

From: [Tony Schwartz](#)
To: [Council Clerk – Testimony](#)
Subject: LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)
Date: Wednesday, November 28, 2018 4:54:52 PM
Attachments: [Steve and Laurie Caldwell - City Council.pdf](#)
[Carolyn Sheldon - City Council.pdf](#)
[Erich and Tanya Austin - City Council.pdf](#)
[1731 Milosevic letter - City Council.pdf](#)

Please find four letters sent to me. I now send them to you.

Thanks ...

Tony

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Tony Schwartz
520 SW 6th Avenue, Suite 600
Portland, OR 97204
503 505 4674
tonyschwartzlaw.com
"may The Schwartz be with you"

November 28, 2018

Steve and Laurie Caldwell
1705 NW Irving Street
Portland, Oregon 97209

RE: – 1727 NW Hoyt

Dear City Commission:

We oppose this project. We are renters and have lived here for years, and raised several children. The building on Irving is about 60 feet high - TWICE as high as the Campbell Townhouses.

This project fails to meet the Historic Alphabet District Guideline #3 as it is way out of scale, too huge, does not match the proportions of the Ballow & Wright building or the proportions of the surrounding houses. My house is about 28 feet tall at the highest point.

This program is essentially a 4-5 ½ story building. The City Council at the Type IV hearing was confronted with a 4-6 story building as a replacement should demolition of the Ballow & Wright building occur. The Council found “the proposed replacement building development is wholly incompatible with the existing urban fabric in scale, proportion, and architectural and site design. The proposed replacement building is not integrated with the existing urban fabric as it is not set back from the street, it does not feature intricate architectural detailing, and most significantly, it is much taller and more massive than the modest Landmark residential structures in the immediate vicinity.” Page 27 of Findings and Conclusions of LU 14-210073. You should know that the rejected replacement building started at 4 stories on Hoyt and Irving and then increased height to 6 stories in the middle. How is 5 ½ stories all on the Irving street at all compatible given the standard of compatibility articulated by City Council for this very site - as City Council found the most significant issue is the massing and height of any building on this site?

We play by the rules in the Campbell Townhouse Association, and now we are confronted with paying for the URM upgrade coming soon. We can't demolish our buildings, nor can we build new development to pay for a seismic upgrade. Should we consider any exterior alteration we have to go through a serious and costly legal process. In return for tending to these buildings, we expect development in the historic areas to be completed with great care to our neighborhood, even if that means the developers don't get top dollar. The proposed building is not close to being the right size or scale. It's overwhelming, and it will stick out like a sore thumb to our detriment.

Sincerely,
s/ Steve and Laurie
Steve Caldwell

Erich Austin and Tanya Loucks
1709 NW Irving Street
Portland, Oregon 97209

LU 18-187493 – 1727 NW Hoyt

November 28, 2018

Dear City Council:

We live directly across the street from the site of the proposed project. **We are opposed** to the project on the size and scale and mass alone. **We are renters** and have rented in one of the historic Campbell Townhouses for many years. We have had both of our children while living here, and they are now attending Metropolitan Learning Center just four blocks away. Our street and neighborhood are very livable and we have multiple families and children within just a two block area. One of the attractions for us and others in this area is that the buildings are in scale to the other buildings, which creates a welcoming and friendly environment. We are not Pearl District. We are the Historic Alphabet District that requires new construction to adapt to the hierarchy of compatibility. We also believe in density and have an ADU in our basement.

I know that **all** the other families in the Campbell Townhouse HOA are also opposed to the project. They feel the same way as we do – too huge for the site. We were all opposed to the first project from 2014; we are all opposed to this second/third proposal. It is still gigantic. The development proposes to build a 60 foot building across the street from our individually listed historic homes that are only about 30 feet high. My house is 2 stories high – my neighbors who live in the Victorians are in 2 ½ story high homes.

City Council addressed the size and sale of any new building on this site when it found that a 4-6 story building was “much taller and more massive” than our homes, and therefore by a vote of 4-1 denied demolition of the existing historic building. Why then are we discussing another 4-6 story building? No one is opposed to affordable housing. We opposed the market rate housing project that had underground parking with half the number of units proposed (about 80 versus 150) that was the subject of the Type IV (LU 14-210073 DM) just as strongly as we oppose this project. We adamantly oppose any project that is **completely incompatible** with the District and the 13 individually listed houses regardless of the population that the building serves. If the developer wants to build a 2-3 story building that supports an affordable housing population, we’d be all in.

This project fails to meet the standard set by City Council and does not meet the Alphabet Historic Guideline number 3 that mandates compatibility. Finally, recent studies show that 1/3 of all baby boomers and 3/4 of all millennials want walkable urban living, and most want it at a **neighborhood scale**. The North Building here is not neighborhood scale.

Sincerely,
Erich Austin and Tanya Loucks

November 28, 2018

Carolyn Sheldon
20445 NW Westover Road
Apartment 204
Portland, Oregon 97210

RE: LU 18-187493 HRM, AD – 1727 NW Hoyt

Dear City Council:

My husband – Bing Sheldon – and I bought the entire row of Campbell Townhouses sometime around 1974. Bing had been approached by a woman whose mother owned them all about buying them. At the time, the Townhouses were boarding houses and each had multiple units with sinks and hot plates. Almost immediately after completing the purchase, we sold the Townhouses individually to Dennis Wild, and Dick Sabin and Doug Macy, among others. We kept one of the Townhouses, and it had a huge “sawdust-burning” furnace in the basement with tentacles reaching throughout the entire basement area. The homes were a wreck, and we all spent many hours of hard work and “blood, sweat and tears” in rehabilitating the homes. There was great friendship and camaraderie between us all as we turned the houses around.

Given that history, I absolutely oppose this project. Outside of its lack of true setbacks, historical featuring architecture (on the South Building in particular), and parking, the sheer size of the project will overwhelm the neighborhood. It is too big, with too many units, and completely inappropriate for that space.

Bing and I never imagined in our wildest dreams that a 60’ foot building would ever be built directly across the street from our house. Indeed, one of the reasons we supported the creation of the Historic Alphabet District in 2000 was to ensure that future development would be compatible with the District as a whole, as well as the immediate buildings next to any development. It was our hope that the District would continue to support families and individuals in a high-density but low-rise neighborhood. One of the reasons that Northwest Portland is so popular now is because there are many historic buildings that are 1-2-3 stories high that are both single family and apartment residences and are not overwhelmed by Pearl District size development. People feel they are part of a community that contains schools, theaters, restaurants and a very walkable and livable space.

I also don’t understand why the owners Tim Ramis and Mark O’Donnell keep trying for another oversized project. This is the third time they have proposed a program that is incompatible for the site. This third attempt feels like they are gaming the system by recruiting “affordable housing” developers to wear the “white hat” and push through a project with the same FAR as the first project rejected by City Council in 2015. Frankly, I feel that Bing and I wear the “white hat” since we undertook an expensive rejuvenation of the Campbell Townhomes that was a catalyst for historic preservation and rehabilitation in Northwest Portland. Indeed, the Irving and Hoyt block rehab in the 70s was the start of the real comeback of all of Northwest Portland that everyone enjoys now, but they don’t remember that or know that it was very gritty and rundown in the 70s, which is why the FAR was changed in the 1980 comp plan to 4:1 in order to recruit development. Now the FAR changes have not caught up with the development pressures causing issues and headaches.

Anyway, I ask that you deny this project. Bing would ask the same. Let's continue to preserve the District and work toward striking the right balance between housing needs and established communities that currently work but could be blown out by development. We must strike the right balance. We can get the program on this site right for all. It's not now.

Sincerely,
s/ Carolyn Sheldon
Carolyn Sheldon

Dragana Milosevic – 1731 NW Irving Street

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

Portland City Council

Dear Commissioners:

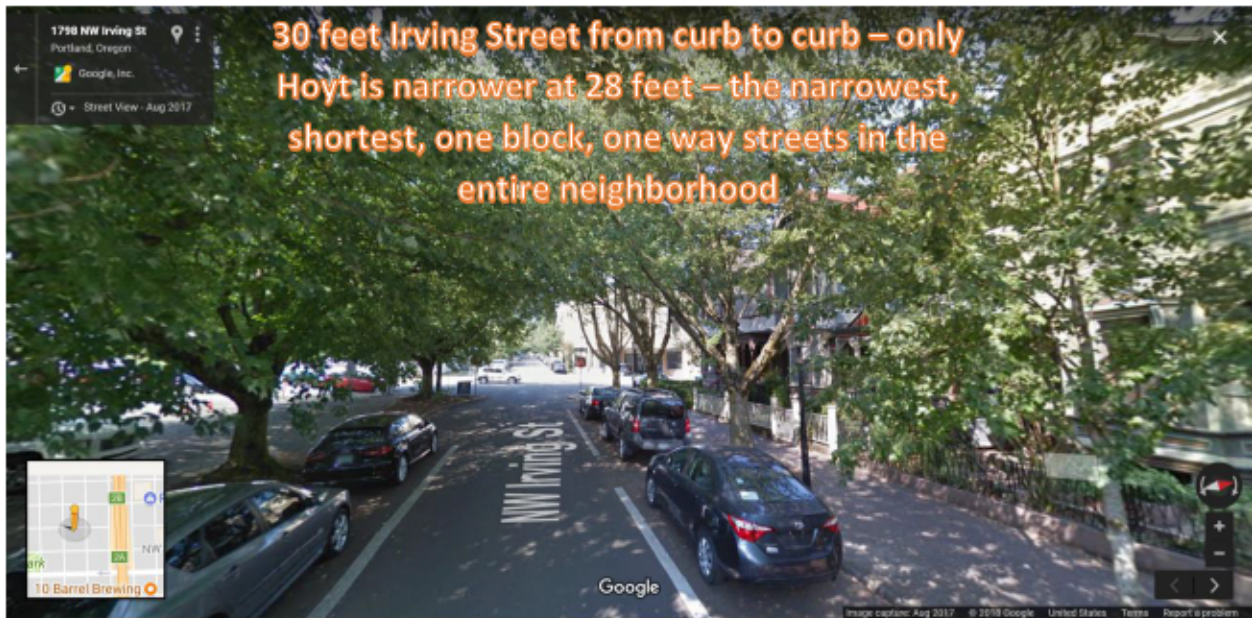
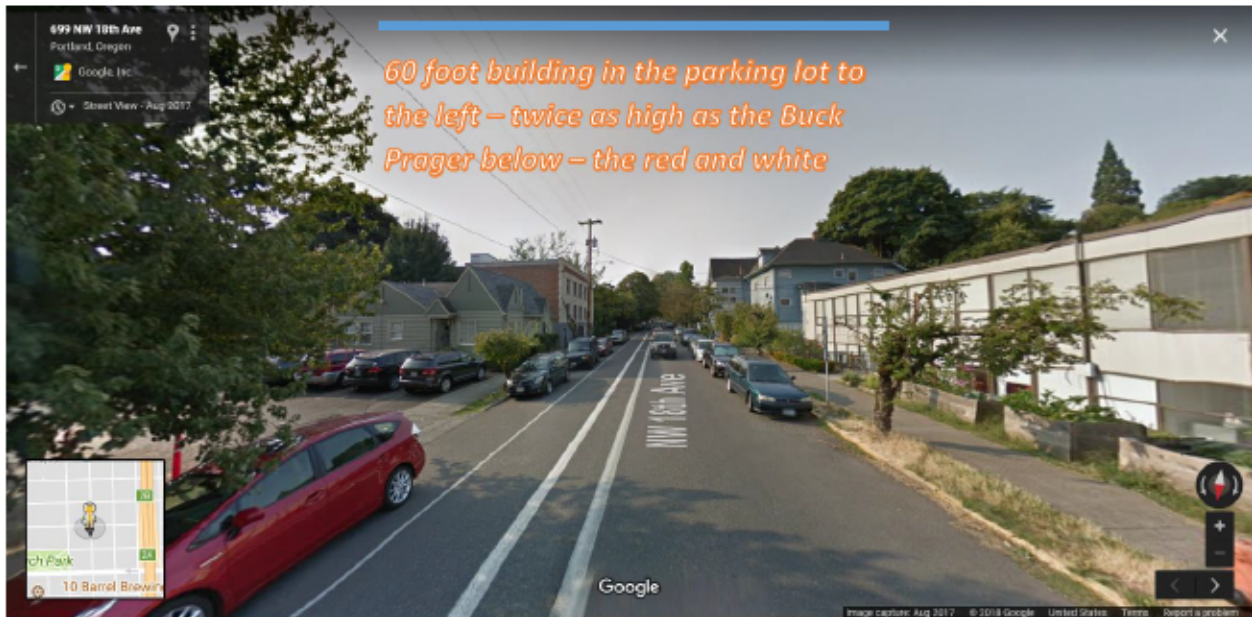
- I own a condo at 1731 Irving, and live with my husband. We share the whole house with another family – we truly live in “multi-family” housing. We are opposed to this project. It is simply overwhelming in size.
- It fails to meet Alphabet District Guideline 3 (Hierarchy of Compatibility), Community Design Guideline P1 (Community Plan Area Character) and D7 (Blending into the Neighborhood).
 - The North Building fails to relate to the scale, massing, or character of the adjacent buildings and surrounding neighborhood undermining its ability to blend with its context. There are no surrounding buildings that high in the Historic Alphabet District immediately adjacent to Landmark houses with fine grain footprints, and FARs of about 1.0
- It seems so unfair to us that the land owners are seeking again to maximize profits with an over-scaled and incompatible proposal for the same parcel over and over again despite feedback from the city and PHLC, causing lack of certainty and increased costs arising from multiple DARs, which in turn require even more units to “pencil out.”
- Because this parcel is not “right zoned” the controversy keeps coming up anew with each proposal, but it is the same parcel, same neighboring landmarks, same small grained patterns.
- City Council stated that a 4-6 story residential building was "severely out of scale" for this site in 2015. How is a 4-5.5 story building suddenly in scale? It's not.
- The street between 17th and 18th and Irving is 30 feet wide. Hoyt is 28 feet wide from curb to curb. These are the two shortest, narrowest, 1 block, 1 way streets in all of the Historic Alphabet District or in Northwest Portland. A 60 foot tall building is totally context inappropriate for this site.

Please reject this project – too big, too many stories, too many units. It does not fit in with the surrounding blocks. We support development on this site, just not this oversized program. Finally, I attach a google street maps views showing how narrow these streets are. Try and imagine a 60 foot building with a FAR of 5:1 in the north parcel. It's just huge.

