

Wendy Chung

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July 12, 2016

Bureau of Planning and Sustainability
900 SW 4th Ave #7100
Portland, OR 97201

RE: Comprehensive Plan Update: Composite Zoning Proposal – Alphabet Historic District

Dear Commissioners:

I am writing on behalf of the NWDA Planning Committee concerning proposed zoning in and around the Alphabet Historic District that is described in the Composite Zoning Proposal (CZP) on the Map App. NWDA appreciates BPS' receptiveness to feedback provided in the form of public testimony throughout the Comp Plan 2035 process, much of which is reflected in the CZP. There are, however, a few areas in the CZP for which we request underlying base-zone changes in order to comply with the Comp Plan Policy 4.49 to reconcile conflicts in historic districts and to refine base zoning: *Policy 4.49 Resolution of conflicts in historic districts. Adopt and periodically update design guidelines for unique historic districts. Refine base zoning in historic districts to take into account the character of the historic resources in the district.*

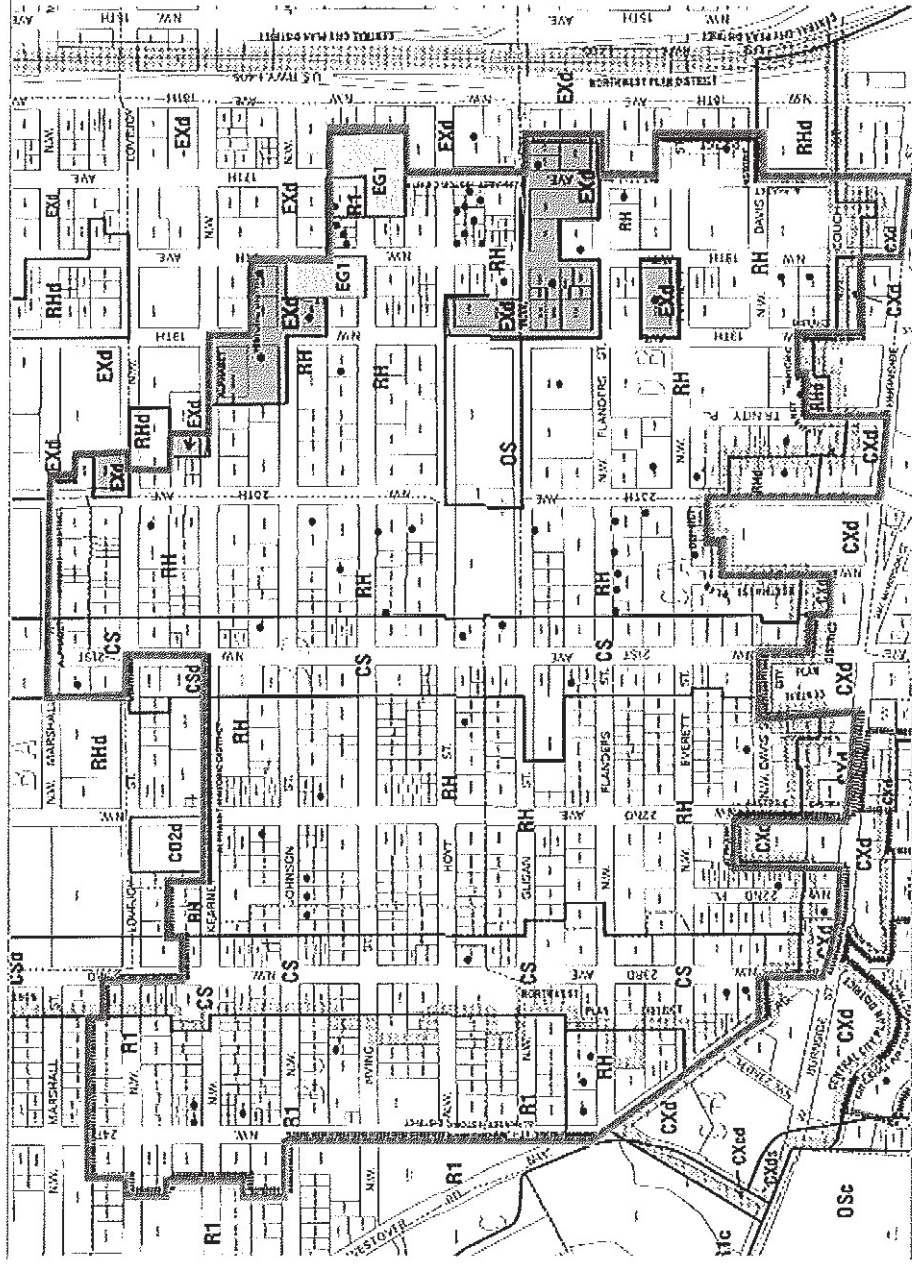
The proposed zoning in these few areas appear to potentially encourage development that would conflict with the Northwest District Plan and the Alphabet Historic District Addendum to the Community Design Guidelines by encouraging demolition of historic resources and out-of-scale projects that would detract from the character of individually-listed and contributing structures within the Alphabet Historic District:

