



**City of Portland**  
**Historic Landmarks Commission**  
**1900 SW Fourth Ave., Suite 5000/16**  
**Portland OR 97201**

August 8, 2016

Planning & Sustainability Commission  
Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 7100  
Portland, OR 97201

Re: Central City 2035 Plan

Dear PSC Commissioners,

The Portland Historic Landmarks Commission (PHLC) has reviewed staff's proposed changes to the Discussion Draft of the Central City 2035 Plan with respect to height in historic districts. In April 2016, we asked staff to lower the maximum heights to 75' in most districts due to ongoing concerns over the very out-of-scale heights that are currently reflected in the Zoning Code. After many of our historic districts were designated in the late 80s and early 90s, the Zoning Code was not updated to bring heights into an approvable scale range—an unfortunate oversight that sets up a frustrating and contentious land use process for applicants. The PHLC has been speaking out about these inconsistencies for years and both the National Park Service and the Oregon State Historic Preservation Office have alerted the City to the threat of incompatible height on the integrity of our existing historic districts.

As some helpful context, you should know that the PHLC reviews Type 3 land use applications related to designated historic resources and the majority of our cases are new construction in National Register Historic Districts. We differ from the Design Commission in that we apply approval criteria to ensure that historic districts as a whole retain their character and integrity. That is, to maintain the National Register status, the physical characteristics that convey what is significant and special about the historic district must be protected. In order to achieve these goals, the primary lens we are working with is "compatibility."

Old and new buildings are compatible when they share similar underlying principles of scale, proportion, composition, level of detail, materials, and craftsmanship that are typical of the district context. Scale is the most important factor and the first thing we discuss when a new project comes to us, as there is no hiding incompatible scale even when materials are chosen that blend in with the historic district. The greatest guide to appropriate scale for new construction in historic districts is the existing context of historic contributing buildings.

A major challenge we face is that applicants initiate their project planning often under the impression that the height/FAR listed in the Code is an entitlement when it is, in fact, a maximum allowance. For historic districts, if the approval criteria cannot be met when an incompatibly-scaled building is proposed, the project cannot be approved.

You may hear arguments that significantly taller new buildings in historic districts create design interest through juxtaposition and differentiation. The problem with this approach is that overt juxtaposition—particularly at a large scale—ruptures the historic sense of place, which is the fundamental aspect that we are trying to protect in historic districts. If the setting, context, and the relationships between buildings were not important, there would be no reason for the collection of historic building to exist as a district, and individually significant buildings would be designated on their own.

To be clear, the PHLC is not trying to create historic districts that are frozen in time or a kind of curated Disneyland experience—quite the opposite. We actively wish to see vacant parcels and surface parking lots infilled with new development, as economically healthy and robust historic districts benefit all properties and the city as a whole. However, when you walk into a historic district, you should know that you're in a historic district—a unique place in Portland that has special meaning and deserves protection. This is the entire point of a district and a local land use process that regulates how districts are managed over time.

We recognize that there is a great desire for economic infusion and increase housing density throughout the Central City. The PHLC believe that these goals are not mutually exclusive with protecting the character of our historic districts. In recent years, we have approved major new developments in the 13<sup>th</sup> Avenue Historic District, Alphabet Historic District, and Skidmore Old/Town that have or will soon begin contributing to Portland's urban vibrancy and livability. Our historic districts are of limited area in the Central City and once they are irreparably altered, that historic character cannot be recreated. We believe that lowering the heights in these finite areas is in the public interest and worthy of advocacy, much in the way the City has established view corridors of Mt. Hood to protect these vistas that are character-defining for Portland in the long-term.

We asked for 75' height maximums in our April letter to Director Anderson. This is the established height in Skidmore Old Town and the Yamhill Historic District and it is a height that is typically compatible for our urban historic districts. While any determination of appropriate height is context-specific and there are some exceptions where buildings greater than 75' may be compatible, it is typically much harder for the PHLC to approve proposals with heights in excess of 75'. As an example, consider the fact that the average height of historic buildings in the Grand Avenue Historic District is 47' feet or less. The attached sketches prepared by one of our commissioners illustrates an example of the potential negative effects of the current maximum allowable height on the historic scale of this district.

