

February 27, 2015

To: Portland Planning and Sustainability Commission
Portland Planning and Sustainability Bureau

Re: Request to Adjust RH Zoning in Alphabet Historic District

We appreciate the opportunity to comment on the Proposed Comprehensive Plan. We reside in a home listed as a historic landmark in the National Registry of Historic Places and are committed to doing our part to preserve the historic heritage of one of Portland's oldest neighborhoods. Our home is in the Alphabet Historic District and Northwest Portland Plan District. The restrictions of the overlay historic and district zoning are inconsistent with the maximum allowances in the base RH zone. This creates false expectations for massing and building height and can be confusing. We request your consideration of the following:

1. The current zoning designation of "RH" (high density residential) seems inappropriate for our single family home and other smaller scale historic properties in the same vicinity. The Campbell Townhomes, located nearby at NW 17th and Irving, are zoned "R1". We therefore request that our home, and the other similar properties be considered for zoning re-classification to a less dense zone such as "R1".
2. The current maximum allowances for the RH zone result in disproportionately large buildings that are out-of-scale with the historic community. Please consider reducing the Floor Area Ratio in the portion of the Alphabet Historic District zoned RH from 4:1 to 2:1. A 2:1 FAR is more consistent with the massing of existing historic buildings. Height allowances should be correspondingly reduced to correspond to roof heights of historic landmarks and buildings listed as contributing historic resources. Development recently allowed (e.g. Park 19 at NW Glisan and 19th and the Cordelia at NW Johnson and 19th) is now acknowledged as too tall and incompatible with the adjacent and nearby historic structures. [See BDS Staff Report, Historic Landmarks Commission correspondence and City Council hearing findings related to the proposed demolition of the Buck-Prager Building at 1727 NW Hoyt (LU 14-210073 DM).]
3. The interplay of base and overlay zoning in the Alphabet Historic District is complicated. The restrictions and incentives related to historic preservation in City Codes are not well publicized. Please considering developing an informational guide that explains how the various provisions apply to properties in the historic district.

There are other collections of single family and small multi-family historic properties located throughout the Alphabet Historic District that would similarly benefit from these recommendations. It is important to preserve smaller residential properties within the historic district, maintain the local character, and reduce redevelopment proposals that adversely impact the historic area. Many of the older historic properties provide more affordable and spacious living alternatives than the new development; they help preserve the housing mix that contributes to a healthy and diverse community.

The Alphabet Historic District Nomination (on page 7) addresses the inconsistency of high density residential zoning with historic properties. The RH zoning is noted as incompatible with preserving the historic single family homes.

In summary, City Codes already provide protections for historic resources, but there is much speculation for potential development in NW Portland. Making adjustments to the current RH zoning would more honestly represent the type of actual infill development allowed and reduce misunderstanding.

Thank you for your consideration.


Vicki Skryha and Allen Buller
1728 NW Hoyt Street, Portland OR 97209
vskryha@aol.com