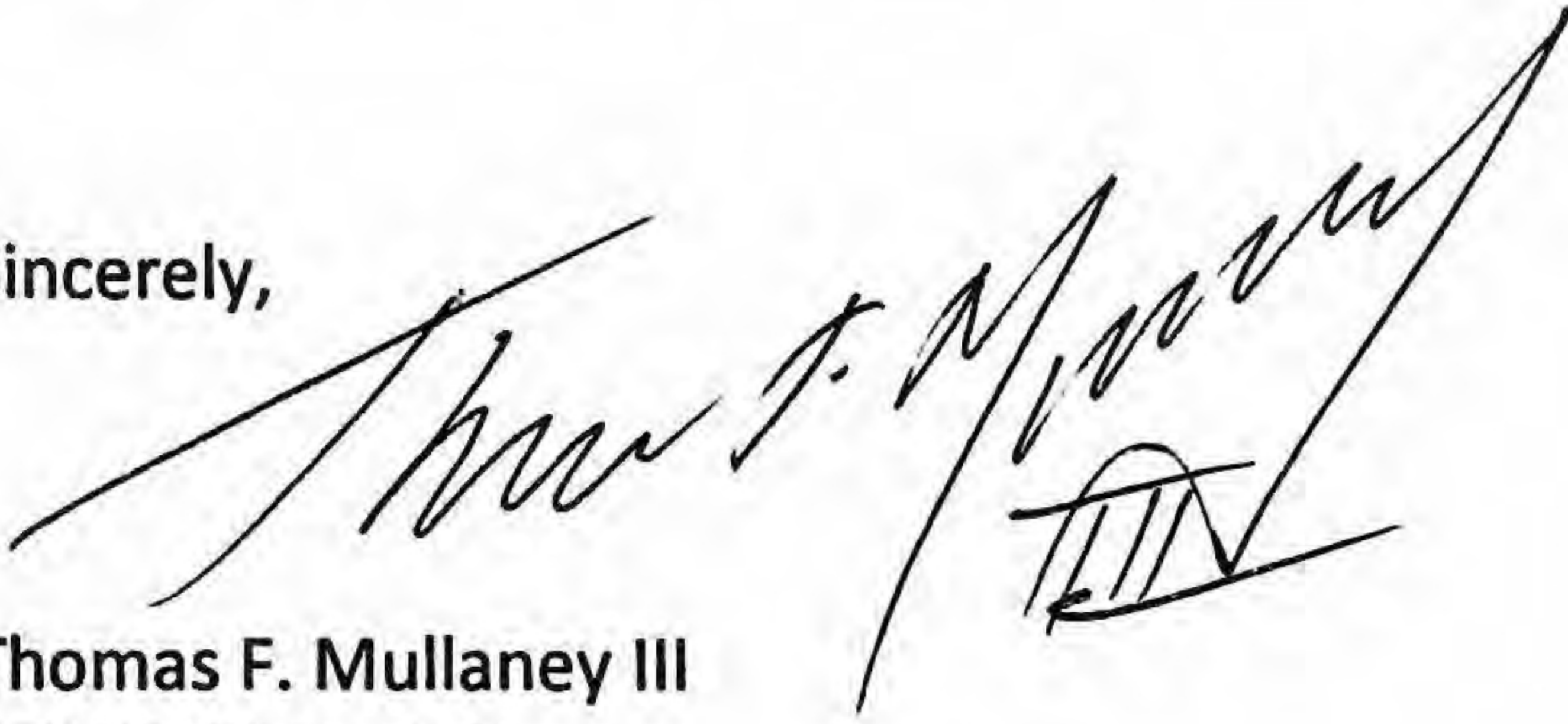
As the applicant presented to the Historic Landmarks Commission there are intermittent 5-1/2 story projects in the immediate vicinity; however, they lack the extraordinary concentration of 2.5 to 3 story Queen Anne, Victorian or brick row-houses directly across. The documents presented from Carlton Hart did not accurately depict the street view renderings for the frontage along NW Hoyt as the Morrison Investment Homes (East) have a 10 foot set-back and Block 162 as proposed (1 ft). Hoyt is a one way street and at the mouth off 18th street, only 13 feet wide. Since the south tower does not present an appropriate set-back for landscaping and/or loading zone, this could become hazardous to pedestrians, bikers and other vehicles obstructed by the inevitable congestion. As I look out my front porch, I treasure the soldier coursing, decorative cornice and quoins from the Buck-Prager building. Our house being on the cover of Slabtowntours.com and the countless individuals photographing the historic character along Hoyt and Irving speaks to the necessary attention required for the proposed development by City Council.