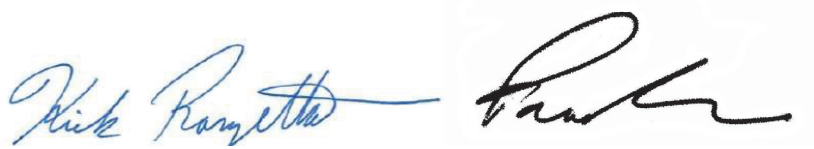
We recognize that the heights proposed by staff are certainly an improvement and will help bring the expectations of applicants closer to the reality of the land use process. Applicants deserve a clear understanding of what their development rights area. However, it is still our position that 75' is the most appropriate number to reflect in the Zoning Code. If 75' cannot be approved in the Central City 2035 Plan, we ask for the following:

- 1. A new map in the Code that shows all of our Central City historic districts and very clearly notes that heights are maximum allowances and actual compatible and approvable heights will be determined during the land use process on a case-by-case basis**
- 2. A separate study undertaken by BPS in the near future to refine heights in historic districts**

**We also ask that you maintain the proposed FAR transfer program for historic resources, which we highly support. This is a much-needed incentive for historic preservation and seismic improvements.**

We sincerely thank you for your time and consideration of this request.

Respectfully,

Two handwritten signatures in blue ink. The signature on the left is 'Kirk Ranzetta' and the signature on the right is 'Paul Solimano'.

Kirk Ranzetta  
Chair

Paul Solimano  
Vice Chair

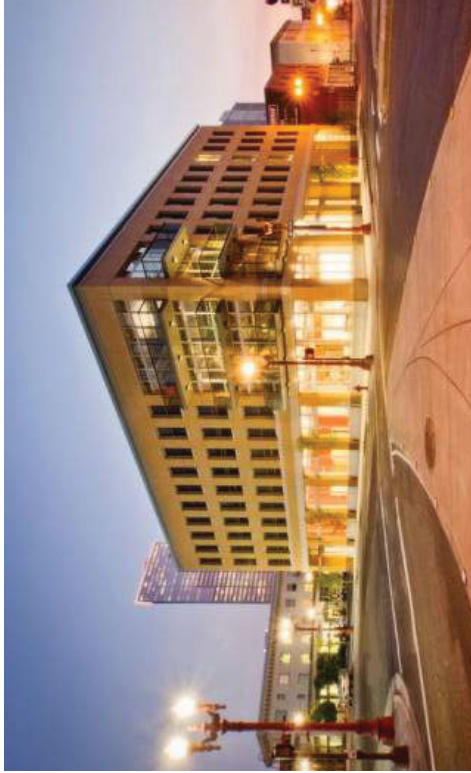
cc: Brandon Spencer-Hartle, BPS  
Hillary Adam, BDS

Encl.:

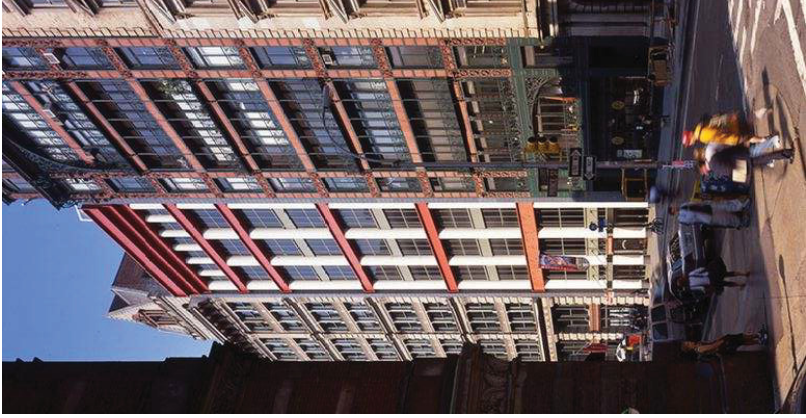
- Examples of compatible infill
- Examples of incompatible infill
- Grand Avenue height sketches



# The Impact of New Construction Height on Historic Resources and District Integrity—Examples of Compatibility



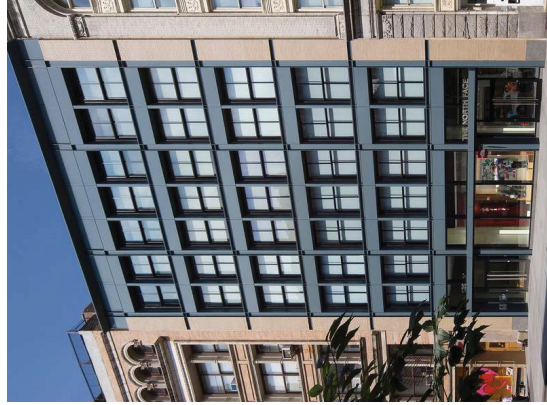
New Blanchet House, Chinatown Historic District, Portland.