Sincerely,

s/ DM

Dragana Milosevic

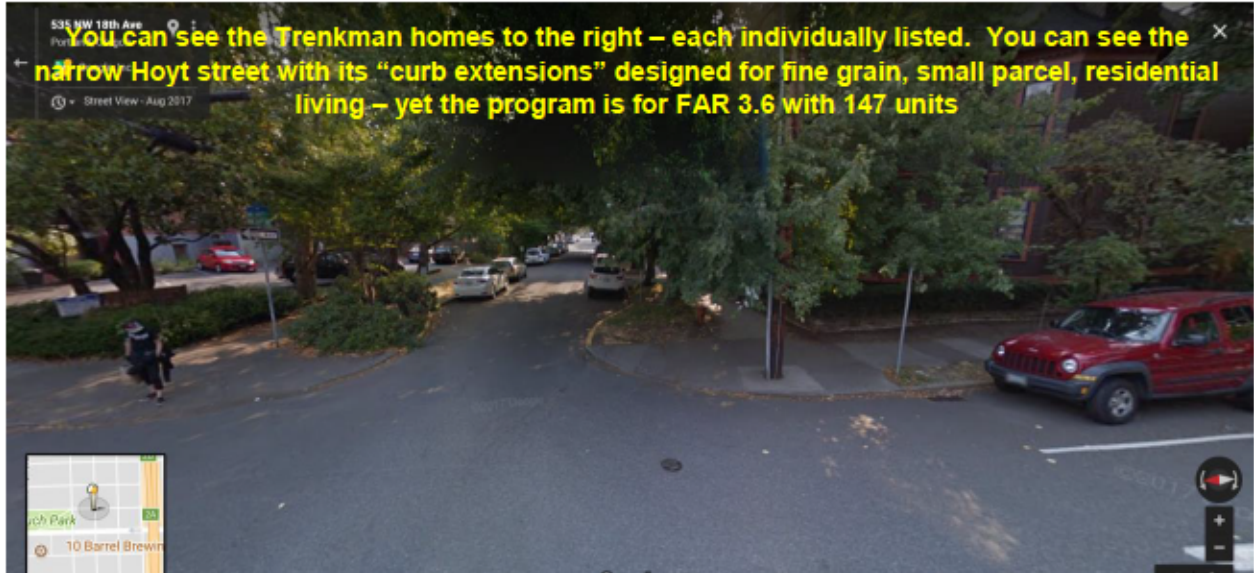


The North Building is twice as high as the surrounding individually listed buildings. Imagine a 60' FAR 5:1 building in the space below looming over the 1 story industrial building on the left (South) of Irving and the 30' houses that ring the site



Hoyt is 28' from curb to curb. These are the two shortest, narrowest blocks in all of Northwest. They were designed that way during the renovation of these historic houses in the 1970s at the request of the owners to preserve the residential character of the space. There are no other blocks like Irving and Hoyt in the State of Oregon.







The north side of Glisan which PHLC and PSC decided should be 2:1 FAR. Even though City Council disagreed, the 4:1 is not an entitlement, rather it is subject to PHLC review, as noted by Carleton Hart. Below see how the Wickersham, with a lower FAR than the proposed North Building, destroys the side trees and casts shade in its wake. The Wickersham is south of Glisan and fronts much bigger footprints than those that surround the site in question.



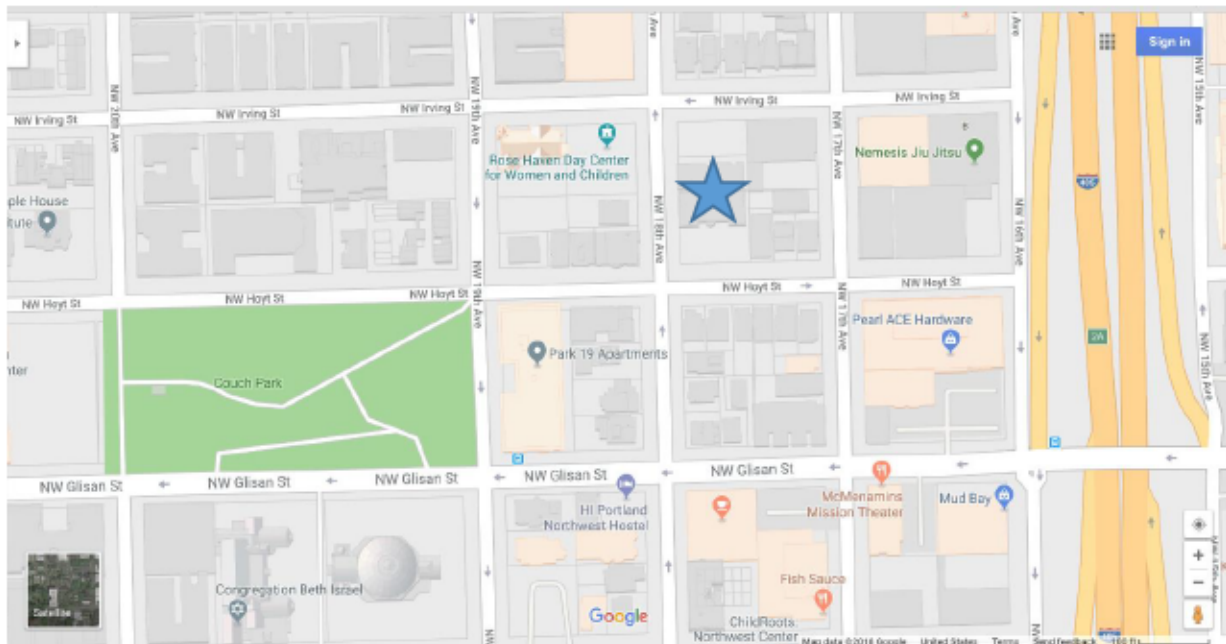
The west side frontages next to the Wickersham – large footprints with parking lots. No such footprints or building parking lots exist on Irving or Hoyt. Below the Wickersham – the two lane roads, the businesses, the bike racks. The 13 landmark and other contributing buildings that ring the site in question are bordered on 3 one way streets, although 18th has a bike lane. The Wickersham and the site in question are much different areas and are not appropriate comparisons as advocated by Carleton Hart.



The Wickersham footprint from Google Maps – notice the large lots across the street and the business that ring the site.



The site in question has multiple small parcels, surrounding the site between Irving and Hoyt and 18th. Carleton Hart's example of 5 story buildings next to 2 story footprints is totally out of place given the fine grain urban fabric exemplified here.



There is only one site like this in the State of Oregon. No other site has such narrow streets, with so many listed National Trust of Historic Places buildings.



From: [Michael Orange](#)
To: [Council Clerk – Testimony](#)
Cc: farrell@nwhousing.org; doty@nwhousing.org
Subject: NHA Letter of Support
Date: Wednesday, November 28, 2018 3:59:18 PM

To Whom It May Concern:

My name is Michael Orange. I live in one of Northwest Housing Alternatives buildings—the Roselyn Apartments—in the Alphabet District just next door to the McMenamins Blue Moon Tavern and just across the street from the former Nob Hill Pharmacy.

Just over three years ago, I was placed here by Northwest Pilot Project, who first introduced me to Northwest Housing Alternatives and told me that this was one of their properties. I am one of the disabled tenants here. Being able to live in this particular area has been one of the greater blessings of living in this particular NHA building. When I first moved in, I was still waiting for my disability hearing to be approved for some form of Social Security Disability income. I cannot walk very far without having to stop to rest because of severe degenerative disc disease. Being close to both the Trader Joe's and Fred Meyer groceries is invaluable to me, because I do not have to walk very far to get to either of them. Nearby access to the Portland Streetcar, the MAX train and several other TriMet bus lines is also an important feature of being in this part of town. I feel very lucky to have been placed here.

Before I became disabled, I worked in IT, and was accustomed to having internet access all the time. So another important blessing to count living in an NHA building is that they have seen fit to provide free Wi-Fi for their tenants. Waiting for my disability hearing for three years with no income meant that I had no access to the internet. A free wireless connection in my building meant that my smartphone could continue to operate with this connectivity after I had to cancel its data plan, and my aging computer could also connect wirelessly. When my desktop computer stopped working, our resident services coordinator Sean Farrell helped me get another one for only fifty dollars from the non-profit organization Portland Youth Builders. Sean also helped me find the funds to cover this since I had no income.

Because this NHA property is comprised of fully functioning studio apartments, I am unable to ignore the following: I have a private space for myself with my own bathroom and kitchen, and do not have to deal with the difficulties of using a shared bathroom in a hallway requiring me to carry my toiletries and towels back and forth all the time. The maintenance services here are exemplary. Having maintenance issues addressed is easy and convenient with easy-to-understand work order forms. The system they have in place for this, in my opinion, is an excellent one.

In addition to free Wi-Fi, NHA provides two desktop PCs with headphones in our basement common area with wired internet access that many of our residents use to reach important websites, play online games and watch movies and videos in private. Sean Farrell has also made possible for us an all important relationship we now enjoy with Lift Urban Portland, who provides for us an emergency food pantry, monthly food boxes for those of us with mobility issues, twice a week food bank surplus deliveries and even a cooking class in our own basement. We also enjoy having a large, wide-screen television with Comcast's Expanded Basic Cable package that has 30-50 important channels that we otherwise would not be able to afford for ourselves.

Among our tenants, we have a gentleman who used to own his own record store, another who owned and ran a fine wine distribution company that served Oregon coast restaurants with wines from local wineries, and another who was once a professional musician until carpal tunnel syndrome got in his way. We have a woman here who was, and may still be, a mentor at Transition Projects' Jean's Place women's shelter. The older gentleman below me used to be a marathon runner with ribbons and trophies to show for it that decorate his small apartment. We also have a gentleman who moved to the U.S. decades ago from the former Soviet Republic of Moldavia who excels in automotive repair and could probably build a house without a blueprint. I am personally a hungry intellectual and romantic who has enjoyed countless foreign language and art house films and documentaries at Cinema 21 just down the street. It's so close that I can walk to it without my cane.

I believe that we contribute to the culture here in the Alphabet District, and Northwest Housing Alternatives made that possible by mindfully targeting this area for one of their properties. When one of our building managers asks me how I'm doing, I regularly surprise them by saying that I'm drowning in gratitude for the privilege of living in this area and for living in a building that has the amenities that it does.

I know that combining low income housing with the higher earners and upper echelon achievers in our society can sometimes be a hard sell, but I am personally overwhelmed with how the residents in our building are proof positive that it can be done with outstanding results. And it needs to be said that NHA is a major player in successes like ours. I consider it a privilege to have the opportunity to send a message to anyone who wants to know how proud I am to be a part of what they do.

In gratitude,

Michael Orange

Wayne Michael Orange
Roselyn Apartments
424 NW 21st Avenue
Apartment 202
Portland, OR 97209

wmichaelorange@gmail.com

503-975-5171

From: [Travis Phillips](#)
To: [Council Clerk – Testimony](#)
Cc: [Wheeler, Mayor](#); [Commissioner Fish](#); [Commissioner Fritz](#); [Commissioner Eudaly](#); dan@portandoregon.gov
Subject: Support for Block 162 Apartments (LU 18-187493 HRM AD)
Date: Wednesday, November 28, 2018 3:40:37 PM
Attachments: [Phillips Block 162 Letter of Support.pdf](#)

Dear Council Clerk, Mayor Wheeler, and Commissioners of the City of Portland,

As a Northwest Portland resident and concerned community member, I encourage you to support and uphold the Landmarks Commission's approval for the Block 162 Apartments, as rendered on September 24, 2018. This development has been thoughtfully considered to be compatible in scale and style with the neighborhood, preserves and seismically upgrades the historic Buck-Prager building, and will deliver urgently-needed affordable and senior housing in a neighborhood with especially strong linkages to transportation, recreation, and services.

Although I am unable to attend the hearing on this matter on November 29, please find attached a more detailed letter of support to be considered by Council during your Thursday meeting. Please do not hesitate to reach out to me if you have additional questions.

Regards,
Travis Phillips
1974 NW Lovejoy St, Portland, OR 97209

Travis Phillips
1974 NW Lovejoy St #3
Portland, OR 97209

November 28, 2018

Mayor Ted Wheeler and Commissioners of the City of Portland
Via Council Clerk (cctestimony@portlandoregon.gov)
Portland City Council
1221 SW 4th Avenue
Portland, OR 97204

RE: Historic Landmarks Commission/Block 162 Apartments

Dear Mayor Wheeler and Commissioners Eudaly, Fish, Fritz, and Saltzman:

As a Northwest Portland resident and concerned community member, I encourage you to support and uphold the Landmarks Commission's approval for the Block 162 Apartments, as rendered on September 24, 2018. This development has been thoughtfully considered to be compatible in scale and style with the neighborhood, preserves and seismically upgrades the historic Buck-Prager building, and will deliver urgently-needed affordable and senior housing in a neighborhood with especially strong linkages to transportation, recreation, and services.

I have read the Landmarks Commission's findings and the appeal filed by the Northwest District Neighborhood Association. While I appreciate the neighborhood association's passion to ensure new development preserves the neighborhood's character and livability, I disagree with their appeal and criteria for doing so. There are a few elements of the Block 162 Apartments design that respond to the existing neighborhood character that I think are particularly notable to call out:

1. The Historic Alphabet District Design Guideline #2 identifies that new development or additions should "retain historic materials" and "be compatible with the historic qualities" of the district, but gives multiple approaches for how to achieve this guideline. From the materials used, to the consistent proportions and style of the entrances, to the cornices and eyebrows, the design of the Block 162 Apartments strikes a delicate balance of retaining historical variety and characteristics (particularly that of the Buck-Prager building) while "differentiating new from old," as described in the guideline.
2. Community Design Guideline D7, cited by the neighborhood association, suggests incorporating elements of nearby buildings into the new development's design. As described above and noted by the Landmarks Commission, by "taking cues from the existing contributing resource, adjacent properties, and the rest of the district," Block 162 Apartments successfully achieves this goal.
3. The scale of the Block 162 Apartments, while criticized by the neighborhood association, is common among other buildings in the district, including historic ones. In fact, in an adjacent block, the Worthington Apartments at 708 NE 19th Avenue, built in 1929 and considered a contributing historical resource, matches the 5-story height of the Block 162 design.

4. The location of multifamily buildings adjacent to single-family dwellings, also criticized by the neighborhood association, has also been repeated consistently throughout the district. The Worthington Apartments mentioned also exemplify this, sited next door to the Richard Koehler house, a historical landmark built in 1905 (precedent for approval should also be noted with two 5-story apartment buildings built across the street from the Richard Koehler house in 2014, one across Johnson Street and the other across 19th Avenue).

I believe it is also worth noting that the aesthetic balance between historic elements and current codes and materials is a balance that, when judged by multiple individuals with unique perspectives and tastes, will likely never see unanimous agreement. This is particularly relevant for elements #1 and 2, above. I urge you to support the Landmarks Commission's approval of this development and their statement that these buildings "will add a fine-grained scale ... which is characteristic of historic development in this district."

Please feel free to reach out to me if you have any additional questions.

Sincerely,

Travis Phillips

From: [Julie Garver](#)
To: [Council Clerk – Testimony](#)
Cc: [Trell Anderson](#); [Sarah J. Stevenson](#)
Subject: Testimony on item #1215, 11-29-18
Date: Wednesday, November 28, 2018 3:15:31 PM
Attachments: [image002.png](#)

Hello, I would like to provide testimony on the following item:

1215 Appeal of Northwest District Neighborhood Association and Tony Schwartz against Historic Landmarks Commission's decision to approve Block 162 Apartments, a five-story plus residential development, at 1727 NW Hoyt St (Hearing introduced by Mayor Wheeler; LU 18-187493 HRM AD) 3 hours requested


As an affordable housing developer who has developed both new construction and historic building projects, I would like to offer testimony in support of this project.

