



Architectural Heritage Center
701 SE Grand Avenue
Portland, OR 97214
503 231-7264
503 231-7311 fax
www.VisitAHC.org



July 22, 2016

Planning and Sustainability Commission
City of Portland
1900 SW 4th Ave., Ste 7100
Portland, OR 97201
Via email – psc@portlandoregon.gov

Dear Planning and Sustainability Commission:

The Architectural Heritage Center/Bosco Milligan Foundation advocates for the following height and zoning issues in the Central City 2035 Proposed Draft.

HISTORIC DISTRICTS

Heights should not be increased in historic districts. Height must be in proportion and scale with the existing historic resources.

SOUTH PARK BLOCKS

The AHC/BMF **strongly endorses the priority/goal of obtaining historic designation for the South Park Blocks**. There is some urgency, however, since the heights and uses being proposed along the blocks could incentivize the demolition of many of the historic churches, historic cultural facilities and early apartment buildings, all of which offer human scale, sunlight and historic character to the park blocks. **We recommend moving the time line for this from 6-20 years to 2-5, for that reason.** (See: Vol5 p147 UD23 Obtain historic designation for S. Park Blocks.)



Zoning/use has been changed on the east side of the blocks from RX (mixed-use/residential) to CX (commercial). The AHC/BMF **recommends against this change, instead recommend retention of the RX zone on both sides/frontages of the park blocks**. When looking at that eastern frontage blocks, there are historic churches and apartment buildings, both of which are more closely associated with residential areas. The exception is the Goodman owned parking lot, the Broadway frontage of which is currently being developed into a tall hotel, threatening to block sunlight.

The threat of loss of sunlight through loss of human-scale buildings and the addition of tall buildings is real. The picture of the Ladd Tower's shadows at left on the South Park Blocks at 11 AM in May 2016 is a good demonstration of what is lost with towers along the blocks. Earlier height maximums on and along the park blocks were thought to be 100'. There is some confusion

about that, but we strongly **recommend maximum building heights for the blocks adjacent to the park be no more than 100'**. In the current proposal, they vary from 185' to 250' to 320' to 370'.

In the current proposal, shadow studies are required on the west side of the park blocks, but not the east side. The AHC/BMF **recommends shadow studies be required on both sides of the park.** People use the park both in the morning and the evenings.

Based on the above analysis, the following **are recommended changes** in the draft plan.

- Vol5 p147 UD23. Obtain historic designation for the South Park Blocks: **Change the timeline from 6-20 years to 2-5 years.**
- Vol1 p70, Policy 5.DT-4b. South Park Blocks: **Add sunlight protection as a requirement. This requirement should also be reflected in the shadow study requirement map** (Vol2A1 p337 Map 510-4).
- Vol1 Urban Design 5.3 p66. Dynamic Skyline: Change last sentence to read, **“Require** heights and building forms that preserve sunlight on public open spaces and parks.”
- Vol2p331, 337: Maps of Heights along S. Park Blocks: **Lower to 100’ maximum along the park blocks and remove the designation of “area eligible for height increase.”**
- Vol2 p467, 469. Zoning Maps: **Keep RX zoning along South Park Blocks as expressed on p467 map. Eliminate zone change on p469 map.**

The AHC/BMF also **endorses the following** policy actions relating to the South Park Blocks:

- Vol5 p111 UD81: Develop a set of special design guidelines and streetscape improvements for the Cultural District.
- Vol5 p139, p153, p177 RC81: Develop a package of streetscape improvements for the cultural district to enhance the pedestrian experience between attractions including the OHS, the Art Museum and the Arlene Schnitzer Concert Hall.
- Vol5 p145 EN 20: Develop a strategy for inventorying, removing and replacing trees in South Park Blocks to eliminate safety hazards while maintaining or enhancing canopy coverage and habitat.

WEST END: HISTORIC PRESERVATION

Preservation of the many historic resources in the West End that merit preservation consideration is a priority. The map in Vol5 p222 and the tables on p221 confirm the historic importance of this area.

The AHC/BMF **endorses the many changes** made to the draft that encourage this goal. Among them are:

- A **new Historic Preservation section** in Central City Urban Design with policies to encourage reuse and incentives that will support the protection of historic and culturally sensitive resources (Vol1 p 69, policies 5.18, 5.19, 5.20);
- A policy for **protection of existing buildings and historic resources in the West End** (Vol1 p71, policy 5.WE-3);
- Retaining a **bonus allowance** that recognizes historic preservation needs, including seismic upgrades (Vol2A1 p52,53,63,64,65) and revising regulations allowing for **incremental seismic upgrades** (Vol5 p92 RC55).
- Advocating for the **state historic rehabilitation tax credit** (Vol5 p99 UD2);
- Updating of the **Historic Resources Inventory** for the Central City, prioritizing **West End and Goose Hollow**;
- Revision of the 2 Downtown **Multiple Property Listings**, in which many **West End buildings** are already included but identifying the need to broaden the listing (Vol5 p111 UD78) and for including a map of these buildings in the West End (Vol5 p222).