While attending DAR2, commission members were completely divided and by DAR3 with the turmoil that ensued it became evident that the Historic Landmarks Commission became inherently innocuous as prior requests from the panel for the applicant to present materials congruent with adjacent historic structures was masked, acquiescing to base zone



allowances and not the Historic Overlay Zone. This inturn compounded additional flaws within the approval as the applicant did not entirely incorporate site and building design features under the CDG P1 and P2. I ask city council to reject the decision by the Historic Landmarks Commission as the application fails to meet Historic Alphabet District Guidline #3 or Commnity Design Guideline (D7).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas F. Mullaney III". The signature is written in a cursive style with a large, sweeping flourish at the end.

Thomas F. Mullaney III  
1734 NW Hoyt St  
Portland, OR 97209

**From:** [Stephanie Whitlock](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** FW: Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)  
**Date:** Thursday, November 29, 2018 1:57:08 PM  
**Attachments:** [BMFAHC\\_Buck-Praeger\\_20181129\\_FIN.pdf](#)

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Resending as per Ms. Moore-Love's out of office email.

---

**From:** Stephanie Whitlock  
**Sent:** Thursday, November 29, 2018 1:25 PM  
**To:** 'Karla.Moore-Love@portlandoregon.gov'  
**Subject:** Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)

Please find attached our written testimony on Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments).

Stephanie Whitlock  
Executive Director  
Bosco-Milligan Foundation/Architectural Heritage Center  
701 SE Grand Ave.  
Portland, OR 97214  
Tel. 503-231-7264  
[www.visitahc.org](http://www.visitahc.org)



# Architectural HERITAGE CENTER

November 27, 2018

Re: Comments – Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)

Portland City Council  
1221 SW Fourth Avenue, Room 140  
Portland, OR 97204

Dear Portland City Council:

This letter is submitted on behalf of the Architectural Heritage Center (AHC) Advocacy Committee to provide comments for the proposed development at 1727 NW Hoyt, encompassing the historic Buck-Prager building. This project was approved by the Historic Landmarks Commission (HLC) at their September 24<sup>th</sup> Historic Design Review hearing, and is being appealed by the Northwest District Neighborhood Association (NWDA) and Tony Schwartz.

The AHC educates and advocates for the preservation of Portland's historic built environment and diverse cultural heritage. Each year, we provide over 100 public programs, walking tours, gallery exhibitions, along with care of our 1883 National Register building in eastside Portland. Our advocacy is directed at keeping Portland a just, sustainable, and livable city.

As stated in our August 27 oral testimony to the Historic Landmarks Commission, the AHC Advocacy Committee would like to express its strong support for the project team's efforts to refurbish the historic Buck-Prager building and bring affordable housing to this Northwest neighborhood – a lofty achievement especially amidst the current boom of high-priced residential development and increased demolition. We're grateful that this project will not only save a cultural landmark from the wrecking ball, but will provide much-needed affordable housing. Too often, affordable housing and historic preservation are pitted against each other; this project demonstrates that these two issues are not mutually exclusive. The new additions do not respond to the district's granularity in a nuanced, sensitive way and lack a connection to the neighboring low-slung structures.

The proposed project has the potential to be more compatible – in terms of its massing and scale – in order to fit into the area's historic context, and respect the modest landmarked building without overpowering it. The design has been improved significantly from the first proposals, and a final push to break up the massing seems worthwhile.

Finally, we support NWDA's request for a "condition of approval" to be applied to this proposal ensuring that the proposed housing to be affordable.

Thank you for the opportunity to comment and for the Council's thoughtful deliberation on this matter.

Brooke Best

AHC Advocacy Committee member

Bosco-Milligan Foundation/Architectural Heritage Center  
701 SE Grand Ave. Portland, OR 97214 Tel. 503-231-7264  
[info@visitahc.org](mailto:info@visitahc.org) [www.visitahc.org](http://www.visitahc.org)

**From:** [Matt Brischetto](#)  
**To:** [Moore-Love, Karla](#)  
**Cc:** [Council Clerk – Testimony; Jessica Richman](#)  
**Subject:** Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)  
**Date:** Thursday, November 29, 2018 1:46:24 PM

---

Hi Karla and City Council,

I am the home owner at 526 NW 18th Ave. I have owned the property since 2007, and resided myself on the block either as a tenant or homeowner between the period of 2004-2013.

I oppose the current design of the building and support reversing the Landmark Commission's decision, and the position of the Northwest District Association. After a review of numerous iterations of the building design over the years, I feel that it is still overly incompatible with the neighborhood and will ultimately be a detriment for its citizens.

While I do support affordable housing, I feel that it must be done thoughtfully, especially in the context of new construction which will be irreversible.

