



Outlook

LU 25-007018 HRM - Irvington Town Homes - 1806 NE 12th Ave

From Watkins <craghouse55@gmail.com>**Date** Fri 5/2/2025 12:52 PM**To** Nielsen, Benjamin <Benjamin.Nielsen@portlandoregon.gov>

1 attachment (2 MB)

LU_25_007018_HRM_RFR-APR18- Irvington Town Homes.pdf;

Hi Ben

As requested, the ICA LUC have the following comments on the attached proposal. These are summary comments, more detail will be provided with testimony for the May 19 Landmarks Commission hearing.

In a number of instances, the narrative does not reflect information on the drawings i.e. FAR calculations, ADU addition, setback requirements, deletion of basements, etc. The LUC requests that the narrative is reissued following alignment with the drawings. For the purposes of this submittal, comments will be directed at the drawings only and the RFR.

Summary

The ICA LUC does not support the proposed development in its' current form and it rejects completely the requested setback modifications. We have met with this Owners representative and architect several times over the past two years. An initial "townhomes" concept with street-facing double car garages was dismissed out of hand by the LUC. Although a proposed "two-structures" approach could have been one means to reflect, respect and support its' context and overall historic district character, the sheer size, massing and scale of this proposal makes it completely unsuitable at this single lot location.

Specific Code and Approval Criteria Comments**1. Setback Modifications**

PZC Section 33.846.070 states: *'The review body will approve requested modifications if it finds that the applicant has shown that the following approval criteria are met:*

A. Better meets historic resource review approval criteria. The resulting development will better meet the approval criteria for historic resource review than would a design that meets the standard being modified; and

B. Purpose of the standard.

1. The resulting development will meet the purpose of the standard being modified; or

2. The preservation of the character of the historic resource is more important than meeting the purpose of the standard for which a modification has been requested.

In the LUC's opinion, the applicant's requests to reduce the NE Schuyler St. setback from 5' 0" to 0' 6" and the NE 12th Ave. setback from 10' 0" to 7' 6" are both unacceptable and the setback modifications should not be granted. The requested setback modifications do not in any manner meet or fulfil any of the above criteria. This proposed building(s) in its' current siting, size and massing is simply too large for this lot and in no way respects or responds to its' site-specific context or the historic district pattern and character as a whole. Any siting, setbacks and massing should support the historic district character and, at the minimum, conform to the minimum setback requirements as required by current code. Our opinion and recommendation is that the overall building(s) footprint and massing be reduced.

2. PZC Section 33.846.060.G: Other Historic Approval Criteria

Subsection 8: Architectural compatibility. New additions, exterior alterations, or new construction will be compatible with the massing, size, scale, and architectural features of the landmark or contributing resource and, if in a district, the district as a whole.

The proposed building(s) is not compatible with the massing, size and scale of the historic district defining patterns or the character of the district as a whole. The LUC believes this proposed development demonstrates specifically no architectural compatibility within the context and character of the historic district at this site location. Nearest and adjoining this site in all directions are multiple contributing structures. They reflect and embody the historic district character in terms of massing, size and scale (and setbacks). The massing, size and scale of this proposal in no manner attempts to acknowledge, reflect or respond to this historic district's urban context in any way. Although there are stylistic nods to architectural features of contributing structures found within the district, they do not begin to achieve architectural compatibility in the absence of a reduction of the massing, size and scale of the proposed building(s).

Subsection 10: Hierarchy of compatibility. New additions, exterior alterations, or new construction will be designed to be compatible primarily with the landmark or contributing resource and, if located within a district, secondarily with contributing resources located within 200 feet and, finally, with the rest of the district. Where practical, compatibility in districts will be pursued on all three levels.

The ICA LUC believes that the proposed development clearly does not meet the hierarchy of compatibility criteria or simply reflect either an understanding of its' specific context or in any way attempt to incorporate any principles of massing, size and scale that acknowledges, respects and/or supports the overarching and prevailing patterns and character of the historic district. This proposed development makes no attempt to achieve, or any kind of compelling case, that a hierarchy of compatibility has been sought or addressed. The massing, size and scale of this building(s) neither reflects multiples of developments from the period of significance nor draws upon the precedents of multi-family contributing structures found within the historic district. Specifically, this proposal in no way attempts to recognize, engage with or achieve some form of compatibility with contributing structures located within 200 ft of the proposed development.

Conclusion

The LUC has, in conversations and exchanges with the owners representative and architect , offered to assist them in creating a design that could meet their needs and wants while equally reinforcing, supporting and enhancing the character of the neighborhood. This current proposal does none of these things. The LUC has recommended previously and advocates still for the following:

1. Setbacks that, at a minimum, conform to code and, more ideally, in some way acknowledge and engage with the context of the contributing structures siting to this site's north and east.
2. Reduce the overall height of the proposed development by one story. The massing and height (especially as reflected in the current concept) of the building(s) are out of scale with the immediate context and, generally, with the character of neighborhood as a whole.
3. The drive court, fronting on the longest street front, will serve as a "dead zone" and negatively impact the quality and character of the pedestrian experience.
4. The inclusion of a recently added non-viable ADU feels like a completely lost opportunity to provide an actually desired occupancy type in the neighborhood.
5. Retaining the Ground Level for mostly two-car/unit automobile parking feels like a lost opportunity for this development to capture more occupiable and interactive spaces at this level in lieu of what has now been identified as "shop".

Regards

Irvington Community Association, Land Use Committee