- 1) The Northwest Neighborhood is a great place for dense affordable housing. The area offers many amenities for residents, as well as job opportunities, services, medical and transportation options.
- 2) The housing diversity and available infrastructure helps support the development of new, dense housing. There are many buildings in Northwest that are five stories. But the variety of existing housing and building types in itself helps offset the higher density of new buildings, helping the area keep its historic feeling. In addition, the mature trees help buffer existing buildings from new buildings.
- 3) Historic buildings are costly and difficult to preserve. In fact, demolition was proposed for the historic building in this proposal by a previous owner. As a developer that has done several historic building projects, the number of units that can be included in the overall project often “makes or breaks” the capital budget and operating budget for a historic building project. We are very happy that NW Housing Alternatives is saving this historic building, and feel the trade-off of having one five story building in the project is worth it to preserve the historic building, which positively contributes to the character of the neighborhood in a way that nothing else can.

Thank you for considering this testimony.

Julie E. Garver
Housing Development Director
Innovative Housing, Inc.
219 NW Second Avenue
Portland, Oregon 97209
Phone (503) 226-4368 ext. 3
Cell (360) 635-1216
Fax (503) 226-2509
www.innovativehousinginc.com



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From: [Holly Balcom](#)
To: [Council Clerk – Testimony](#)
Subject: LU 18-187493 HRM AD, 1727 NW Hoyt
Date: Wednesday, November 28, 2018 3:15:24 PM

I'm writing in support of the proposed residential development at 1727 NW Hoyt.

The Wickersham Apts., 410 NW 18th, 2 blocks away, are 5.5 stories just like this one and are also across the street from single family Victorian homes just like this would be. The right of way on both streets is 60 feet. It has been individually listed on the National Register since 1983.

The Park 19 building a couple blocks away at NW 19th and Glisan is six stories. And it's right next to single-family homes on the same block

Also, the NW Towers just around the corner at 335 NW 19th is a full 13 stories. It has a long wait list for the affordable housing for the disabled.

I'd say in a housing crisis, any residential building that is shorter than three other established buildings in a three block radius should be approved! In fact, this opportunity should be maximized up to the original six stories requested. It is zero displacement, replaces a parking lot, and preserves the historic Buck-Prager Building.

Please uphold the Historic Landmarks Commission's September approval of this project. It fits the neighborhood which is defined by small apartment buildings like this side-by-side with single family homes.

Thank you for your consideration

Holly Balcom
2158 NE Hasley St
Portland, OR 97232

From: [Page Stockwell](#)
To: [Council Clerk – Testimony](#)
Subject: written testimony for 29 November 2018 hearing on proposed development at 1727 NW Hoyt
Date: Wednesday, November 28, 2018 3:11:42 PM

Dear Commissioners:
2018

28 November

RE: Opposition to Proposed Development at 1727 NW Hoyt Case File # LU18-187493 HRM, AD 1727 NW Hoyt (Block 162 Apartments)

My name is Page Stockwell, and I live in the Lewis Mills house at 2039 NW Irving Street, in the heart of the Historic Alphabet District. The house was built in 1916, and is listed in the National Register of Historic Places.

Over the last 20 years, I have restored the house to what it was more than 100 years ago. Construction centered on rebuilding and repair of a number of architectural features which had been removed or modified over the years. I made this effort because I was born and raised in Portland, and have a great deal of respect for our City's heritage, reflected in many ways by the Historic Alphabet District. Because I live in the District, I feel that it is my civic duty to contribute to it and to help preserve it. The District is not simply a collection of buildings, but it is a neighborhood, a fabric woven by the history and culture of our City.

The proposed development's location in the Historic District is unique because it preserves two complete block-faces (Hoyt and Irving between 17th and 18th) of middle class investment housing constructed in the 1880s and 1890s by prominent Portland families.

Placing an out-of-scale development in the middle of these preserved blocks deteriorates the historic fabric. In the past, I have written letters and testified against the demolition of the Buck-Prager building, and was pleased that permission to demolish was denied. Now the owner of the property has applied for approval of a project which does not destroy this historic building, but all but obscures it from public view by the erection of a massive structure which is incompatible with its surroundings. While the ban on demolition forestalls the creation a hole in the fabric of the neighborhood, the proposed development would create an ineradicable stain on that fabric.

Please do not approve the above referenced development as it does not meet several of the mandatory review criteria in the Community Design Guidelines and Historic Alphabet District Addendum. These criteria require new development to be compatible with historic resources on and immediately surrounding the site and consistent with the local historic context. While the historic 2½-story Buck-Prager building is being preserved, it is sandwiched between new 4-story and 5½-story structures that will tower above all surrounding historic structures which range from 1 to 3 stories. The proposed development is too massive. It is incompatible with the 'fine-grained, partial lot development pattern' in the historic district and Eastern Edge of the Northwest Plan District. The design does not incorporate the scale, details, and character of the nearby structures, including the streetcar era Buck-Prager and the Victorian cottages, townhomes and small apartment complexes. The setbacks (just 5-1/2 feet along Irving, only 13 inches along Hoyt) are minimal compared to the established residential setbacks along both those blocks. The elimination of setbacks would most likely pave the way for the elimination of many of the old trees which create a leafy context for the surrounding the historic buildings.

It seems that much has been made of the commitment by the developers to the project's provision of affordable housing, which is indeed a worthwhile objective. However, any such project should not be designed or situated in a way that constitutes a blight on a significant historical landmark. Because of such a possibility, any approval of this development should be contingent upon on a set of restrictions mandating that the developers actually provide a share of units with prices within defined limits of affordability.

A lot of work by a great many people has gone into the creation and preservation of this historic district, and to throw it away by approving this development would risk Portland becoming a laughingstock in the country's historic preservation community.

Page Stockwell
2039 NW Irving Street
Portland, Oregon 97209

From: [Dan Anderson](#)
To: [Council Clerk – Testimony](#)
Subject: FW: Item 1215 on Council agenda for Thursday, November 29, 2018
Date: Wednesday, November 28, 2018 12:50:48 PM
Attachments: [Letter to City Council 1724 NW Hoyt project 11-28-18.pdf](#)

Forwarded per Ms. Moore-Love's request

From: Dan Anderson <danderso@q.com>
Sent: Wednesday, November 28, 2018 10:52 AM
To: 'Karla.Moore-Love@portlandoregon.gov' <Karla.Moore-Love@portlandoregon.gov>
Subject: Item 1215 on Council agenda for Thursday, November 29, 2018

Dear Ms. Moore-Love:

Please find attached my letter to the City Council relative to item 1215 on the Council's agenda for Thursday, November 29, 2018. Please include my letter in the record of testimony and submissions relative to this item.

Thank you.

Daniel Anderson
1930 NW Irving – Unit 504
Portland 97209
503 222 3241

Daniel Anderson
1930 NW Irving Street – Unit 504
Portland, Oregon 97209
(503) 222 3241

November 28, 2018

Portland City Council
c/o Council Clerk
1221 SW Fourth Avenue, Room 140,
Portland, OR 97204.

Via e-mail and confirmed by hand delivery to Council Clerk

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

Dear Mayor Wheeler and Commissioners :

I support the development of scale compatible, bona fide affordable in my immediate neighborhood. The proposal for development at 1727 NW Hoyt is unlikely to deliver either of these outcomes. Because of this, the City Council should reverse the Landmark Commission's decision and DENY this proposal. The Council should take this action for two reasons:

First, the applicable approval criteria have not been met by the applicant - (specifically Historic Alphabet District Guidelines 2 and 3, and Community Design Guidelines P1, P2, D6, D7). These criteria promote compatible scale, proportions and design in consideration of the historic Buck-Prager building on the site and the historic structures immediately surrounding the site.

Second, the proposal fails to include enforceable protections that the development would indeed deliver affordable housing as that term is conventionally understood and used by industry practitioners.¹ Absent such enforceable affordable housing protections, the Council will be acceding to the certainty of an incompatible development and receiving little more than non-enforceable statements of good intentions relative to increasing the supply of affordable housing. To countenance such a situation would be to accept a policy bargain highly susceptible to "bait and switch" outcomes. The Council should not agree to such a weak and unenforceable bargain.

As an alternative to the proposal, I urge you to support the NWDA appeal including its request that any approval of development at this site be limited to bona fide affordable housing. A more detailed discussion of these concerns follows below.

¹ As commonly used by industry practitioners and policy specialists, "affordable housing" exists when a development is structured so that the targeted tenant population are households earning not more than 60% of area median family income and that the such resident tenants pay no more than 30 percent of their gross household income for rent and utilities.

My first concern is that the proposal fails to meet applicable design guidelines. More specifically, the proposal fails to reflect the scale and massing related guidance for new development as that guidance is set out the Community Design Guidelines (CDGs) and in the discussions of “Desired Characteristics and Traditions for the Northwest District” (and for the Eastern Edge sub area within the district) which are part of the CDGs.

Guideline D7 is captioned “Blending into the Neighborhood” and reads:

“Reduce the impact of new development on established neighborhoods by incorporating elements of nearby, quality buildings such as building details, massing, proportions, and materials.”

Given this guideline and its unambiguous emphasis on blending into the neighborhood by conforming to existing patterns of building details, massing, proportions, it is worthwhile to take a close look at how the CDGs actually describe the neighborhood’s existing architectural patterns and how the CDGs specifically suggest that new development ought to respond to these existing patterns.

Consider, for example, the CDG’s explicit emphasis (in Appendix J) on the maintenance of the Northwest District’s architectural scale:

“...development throughout the Northwest District should contribute to maintaining the district’s architectural scale and its fine-grain grain pattern of development. New buildings and additions that are taller than the two- to four-story building height that is predominant in the district should have upper stories stepped-back in order to contribute to a more consistent streetscape and to maintain neighborhood scale. Also, the street frontage of large projects should be divided into distinct components that reflect the district’s established pattern of partial block massing.”

The applicant’s proposal fails to adhere to this specific guidance regarding upper story step back. In doing so, it fails to blend into the neighborhood as mandated by Guideline D7.

The CDGs also include design guidance in their description of how the urban pattern of existing apartment buildings reduce facade massing impacts:

“Apartment buildings occupy no more than 100 feet of street frontage, with most facades divided into building volumes no wider than 50 feet.”

The Historic Alphabet District Design Guidelines in their discussion of “Form and Style in Multi-family Housing” discussed how the division of longer facades was usually accomplished:

“Ranging in height between one and five stories, the typical building has a conventional U-shaped or H-shaped plan.”

This kind of facade division was often accomplished through the use of comparatively wide (12 – 15 feet) and deep (30 – 45 feet) entry niches which divided the building into a “U” shape. Because these entry niches are wide, deep and open to the sky, they provide quite a substantial

division of the facade. A number of the exemplar properties cited by the applicant, including the American Apartments at NW 21st & Johnson, display just these facade division details.

By contrast, the applicant's facade division proposals are superficial and trivial. They simply fail to accomplish the "de-massing" effects so artfully supported by many older buildings in the neighborhood. As such, the applicant's proposal can not be viewed as successfully addressing the facade division mandates of Guidelines D7 and D6. They do not meaningfully incorporate the massing and proportion details of most existing, older apartment buildings in the neighborhood.

Scale relative to context matters. The overwhelming bulk and mass of the applicant's proposal is also substantially out of scale relative its immediate architectural context, the row houses and cottages along NW Hoyt and NW Irving which will face and in one case adjoin the proposed development. These row houses and cottages are arguably the point of origin for the re-animation of the historical preservation movement in Portland over the past five decades.

As such, preservation of the integrity of the immediate urban context of these modest homes deserves a measure of special deference. The scale and wholly unmitigated massing of the applicant's proposal, if implemented, would severely damage the urban context of these homes and would stand as a source of ironic mockery of the notion of responding to historic context.

My second concern is that the Council runs the risk of enabling a "bait and switch" scenario wherein the Council approves a design under the assumption that "affordable housing" will be forthcoming yet little or none is delivered because required public subventions are insufficient or unavailable. This concern could be addressed if the Council conditioned any approval on a requirement to record a restrictive use agreement concurrent with the issuance of a building permit. Such an agreement would require that all units in the property be rented to households earning not more than 60% of area median family income (as adjusted for household size) and that rents not exceed 30% of resident household income. Recorded restrictive use agreements of this kind are a customary feature in the development of bona fide affordable housing for low income households.

With a few very limited exceptions, the development of new affordable rental housing in Portland is not possible without access to adequate "gap funding". Such "gap funding" may assume several forms including the the low income housing tax credit. What all these forms have in common is that access to them is supplied by the State of Oregon or another public instrumentalities such as the City of Portland. Thus any assertion that the current proposal will provide affordable housing needs to be tested against available evidence that the required public gap funding subventions are, in fact, available to the project.

Given the dependence of an affordable project outcome on access to gap funding, there is reason to believe that assertions relative to forthcoming affordable housing at this site lack a factual foundation. This is true because, as of the date of this letter, there is no public record that the applicant has received an award of gap financing (via the low income housing tax credit or any

similar form of gap funding or other public subvention) from the State of Oregon or any other public instrumentality. In fact, the applicant was previously NOT successful in prior efforts to secure competitively awarded gap financing for this project from the State of Oregon acting through its Department of Housing and Community Services.

As described in the proposal, micro-unit “work force” housing will constitute more than two thirds of the development. Commissioners should note that the term “work force housing” is often used to distinguish the rental housing it describes as being *less* affordable than that identified by the term “low income housing”. See, for example, the definition of “Workforce Housing” included in the State’s December 2017 “Request for Applications (RFA) Workforce Housing Initiative RFA# 914-4617-17. The definition in this document reads: “Workforce Housing is defined for purposes of this RFA as homes (rental or owned) for Oregonians with incomes between 60% - 120% Area Median Income (AMI).” Low income housing, by contrast, is affordable to households with incomes not exceeding 60% AMI.

In fact, given the technical details of what constitutes “work force housing” and the current rental market for existing projects with similar unit sizes, there is a case to be made that the “work force” housing component which dominates the proposal will not be materially less expensive (or materially more affordable) to rent than existing competing properties with similar unit dimensions.

Absent evidence of a clear commitment by the project sponsor to enter into a recorded, enforceable restrictive use agreement detailing the sponsor’s commitments to the delivery of low income affordability at this site and a detailed and credible economic explanation of how such deep affordability will be achieved, the City Council would be well advised to approach claims of “affordability” and “affordability relative to the existing market” with significant caution.

If the City Council’s decision fails to incorporate the cautions noted here, the result will be a project that most certainly delivers a degree of incompatible bulk and mass which will overwhelm its immediate context. But that project may make no material contribution to increasing the supply of housing which is substantially less expensive than that on offer today from competing developments. *The City Council ought not facilitate or be a party to such a “worst of both worlds” outcome.*

Thank you for your attention to this matter.

Sincerely,

/s/

Daniel Anderson

From: [Steve Rambo](#)
To: [Council Clerk – Testimony](#)
Subject: Northwest Housing Alternatives /Resident Testimonies From The Victorian Inn.
Date: Wednesday, November 28, 2018 12:04:58 PM
Attachments: [Simons Letter for NHA.DOCX](#)
[Stockdale-Frazier Letter for NHA.docx](#)

Good Morning,

My name is Steve Rambo. I am the resident services coordinator for the Victorian Inn. The property is an historic landmark as well as an affordable housing site supported by Northwest Housing Alternatives. Please see attached testimonials written by two current residents that live at the Victorian Inn. Both residents would like their testimonials to be presented at the on Thursday November 29th at 2pm at City Hall in City Council Chambers. Thank You.

To NHA, 11/27/2018.