Most importantly, the scale of the building must be reduced for the context of a historic district. The building, in its current state, will overwhelm the neighboring 2 story turn-of-the 20th century homes which define the Alphabet district. Urban planning is done to concentrate high density in certain areas; juxtaposing lower density with this type of extreme high density will confuse the character, mismatch business growth, transportation planning, and host of other public services.

Please count me as an opponent to the current design, and a supporter for overturning the current decision.

Best,

Matt Brischetto  
526 NW 18th, homeowner



**From:** [Madeline Kovacs](#)  
**To:** [Council Clerk – Testimony; Moore-Love, Karla](#)  
**Subject:** Support for Block 162 Apartments - LU 18-187493 HRM AD  
**Date:** Thursday, November 29, 2018 1:08:04 PM  
**Attachments:** [P4E Support for LU 18-187493 HRM AD Nov.29 .pdf](#)

---

Dear Portland City Council,

The Portland for Everyone coalition is pleased to submit into the record our attached letter of support for the Block 162 Apartments.

We urge you to reject the appeal of the Block 162 Apartments and instead uphold the decision by the Historic Landmarks Commission.

Portland does not have enough homes that are affordable to its lower- and moderate-income residents. Please do not take these 148 affordable homes away from the seniors and lower-income residents who desperately need them.

We also thank City Council for your time and your contributions to Portland, where we hope ALL of our residents will be housed safely and affordably.

Sincerely,

Madeline Kovacs on behalf of the [Portland for Everyone coalition](#)

Madeline J. Kovacs (she/her/hers)  
Coordinator, Portland for Everyone  
1000 Friends of Oregon  
133 SW 2nd Ave, #201 | Portland OR 97204  
[friends.org](#) | [portlandforeveryone.org](#)  
o: 503.497.1000 x137 | c: 510.410.4176

<https://giveguide.org/>



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Portland City Council  
1221 SW 4th Ave., Room 130  
Portland, OR 97204

November 29, 2018

**RE: Support for the NHA affordable housing project being appealed under Case # LU 18-187493 HRM**

Dear Mr. Mayor and Portland City Councilors,

The 43 members of the Portland for Everyone coalition are pleased to submit for the record our letter of support for the proposed 148-unit affordable housing development at 1727 NW Hoyt St by Northwest Housing Alternatives (NHA). We urge Portland City Council to vote “yes” for a project that will:

- Preserve and seismically retrofit the historic Buck-Prager building,
- Fall well within massing and unit limits allowed by the zoning, and
- Offer 148 regulated affordable homes to low-income seniors and/or Portland households making 60% of Median Family Income or less.

NHA has worked for eight months with neighbors, with representation from the Northwest District Association (NWDA), with the Historic Landmarks Commission (HLC), and with City staff to submit a planned development that meets city codes and historic preservation guidelines, and blends in with the existing character of the neighborhood. During these processes, plans were modified extensively to reflect design and scale considerations, and gain approval by the HLC: NHA originally proposed a six-story building but, based on feedback and comments from neighbors, reduced the building to five stories and eliminated 17 total units of affordable housing to accommodate concerns. Preservation of the Buck-Prager building, and the scale and design of the two new buildings, were then reviewed, amended, and approved by City staff and the HLC – meaning they believe that the project meets all requirements.

This last iteration of the proposal echoes the character of surrounding buildings in the district very well, both in scale and in design: The Alphabet District guidelines *do not* call for matching buildings directly across the street in design or proportion. In fact, a mixture of housing types, with larger five-to-six story buildings sited next to large single-dwelling homes, is found frequently throughout the Alphabet District. The mixture of housing types adds a unique flavor to the District not seen most other places in Portland. Indeed, the Kearney House Apartments is two stories higher than the Contributing property across the street, and this is highlighted by Guideline 3 as an example of matching proportions. The project under consideration honors and furthers this district aesthetic.

The project also supports CDG Guideline D7, which calls for “incorporating elements of nearby, quality buildings,” by mirroring the details, proportions, and massing of the nearby Wickersham apartments, one and a half blocks away (which also rises to five and a half stories directly across the street from low rise detached houses). Many changes were also made to reflect the feedback from DAR 1 and DAR 2 design advice hearings, including a change in brick color, reducing heights, changes to the front facade, and notching in the north facade of the north building facing NW Irving, among others.

Such care should be taken to produce quality buildings in our city. **We must also consider that we are in the midst of an affordable housing shortage: Portland does not have enough homes that are affordable to its moderate- and lower-income residents.** If bringing online more *regulated affordable* homes as quickly and efficiently as possible is a concern (and it should be), then we urge Portland City Council to approve the project, and not add further delay, thereby increasing cost per home.