However, the AHC/BMF **recommends the following changes or additions**:

- Add a **new Policy** 1.WE-4 Vol1 p.35. Repeat excerpted language in Vol 1 Policy 1.OT-4 p36 under the West End sub section to read:
Encourage the reuse, rehabilitation and seismic upgrade of underutilized buildings to increase useable space and economic activity in the district to preserve and enhance the cultural and historical significance of the area.
- Add **new action items** on Vol5 p92 under both BDS and PBEM headings:
West End RC55 Consider creating/revising seismic regulations to allow for more incremental upgrades. Timeline: 2-5 years.

WEST END: FAR/HEIGHTS/BONUS

Because preservation and reuse of historic resources and reducing incentives for the demolition of them are so closely linked, the FAR and maximum building heights in the West End need to be revised. This area is rich with buildings telling the unique history of Portland from the 1880's to the late 1930's. This has been well documented in the Multiple Property Listing, in the 1984 Historic Resource Inventory, and with individual listings in the National Register.

An additional reason for lowering the FAR and heights is that the West End is a transition area between the lower zoned areas of the Pearl, Goose Hollow, and the University District. Those adjacent contexts have FARs of 4:1 and 6:1. A gentler, stepped-down transition is needed between them and the very high allowances (15:1 and 12:1) in the Downtown District.

Recommended is to explore a West End base FAR of 7:1 west of Park Avenue and a maximum building height of 100'. Recommended to the East of Park for one or two blocks is a base 9:1 FAR with a maximum building height of between 250' and 325' maximum building heights. This proposal would create a better step down between the tall, dense corporate district to the smaller businesses and dense residential, mixed-use urban character of the West End district. And this proposal would also go far in preserving the unique and historic character of the West End.

WEST END: CHANGE IN ZONE FROM RX TO CX

The AHC/BMF **endorses the change of the RX/CX demarcation line in the northeast part of the West End to Taylor St from Salmon Street** as outlined in Vol 1 p35 1.WE.1 and the map in Vol 1 p93. These affected blocks house several National Register buildings more in keeping with residential zoning (churches, cultural building and apartment buildings).

However, the northwest corner of the West End, where an RX to CZ zoning change is proposed, holds many historic resource buildings (see map in Vol5 p222), many being used as affordable housing. Therefore, **we oppose the change from RX to CX in the northwest corner.** (Vol2A1 p473). Both codes now have many similarities, but RX emphasizes the residential uses of these buildings as worthy of preservation. This emphasis will also help meet the goal of 6800 households by 2035 in the West End.

IN GOOSE HOLLOW

Nine historic buildings in Goose Hollow (along/near SW Morrison) remain threatened by 280'-325' heights (total with bonuses), which will incentivize the destruction of those buildings. Many of these buildings are listed on the National Register or HRI--The Tiffany Center (1410 SW Morrison), The Bronaugh Apartments (1434 SW Morrison), The Scottish Rite Building (709 SW 15th), the old Concordia Club--a Jewish social organization formed when Jews weren't allowed membership in the MAC, Arlington club, etc. (1532 SW Morrison), the Commodore Apartments (1621 SW Morrison), the Winston Apartments (1709 SW Morrison), the Historic Hamilton Arms Condos (709 SW 16th), the Lafayette

Apartments (730 SW 16th), and the Hotel deLuxe (729 SW 15th). Heights should be lowered significantly on these historic buildings in order to disincentivize demolition.

View protections: The **Vista Bridge view corridor to Mt. Hood**—This view corridor was protected in 1991 to prevent further destruction of the view of Mt. Hood from the Vista Bridge. Heights should be



Figure 16: View of Central City and Mt Hood from SW15 – Proposed Bonus Heights

Image from Central City 2035 Proposed Draft

reduced on the bottom elevation to keep the timberline viewable, as it can be seen today.

Views toward the Vista Bridge—The view corridor to the Vista Bridge is currently protected and should remain protected. Downgrading this to a view street does not give sufficient protection to views of the arches of the bridge (the architecturally significant feature). The adopted West Quadrant Plan commits to preserving the view corridor to the Vista

Bridge--“elevate the presence, character and role of significant public view corridors (e.g. Vista Bridge, West Hills) which define the district.”

Proposed heights in this draft will result in a canyon of buildings along SW Jefferson (reaching up to 180’ near I-405). This should remain a view corridor. Heights should be lowered so that views of the bridge will be permanently protected. No building should ever block the view of the arches. Heights next to the bridge and on either side of the



Figure 18: View of Vista Bridge from SW Jefferson Street – Proposed Bonus Heights

Image from Central City 2035 Proposed Draft

bridge should be much lower and should require significant set-backs to protect sightlines of the arches. The proposed heights will allow a 140’ building 2 blocks from the bridge. When fully built to the proposed heights, one would have to stand in the middle of the street to have an unobstructed view of the arches. This should remain a protected view corridor.

We appreciate your attention to our comments, and your thoughtful consideration of them. Thank you very much.

Sincerely,

A handwritten signature in cursive script that reads "Fred Leeson". The signature is written in black ink and is positioned above the typed name.

Fred Leeson, President