



City of Portland Historic Landmarks Commission

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Planning & Sustainability Commission
1900 SW 4th Ave #7100
Portland OR 97201

Dear Planning & Sustainability Commissioners,

The Historic Landmarks Commission (HLC) would like to offer some comments on the Mixed Use Zones Project that is before you. We thank BPS staff for briefing the HLC on 10/26/15 and 2/22/16. We understand these zoning changes will affect some commercially-zoned properties in the Ladd's Addition Historic District, Irvington Historic District, South Portland Historic District, Eliot Conservation District, and Piedmont Conservation District, as well as landmark properties within the MU zone. Please accept the following comments, which expand upon the comments that were provided to BPS staff during the briefings:

- The HLC is very supportive of the proposed zoning regulations and map changes that would limit building height to three stories in older "main street" areas that have concentrations of streetcar-era storefront buildings. We believe this change will allow for the retention of older buildings that are "little h" historic. These resources are not designated, but contribute to the livability and character of streets like SE Hawthorne, SE Belmont, NE Alberta, and others. Curtailing the development potential on these properties will help discourage the trend of demolishing and replacing these smaller structures with larger developments.
- The HLC supports provisions that provide more flexibility for parapets to exceed height limits above the roof. This added flexibility will allow for increased architectural variety, which is desirable in our MU-zoned commercial districts. Parapets will also be able to serve a screening purpose for rooftop equipment more easily.
- The HLC has concerns about the proposed changes to building articulation/massing. While we support the general idea of breaking long (200') building lengths in order to achieve more compatible articulation, the proposed solution of a 20' x 20' gap could result in undesirable outcomes. In commercial neighborhoods with an urban street wall condition, these gaps would result in a less compatible result and may be out of scale with the grain of the surrounding development. The continuity of the pedestrian landscape and strong, consistent retail presence is important to maintaining urban vibrancy. The HLC therefore supports a solution that allows for visual breaks in long façades, perhaps by a change in materials, a noticeable change in the pattern of the openings, and/or changes in cornice or parapet height.
- The HLC continues to be strongly opposed to the limiting the TDR radius to 1 mile and again requests that 2 miles be retained in the code. The one-mile distance is insufficient and will add an unnecessary barrier to the use of this preservation tool by lessening the pool of sending and receiving sites that can partner for a FAR transfer. While we are in favor of new provisions that allow contributing resources in historic and conservation districts to participate in this transfer program, as well as the new code's treatment of FAR calculations that should help bolster the use of this tool, we see no reason to take a step back by

limiting the transfer radius. The maps on the following page show a one- and two-mile radius drawn around an example contributing historic resource at 13th and SE Hawthorne. The map illustrates the relatively limited number of sending sites within that one-mile radius. While the two-mile radius has the potential of sending development to a different part of the City, it provides many more opportunities for this preservation tool to be put to use.

With thank the PSC and the staff at BPS for all your hard work in this important component of the Comprehensive Plan. We hope that you will seriously consider the few important comments that we have on these code amendments.