Please also do not further remove floors from the building—again, *floors allowed under the 5:1 FAR allowed by the zoning code, and even under the 4.1 base FAR approved for the neighborhood by Council.* **Please do not take affordable homes away from Portlanders who need them, homes that are also in close proximity to services that they may access on a regular basis.** To do so would be incredibly out-of-touch with the pain and suffering of people who do not always have the time or the resources to advocate for their own interests; and these Portlanders’ interests matter. These Portlanders matter.

In Oregon, statewide land use laws specifically state that local jurisdictions should first undergo a rigorous forecasting and comprehensive community planning process, then give “clear and objective” standards by which all subsequent development may follow. There is utility in this approach: It is much more efficient for cities, for builders, for residents, and, ultimately, for taxpayers. Although the projects that are in historic districts, like this one, are also required to undergo discretionary review, once comprehensive and district planning has been completed, we believe that review should focus on delivering a quality, well-designed building – an objective that has been achieved – and not on the entitlements already established through the comprehensive planning process.

As a city, if we continue to add delays and costs to every housing project (not to mention unduly burdening nonprofit affordable housing projects) then the overall cost to Portlanders will be tremendous. These inefficiencies add up, and it’s the public that pays, through public expenditure of time and resources, and through rising housing prices.

We want to thank all Portland City Council members for your time and your contributions to Portland, where we hope ALL of our residents will be housed stably and affordably.

Sincerely,



Madeline Kovacs  
Coordinator, Portland for Everyone  
[www.portlandforeveryone.org](http://www.portlandforeveryone.org)

1000 Friends of Oregon  
133 SW 2nd Ave, Suite 201  
Portland OR 97204

**From:** [Iain Mackenzie](#)  
**To:** [Council Clerk – Testimony; Moore-Love, Karla](#)  
**Cc:** [Jeffreys, Grace](#)  
**Subject:** Block 162 Apartments - LU 18-187493 HRM AD  
**Date:** Thursday, November 29, 2018 12:48:03 PM

---

Dear City Council--

I urge you to reject the appeal of the Block 162 Apartments and instead uphold the decision by the Historic Landmarks Commission.

From 2013 to January of this year I was a resident of the Northwest District, living at the 1927 Empress Condominiums. Although located just outside of the boundaries of Historic District they are a great example of the kind of multifamily housing that makes Northwest the wonderful district that it is. The five story building was designed by noted architects Claussen and Claussen and has been determined to be eligible for inclusion in the National Register.

I believe that the NW 18th & Hoyt will be a worthy successor to this tradition of multifamily housing, a character defining feature of the neighborhood. As the nomination to the National Register states, "the Historic Alphabet District is unique in Portland for its concentration of early twentieth century multi-family structures—many of which were designed and constructed by the city's premier architects and developers."

Only two blocks to the south is the individually listed Wickersham Condominiums, which rises to 5 and a half stories directly across the street from low rise detached houses. This juxtaposition of scale is part of what makes Northwest so charming.

The applicants have done a great job of studying the district, and drawing influence from its greatest buildings, including the American Apartment Building at NW 21st and Johnson. In doing so they have not only met but exceeded Guideline D7 "Blending into the Neighborhood", which says that new development should incorporate "elements of nearby, quality buildings such as building details, massing, proportions, and materials."

This project underwent a great deal of scrutiny by the Landmarks Commission, a body that takes their role in historic preservation very seriously. If you vote to uphold their decision you can be confident that you are approving a building that has already been very carefully reviewed by city staff and dedicated volunteers.

I would also urge you to vote yes on this today. Affordable housing in particular faces great challenges in assembling its funding, and that funding can easily be jeopardized by delay. Voting yes will allow the Northwest Housing Alternatives to quickly move forward to submitting building permits and ultimately to breaking ground on 148 new affordable homes.

Regards,

Iain MacKenzie, AIA



**From:** [Heidi Steffens](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)  
**Date:** Thursday, November 29, 2018 12:30:59 PM

---

I would like to express my vociferous opposition to construction of 1727 NW Hoyt, the proposed Block 162 Apartments.

As a resident of NW Portland I value the contrast between the massive apartment and condo complexes in the Pearl and the low-rise, less dense historic nature of the area surrounding the Alphabet District. This is what makes NW Portland liveable and attractive. The proposed massive complex would be an eyesore in one of the few west side areas that preserves the historic nature of our city. The scale of the complex is too large, too tall and will do great damage to the vitality and attractiveness of the NW historic district. In addition, the visible HVAC and the generally cheap appearance of the complex will be an eyesore. Surely the city and Hoyt can come up with a viable, low-rise design in keeping with the neighborhood.

Thank you for your consideration.