I've lived at the Victorian Inn for 2 years.

It's nice to live in a NHA building because of the location. The bus line is ½ block away both ways. There is a store 2 blocks away and all within walking distance. The building is secure, as long as everyone adheres to the rules.

Having this building labeled as "historical" as well as it being affordable is great for the area. We need more affordable housing communities in downtown Portland, because the demand for affordable housing is very high. I hope that issues with City's processes don't become a barrier to people having access to affordable housing.

Thank you,

Russell Simmons

Victorian Inn

Northwest Housing Alternatives

I am grateful for the Victorian Inn. It is a beautiful old building that has been my home for 3 years. This historic property allows me to live in the City of Portland.

As a city I think we need more projects like this which allows myself and others to live close to our jobs and all that city life provides.

I for one hope that the city guidelines do not become a barrier to new and historic projects that help people like myself living in the city.

Projects like this relieve the demand for affordable housing.

Thank you for your time and consideration.

Michael Stockdale-Frazier

The Victorian Inn Apartments

From: [Tony Jordan](#)
To: [Council Clerk – Testimony](#)
Subject: Item 1215: Block 162
Date: Wednesday, November 28, 2018 11:18:42 AM

Commissioners and Mayor,

I am writing in opposition to the appeal of the approval of much needed affordable housing in our city.

It's shameful that this project went through as much trouble to get approved as it did and it's a waste of time and money to have to take this one step further to an appeal.

For the last several years the city has been in dire need of projects like this.

The Historic Landmark Commission did enough damage to this project by reducing the number of units in order to satisfy subjective aesthetics. Nevertheless, even they eventually had to approve the project and now there is this appeal. It's enough.

Send a signal to the city that we will not stand in the way of good faith efforts to build housing for people who need it most. Vote this appeal down forcefully.

Thank you,
Tony Jordan
4540 SE Yamhill St.
Portland, OR 97215

From: [Jere G](#)
To: [Council Clerk – Testimony](#)
Cc: [Esther Arellano Harlow](#)
Subject: letter of support for the Buck-Prager Project
Date: Wednesday, November 28, 2018 10:44:38 AM

To Portland City Council Members:

I am writing to voice my enthusiastic support of the proposed affordable housing project which incorporates the Buck-Prager Historic Building and provides desperately needed homes for a much ignored group of citizens of the city of Portland.

I have lived in Portland for nearly sixty years & been deeply involved in historic projects; beginning with the failed attempt to save the Captain John Brown house; oh, so long ago.

I have watched the district's development and the city grow beyond it's capacity to adequately house folks who won't provide appropriately large profits for developers and regret deeply the turn things have taken. What a scar on our cityscape and conscience are the tents and shelters on every corner. We ought to be sorely ashamed!

This project was reviewed and approved by the Landmarks Commission; most of my friends view this proposal with great enthusiasm and fondly anticipate our Northwest community welcoming such a chance to supply such an urgent need.

Thank you for your anticipated support of these good efforts!

Sincerely,

Jere Grimm

1734 NW Aspen Ave

Portland Or 97210

From: [Rob F](#)
To: [Moore-Love, Karla](#)
Cc: [Council Clerk – Testimony](#)
Subject: Buck-Prager Building Testimony
Date: Wednesday, November 28, 2018 10:06:46 AM

Hello,

Unfortunately, I'll be out of town tomorrow and unable to present this in person. I'm writing to support the appeal by Ciaran Connelly of behalf of the NWDA.

I was disappointed in the Landmark Commission's decision to approve the design proposal for the Buck-Prager lot development at 1727 NW Hoyt St in its current form (case file LU 18-187493 HRM). The proposed development clearly violates Historic Alphabet District guidelines 2 and 3, and Community Design Guidelines D6, D7, P1, and P2.

It is out of scale with adjacent properties. Like my neighbors, I'd be supportive of a three story (south side) and four story structure (north side) that would fit in with other nearby structures - but that's not what's proposed.

As co-chair of the Northwest District Association's Safety & Livability committee I worry about the erosion of livability in our historic neighborhood. Please reject the current proposal and have the developers design a building that matches its historic location.

When that's been done, I'd urge council to require that affordable housing grants be actually secured for permitting to proceed, since much of the impetus for the Landmark Commission approval of the project is that it would offer additional affordable housing units. Please stipulate that requirement be actually realized for the City to allow the development to move forward.

Thank you for your consideration,
Rob Fullmer
1812 NW Hoyt St
NWDA Safety & Livability Committee Co-chair

From: blake.goud
To: [Council Clerk – Testimony](#)
Subject: Fwd: Block 162 Apartments LU 18-187493 HRM AD
Date: Wednesday, November 28, 2018 9:31:02 AM

----- Original message -----

From: Blake Goud <blake.goud@gmail.com>
Date: 11/26/18 3:59 PM (GMT-08:00)
To: karla.moore-love@portlandoregon.gov
Subject: Block 162 Apartments LU 18-187493 HRM AD

Dear Ms. Moore-Love,

Please accept this as my recommendation that City Council vote to uphold the Landmarks Commission's decision to approve 148 units of affordable housing in a high opportunity neighborhood. It is important for City Council to respect existing processes unless there is a significant public interest in overturning the outcomes. In this case, not only is there no compelling reason to overturn the current decision and indeed it is greatly in the public interest to provide more certainty for future affordable housing projects by rejecting this appeal.

Sincerely,

Blake Goud
Portland resident

From: [Teri Ruch](#)
To: [Council Clerk – Testimony](#)
Subject: Testimony from Havurah Shalom Re LU 18-187493 HRM AD - Block 162 Apartments, 1727 NW Hoyt
Date: Wednesday, November 28, 2018 9:28:43 AM
Attachments: [Letter from Havurah Shalom to Mayor Wheeler and City Commissioners re LU 18-187493 HRM AD.pdf](#)

Attached is a letter from Havurah Shalom, 825 NW 18th Ave, Portland, OR 97209 in support of the Northwest Housing Alternatives' (NHA) project referenced above. Could you confirm that you received this document?

Thank you for your consideration.

Teri Ruch
Communications & Engagement Manager
Havurah Shalom
503-248-4662 ext. 4
havurahshalom.org

Office Hours:
Monday-Thursday, 10:00 am-4:00 pm
Fridays, 10:00 am-3:00 pm



Havurah Shalom

825 NW 18th Ave.
Portland, OR 97209-2333
Tel: (503) 248-4662
Fax: (503) 248-4668

November 28, 2019

Dear Mayor Wheeler and City Commissioners,

Thank you for this opportunity to share some thoughts about the current appeal on LU 18-187493 HRM AD – Block 162 Apartments, 1727 NW Hoyt that you are considering on Thursday, November 29.

As the Rabbi and lay leaders of Havurah Shalom, a local Jewish congregation, we are writing in support of the Northwest Housing Alternatives' (NHA) project. Our community's building is located at 825 NW 18th between Johnson and Kearney, just around the corner from the proposed NHA project. We encourage you to deny the appeals, and uphold the Historic Landmarks Commission's decision to approve the requested Block 162 Apartments Historic Review (HR) with Modifications (M) and Adjustment (AD), case file # LU 18-187493 HRM AD.

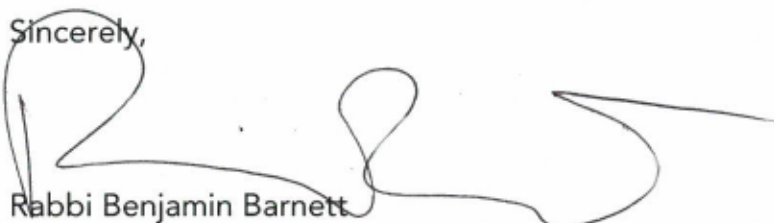
NHA has worked the past eight months with neighbors, representation from the Northwest District Association (NWDA), the Historic Landmarks Commission, and City staff to submit a planned development that meets city codes and historic preservation guidelines, and blends in with the existing character of the neighborhood. NHA already owns and operates two historical assets in the neighborhood, the Roselyn and the Victorian Inn, as affordable housing. They have responded to feedback and comments from neighbors, reducing the height of one of the proposed buildings and eliminating 14 units of affordable housing to accommodate concerns. The preservation of the Buck-Prager building, and the scale and design of the two new buildings intentionally includes elements compatible with other historic buildings in the District, and were reviewed and approved by City staff and the Historic Landmarks Commission. We hope you will support the process, deny the appeals, and allow the project to move forward.

As a faith community we promote spirituality, learning, and acts of social responsibility. Our theme for this year is *Panim el Panim*: Encountering One Another. *Panim el panim*, literally "face to face," directs us to recognize and honor how we live

in relation to one another. When we build relationships with people from whom we differ as well as those like us, striving to know the other for who they are, we grow as individuals and enhance our potential as a community. And amidst tensions in the world, the notion of *panim el panim* challenges us to perceive our interdependence and build bridges however possible.

While we respect the differing opinions of some of our neighbors about this project, we believe that our community needs additional affordable units, that the project has gone through a comprehensive review process, and it is time for you to deny the appeals, thereby allowing the project to move forward, so we can welcome the new residents of the NHA units as our new neighbors.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to be 'R Barnett'.

Rabbi Benjamin Barnett

Julia Lager-Mesulum

Co-President

A handwritten signature in black ink, appearing to be 'Ken Lerner'.

Ken Lerner

Co-President

From: [Karstan Lovorn](#)
To: [Council Clerk – Testimony](#)
Subject: Buck-Prager building
Date: Wednesday, November 28, 2018 9:21:44 AM

I'm writing in support of the Buck-Prager building development that is currently being appealed by the NWDA. I believe the NWDA is misguided and doesn't have the best interests of the city in mind. Please reject the appeal and confirm your prior approval.

Thank you.

--

Karstan L. Lovorn
503-679-0636
karstanlovorn@gmail.com

From: [Vicki Skryha](#)
To: [Council Clerk – Testimony](#)
Subject: Fwd: Appeal of Decision on 1727 NW Hoyt (LU 18-187493 HRM, AD)
Date: Tuesday, November 27, 2018 3:12:05 PM
Attachments: [Comments re Appeal 1727 NW Hoyt LU 18-187493 HRM AD 11-27-2018 V Skryha.pdf](#)
[Comments 1727 NW Hoyt LU 18-187493 HRM AD 8-15-2018 V Skryha.pdf](#)
[HLC Testimony 8-27-2018.pdf](#)

-----Original Message-----

From: Vicki Skryha <vskryha@aol.com>
To: [karla.moore-love](mailto:karla.moore-love@portlandoregon.gov) <karla.moore-love@portlandoregon.gov>
Sent: Tue, Nov 27, 2018 2:41 pm
Subject: Appeal of Decision on 1727 NW Hoyt (LU 18-187493 HRM, AD)

Please find attached my testimony in support of the NWDA appeal of the above-referenced decision and request that City Council deny the proposal.

Thank you for the opportunity to comment.

--Vicki Skryha

Vicki Skryha
1728 NW Hoyt Street
Portland, OR 97209

August 15, 2018

Historic Landmarks Commission
Attn: Grace Jeffreys
1900 SW Fourth Avenue, Suite 5000
Portland, OR 97201

RE: Comments on 1727 NW Hoyt (LU 18-187493 HRM, AD)

Dear Commissioners:

Thank you for your important work on historic preservation for the City of Portland. I am very concerned about proposed incompatible development in my neighborhood and hope my comments will be helpful. This letter reiterates and expands upon comments provided during Design Advice Reviews for the above-referenced project.

I have served on two City of Portland zoning advisory committees, attended training for neighbors on the City's zoning codes, and also worked with zoning regulations in former employment. I have been an advocate for affordable housing for over thirty years and have been both a private housing development consultant and state staff person responsible for administering funding resources for affordable housing for persons with disabilities. *I support compatibly scaled and designed affordable housing on the project site.* I know the importance of public review processes and the use of review criteria. I believe this project does not meet several of the historic review criteria; this is a problem that will impede its ability to be funded as affordable housing.

In order to analyze this project in relation to the applicable criteria, I updated a table listing several of the key review criteria and analyzing whether this project, as presented in the current application, meets them. Based on my analysis, the project partially meets Historic Alphabet District Guideline 1, but primarily fails to meet Historic Alphabet District Guidelines 2 and 3, and Community Design Guidelines P1 (Plan Area Character), P2 (Historic and Conservation Districts), D6 (Architectural Integrity), and D7 (Blending with the Neighborhood). It is also questionable whether the project meets other review criteria; for example, does a building with basement unit windows right on the sidewalk and four entrances provide sufficient safety and crime prevention features for a fragile elderly population consistent with Community Design Guideline D5 (Crime Prevention)?

In summary, the proposed development does not meet these criteria for the following reasons:

- It is too large and massive in relation to the existing historic building on the site and surrounding historic resources.
- It does not take into consideration the local historic context as explained in the Historic Alphabet District context statement; this context highlights the Victorian 'middle class investment homes' on

both NW Hoyt and Irving and the small apartment complexes and historic Scandinavian churches along 18th Avenue.

- Similarly, it does not comply with the characteristics and traditions in the Northwest District Plan; these emphasize maintaining architectural scale and a fine-grain development pattern.
- It does not include landscaped setbacks and other elements appropriate to the site's residential side streets; this is particularly significant since these side streets (Hoyt and Irving) contain a concentration of historic resources – Trenkman Houses, Couch Investment homes and Campbell Townhomes – that are individually listed on the National Register of Historic Places, and the two streets were approved as a one-way couplet with extended curb ends for the purpose of retaining a quiet, residential character.
- The proposal does not include a properly scaled addition to the Buck-Prager building. Please see the attached analysis for complete details.

I would like to highlight some issues with the South building. The City has confirmed that this building is an "addition". It is connected to an original historic resource (Buck-Prager building), and together with that building is proposed to provide senior housing. Historic Alphabet District Guideline 3 (HAD-3) is quite clear that additions must be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, with the rest of the district. Historic Alphabet District Guideline 2 also speaks to additions retaining historic materials that characterize the property. The South building is not compatible with the Buck-Prager building or adjacent resources. It is taller, blocks the Buck-Prager quoin detailing, uses significantly different fenestration, employs contrasting rather than harmonious colors, and its mass over-powers both the Buck-Prager and adjacent historic resources. Example A for HAD-3 speaks to connecting a new building to existing structures in a historically sensitive fashion. The example of Abbott Hall, addition to the historic McKenzie House, is provided. Abbott Hall is located just a couple of blocks west of the project site. I tried to find other examples of additions in the Historic Alphabet District. I found only three, including Abbot Hall. The other two are rooftop additions. Please see a second attachment where I compiled information on these three examples. Commissioners have discussed the approach of presenting the South Building as a separate building. While this is a potential approach for buildings that must comply with the Community Design Standards alone, it clearly does not seem allowable under the HAD-3 guideline.

The National Park Service has published a Preservation Brief (***14: New Exterior Additions to Historic Buildings: Preservation Concerns***) that provides excellent guidance and many examples illustrating how additions should be sensitively added to historic properties. It includes this summary:

Designing a New Exterior Addition to a Historic Building [return to top ▲](#)

This guidance should be applied to help in designing a compatible new addition that that will meet the *Secretary of the Interior's Standards for Rehabilitation*:

- A new addition should be simple and unobtrusive in design, and should be distinguished from the historic building—a recessed connector can help to differentiate the new from the old.
- A new addition should not be highly visible from the public right of way; a rear or other secondary elevation is usually the best location for a new addition.
- The construction materials and the color of the new addition should be harmonious with the historic building materials.
- The new addition should be smaller than the historic building—it should be subordinate in both size and design to the historic building.