Sincerely,



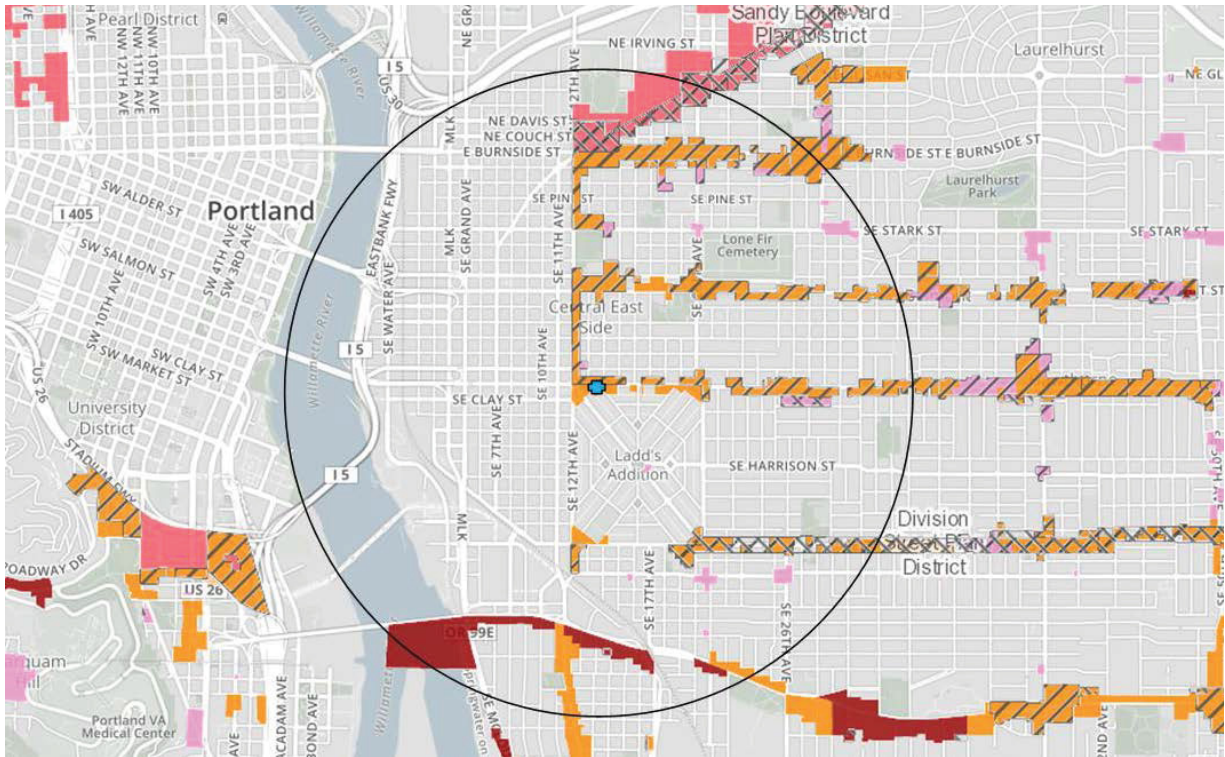
Kirk Ranzetta
Chair



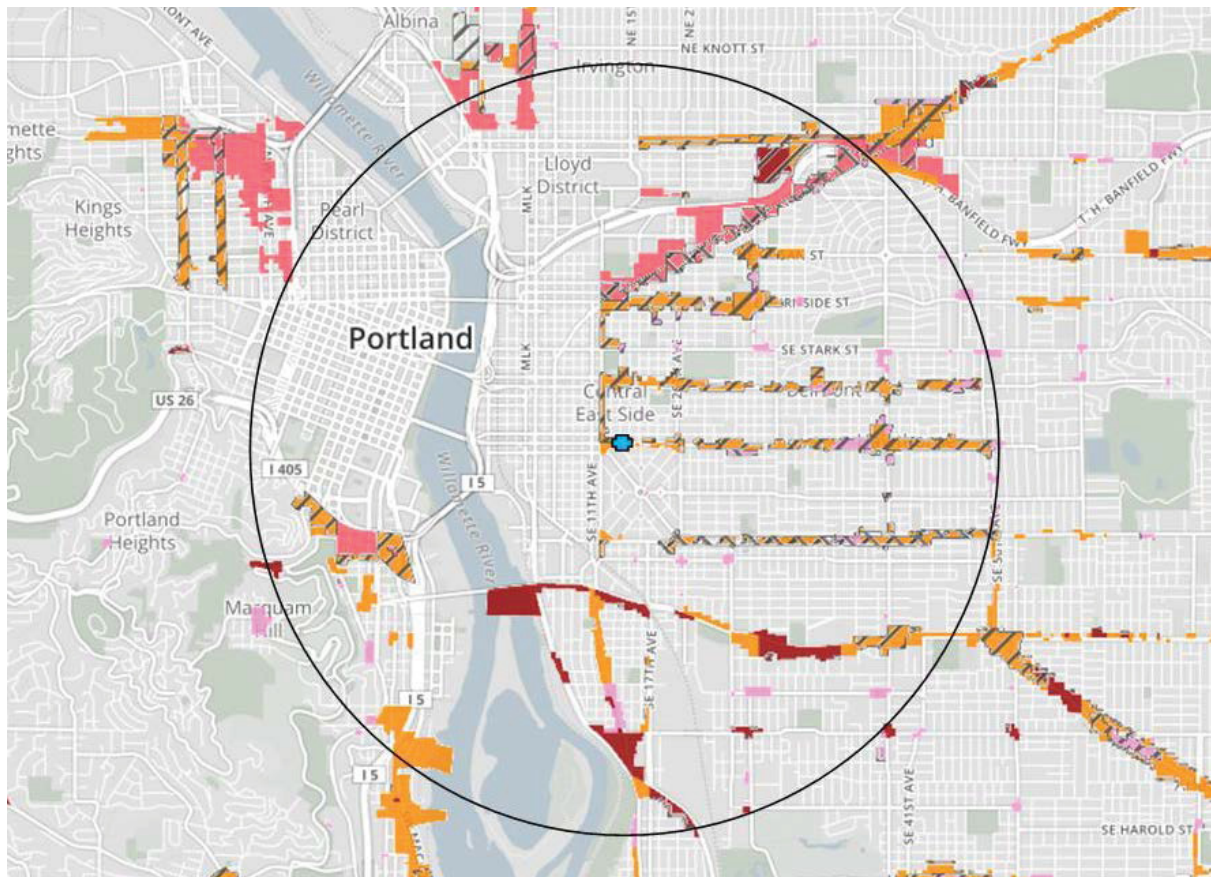
Paul Solimano
Vice Chair

CC:

Bill Cunningham, BPS
Barry Manning, BPS
Brandon Spencer-Hartle, BPS
Kara Fioravanti, BDS
Hillary Adam, BDS



Map showing one-mile radius around a contributing historic resource at SE 13th & Hawthorne



Map showing two-mile radius around same historic resource and the increased number of sending sites.