Heidi Steffens  
1150 NW Quimby Street  
Portland 97209

**From:** [Regina Tricamo](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Affordable housing  
**Date:** Thursday, November 29, 2018 12:05:09 PM

---

Please support and approve the affordable housing project at NW 18th and Hoyt. I spend a lot of time in the neighborhood, with children at MLC and the Northwest Children's Theater and School. The building design has already been approved by the landmarks commission and will be a welcome addition to the neighborhood.

Portland is in an affordable housing emergency, and we need to start acting like it. Please approve this project.

Regina Tricamo, LCSW  
215 SE 24th Ave  
Portland, OR 97214

**From:** [McMurtrey, Stephen](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Block 162 Apartments, response in favor of Northwest Housing Alternatives  
**Date:** Thursday, November 29, 2018 10:45:42 AM

---

Good morning,

My name is Stephen McMurtrey and I am the former Housing Development Director at Northwest Housing Alternatives (NHA). I want to stress my full support of this project moving forward. From the beginning, NHA has put together a thoughtful and experienced team that has demonstrated a sensitivity to the design of the buildings within the context of the Alphabet District and its neighbors. As direct demonstration of this, NHA has committed to preserving and fully renovating the Buck-Prager building which as it stands now is rapidly deteriorating. It is my opinion that all three buildings making up the redevelopment of this important site, in such a resource-rich area as the Alphabet District, do an excellent job of directly complimenting the adjacent dwellings in the community while reflecting the eclectic nature and the varied uses, shapes, and sizes of the buildings that make up the district as a whole.

NHA has an unparalleled track record of conceptualizing and delivering on mission-based affordable housing developments that become permanent resources to the communities they serve throughout Oregon. They have selected a project-team with decades of experience in preserving historic resources and the development of affordable housing in urban communities with a varied cast of community stakeholders. With that in mind, NHA and their team have presented a project that meets historic landmark guidelines while providing an affordable housing resource in a resource-rich neighborhood for decades to come.

There is a housing crisis throughout our community as evidenced and supported by the voters through the metro housing bond and the passing of statewide Measure 102. The crisis is real and this project makes the commitment to help alleviate some of this crisis while making itself a valued and complimentary part of the Alphabet District.

I thank you for your time and efforts and hope you will support NHA in moving forward with this development.

Sincerely,

Stephen McMurtrey  
Director of Housing Development  
Housing Authority of Clackamas County  
503.650.3414 desk  
503.915.9345 cell  
[SMcMurtrey@clackamas.us](mailto:SMcMurtrey@clackamas.us)

**Please note that our work hours are from 7:30 to 5:30 Monday through Thursday and closed on Fridays.**

**From:** [thomas.gihring](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Buck-Prager project  
**Date:** Thursday, November 29, 2018 10:39:10 AM  
**Attachments:** [Let to CC Buck-Prager project.docx](#)

---

For City Council Agenda: 29 Nov 2018

Please see the attached letter.

Tom Gihring  
3116 NE 9<sup>th</sup> Ave  
Portland



---

*Thomas A. Gihring*  
3116 NE 9<sup>th</sup> Ave.  
Portland, Oregon 97212  
(503) 360-1147      tagplan@gmail.com

---

29 November 2018

Portland City Council  
1221 SW 4th Ave., Room 130  
Portland, OR 97204

**RE: Support for the NHA affordable housing project being appealed under Case # LU 18-187493 HRM**

Dear Mayor Wheeler and Portland City Councilors,

I wish to submit for the record this letter of support for the proposed 148-unit Buck-Prager affordable housing development at 1727 NW Hoyt St by Northwest Housing Alternatives (NHA). I urge Portland City Council to vote “yes” on this project.

If neighborhood opposition to projects like this becomes a new norm, the goals of the city’s Inclusionary Housing policy is at risk. Portland is growing rapidly in size; it is no longer the small city that many long-time residents remember. Moreover, Portland is becoming unaffordable as residential lot prices are skyrocketing; better utilizing the land supply we have available is more important than ever. This inevitably means accepting higher densities.

Inclusionary zoning is a quid pro quo – affordable units for a density bonus. We are in the midst of a housing crisis. Let us step up and do everything we can to bring more dwelling units on line for moderate and low-income residents.

The developers for this project have already reduced the proposed building to 5-stories, eliminating 14 units of affordable housing. For this and future projects let us correct the imbalance between “the way things were” and affordable housing for all.

I urge Portland City Council to approve this project without delay. Thank you for your time and consideration.

Sincerely,

Tom Gihring

**From:** [Blaine Palmer](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Approve Affordable Housing at NW 18th and Hoyt  
**Date:** Thursday, November 29, 2018 10:23:23 AM

---

Please support and approve the affordable housing project at NW 18th and Hoyt. I spend a lot of time in the neighborhood, with children at MLC and the Northwest Children's Theater and School. The building design has already been approved by the landmarks commission and will be a welcome addition to the neighborhood.