I recently came across an award-winning example of a project that converted a historic former hospital into 60 units of affordable senior housing – St. Charles Hospital in Aurora, Illinois. I am attaching an article describing this project. In contrast to the proposed development, the St. Charles project has several features consistent with an 'aging in place' model for senior housing: (a) spacious units ranging in size from 490 square foot studios to 981 square foot 2-bedroom units (this allows for live-in caregivers); (b) project-based Section 8 rental subsidies making the apartments truly affordable; (c) wide hallways; (d) a large, attractive community room; and (e) plenty of outdoor space and landscaping. For this project, several entities work collaboratively with a mutual goal of historic preservation and compatibility; the project was a welcome addition to the community and successfully obtained a variety of financing resources. I sincerely wish the 1727 NW Hoyt development could adopt a similar collaborative and historically sensitive approach toward a successful end.

Please feel free to contact me if you have any questions.

Sincerely,

Vicki Skryha, Neighbor

Attachments: 1-Select Historic Review Criteria and Analysis, 2-HAD Additions, 3-NPS Preservation Brief 14, 4-St. Charles Hospital Senior Housing Article.

November 27, 2018

---Submitted by email to Council Clerk---

To: Mayor Ted Wheeler
Commissioner Chloe Eudaly
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Dan Saltzman



RE: Appeal of Decision on 1727 NW Hoyt (LU 18-187493 HRM, AD)

Thank you for considering the decision on this proposed development in the Historic Alphabet District. I **support the appeal of the Historic Landmarks Commission decision because the design clearly does not meet the review criteria. Please deny this proposal and ask that an appropriately scaled and designed affordable housing project be submitted in its place.**

This proposal does not meet several review criteria (specifically Historic Alphabet District Guidelines #2 and #3 and Community Design Guidelines P1, P2, D6 and D7). In summary:

- **HAD #2 (Differentiate Old from New) is not met** because the new buildings aren't set back (thereby obscuring rather than restoring character-defining quoins), do not follow the form of the Buck-Prager (existing structure) as illustrated in Example A, and is not based on the most relevant and applicable portions of the Historic Context Statement (pp. 15 and 21) where adjacent buildings are described.
- **HAD #3 (Hierarchy of Compatibility) is not met** because: (1) The new development is not primarily compatible with the original resource (Buck-Prager); it overshadows and obscures it. (2) It is not secondarily compatible with adjacent properties, many of which are landmarks; (3) it is not based on similar buildings in the rest of the District; the design is not based on District buildings that are similar to the original resource and adjacent structures, but on dissimilar buildings cherry-picked to justify incompatibly large development.
- **P1 (Plan Area Character) is not met** because the design is not consistent with the Eastern Edge's desired characteristics traditions; these highlight the 'middle class Victorian houses', 'brick rowhouses', and 'small wood frame apartment buildings' that are adjacent to the site and characteristic of the immediate area.
- **P2 (Historic and Conservation Districts) is not met** because the new development does not complement and enhance the local historic identity. Buck-Prager is sandwiched and obscured; a cluster of small historic buildings are disrupted by insertion of overly large and incompatible new buildings.
- **D6 (Architectural Integrity) is not met** because the Buck-Prager is compromised and obscured while the addition is incompatible in scale, color, details and material proportion.
- **D7 (Blending into the Neighborhood) is not met** because the impact of new development is not reduced by incorporating elements of nearby, quality buildings such as building details, massing, proportions and materials. The design does not orient windows away, step-back building bulk, use forms and materials that respect surrounding character, as described.

Affordable housing resources the applicant hopes to obtain, such as Low Income Housing Tax Credit financing and project-based rent subsidies, come with historic preservation requirements that take into account immediately surrounding properties and require an evaluation of the 6-unit apartment building that will be demolished as a result of this project.

Please see my previous testimony for additional detail on my concerns.

Thank you,

Vicki Skryha, 1728 NW Hoyt St. Portland, OR 97209

(Previous Comments dated 8-15-2018 and 8-27-2018 are attached.)

Date: August 27, 2018

Testimony before Historic Landmarks Commission

RE: LU 18-187493 - Requirements for Affordable Housing Development and Zoning in Historic Districts

I am in support of an affordable housing project at the NW 18th and Hoyt site but believe the current design falls short of meeting pertinent historic preservation requirements. Ironically, this shortfall is one factor that will make it difficult, if not impossible, for the project to successfully obtain the resources it needs to operate successfully as affordable housing. This is because the site is in a historic district, contains a contributing historic resource, proposes to demolish another potentially significant building that is more than 50 years old, and proposes to offer federally funded project-based rent subsidies. The latter item (federal assistance) results in the project being subject to a Section 106 consultation process.

Under state law at ORS 358.653 and federal law implementing Section 106 of the National Historic Preservation Act [36 CFR Part 800], projects receiving government financing must show they meet standards for preservation that include the following criteria [found at 36 CFR 68.3(a) – *emphasis added*]:

(9) New additions, exterior alterations or related new construction will not destroy historic materials, features and *spatial relationships that characterize the property*. The new work will be differentiated from the old and *will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment*.

(10) *New additions and adjacent or related new construction will 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.*

I have worked in the affordable housing field for more than thirty years and was a housing specialist/consultant for several federally funded affordable housing projects early in my career. These types of projects must follow the environmental review requirements found at 24 CFR Part 58 or Part 50. In the case of the project before you, the applicant has noted its intention to apply for project-based subsidies from the local housing authority. The regulations that clarify environmental review requirements for such projects are found at 24 CFR 986.58.¹ While the applicant may not have applied yet for this resource, the usual practice is to satisfy the environmental review requirements in advance of such an application, and in advance of design proposals that may be impacted. For projects located in the City of Portland, the City is the Responsible Entity for carrying out the Section 106 process. The City may decline to conduct this process, and it would then be conducted by the US Department of Housing and Urban Development. Materials providing further information on the Section 106 process for federal assistance, including project-based rental assistance in a newly constructed or rehabilitated project, can be found online here: <https://www.hudexchange.info/environmental-review/historic-preservation/>.² A copy of the Section 106 regulations are attached.

¹ 24 CFR 983.58 can be accessed online - see https://www.ecfr.gov/cgi-bin/text-idx?SID=1c2a7c9e9ac114058dcd0f1ed4a79afa&mc=true&node=se24.4.983_158&rgn=div8. Copy also attached.

² A helpful reference document for the Section 106 consultation process is found through a link on this page or directly at <https://www.hudexchange.info/resources/documents/Historic-Preservation-Basics.pdf>;

The Section 106 process requires identifying the project's (or 'undertaking's') 'Area of Potential Effects'. For this project, it would include, at a minimum, adjacent properties listed in the National Register of Historic Places and/or contributing to the historic district. Owners of such properties qualify to participate in the Section 106 consultation process since they are 'parties with an interest in the effects of the undertaking on historic properties'. Per the Section 106 regulations, the goal of consultation is 'to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.' I and other adjacent property owners look forward to being part of this consultation process.

While advocates in support of this project have argued against reducing its size in order to 'not lose any additional affordable housing units', the disproportionately large and incompatible size is more likely to disqualify it from funding because it does not meet applicable historic preservation criteria. Therefore, maintaining the current incompatible size is more likely to result in no affordable housing units. Alternatively, a compatibly scaled project would enable the project to be competitive for affordable housing resources that will ensure the intended residents, with incomes up to 60% of AMI, can live there.

It should be pointed out that proposed units (i.e. units that don't currently exist) cannot be 'lost'. On the other hand, existing housing on the site offers affordable housing and accommodates at least one household assisted by a Section 8 voucher. These existing units are the only units that will truly be lost if this project design proceeds. Since low-income housing financing has not been secured, there is no guarantee that affordable housing will result if the design is approved. The existing units are in a habitable building, and in these days of limited affordable housing resources, can the City afford to lose these 6 units with no guarantee that they will be replaced?³ Demolishing these units increases the cost of development because relocation expenses must be covered. It also creates displacement and hardship for existing tenants. Public policy generally discourages projects that displace people.

It is curious that there is no evaluation of the existing apartment building on the project site in the design review process. Funding applications require that this structure be evaluated for historic significance as it is more than 50 years old. The attached excerpt from the Alphabet District's application for listing on the National Register of Historic Places summarizes the significance of these 'Motor Age' apartments and notes, "This structure is classified as noncompatible and noncontributing due to its date of construction and style." Thus, while it does not fall within the primary or secondary time periods covered in the Alphabet District listing, the building has features and associations that make it of historic interest.

I and other neighbors have tried very hard to understand the complex requirements for zoning, especially how the historic resource protection overlay zone and the Plan District apply to this site. We understand that all of the existing city codes and requirements were the result of much public process and an official legislative process. We are not asking for any special considerations; we simply want to be sure that the applicable requirements are all met. I have summarized applicable zoning information for this site in a document and am attaching it so you can understand the basis for many comments made by neighbors. In sum, while the RH base

³ Also, please consider whether this project be prioritized and selected for funding in the competitive field of applications that exists for the limited resources available. It is not desirable to lose 6 affordable units in exchange for high rent development that could end up on this site.

zone outlines the allowed development parameters, these are superseded by the overlay zone and Plan District criteria.

I believe that historic preservation and affordable housing are complementary goals, and they both provide public benefits. Please consider some how affordable housing opportunities can be created when historic preservation criteria are appropriately met. The most recent annual report on Federal Tax Incentives for Rehabilitating Historic Buildings (2017) notes that 160,058 low- and moderate-income housing units have been created in historic buildings between 1977 and 2017, with 6,803 created in 2017 alone. This report can be found online at <https://www.nps.gov/tps/tax-incentives/taxdocs/tax-incentives-2017annual.pdf>; it demonstrates how historic buildings can compatibly accommodate affordable housing. Many examples of successful projects can be found at <https://www.hudexchange.info/programs/environmental-review/historic-preservation/tax-credit/>.

Thank you,

Vicki Skryha
1728 NW Hoyt

Attachments:

- 1-24 CFR 983.58 Environmental Review Requirements for Project-Based Rental Assistance
- 2-regs-rev04 36 CFR 800 - Section 106
- 3-624 NW 18th Inventory Listing in Alphabet Historic District Application
- 4-Notes on City of Portland Zoning

From: bullera@aol.com
To: [Moore-Love, Karla; Council Clerk – Testimony](#)
Subject: Comments for Appeal Hearing for LU 18-187493 HRM AD
Date: Tuesday, November 27, 2018 9:10:01 PM
Attachments: [A Buller Comments on 1727 NW Hoyt LU18-187493 Appeal 11-29-2018.pdf](#)
[A Buller comments on 1727 NW Hoyt LU18-187493 8-15-2018 updated for 8-27-2018.pdf](#)

Attached are my comments for the above referenced land use appeal hearing.

Thank you,

Allen W Buller
1728 NW Hoyt
Portland OR 97209

Allen Buller
1728 NW Hoyt St
Portland, OR 97209

November 27, 2018

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

RE: Support of Appeal of LU 18-18749 HRM, AD - 1727 NW Hoyt

Dear Mayor Wheeler and Commissioners Eudaly, Fish, Fritz and Saltzman:

I support the appeal of the above-referenced Land Use Decision and ask that you deny the proposal. The proposed project does not meet the design criteria and will place overly large new construction in the midst of a cluster of well-preserved middle-class Victorian homes, thirteen of which are individually listed on the National Register of Historic Places.

I am attaching my previous testimony and ask that you please look carefully at the pictures provided of all adjacent properties. All of these properties are consistently small scale and complement the historic Buck-Prager building and the existing one-story apartments on the project site.

The applicant inappropriately bases the design on structures that cannot be observed from the project site in an attempt to justify out-of-scale proportions – this is not compatibility! This approach is totally inconsistent with **Historic Alphabet District Guideline #3** which clearly identifies a hierarchy of compatibility:

- **first with the original resource** (2½ story Buck-Prager),
- **secondarily with adjacent properties** (all small structures up to 2½ stories), and
- **finally with the rest of the district** (where the overall pattern is consistency in size of grouped structures as shown in the pictures on the page introducing Guideline #3 – see page 39 of the Historic Alphabet District Addendum to the Community Design Guidelines).

The proposal clearly does not meet this guideline. It also does not meet Community Design Guidelines P1, P2, D6 and D7 – which speak to compatibility, scale and proportion.

As mentioned in prior comments, I support a smaller scale development of affordable housing on this site, one that has a more humane scale for the residents who will occupy the structure.

In closing, I ask you to apply the design criteria as they are intended: to preserve this locally and federally recognized historic neighborhood. Please don't destroy the fragile fabric of this cultural resource in the City of Portland.

Respectfully,

Allen Buller
NW Portland resident

Attachments

Allen Buller
1728 NW Hoyt St
Portland, OR 97209

August 15, 2018

Bureau of Development Services – Attn: Grace Jeffreys
1900 SW Fourth Ave., Suite 5000
Portland, OR 97201

RE: Comments Regarding Proposal LU 18-18749 HRM, AD - 1727 NW Hoyt

Dear Historic Landmarks Commissioners:

I appreciate the work you do in service to the City of Portland and ask for your close review and consideration of the above referenced application.

Images create powerful impressions. The drawings submitted for the 1727 development are engineered to create an impression that no one will see if the proposed development becomes a reality. I believe these images are misleading. The application also does not provide a complete picture of the actual local context. I am providing additional documentation to present a more accurate picture of the setting for this proposed project. I hope you will carefully review this documentation. I think you will be able to see that the proposed development (1) is not compatible in scale and massing to this historic residential neighborhood, and (2) proposes design elements inconsistent with the immediate historic context. For these reasons, the application does not meet Historic Alphabet District guidelines 2 and 3, and Community Design Guidelines P1, P2, D6 and D7.

If you stand before existing homes, you see one-story porches set back 10 feet from the sidewalk and narrow wall planes set back further above the porches. From the sidewalk, you cannot see the rooftops. Conceptualize how this compares to the proposed new construction that has no setback along 18th, a 5½-foot setback along Irving and a 1-foot setback along Hoyt. The buildings go straight up with minimal articulation or design. The wall plane facing Hoyt is 91 feet wide and at least 44 feet high. This design does not 'blend into the neighborhood'.

In the following pages, I have excerpted images from Design Advice Review drawings submitted by the applicant; the buildings have not changed in massing and height. I follow these excerpts with photographs of the nearby structures, including contributing historic resources and 13 properties individually listed on the National Register of Historic Places. The pages are titled: "North Elevation: cropped", "West Elevation: cropped", "West Elevation—Hoyt Street", "South Elevation—cropped," & "Northwest Irving Existing Adjacent Structures/North Streetscape".

I hope you will be able to see that the sketches provided by the applicant do not accurately represent the reality from the street. For example, please review the design drawing at the top of the page titled "West Elevation" & note the width of the street with respect to the Buck-Prager Building. The Buck-Prager Building is 57' as it faces 18th Avenue. To the right is Hoyt Street which measures 17'9" at the entrance and 27'8" mid-block. The drawing gives the visual impression that Hoyt Street is as wide as the Buck-Prager Building, but that is not the case by objective measurement and is not what pedestrians and residents will experience.

