

Portland Coalition for Historic Resources Proposal to Portland City Council for Amendments to the Portland 2035 Comprehensive Plan

A Response to Mayor Hales' Tentative Recommendations for Policy and Other Changes to the Comprehensive Plan Draft Dated February, 2015

Prepared February 8, 2016 by the Volunteer Members of the Portland Coalition for Historic Resources

Executive Summary

The Portland Coalition for Historic Resources is an all-volunteer body consisting of representatives from neighborhood associations which include Historic Districts, together with participation by volunteers and staff from the two leading Historic Preservation organizations in Portland.

Relative to the Mayor's Comp Plan Amendment list item #12, we make the following recommendations:

- 1)** In Section 4 implementing Goal 4B, Historic and Cultural Resources, strengthen and clarify the wording in the following Policies:
 - a)** Historic and Cultural Resource Protection, Policy 4.45
 - b)** Continuity with Established Patterns, Policy 4.46
 - c)** Historic Resources Inventory, Policy 4.49
 - d)** Other Policies as detailed in the document
- 2)** Assign BPS to draft specific amendment language to implement requested right-zoning changes to align zoning designations in Historic Districts as requested by the neighborhoods:
 - a)** Irvington Historic District
 - b)** Alphabet Historic District
 - c)** King's Hill Historic District
 - d)** Eliot Historic Conservation District
 - e)** Proposed Buckman Historic District
 - f)** Potential Eastmoreland Historic District
 - g)** Commit to a Refinement Phase Project to address right-zoning in all other Historic Districts and Historic Conservation Districts

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Portland Coalition for Historic Resources Proposal to Portland City Council for Amendments to the Portland 2035 Comprehensive Plan

Prepared February 5, 2016

Introduction

At the City Council hearings on January 7 and 13, 2016, representatives of the Portland Coalition for Historic Resources and other Portland residents concerned about Historic Preservation and Historic Resource Conservation issues, presented a number of urgent proposals to the Council for modification of the currently proposed 2035 Comprehensive Plan. At that time those presenters provided the required written testimony by the established deadline.

This document is a follow-up to that written testimony, responding to questions raised by the Office of the Mayor and others asking for more complete rationale for the specific zoning changes requested, as well as greater explication of our concerns relating to Comp Plan Policies affecting Historic Resource protections. It also responds to Item No. 12 in the Draft List of Mayor Hales proposed Amendments to the Comprehensive Plan dated February 4, 2016. Comments in the district-specific sections of this document also provide additional support for a possible Buckman Plan District as suggested in Item #67 proposed by Amanda Fritz.

Our recommendations are presented in two parts. The first lays out specific recommendations for new Comp Plan Policy language, together for the rationale for them. The second presents a compilation of the specific District-by-District zoning requests. Following that section is an Appendix containing some detailed documentation of these requests.

The Portland Coalition for Historic Resources is an all-volunteer body consisting of representatives from neighborhood associations which include Historic Districts, together with participation by volunteers and staff from the two leading Historic Preservation organizations in Portland: the Bosco-Milligan Foundation/Architectural Heritage Center, and Restore Oregon. The Historic Districts and historic neighborhoods represented include Alphabet District, King's Hill District, Ladd's Addition District, Irvington District, and the Eastmoreland, Buckman, and Laurelhurst neighborhoods.

Questions and concerns related to this document may be directed to Holly Chamberlain, Deputy Director, Bosco-Milligan Foundation, at 503-231-7264, or to Jim Heuer, Chairman, PCHR, at 503-335-8380.

Part 1 – Proposed New and Revised Policies

PCHR is concerned with ensuring the on-going identification, recognition, and protection of the significant places that make Portland unique and provide visible markers of the history and cultural development of the city. To quote Policy 3.12 in Citywide Design and Development, we seek to: “Enhance and celebrate significant places throughout Portland...”, which includes “Historically or culturally significant places”. We also are concerned that the City of Portland

live up to its agreements with the State of Oregon as a Certified Local Government under PL 89.655, especially these requirements:

“(1) Enforce appropriate state or local legislation for the designation and protection of historic properties”

And

“(3) Maintain a system for the survey and inventory of historic properties.”