Portland is in an affordable housing emergency, and we need to start acting like it. Please approve this project.

*Blaine*

Blaine Palmer  
215 SE 24th Ave  
Portland, OR 97214  
[blaine.e.palmer@gmail.com](mailto:blaine.e.palmer@gmail.com)  
503.913.5667

**From:** [Paul Frazier](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** NHA Buck-Prager Project  
**Date:** Thursday, November 29, 2018 8:07:50 AM

---

Hello,

I support this project 100% and think you should too.

We need more housing and we need it now. As we know thousands of people are moving to the Portland area all the time. They will need places to live.

We are in a housing emergency. Seattle has shown us that we can build our way to rents dropping, so let's build!

This project has been reviewed and reviewed, frankly we need to find a way to speed up the process for permits and approvals.

From housing to minor office improvements the process is taking too long.

Best,

Paul

--

Paul Frazier  
503-703-7710

**From:** [Eric Lindsay](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** proposed 148 units of affordable housing on NW 17th between Hoyt and Irving  
**Date:** Thursday, November 29, 2018 8:02:11 AM

---

To whom it may concern,

I write to you as a Portland Resident to urge you to clear the way for this development without delay. Northwest Housing alternatives has already responded (and indeed compromised) to the concerns expressed in the NWDA appeal. The project clearly is designed to fit in with the historic character of the neighborhood and has already been reduced in size (which resulted in 14 fewer affordable units: 14 fewer families without homes!). Given the exhaustive process that has already transpired and the urgent need for affordable housing across the city, it is hard to see this appeal as anything but a dilatory response by folks who would rather not have an affordable housing project in this neighborhood.

Please do not reward this impulse by allowing "process" to kill an amazing project proposed by NW housing alternatives (who has a track record of being an amazing neighbor and operator already: see the Roselyn and the Victoria Inn).

This is one of those situations that is so clearly a win for everybody in the city and the neighborhood except folks that don't want to live near affordable housing. Good for folks that need housing, a beautiful building, creates a more mixed-socioeconomic neighborhood, reduces other housing costs by increasing supply.

You got this, we, the city, will support you in giving this project the go-ahead without delay.

If you wanted to discourage future ex post facto appeals, you could do the city one better and approve the original 6-story project and take a stand for the 14 families that don't get to have a home because oh the horror of that 6th story, it will ruin the neighborhood or whatever.

Sincerely,  
Eric Lindsay  
4600 SE 33d Pl.  
Portland, OR 97202  
503-901-9339

**From:** [Doug K](#)  
**To:** [Jeffreys, Grace; Council Clerk – Testimony](#)  
**Subject:** Testimony on LU 18-187493 HRM AD appeal at Council 11-29-18  
**Date:** Wednesday, November 28, 2018 11:21:37 PM  
**Attachments:** [11-29-18 Klotz testimony LU 18-187493 HRM AD.docx](#)

---

Attached is my testimony on LU 187493 HRM AD, 1727 NW Hoyt, Item 1215 at Council tomorrow, 11-29-18.

Doug Klotz

Doug Klotz  
1908 SE 35<sup>th</sup> Pl.  
Portland, OR 97214  
Nov. 29, 2018

Mayor Wheeler and Commissioners  
1120 SW 4<sup>th</sup> Ave.  
Portland, OR 97214  
Re: Item 1215, Appeal LU 18-187493 HRM AD, 1727 NW Hoyt

Mayor Wheeler and Commissioners:

I oppose this appeal, and support the project as approved by the Historic Landmarks Commission. The design restores the Buck-Prager building and the South addition uses simple massing and fenestration to relate to Buck-Prager.

The North building's materials and detailing form a rich fabric with recesses and projecting bays, that echo many historic apartments in the district. This 5-story building meets the standard of HAB District Guideline 2: "compatible with the historic qualities of the district as identified in the Historic Context Statement".

Within two blocks are the 5-story Wickersham Apartments, and the 5-story Worthington Apartments. The Wickersham sits directly across a 60' street Right of Way from 2-story Victorian houses. The North Building will also be across a 60' Right of Way from 2 to 3 story Victorian houses. Although the Irving roadway is only 28' wide, its Right of Way, which determines building spacing, is the same 60' as all streets in the district.

This juxtaposition of tall apartment buildings and smaller houses is a characteristic of the District, as described in the Context Statement, (on page 11 in the District Guidelines), which speaks of the "buildings of various types, styles and eras". The Statement notes, (also page 11), that "single-family homes sit next to first class apartment buildings in a physical representation of the sociocultural transition experienced by one of Portland's oldest neighborhoods." Thus the North Building is appropriate for the district, and for this site.