These misrepresentations continue throughout the design drawings and are visually inconsistent with the corresponding photos. The application drawings further further create a false impression by noting measurements from building face to building face. This seems unfair and distracting. The criteria discuss blending into established areas, utilizing design elements (such as setbacks), and complementing the scale and proportions of surrounding buildings. It is clear that the proposal does not meet this criteria.

There are other misleading presentations: the existing buildings are either obscured by non-existent fully grown trees, misrepresented (e.g. describing 2 story houses – some with and some without attics - as 3-story buildings), or cropped out of the drawings. A visual comparison of photographs of the three houses on the north side of NW Hoyt and the six Trenkmann homes on the south side of NW Hoyt between NW 18th Avenue and NW 17th Avenue have no compatible design elements with the proposed South Building. Further the façade of the South Building obscures the contributing historic Buck-Prager Building—and is only minimally compatible with the Street Car Era design of that existing building, the very building it should be most compatible with. The same lack of design compatibility is evident on NW Irving when comparing the Couch Investment Homes and the Campbell Town Houses with the proposed design sketches showing the North Building.

In addition to the pictures, I ask you to consider the surrounding one-way streets. Hoyt Street was actually narrowed in order to preserve the small scale residential feel of the street. Relatedly, both Hoyt and Irving were modified around the time the historic resources were accepted for listing in the National Register. The curbs were extended the streets were converted to one-way traffic. Additional attachments provide documentation of this history. The scale of the proposed buildings directly conflicts with these historic changes.

I support a smaller scale development of affordable housing on this site, one that has a more humane scale for the residents who will occupy the structure.

In closing, I ask you to honor the intent of the design criteria as they are intended to preserve this historic neighborhoods rather than destroy their fabric in the City of Portland.

Respectfully,

Allen Buller
NW Portland resident

1727 NW Hoyt Street
Portland, Oregon 97209

Attachments

North Elevation – cropped:



NORTH BUILDING

NW 18TH AVE



Above and below: Real life views of structures along NW 18th.



West Elevation – cropped (Irving Street):



NW IRVING STREET



Above: Real view of two houses along NW 18th in West elevation.



Above: Narrow street opening at NW Irving due to extended curbs, reducing street width at corner to 16 ft; distance curb to curb mid-block is 30 ft per Portland Bureau of Transportation.

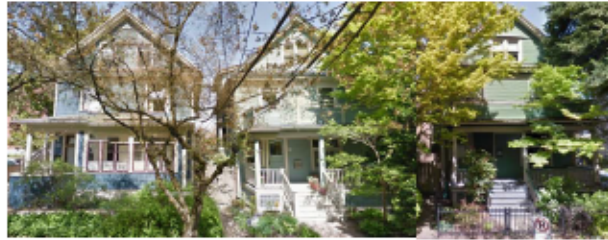
West Elevation – Hoyt Street:



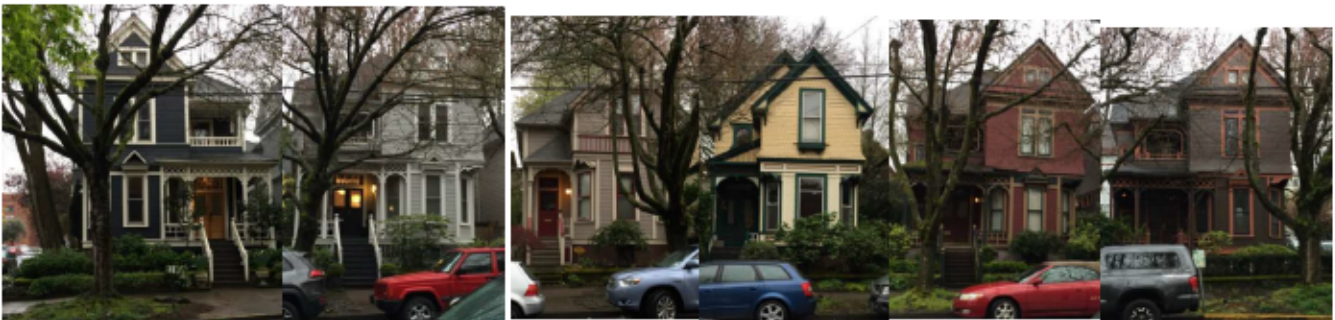
Above and below: View of 'real life' access to NW Hoyt from NW 18th (B-P bldg to left; Trenkmanns to right); street measures 17'9" between extended curbs and 27'8" curb to curb midblock. Also below: View looking west on Hoyt.



South Elevation – cropped:



Above: Buck-Prager Building and adjacent three houses on north side of NW Hoyt between 17th and 18th



Above: Six Trenkmann houses on south side of NW Hoyt between 17th and 18th



Above: View from NW 18th of existing Buck-Prager and adjacent 2 1/2 story house in background

Northwest Irving Existing Adjacent Structures:

North streetscape (stitched images):



Above: Couch Investment Homes on west half of north side of NW Irving between 17th and 18th



Above: Campbell Town Homes on east half of north side of NW Irving between 17th and 18th



Above: south side of NW Irving between 17th and 18th (one-story commercial building and 1½ story existing apartment building)

From: [J Johnson](#)
To: [Council Clerk – Testimony; Moore-Love, Karla](#)
Subject: LU 18-187493 1727 NW Hoyt Block 162 Buck Prager
Date: Tuesday, November 27, 2018 12:29:04 PM
Attachments: [JoZell Johnson Letter - LU 18-187493 1727 NW Hoyt Buck Prager - City Council.pdf](#)

To: Portland City Council %Council Clerk at Karla.Moore-Love@portlandoregon.gov
From: JoZell Johnson
RE: Case File # LU 18-187493 HRM, AD – 1727 NW Hoyt (Block 162 Apartments)
Date: November 27, 2018

Please find attached the PDF of my complete letter and attachments for the hearing this Thursday - Summary below

Please reverse the Landmark Commission’s decision and DENY this proposal. The approval criteria were not met (specifically Historic Alphabet District Guidelines 2 and 3, and Community Design Guidelines P1, P2, D6, D7). These criteria promote compatible scale, proportions and design in consideration of the historic Buck-Prager building on the site and the historic structures immediately surrounding the site. These specific criteria are called out in the NWDA Appeal.

As a direct neighbor **I do support compatibly scaled development.** I welcome affordable housing for this site if it were scaled to fit with the immediate established historic neighborhood. That is properly scaled for its context within this specific historic district neighborhood. Such a development should be no more than 3 stories on the south end and 4 stories on the north end.

Additionally, **I support the condition requested by the NWDA.** The NWDA has requested that any approval have a condition that the housing be affordable, as the applicants have said it will be. Without this condition the housing could be switched to market rate housing without any barrier. The NW needs the affordable housing, not additional market rate micro units. As the proposed project has not been able to make it through current state and federal housing funding criteria with three attempts, I am very concerned that this project will be flipped to market rate when the funding is not easily available. It strikes me as being disingenuous to their affordable housing mantra that this project has not addressed these concerns to be qualified for this funding during the process.

I am concerned that this project has been positioned to be the “optically correct” solution to get overscale housing in a historic district. This action continues to chip away at historical neighborhoods that have been called out as a national resource from behind the screen of affordable housing. We are not opposed to affordable housing but specifically overscale development. The bottom line result of these actions significantly weakens established criteria that have protected these neighborhoods for our future Portland residents.

Please find attached my previous letters and testimony to the Landmarks commission highlighting more historical detail of this unique neighborhood within the Alphabet District and concerns over the proposed design. I am pleased to be engaged with our neighbors on this project as concerned citizens, not professional property lawyers or lobbyists that represent special interests. We are the neighbors that make up the fabric of Portland.

Thank You

JoZell

jozell.johnson@gmail.com

To: Portland City Council %Council Clerk at Karla.Moore-Love@portlandoregon.gov
From: JoZell Johnson
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Date: November 27, 2018

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Thank You

JoZell Johnson

To: Historic Landmarks Commission
Attn: Grace Jeffreys (grace.jeffreys@portlandoregon.gov)
1900 SW Fourth Avenue, Suite 5000
Portland OR, 97201
From: JoZell Johnson
Date: August 22, 2018
RE: Comments for LU 18-187493 1727 NW Hoyt, Buck Prager Project

Please find my current testimony below and attached previous DRA testimony as a complete package for comments for LU 18-187493.

The blocks bordered by NW Irving to the North, NW Glisan to the South, NW 17th to the East and NW 19 to the West represent a unique neighborhood at the edge of the Historic Alphabet District. It is home to a dense group of 2-2 ½ storied Victorian Homes embodying early 1900 and before Portland architecture. Highlights include the full block face of the Trenkman homes on Hoyt, the Couch Family Investment Homes and the Campbell Townhouses on Irving and the Scandinavian Churches off 18th and 19th. Unlike NW 18th continuing to the North, this specific neighborhood was not gutted by the industrialization of the NW in the early 20th century. The new larger apartment buildings that are currently springing up to the North replace Industrial buildings and are creating new neighborhoods that did not exist before. This specific proposal seeks to bring those taller structures into this established neighborhood cutting it in two and overshadowing the historical buildings. Development is welcomed on this parcel if it keeps within the historic overlay recommendation. That in simple terms is lower profile buildings that fit into the neighborhood fabric.

The rally cry that keeps coming up to push the larger footprint beyond the Historic guidelines is “Affordable Housing”. As a neighbor, I can say in confidence affordable housing is welcome but we ask that it follow the criteria laid out by existing codes. Several points here. This is not a change that the owners and developers would not have been aware of from the start. It is frustrating the proposal changes response to get around those existing criteria. Additionally, the affordable housing seems to be on soft footing because to achieve their rental goals, some level of governmental funding is needed. This proposal has been submitted jointly once and separately each for the senior and work force housing for a total of three opportunities. Each time the proposal has not made it past the criteria review to be actually reviewed for funding. If this was truly the affordable housing opportunity as it would be presented I believe that it should at least have the criteria in place to allow it to be reviewed for funding. I support the NWDA Request that criteria be attached to the proposal that limits the building to affordable housing to not allow market rate housing to be the focus if funding is not secured.

This project also presents challenges to the neighborhood livability.

- **No Drop off zones and Limited loading zone** - Surrounded by one way streets on all external sides, there is not a way to drop off or pick up the residents without stopping or blocking traffic. This means stopping in the bike lane on 18th or completely blocking the street on NW Hoyt or Irving. This would be additionally compounded by moving in or deliveries to the buildings. Carving out loading zones in the street compromise an already existing limited parking environment.
- **Street Trees** – Current design does not call out any street trees on NW 18th because of utility lines. This means no tree canopy to disrupt the oversized building on a street that is 28 feet or less on the intersection entries. Putting street trees around the entire development is needed to help fit into the neighborhood.

- **Basement Apartments** - Basement Apartments close off the street engagement and may attract crime. This is not just rhetoric. Just this week in Nextdoor Northwest District Digest (an electronic neighborhood page) a peeping tom incident is outlined. Taken directly from the post: "I filed a police report about a peeping tom late last night on NW 18th. Please keep an eye out for suspicious behavior (creeps looking in windows). If we all look out for each other, maybe we can stop or at least deter this kind of behavior. I have no physical description to offer other than male, based on voice. He spent a while at my window making a concerted effort to look in and making lewd noises and increasingly graphic sexual comments. This escalated to sexually threatening comments while I pretended to sleep. I did not engage him, and he eventually wandered on. Everyone please stay safe and if you're sleeping with windows open because of the summer heat, make sure they're as secure as possible." As this real time example calls out - the basement level apartments have a reason to be closed both visually and securely creating spaces that cannot interact with the sidewalk.
- **Extremely Limited Setbacks in current plans**– With the proposed buildings built to within feet of the property line. Traditional setbacks frame the Victorian flare of the streets and then are cut up badly by the oversized building. Pushing back the building to allow continuity would help with the integration into the neighborhood.
- **Limited Bike parking** – The requested reduction in general area bike racks push bikes into the individual units reducing an already tight personal living floorplan. Please consider supporting general area bike areas to support retaining as much living space as possible.
- **No parking** - Beyond landmarks scope is the lack of parking. Zone K is currently oversubscribed. This proposal is adds over 150 tenants who with even a limited number of cars will result in parking frustration for both old and new neighbors. If this truly is a non car development then consider no permits for this proposal as discussed in the Parking SAC.

I call upon the Commission to step back from the political messaging led by the "affordable housing" pitch to look at the architecture/design and how it fits specifically into this specific neighborhood footprint – not those further away. This area is a unique resource for Portland showcasing a historic glimpse into the past – when it is gone there is no replacing it.

Thanks

JoZell Johnson

To: Historic Landmarks Commission
Attn: Grace Jefferys
1900 SW Fourth Avenue, Suite 5000
Portland OR, 97201
From: JoZell Johnson
Date: April 16, 2018

RE: Comments for DAR #3, EA 17-269490

Key Point Summary:

1. The development under review is proposed at **the edge of the Alphabet Historic District** – This area is key to the district as a whole and subject to continual development approach from the Pearl and other areas. **It is important to protect the edges as well as the center of the “map” and not chip away at the overall integrity of the historic district** – your role as the landmarks commission helps protect these valuable historic resources. It is my opinion that this development compromises the neighborhood’s continuity of Victorian buildings and early Victorian apartments, disrupting the overall historic fabric.
2. The Historic Couch blocks 161 -163 were **the first blocks developed in NW Portland as rental only income**. They represented investment opportunities for the leading citizens to create rental opportunities for the emerging middle class.
 - a. The historic Couch family even invested in block 161 creating a west block face of 8 identical homes that they rented out. The remaining homes is unique for Portland overall – they include Couch Family homes (4 homes remain of confirmed 8) Campbell Townhouses (6 homes in one footprint), the Trenkmann houses (8 homes of confirmed 8), the Earl Apartments (8 homes in one footprint), the Morrison Homes (4 homes of believed 8) and the William Walker Apartments (4 homes in one footprint). **These structures represent the highest concentration of historic Victorian rental homes remaining in Portland.** (please refer to handout for clarification of home placement). The development proposed is out of scale with these historic homes and breaks the historic continuity of the blocks that were originally built from the 1890s to 1910 supporting the growing population and then the 1905 Exposition. **To often we identify historic old mansions that deserve preservation, this neighborhood is unique because it is specifically historic rental property with a largely migratory population and middle to lower class occupants.** We should defend the historic integrity of these homes just as we would if the stately mansions would have survived which originally graced the 19th corridor.
3. The immediate structures to this proposed development constitute 2 and 2.5 story Victorian homes. **The proposed 4 and 5 story structures tower over these much smaller buildings and break community structure.**
 - a. The closest 4 story building is one block away at the corner of 19th and Irving (Worthington Apartments 1920’s) and represents the later period of the district timeline. This building is significantly smaller than the proposed North 5 story structure.
4. **The six blocks immediately abutting the proposed development represent a unique density in Victorian home development in the historic alphabet district.** This development drives a wedge in the middle of the two iconic rental home developments of Couch Houses/Campbell townhouse and the Treckman Houses by building two larger and monolithic structures flanking the Buck Prager building. This effect could be mitigated by rightsizing the development to reflect the neighborhood homes.

