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To: Portland Planning and Sustainability Commission

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Subject: PSC MISC. Zoning Update Testimony

Distribution: Portland Historic Landmarks Commission
John Bradley, Chairman, NWDA Planning Committee

Upon reviewing the Miscellaneous Zoning Amendments – Proposed Draft – June 2016, I was alarmed to find that a vast swath of Northwest Portland has been/will be zoned RH with FAR of 4:1. I am referring to the first two attachments, Maps 120-6 and 120-7, pages 75 and 77 of the referenced document. Almost ALL of the FAR 4:1 area occurs within the Historic Alphabet District. Please refer to the third attachment, Map 1 of Historic Alphabet District, and compare it to Maps 120-6 and 120-7. Basically most property east of NW 21st Avenue has RH zoning with FAR 4:1, while areas of the Historic Alphabet District west of NW 21st Avenue are spared this higher density designation.

The RH zoning with a maximum FAR of 4:1 is a threat to the future of the eastern half of the Historic Alphabet District. Property owners and developers will certainly be enticed to demolish smaller historic buildings in the Alphabet District in order to replace them with larger, taller buildings up to FAR 4:1. The PSC MISC. Zoning Update is strongly advised to reduce the FAR to 2:1 in all areas of the Historic Alphabet District in order to eliminate the owner/developer enticement to tear down and build bigger. A similar revision was advocated by the Irvington Community Association for the Irvington Historic District. Refer to pages 78 and 79 of the Miscellaneous Zoning Amendments.

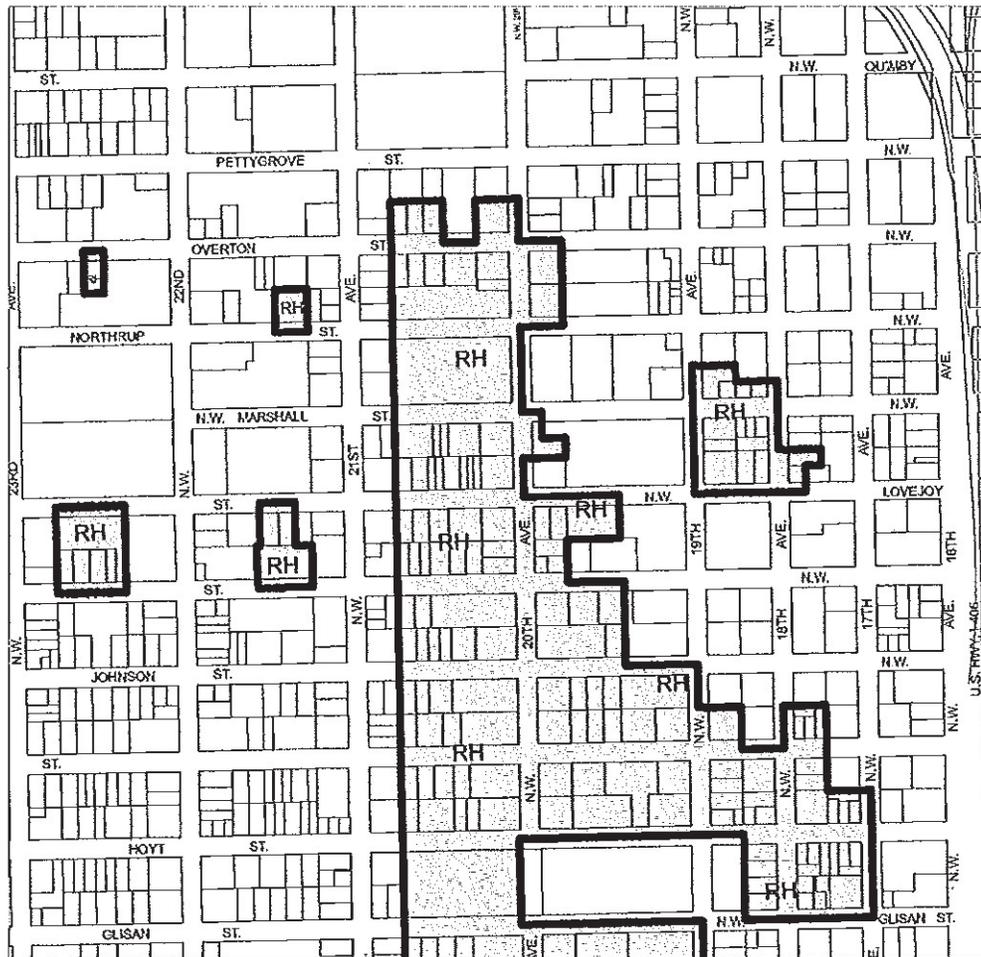
Furthermore, a maximum FAR of 2:1 would be a better fit for properties currently with no structures, such as parking lots. Tall, out of scale new buildings near such prominent older buildings as St. Mary's Catholic Cathedral, the NW Childrens' Theater, and Trinity Episcopal Cathedral would damage the character of the Historic Alphabet District.

If one assumes that the RH zoning with a maximum FAR of 4:1 is necessary to sustain an adequate supply of housing units in the city, then refer to page 120 of the Miscellaneous Zoning Amendments. The Commentary states that due to the large surplus of residential capacity in the city, the code provisions for No Net Loss of Housing and a Housing Pool are to be deleted. Under the proposed zoning amendments, a reduction of FAR to 2:1 in the Historic Alphabet District would not contend with a requirement to maintain residential capacity.

Proposed RH Areas with Maximum FAR of 4:1

Map 120-6

Map Revised Xxxxx X, 201X



- City Boundary
- Boundary of Existing/Potential RH - Zoned Area

Quarter Section(s): 2927, 2928, 3027, 3028



Proposed RH Areas with
Maximum FAR of 4:1

Map 120-7

Map Revised Xxxx X, 201X



- City Boundary
- █ Boundary of Existing/Potential
RH - Zoned Area

Quarter Section(s): 2927, 2928, 3027, 3028