It is also significant that this building will have 148 units of affordable housing, many for seniors who would benefit from close proximity to Good Sam hospital. I urge you to reject this appeal so this much needed housing can be built.

Sincerely,



Doug Klotz



**From:** [Brandon Narramore](#)  
**To:** [Council Clerk – Testimony; Moore-Love, Karla](#)  
**Subject:** Testimony - Case File: LU 18-187493 HRM AD, 1727 NW Hoyt  
**Date:** Wednesday, November 28, 2018 11:21:01 PM

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I am writing to offer my written testimony in support of the NW 18th & Hoyt development.

My three arguments of support are:

1.

The development is in line with other buildings in the area and does blend in successfully.

The appeal by the NWDA rests on its contention that Buck-Prager is listed on the National Register of Historic Places and the proposed additions will not “retain historic materials” and that it fails at “blending into the neighborhood”. This argument by the NWDA is simply not true. The south building retains the existing historic Buck-Prager structure and the proposed north building draws its design influences from nearby landmarks such as the American Apartment Building at NW Johnson St & 21st Ave and the Wickersham Apartments at NW Flanders St & 18th Ave.

2. The experts of the Historic Landmark Commission approved the materials and design of the development

The north building’s design and materials which include red brick, wood, and white fiberglass windows are not an anomaly but are rather totally in character with the rest of the neighborhood. The project architects used suggestions from the Historic Landmarks Commission to ensure their project “blended in” by opting to move away from their original art deco expression to the project’s now more stripped classical design. The NWDA appeal is in direct contradiction with the opinion of the experts from the Historic Landmark Commission.

3. The development will bring more equity to the neighborhood.

The construction of this project would not “disrupt” the Alphabet District’s “unique and distinct character”, but rather it provides the opportunity for working-class folks and low-income, vulnerable seniors to share in the wonderful benefits of living in a beautiful, walkable, and desirable neighborhood. Thank you,

Best,

-Brandon Narramore (Irvington Resident)



**From:** [Annette Jolin](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)  
**Date:** Wednesday, November 28, 2018 6:21:27 PM  
**Attachments:** [Letter Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt.docx](#)  
[NW Examiner 11 2018.png](#)

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Please include the attached materials in the attachments for the 11.29.2018 council hearing.

My email to Ms. Moore-Love redirected me to this site.

Thank you for your consideration,

Annette Jolin

Richard U'Ren & Annette Jolin  
1735 Irving Street  
Portland, Oregon 97209

11. 27.2018

Portland City Council  
1221 SW Fourth Avenue  
Portland, Oregon 97204-1900

**Re: Block 162 Apartments, 1727 NW Hoyt; LU 18-187493 HRM, AD**

Honorable Mayor Wheeler, Commissioner Eudaly, Commissioner Fish, Commissioner Fritz, and Commissioner Saltzman:

We have lived at 1735 NW Irving Street since 1993. In 2000 we supported the creation of the Historic Alphabet District (HAD) and have since then maintained one of the four 1884 Couch Family Investment Houses in accordance with HAD regulations. In practical terms that has meant refraining from constructing add-ons such as off-street parking hubs, roof-top porches or anything that would alter the external features of the house as it was built in 1884. It also meant living up to expectations of tourists and film crews in search of a small slice of Portland urban history. Finding such neighborhoods is not an easy task since historic neighborhoods cover just under 3% of Portland's land.

The two one-lane streets - Hoyt and Irving – that face the South and North sides of the proposed complex in this proposal contain 13 buildings with individual listings on the National Historic Register. The pictures of the buildings in the proposal neglect showing the development as it fits into this unique neighborhood. In fact, the landowners and their team have done much to pit the City's commitment to maintaining a sliver of its urban past against its commitment to the development of affordable housing. They have succeeded with this approach at the Historic Landmarks Commission (HLC). In a 5:1 vote in favor of the housing complex, the HLC commissioners cited Portland's housing needs as one of their considerations. In doing so they overstepped their authority, which does not include making recommendations based on economic policy issues relevant to the city as a whole. HLC assessments are supposed to be based on design-related issues when rulings in declared historic neighborhoods are called for. The appeal you are hearing today stems in large part from this transgression.

In evaluating our opposition to this proposal, we hope that you will be willing to consider the points above and, in addition, to look beneath the 'housing needs narrative' so intricately (and misleadingly) woven into the proposal's public presentation. In a recent editorial, Allan Classen, the editor and publisher of the *Northwest Examiner* since 1986, has done just that in a piece titled *Magic words open all doors* (November 2018, p.3; see attached). There he unravels the affordability component of the project as it is currently presented with the following words:

"The project in question, on the Buck-Prager site at 1727 NW Hoyt St., may include 148 housing units, but the possibility that any will be affordable - in either the general or technical sense - is as "thin as a soup made by boiling the shadow of a pigeon that had starved to death" [quoting Abraham Lincoln].