- a. When the Couch addition was laid out in the late 1890's, it was comprised of two block sizes. The smaller block sizes east of 19th represented 200X200 blocks and were suggested to be broken into lots of 50X100 size equaling 8 lots per block. The blocks to the west of 19th were much longer as exemplified by Couch park and were suggested to be broken into 18 lots of 50X100. Early in development, the blocks that were called out for investment development were built to a much higher density. "Block 161 on which the Irving street homes are located, appear to have been the earliest densely built block on Nob hill with 18 dwellings in 1894. Early Residents were laboreres or person of other semi-professional occupants" (Quote taken from Historic National Registry Application for the Couch Family Homes) Block 163 (Treckman homes and Earl Apartments) was developed to include 23 homes. **This density is at over 2X the proposed lot/houses per blocks at the time of Victorian development and is unique to this immediate neighborhood.** There are other dense developments individually sprinkled in the alphabet district but not the concentration exhibited here. Local developer, Rick Michaelson recognized with unique factor and helped restore the neighborhood in the 1970's moving 4 Victorian homes back into the 4 footprints of those destroyed by industrialization of the nw in the mid 1900's.
5. **The revival of NW Portland started within these blocks.** Allowing oversize development within its boundaries flies in the face of the historic development that was initiated here and helped create the Portland environment that attracts visitors and new residents as well.
 - a. NW Portland was at a tipping point for losing its historic face in the 70's. The Campbell Townhouses banded together in the early 1970's led by recognized historians such as Bing Sheldon, placing the Campbell townhomes on the National Register in 1973 and returning all homes to individual ownership from run down boarding houses. The Treckman homes were slated to be destroyed for a medical center development when local business men joined together, bought the homes and initiated rejuvenation which resulted in their submission to the National Registry in 1977. The Couch Investment homes followed in 1979 and the NW tradition of renovation was born beyond the individual hobbyist. This action culminated in the creation of the Historic Alphabet District in 2000.

This research has endeared me even more to my neighborhood and my home. Because of the history of rentals of these properties I am the longest resident in my home and feel it is important to protect our historic heritage in the fabric that makes up Portland. We welcome affordable housing and housing supporting aging in home – but at the scale appropriate in size with the neighborhood.

Thanks

JoZell Johnson

Map of direct neighborhood PDF attached
Historic Home Summaries of the neighborhood PDF attached

Map of Direct Neighborhood

Review of the Historic Homes in the area of NW 17 to NW 19 and from Glisan to Johnson. A unique example of investment homes for rental and early scandanavian churches.

Key
 Blue diagonal lines - Alphabet District
 Blue dotted line - Alphabet District boundary
 Blue land lots - historic or contributing (red dots = individual historic or contributing buildings)
 Yellow land lots - non contributing structure
 Green highlight - focus of DAR/development



Couch Family Investment Homes (1)



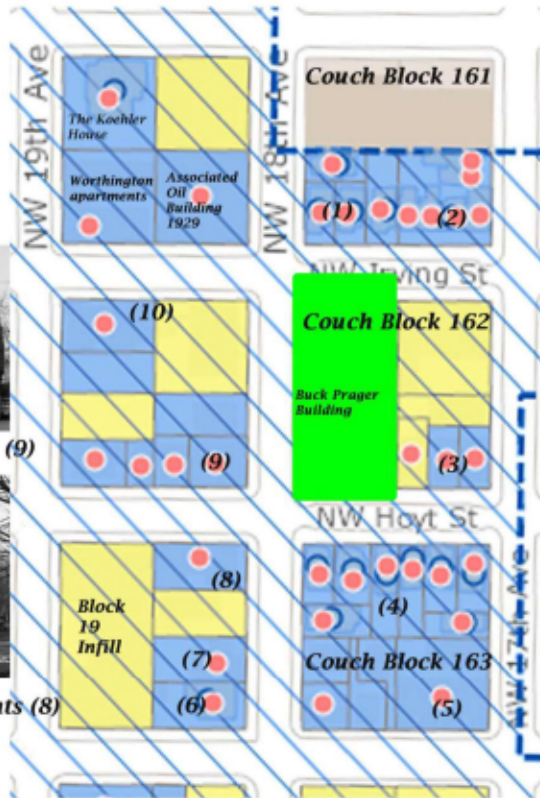
First Immanuel Lutheran Church (10)



Danish Methodist Church (9)



William Walker Apartments (8)



Campbell Townhomes (2)



Morrison Investment Homes (3)



Trenkmann Houses (4)



Earl Apartments (5)



Landenberger Home (6)
 George Cummings Home (7)

To: Portland Landmarks Committee
From: JoZell Johnson, Neighbor/Property Owner at 533 NW 18th, Portland OR
Re: Development at 1740 NW Hoyt (Development around the Buck Prager Building)
Date: February 26, 2018

Again, thank you for your consideration of neighbor input, I am updating my testimony of Jan 7, still in opposition of the structures as currently proposed. Elements in my original letter are relevant in this testimony.

As a long time resident of the neighborhood I have seen many changes (in current Victorian home since 1995 and overall neighborhood since 1992). What has been consistent is the historic neighborhood feel of our enclave of historic homes from NW 17-18 avenues and NW Hoyt to Irving streets. This was especially true when our neighborhood gained historic status of the Alphabet district. Directly in the blocks adjacent to this proposal, we have one of the highest if not the highest concentration of historically listed and contributing homes in the City of Portland. We took a hit with the construction of Park 19 blocking our flow to Couch park and disrupting the westward historic district feel. I believe that the proposed of oversize construction would drive an "architectural wedge" in the middle of our existing neighborhood causing further destruction of the historic look/feel. I believe development is needed and welcome the opportunity of housing for working wage or low-income residents. But, I do not welcome these specific structures that are out of scale and out of balance with the immediate neighborhood.

Setting the stage for the out of scale size of this project I would like to call out the RH zone requirements which is 1 unit per 1k square feet footprint. Minimum for this site would be 20 per this algorithm. The RH description then goes on to highlight that 80-125 units would be built per acre – so prorated this site would be assuming 37-60 units on this site. This does not take into account other overlays such as the historic district. Comparing recently built properties also shows they have fewer units on roughly half block sizes – Park 19(2008: 550-550 NW 19th Ave) has 103 units on 6 floors, Cordelia Apartments (2014: 777 NW 19th av) has 135 units across 2 5 story buildings, the Addy (2014: 1222 NW 18th Ave) has 105 units with a 5-story building. The density proposed by this project eclipses these relatively new apartments built since 2008 and completely blows out the historic apartments built in this area (example Wickersham early 1900s with less than 40 units). Density is very important for the growth of Portland, but NW Portland is already one of the most densely developed neighborhoods and with this addition it significantly stresses the infrastructure and livability. I have heard the response that it is "affordable housing" and needs to be this dense. I question this response and show illustrations that the developer DHA has built comparable foot print buildings in Lake Oswego and Orenco station with significantly few units (45 at both sites). I believe that the design is being driven strictly by the revenue goals of the site not the support of the targeted populations.

With specific feedback to the design, the revised design still significantly overshadows the homes immediately adjacent and across the street from the structure and frankly the historically contributing Buck Prager Building itself. I believe that the south building, which is structured as an addition to the Buck Prager building should be an extension of the building not overshadowing by a floor. And the distinct north building should be within one floor of the Buck Prager not towering over it out of context. This would go a low way with fitting in with the immediate neighborhood and not calling to comparisons from across the greater NW. As an immediate neighbor of both Park 19 and this proposed development I will be cut off from the greater neighborhood and the fragmentation of the historical district will have reached a tragic tipping point.

Looking at simple design elements,

- Set backs are important also in maintaining the integrity of the direct community – specifically on the Hoyt and Irving Streets. All houses are set back from the property lines and accessed by steps – in effect putting in an approximate 8 foot setback. With the proposed designs they are building up to the property lines on all side. This is another evidence of oversized building on a tight lot. Combine this with basement units and you subconsciously drive people from these street areas rather than encourage a traditional walking street.
- This project design overall adversely impacts the livability of these streets. With only limited loading zones on the back of the building requiring planning for pulling into then backing out, I believe human nature will be to block the one-way streets while loading and unloading people, and cargo. On 18th this will affect at least the bike lane significantly and on Hoyt/Irving it will stop traffic completely. With the high density of these units I would ask for some type of loading area that are not limited to the pull in pullout on the back sides be considered because of the volume of use.

For non-architectural elements I would like to call out the lack of parking. I believe this may be beyond the purview of the Historic Landmarks Committee but it will also influence the livability of the neighborhood. The Proposed development takes away over 30 units currently in use in the neighborhood. With the over 125 (conservative #) units proposed I believe that 30-50% of the people will have cars. If we take the low end of 30% that results in 40 cars added to the mix and then we have the 30 cars that were using the lots and we are at 70 cars being added to the street parking status. In Zone K where this resides is at present oversubscribed and cannot “absorb” this level of influx. Where will these cars go??

Thank you for your consideration

JoZell Johnson, 533-535 NW 18th Avenue

Historic input from Jan 7, 2018

Thank you for your consideration for neighborhood input for this project. I am a neighbor residing directly across from this proposed development. I oppose the proposed design based on concerns that

- 1) The applicant claims the development will be focused on affordable housing for elderly or workforce tenants but does not have identified funding for that purpose; and
- 2) Additionally, the oversized proposal of the structure in comparison to the neighboring historical homes, disrupts the historic fabric within the Historic Alphabet District and does not comply with many review criteria as outlined in the staff memo to the commission.

I am supportive of appropriately scaled affordable housing. With regards to this project's affordable housing status, I have spoken directly to Jill Chen, Housing Portfolio Finance Coordinator, Portland Housing Bureau, and have confirmed that Northwest Housing Alternatives (NHA) submitted a proposal that was not approved in August 2017 for development of affordable housing units. At this time PHB has no plans to fund the proposal and there is not an active review for future funding at this site. The NHA has not been specific on other funding that has been secured for this site. So, at the moment, the discussion of affordable housing is an aspirational goal, not a funded project. Based on these facts, I do not believe that the proposal should be considered under the special consideration given for affordable housing in this process. As of now there is not a limitation that these would units would not shift to market rate units if aspired funding is not secured.

In regards to size the 7 and 4 story proposed structures, they will tower significantly over the largely historic or historic contributing buildings surrounding the site. The historic overlay limits the height on the RH housing based on compatibility with the local context. Additionally, the applicant has claimed that the zoning of the property east of the site (at the corner of NW 17th and Irving) justifies excessive height. However, new zoning on the adjacent property was changed in 2017 to EG1 (General Employment) zoning which limits it height to 4 stories and 45 feet. This results in the proposed north structure at ~70 feet being double the height of the neighboring family houses and over 20 feet over future development that could be proposed. The southern building is more in line with the neighboring buildings but with the structure built to the south property line with no setbacks, it disrupts the pattern of setbacks existing for the houses directly to the side and across from it. People walking toward the development from the west will immediately notice the protruding building, and this will detract from the historic nature of this almost complete side street of historic single-family homes. Setting back the front of the south elevation consistent with adjacent set-back would be greatly beneficial.

Please find following a visual example an oversized development the Park 19 structure currently overshadowing existing structures breaking up the neighborhood access to Couch park (South West corner across from the development under review). This proposed structure would drop a similarly disruptive structure in the middle of one of the most historically preserved blocks in NW Portland.



Example: Park 19 Apartment building overshadowing historic homes at Southwest corner of 18th and Hoyt

Additional design and scale concerns with of the Proposal is as follows:

1. The request for no off-street loading zones or pull outs for accessibility to these structures should not be allowed given that there are single lane streets (Hoyt and Irving) on the sides and a one-way street with a bike lane on 18th Avenue. This large structure on the smaller road infrastructure will result in congestion and regular disruptions for pedestrians.
2. Reduction of bike racks in a building that has no parking allocations for tenants should also not be allowed. This is counterintuitive in supporting “car-less” building.

As I was doing research on the affordable housing requirements I discovered additional challenges this project will face in obtaining financing for affordable housing

- 1) The proposal involves demolition, adding much expense to an affordable housing project.
- 2) The project involves a leasehold for the land; this is assumed to be at a competitive market rate and will increase operating costs once constructed.
- 3) The demolition of the six-unit, existing apartment building will involve displacing current tenants who will be eligible for relocation cost assistance; this adds to the overall cost of the project.
- 4) As demonstrated by community response, the proposed height and lack of compatible scale and design conflict with requirements for the local historic context and is likely to result in appeals and other legal actions that will increase expenses for this project.

In the respect of time I have not gone through these issues in depth.

Thank you
JoZell Johnson

Parsons, Susan

From: Marshall Steeves <marshallsteeves@gmail.com>
Sent: Tuesday, November 27, 2018 6:36 PM
To: Council Clerk – Testimony
Subject: Fwd: Block 162 Apartments LU 18-187493 HRM AD

----- Forwarded message -----

From: Marshall Steeves <marshallsteeves@gmail.com>
Date: Tue, Nov 27, 2018 at 5:25 PM
Subject: Block 162 Apartments LU 18-187493 HRM AD
To: <karla.Moore-Love@portlandoregon.gov>

Dear City Council,

I am writing to express my strong support for the proposed building at NW 18th and Hoyt. There is a severe lack of affordable housing around the NW area and, as an owner, desire to see more diversity and density in the area -- I personally am quite fed up with all the vacant parking lots and seeing very little housing go in its place. I am excited to see a beautiful new residential tower proposed for the area which will also add jobs with the retail space and I believe Block 162 compliments the area with it's brick facade.

I am in full agreement and support for the project and would like to help push it forward in any way I can.

Please let me know how I can continue to show support for the project.

Best,
Marshall Steeves

Parsons, Susan

From: Brad Hochhalter <oboebrad@yahoo.com>
Sent: Tuesday, November 27, 2018 10:14 PM
To: Council Clerk – Testimony
Subject: Testimony for Buck-Prager Building Hearing

To Whom it may concern and the City Council,

The proposal up for a hearing before you regarding the Buck-Prager building is one we know well and have heard in various forms for the last 4 + years. In the recent Landmark Commission decision my wife and I gave testimony to deny the proposal. As in other iterations for developing that site, the approval criteria for Historic Alphabet District guidelines were not met by the proposal. Specifically guidelines 2 and 3 and Community Design guidelines P1,P2, D6 and D7 concerning scale, proportions and and considerations for the historic Buck-Prager building and others surrounding the site.

We have a home in the adjacent block along NW Glisan backing up to NW Hoyt between NW 17th and 18th and we love the neighborhood. The height and mass of the proposed development would dwarf the homes on the Irving and Hoyt sides and, as with every other proposal in the last 4 years, it is "penciling out" only if they cram too many units in a building that is too big, has no parking accommodations and does not enhance the neighborhood at all.

We have also heard that the building is supposed to have significant affordable housing units. We feel affordable housing is a noble goal, however, the current proposal has no guarantee to meet this goal. Therefore, we support what the NWDA has requested; that any approval have a condition that the housing be affordable, as the applicants have said it will be.

Please consider the precedent that might be set by the proposal that violates the very historic district guidelines that make the neighborhood and Portland livable. If this proposal is approved despite not meeting the criteria for the historic district it will open the door for more inappropriate developments and weaken the foundation for preserving our historical heritage.