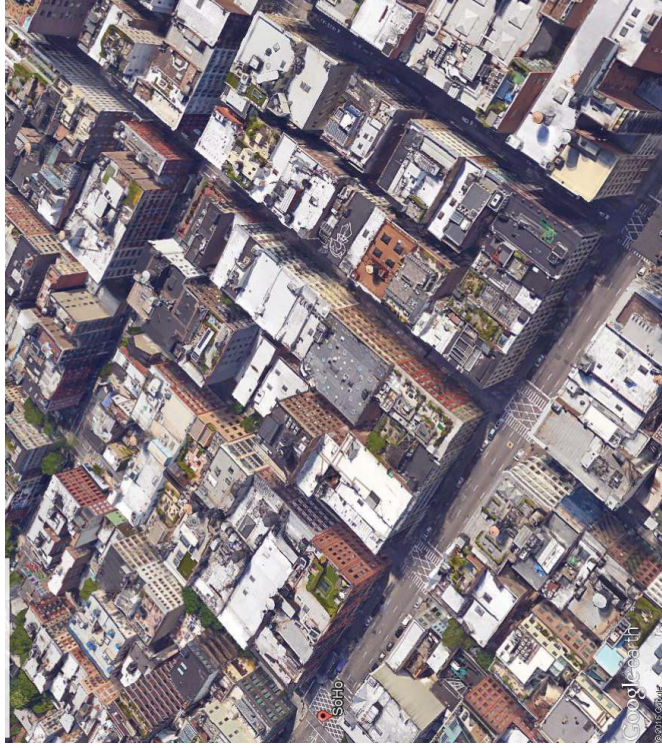
Block 136 in the Pearl District just outside the 13th Avenue Historic District. Developer responded to neighborhood requests to make this building relate to the scale and materials of the surrounding warehouse buildings.



Skidmore Old Town Historic District. Infill on SW Pine & SW 1st.



Above: Infill buildings in the SoHo Cast Iron District



Above: SoHo Cast Iron Historic District, NYC. District maintains a scale consistent with the historic period and new infill supports the district's setting, resulting in a high level of district integrity.

Left: Infill construction in the Euclid Avenue Historic District, Cleveland.



# The Impact of New Construction Height on Historic Resources and District Integrity—Examples of Incompatibility



Proposed 12-story infill in the Pioneer Square Skid Road Historic District, Seattle. Rejected by their Commission due to its incompatible scale with surrounding buildings. Height limits are 120 ft. Prior to this upzoning in 2011, the district had variable zoning requiring new buildings be no higher than 15 feet above their neighbors. Appealed several times, the City's deputy hearings officer upheld the Commission's decision saying the scale of the building must be considered along with its height and this proposal was too big.



Proposed design for 218 Arch St., Philadelphia. Glass tower above main street-scaled podium. At 275 feet, it greatly exceeds the 65-foot height limit in the Old City Historic District, but zoning variances are common.



The incompatible scale of 108 Arch Street resulted in the creation of 65-foot height limits in Philadelphia Old City Historic District. Their historical commission has no purview over new construction, to the great detriment of the City's historic districts.



Above Left: Residential infill tower in Washington DC.