It is our hope that City Council will consider all aspects of this complex housing proposal and in doing so will:

1. **Reverse the HLC decision**
2. **Disapprove the proposed design**
3. **Support a compatibly scaled affordable housing unit consisting of no more than 3 stories facing the historic residences on Hoyt and 4 stories facing those on Irving.**

With kind regards,

Richard U'Ren and Annette Jolin



# Editor's Turn

BY ALLAN CLASSEN | EDITOR & PUBLISHER

## Magic words open all doors

City of Portland officials will swallow anything labeled "affordable housing."

Bureau of Development Services staff described a Portland Historic Landmarks Commission decision as approving "148 new affordable housing units."

The project in question, on the Buck-Prager site at 1727 NW Hoyt St., may include 148 housing units, but the possibility that any will be affordable—in either the general or technical sense—is as "thin as a soup made by boiling the shadow of a pigeon that had starved to death" (to quote Abraham Lincoln).

The developers and owners of the land, attorneys Tim Ramis and Mark O'Donnell, had the application filed by a nonprofit housing organization, an organization with no control over the shape or nature of the project. Northwest Housing Alternatives offers its good name as window dressing for reasons that seem curious at best.

The law partners have done everything imaginable to create the impression that



They have applied for state low-income housing tax subsidies repeatedly, even for programs for which they were ineligible, in a smoke-screen they pose as demonstrating their commitment to housing the poor.

The odds of obtaining public subsidies for low-income or senior housing could be improved if Ramis and O'Donnell did not insist on retaining ownership of the land, but that's a sacrifice too great for their bottom line and their lega-

als Ramis and O'Donnell have made for this property over the last five years said nothing about affordable housing. But now that affordable housing is the city's flavor of the day, they have somehow discovered their true mission.

Still, the developers repeat their goal of making at least some of the units affordable. That's all it took to win over some Portland Landmarks commissioners, one of whom argued against reducing the project

of affordable housing, the number of affordable units proposed for the entire building. The commissioner apparently thought every unit lost by downsizing would be in the affordable category, which assumes a level of conniving by the developers that should have been seen as offensive manipulation.

The commission clung to the affordability rationale even though the topic is not in its purview, which is about physical appear-

surrounding structures. The commission has nothing to say about rent levels or the demographics of residents.

The Northwest District Association is appealing the commission's approval, putting the case before the Portland City Council. The council has wide latitude in applying its laws and policies, and if the five lawmakers deem that the proposed three-building complex looks good and fits the neighborhood, they might ignore the finer points of design guidelines and procedures.

But if they claim to support 148 micro apartments amid a cluster of historic houses because it will create affordable homes for those in need, such a stipulation can be written into their decision. Approval could be contingent on a deed restriction mandating that the developers actually provide a share of units at set price points.

If the developers scream unfair, that they must retain the right to renege on public promises once the approval is in hand, it should not take the wisdom



**From:** [Gabriele Hayden](#)  
**To:** [Council Clerk – Testimony](#)  
**Subject:** In support of Block 162 Appartments  
**Date:** Wednesday, November 28, 2018 5:19:24 PM

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I'm writing to urge the city council to support of the affordable housing + historic preservation project by Northwest Housing Alternatives, as approved by the Historic Landmarks Commission. I was born on Glisan Street not far from this building, at a time when the area was economically depressed and my parents could afford to live there on my father's salary as a union carpenter. Even though the area has now become very expensive, a key part of the area's history--and what makes it a desirable and valuable part of the city--is the area's mix of incomes and design styles. Many of the buildings in the area are ugly, while others are beautiful. Many are large, but a few are small single-family dwellings. This mix is part of the area's visual interest. But the true interest of the area lies in its mix of incomes. Adding affordable housing to the area is a key part of preserving the history of this area of Portland. My cousin, who designs buildings for an architecture firm, lives in affordable housing also in this neighborhood, and it has allowed her to be able to raise her son as a single mother.

The Historic Landmarks Commission has already decided that this building meets all of the necessary historic and design criteria. The fact that people who live directly across from this building who happen to be well-connected can delay the building of affordable housing--and by delaying the process increase the cost of erecting this housing--is a travesty.

Please support the true history of NW Portland and deny this appeal. In fact, if there is any question at all, please allow the building to be larger and taller, whatever allows the most affordable units.

Thank you for your consideration,

Gabriele Hayden  
Portland resident