- *Northwest District Plan - Eastern Edge: Desired Characteristics and Traditions* "The historic resources of the Eastern Edge, part of which is located in the Alphabet Historic District, should be preserved. The scattered remnants of the historically working-class Slabtown neighborhood, located in northern portions of the area, are a particularly vulnerable component of the area's built environment that should also be preserved."
- *Alphabet Historic District Addendum to Community Design Guidelines* –
 - *Historic Alphabet District Guideline 2:* "The design of new construction will be compatible with the historic qualities of the district as identified in the Historic Context Statement."
 - *Historic Alphabet District Guideline 3:* "Hierarchy of Compatibility. Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a historic or conservation district, with the rest of the District. Where practical, compatibility will be pursued on all three levels."

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Specifically, NWDA believes that the proposed CM3 zoning within Alphabet Historic District should be zoned CM2 instead, because we believe a) lower FAR and height allowances are more compatible with the historic designation of such properties, and b) a base zone more consistent with historic policies and guidelines will provide more up-front certainty and clarity to developers. We request that the dark grey areas on the map below (marked EXd) be zoned CM2 rather than CM3.



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As described in the examples listed below, many of the properties listed are historically significant, and are either listed individually on the National Register of Historic Places as historic landmarks or contributing structures within the Alphabet Historic District on the National Register. Others are adjacent to such properties and thus should appropriately be zoned CM2 rather than CM3, in order to encourage development that is "compatible with the historic qualities of the district" and consistent with Historic Alphabet District Guidelines 2 and 3.

Address	Within Historic District?	Historic Designation	Proposed	Requested
1819 NW Everett St./NWNCC	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
732 NW 19 th Ave	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
1815 NW Flanders St.	Yes	Contributing Structure in NR Alphabet Historic District	CM3	CM2
535 NW 16 th St ¹	No	Individually Listed on National Register of Historic Places	CM3	EG1
811 NW 19 th Ave	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
829 NW 19 th Ave.	Yes	Contributing Structure in NR Alphabet Historic District	CM3	CM2
1809 NW Johnson St.	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
1927 NW Lovejoy St.	Yes	Non-Contributing (adjacent to Contributing)	CM3	CM2
1959-63 NW Kearney St.	Yes	Non-Contributing (adjacent to Contributing)	CM3	CM2
434 NW 19 th Ave	Yes	Contributing in NR Alphabet Historic District	CM3	CM2
1818 NW Glisan St.	Yes	Contributing in NR Alphabet Historic District	CM3	CM2
425 NW 18 th Ave.	Yes	Individually Listed on National Register of Historic Places	CM3	CM2

Photographs of some of these properties are included in the attached map for illustrative purposes.

Thank you for considering our request to change the CZP to reflect that CM3 properties within the Alphabet Historic District be zoned CM2.¹

Sincerely,



Wendy Chung

Encl.

¹ We also request that the Individually-Listed Historic Landmark at 535 NW 16th St (Ace Hardware), be zoned EG1 rather than CM3 as described in the CZP.

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