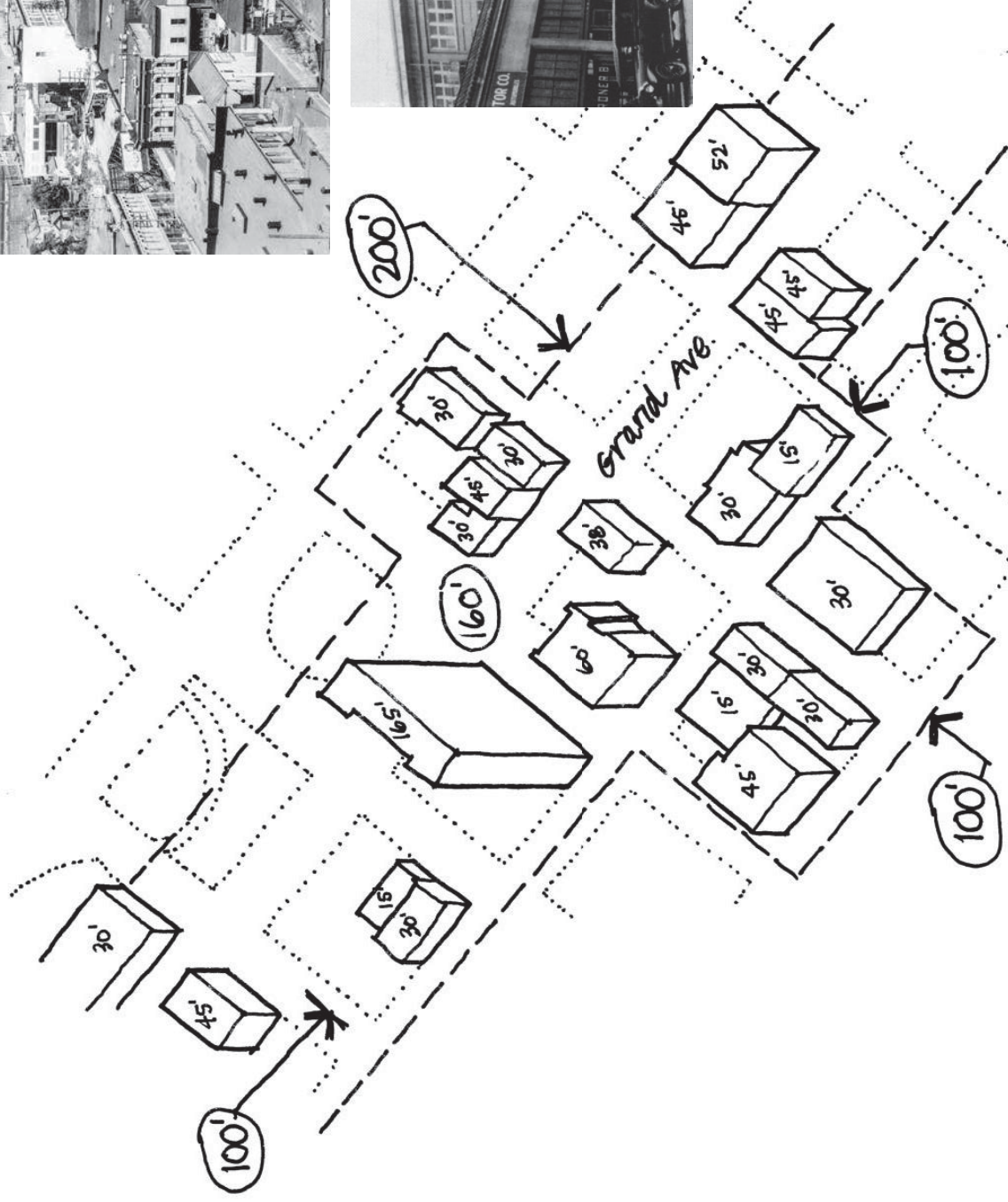
Upper Right: Mid-block infill twice the height of its historic neighbors in Washington DC.



"The Beaumont," 14 stories in the Old City Historic District, Philadelphia. Cited as incompatible in the 2007 "Sense of Place: Design Guidelines for New Construction."



## A black and white photograph of a busy street scene in New York City. The image is oriented horizontally but appears to be a vertical shot rotated 90 degrees clockwise. On the left side of the image (which would be the top of a vertical photo), there is a large, multi-story building with many windows. A streetcar is visible on the street in front of it. To the right of the streetcar, there is a sign that reads "TOP CO." and another sign that reads "PINE B". The street is filled with various vehicles, including cars and trucks, and there are people walking on the sidewalks. The background shows more buildings and a hazy sky.



E. Portland/Grand Ave HD (portion proposed for 100')  
Historic buildings only shown (heights approx.)

# East Portland Grand Avenue Historic District—Built to Maximum Height