Thank you,

Brad Hochhalter
Siri Shetty

1721/1723 NW Glisan St.
Portland, OR 97209

Parsons, Susan

From: Jacob Gellman <gellman@bren.ucsb.edu>
Sent: Tuesday, November 27, 2018 1:42 PM
To: Council Clerk – Testimony
Subject: Block 162 Apartments LU 18-187493 HRM AD

Hello,

My name is Jacob Gellman and I am a PhD student in Economics and Environmental Science at the University of California, Santa Barbara.

I hope that City Council upholds the Landmarks Commission's decision to approve 148 units of affordable housing in a high opportunity neighborhood (NW 18th and Hoyt).

Portland is in an affordable housing crisis, mainly driven by restricted supply. The solution to the affordable housing crisis is to increase the supply of housing. Projects like the one at NW 18th and Hoyt will ease the problem by adding to the supply of affordable housing.

Affordable housing is a region-wide problem, having effects that ripple through to other parts of Portland and to the greater metropolitan area. It is thus troubling that individual wealthy neighborhood groups can block or delay projects with region-wide significance, which is what the Northwest District Association and appellant Tony Schwartz are attempting to do.

In my past research on housing I studied the effects of land use regulation on housing prices. One of the most significant ways that regulatory restrictiveness increases housing prices is through delays in the permitting process. Delays like the one caused by the Northwest District Association set a precedent and cause uncertainty among developers. Increased regulatory hurdles like the one at hand will undoubtedly be priced into future development decisions in Portland, exacerbating the affordable housing problem.

I grew up in Vancouver, WA, where my parents still live, and I spent several years living in Portland, studying at Portland State University, and working in the city. Someday I would like to move back to the area. The matter of affordable housing is of concern to past, current, and future residents of Portland.

Please uphold the Landmarks Commission's decision to approve 148 units of affordable housing at NW 18th and Hoyt.

Best regards,

--

Jacob Gellman
PhD Student
Bren School of Environmental Science & Management
Department of Economics
University of California, Santa Barbara

Parsons, Susan

From: Brad Baker <bradmbak@gmail.com>
Sent: Monday, November 26, 2018 3:34 PM
To: Council Clerk – Testimony
Subject: Fwd: Block 162 Apartments LU 18-187493 HRM AD

Hello,

Please uphold the Landmarks Commission's decision to approve 148 units of affordable housing in a high opportunity neighborhood. Portland is in the midst of a housing crisis and we need all the homes, especially affordable housing, as we can get.

Thanks so much for your time!

Brad Baker
2301 NE Rodney Ave, Portland, OR 97212

Parsons, Susan

Subject: FW: Testimony agenda item 1215 case file LU18-187493HRM,AD1727 NW Hoyt Block 162 Buck Praeger

From: Michael James <mhjames@gmail.com>
Sent: Monday, November 26, 2018 10:52 AM
To: Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Subject: Fwd: case file LU18-187493HRM,AD1727 NW Hoyt Block 162 Buck Praeger

CASE FILE LU18-187493HRM,AD 1727 NW Hoyt BLOCK 162 Buck Praeger apts.

Subject: case file LU18-187493HRM,AD1727 NW Hoyt Block 162 Buck Praeger
To: <karla.moore-love@portlandoregon.gov>

Commissioners and Mayor Wheeler,

I urge you to reject the Landmark Commission decision approving the project at 1727 NW Hoyt. As a resident of NW Portland, I strongly support affordable housing in my neighborhood and am incensed that this sham project serves only to line the pocket book of the developers and landowners, with no guarantee that any affordable housing units will be created.

1. The Landmarks Commission approval was outside its purview.
Having testified before the Landmarks Commission on this issue before, it was apparent that the Commission did not base its approval on the criteria within its purview. Clearly the proposed project does not meet the approval criteria as its scale, design and proportion are wildly incompatible with the surrounding historic homes on Irving and Hoyt which are neighborhood treasures.
2. The project has no guarantee of providing affordable housing and should be rejected unless any approval is contingent on a deed restriction specifying the exact number or percentage of affordable units and guaranteed prices or price range of those units.

This project has currently designed has NO guarantee that it will provide affordable housing. The lawyers who are the property owners and developers have tried numerous approaches to develop this property with no success. Casting their current proposal as offering "affordable housing" certainly mesmerized the Landmark Commission. I hope the Council will look more closely at this for what it is--a sales job with no guarantee of providing affordable units.

Ms. Michael James
NW Portland

Moore-Love, Karla

From: Steve Connolly <skcnerima@icloud.com>
Sent: Tuesday, November 20, 2018 12:31 PM
To: Moore-Love, Karla
Subject: Case number LU18-187493 HRM, AD
Attachments: Historical Review, city council, 92018.pdf

Ms. Moore-Love,

Please distribute the attachment to whomever is participating in this decision.

I'm disappointed that I cannot attend the hearing in person.

Thank you.

Steve Connolly
Tokyo



Steve Connolly
1917 NW Hoyt
Portland, OR 97209
(503) 501-1181
skcnerima@icloud.com

November 20, 2018

City Council
c/o Karla Moore-Love, Council Clerk
1221 SW 4th Ave., Room 140
Portland, Oregon 97204

Re: Case number LU18-187493 HRM, AD

City Council members:

I have so many objections to this project and its current design that I scarcely know where to begin. Having had a unit since 1980 facing due east on the third and fourth floors of Hoyt Square Condominiums, at 19th and NW Hoyt, I have a dog in this fight. May I remind you that when I bought my unit in 1980, a fast food taco drive-in was proposed for the site at 19th and NW Hoyt. Enlightened neighbors and an enlightened city council were successful in thwarting that proposed eyesore and the proposed was replaced by the Hoyt Square Condominiums, which I am confident will someday be granted historical preservation status because of its unusual and elegant architecture.

I am, however, resigned to the property owners/developers/architects whining so stridently and for so long that everyone concerned finally caves in from exhaustion and permits them their only motive: profit. That said, I feel compelled to outline my objections anyway.

Portland urban planning (and the influence of the University of Oregon) has long been recognized and admired all over the world for its inspired protection of its historical neighborhoods. The neighborhood under discussion is the very heart of that historical preservation effort in NW Portland. The lovingly-restored and coddled small residences on Hoyt and Irving between 17th and 18th provide two of the most breathtaking strolls of

any city on Earth, and are paradigms of what enlightened neighborhood alliances and public agencies can do in protecting these exquisite reminders of our architectural heritage. To sacrifice this, or any similar neighborhood, for any reason would be a reprehensible travesty.

- The scale of the buildings at both ends is *far too large* for that neighborhood and for the Buck-Prager Building itself. Far too large, never mind that Historic Alphabet District Guidelines 2 and 3, and Community Design Guidelines P1, P2, D6, and D7 were not met.
- The new buildings would dwarf and overshadow the surrounding area. The developers are merely employing the time-worn bait and switch ploy: propose six stories, and if that's rejected, drop to five, and hope for no fewer than four. Throw in a sudden social concern for low-income individuals. Six, five, and even four stories are too many for this site. The architects know that; if they don't they should find other professions. The neighbors and the neighborhood associations know that. One quick glance by any sentient individual on Earth would know that.
- The buildings would deposit an additional *200 people within one city block* of some of the densest population concentrations in Portland, with the attendant activity: visitors, noise, trash, conveyances, traffic, crime, and pets.
- Immanuel Lutheran Church, *directly across 18th from the proposed monstrosity*, provides a food and clothing distribution service for low-income and homeless people. There are daily queues along 18th between Hoyt and Irving, and rounding the corner halfway up Irving between 18th and 19th, in order to take advantage of this long-established and valuable service. Consequently, there is a regular trek to that service, and an easily identifiable parade back and forth from Couch Park. I've counted as many as 27 people in that queue at one time. The proposed development would dramatically exacerbate the existing Church activity, and re-identify the area from a historical neighborhood to a center for low-income individuals.
- In my many walks around the NW neighborhoods, my non-empirical observation has been that there always seems to be units for rent in the older, classic apartment buildings. Furthermore, I was recently told by a resident of one those classic buildings that new construction is applying downward pressure on the rent prices of the older,

classic buildings. I wonder if that downward pressure on rent prices might eventually result in insolvency for those classic old buildings. The specter of decreasing rent prices, the need to modernize to compete, and the looming earthquake refitting costs must be a developers' dream: insolvency for those classic buildings, and the opportunity to tear them down and throw up some nondescript replacement.

The Portland Historic Landmarks Commission and the City Council are the last bastion of protection for our citizens and our neighborhoods. The news media and the sound bite public apparently worship the mantra of *growth*. Growth at any cost. "Oh, no, growth is down." "Only 2% growth is projected for next year." Growth, growth, growth, growth, growth. Where does it stop? The world population as of July, 2018, is 7.6 billion. How many are enough? Twenty billion? Forty billion? Malthus was right in 1798. Why are we not as enlightened as he was?

How many for Portland? If growth is the mantra to which you pray, why not jettison the Landmarks Commission and allow high rises to be built everywhere? Developers and less scrupulous architects would be overjoyed, the tax dollars would roll in and the result? Even more growth. Victor Steinbreuck saved Pike Place Market in Seattle, and he and Richard Haag, Gasworks Park. They could tell you what you already know: add a freeway lane and it will alleviate traffic congestion for awhile, until drivers catch on and start using it more. Then you have to add another freeway lane, ad infinitum. Seattle is living and barely breathing proof.

There are many of us who do not subscribe to the mantra of unfettered growth: the mantra most likely to guarantee our self-destruction as a species.

Do not allow this behemoth to be foisted on us, the owners who live in that area, and on the owners of the immediate surrounding historical landmarks that have been so beautifully and dutifully restored and preserved.

Kindest regards,

Steve Connolly
Ed.D.
Portland & Tokyo

Moore-Love, Karla

From: Steve Pinger <steve@sspdev.com>
Sent: Friday, April 27, 2018 7:56 PM
To: Wheeler, Mayor; Commissioner Fritz; Commissioner Eudaly; Commissioner Saltzman; Commissioner Fish
Cc: Moore-Love, Karla
Subject: RE: the Landmarks Commission
Attachments: HLC 2018 04 16 - EA 17-269490 DA - 1727 NW Hoyt St .pdf

including attachment:

From: Steve Pinger [mailto:steve@sspdev.com]
Sent: Friday, April 27, 2018 4:36 PM
To: 'mayorwheeler@portlandoregon.gov' <mayorwheeler@portlandoregon.gov>; 'Amanda@portlandoregon.gov' <Amanda@portlandoregon.gov>; 'chloe@portlandoregon.gov' <chloe@portlandoregon.gov>; 'dan@portlandoregon.gov' <dan@portlandoregon.gov>; 'nick@portlandoregon.gov' <nick@portlandoregon.gov>
Cc: 'karla.moore-love@portlandoregon.gov' <karla.moore-love@portlandoregon.gov>
Subject: the Landmarks Commission

Mayor Wheeler and Councilors

I am forwarding the attached letter of testimony from the NWDA in regard to the proposal at 1727 NW Hoyt that is currently before the Landmarks Commission. We are forwarding our testimony in response to comments that were made by Alan Kessler to Council at Wednesday's morning session, at ~18:00 in the transcript.

We state in our testimony that the proposal has failed to comply with the compatibility requirements for scale and massing, relative to its immediate neighboring buildings, of the Historic District overlay. We also stated that whether or not there is affordable housing included in this proposal is irrelevant to the approval criteria and the interpretation of the guidelines that the Landmarks Commission is charged with.

This position is consistent with comments made by Commissioner Fritz on Wednesday, but we are highly concerned by two other aspects of Mr Kessler's testimony:

1. **First, the ongoing characterization of the Landmarks Commission and of neighborhood associations as impediments to the creation of affordable housing.** The Landmark Commission's purview in NW Portland is inherently complicated by the conflict between the density provisions of the RH and EX zones and the compatibility requirements of the Alphabet Historic District. These conflicts, unfortunately, were not resolved during the CC2035 Plan process, and will, no doubt, continue to elicit further conflict and confusion. Furthermore, the reason that this proposal has been in design review for 5 months (so far) is because the proposal continues to not comply with the requirements of Title 33, not that the Commission's review is unnecessarily lengthy or onerous. Moreover, the NWDA has long advocated for affordable housing, from its inception in the 1970s, and explicitly through its 2003 *Northwest District Plan* that actively supports the creation of affordable housing through specific bonus provisions offered in the plan and reflected in Title 33 ordinance.
2. **Secondly, the personal nature of Mr Kessler's focus on the individual commissioners,** particularly Commissioner Chung, whom he continues to attempt to discredit even after his filing of two ethics complaints about Ms Chung, both of which were rejected by the Oregon Government Ethics Commission. The commissioners are endeavoring to do the job that they are charged with, and the NWDA asks that they be more strenuously supported by the Council in that effort, just as we would ask that they would be challenged when there are legitimate questions about their ethics and functional behavior. In this instance, there is no such legitimate question, but rather the conflation of issues and confusion about what the Commission's actual role is, and troublingly coupled with a seemingly inappropriate level of disinformation and distortion that has no useful place in our City's efforts at solving this quite real issue.

best regards

Steve
Steve Pinger
on behalf of the Northwest District Association



Northwest District Association

April 16, 2018

Historic Landmark Commission

1900 SW 4th Avenue
Portland, Oregon 97201

RE: EA 17-269490 DA – 1727 NW Hoyt St.

Dear Commissioners:

The NWDA Planning Committee reviewed the current proposal in our meeting last week. We offer the following comments for your consideration during the 3rd Design Advice for the proposal on April 23rd. The following Guidelines are relevant:

Alphabet District Guideline 3: *Hierarchy of Compatibility*
Community Design Guideline P1: *Community Plan Area Character*
Community Design Guideline D7: *Blending Into the Neighborhood*

1. These Guidelines are not met by this design. In particular, we emphasize Alphabet District Guideline 3, which calls for development to be, first, compatible with the historic resource on the site; second, to be compatible with the adjacent neighborhood, and finally, to be compatible with the district. While this proposal considers development elsewhere in the district, it neglects compatibility with both the resource and the adjacent neighborhood.
2. It is the Committee's position that the height of both the North and South buildings, as they face Hoyt St and Irving St, need to be reduced to comply with the compatibility requirements of the historic district overlay, specifically:
 - a. The South Building to 3 floors or 35 feet;
 - b. The North Building to 4 floors or 45 feet for at least 30 feet south from the north property line;
3. The south building has no relationship to the historic resource (the Buck-Prager Building) in size, scale, design, style, or materials. While the Commission has been discussing this as a separate building, the Zoning Code regulations *clearly classify it as an addition*, and so the lack of any relationship to the Buck-Prager Building is inconsistent with the Guidelines.
4. Finally, we understand that there was discussion at the 2nd DAR of the need for affordable housing. The NWDA and the *NW District Plan* support affordable housing throughout the neighborhood and on this site. There is no assurance, however, that this project will receive funding and ultimately provide affordable housing. More importantly, affordable housing is not one a design review approval criteria. Proposals including affordable housing are subject to the same approval criteria as any other proposal. Affordability and the objectives of the historic district are not mutually exclusive.

Best Regards,
Northwest District Association Planning Committee

Steve Pinger
Member, NWDA Planning Committee

the NorthWest District Association is a 501(c)(3) tax-exempt organization

2257 NW Raleigh St. Portland Oregon 97210 503 823 4288 northwestdistrictassociation.org