Furthermore, State Land Use Planning Goal 5 requires Portland City government to take appropriate steps to preserve historic resources: OAR 660-015-0000(5) requires local governments to “adopt programs that ... conserve ... historic, and open space resources for present and future generations.”

All of this addresses Goal 4.B, of the Comprehensive Plan: Historic and Cultural Resources which, attempting to comply with these mandates, specifically calls for the preservation of our historic and cultural resources. However, the Goal is only as effective as the policies which implement it.

To these ends, PCHR volunteers have drafted a number of proposed changes and enhancements to Comp Plan policies in Section 4 and elsewhere. Of these three rise to the level of urgent priorities and are detailed below. Others are listed in Appendix A, containing material provided by the North West District Association Planning Committee.

With a deep sense of urgency, we propose these high priority enhancements (*italicized*) to the wording of Policies 4.45, 4.46, and 4.49:

Policy 4.45 Historic and cultural resource protection. *Identify, protect and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland’s evolving urban environment.*

4.45.a Provide options, including zoning adjustments, bonuses, land use variances, and other incentives to allow for the productive, reasonable, and/or adaptive reuse of historic resources.

4.45.b Partner with community organizations to develop educational and informational programs for techniques and processes to preserve existing, potentially historic structures, while achieving greater energy efficiency and maintaining historic character

4.45.c Mandate the transfer of bonus height and density allowances earned inside historic districts to construction outside of those historic districts where the use of those allowances would otherwise jeopardize the character of the district and violate historic resource review guidelines.

Rationale: Historic properties worthy of preservation often present difficult challenges when they must be adaptively re-used to reflect modern commercial needs. This sometimes means uses which otherwise might not be allowed by the local zoning. Policy 4.45.a enshrines in the Comprehensive Plan, approaches which the City has used in exceptional situations, and provides encouragement for more extensive use of this tool for preserving viable buildings. Policy 4.45.b amplifies the City’s potential role in encouraging preservation and protection of its historic building fabric using positive tools of education and information. Policy 4.45.c allows aggressive use of transferable density and height bonuses for new construction in historic districts while protecting those districts from the untoward effects of inappropriately sized development in violation of Policy 4.46. Flexible bonus transfer policies will both protect our historic resources and facilitate increased density in areas more suitable for it.

Policy 4.46 Continuity with established patterns. *Preserve and complement historic resources both in historic districts and in Inner Ring and the Inner Neighborhoods Pattern Areas, and in other areas where large concentrations of potentially historic properties are found, by encouraging new construction infill and rehabilitation or expansion of existing structures, that is compatible with the established urban fabric.*

4.46.a Give precedence to Historic Resource Review guidelines for Historic Districts and historic resources, and Plan District Design Overlay requirements in other areas, over base zone regulations when they conflict.

4.46.b Adjust zoning in Historic Districts and Conservation Districts to reflect the allowable mass, scale, size, setbacks, and other key metrics imposed by the Historic Resource Review Guidelines.

4.46.b Recognize a Hierarchy of Compatibility for evaluating alterations of historic properties or proposals for infill such that they will be designed to be compatible primarily with the original resource (if applicable), secondarily with nearby 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.

Rationale: Portland’s Inner Ring and Inner Neighborhoods Pattern Areas have a rich and potentially historically significant collection of pre-World War II buildings. This mix of early buildings is more like that of Chicago and Baltimore than of other major Western cities other than San Francisco. Conflicts between zoning and allowable building sizes in historic districts where smaller scaled structures predominated in historic times, create confusion for would-be developers and economic incentives to demolition by neglect. A first step is to make clear in City Code that Historic Resource Review (Historic Protection Overlay Zones) protections supersede base zoning regulations. Such language is currently found in City Code in 33.700.070.E, but is highly general. Explicit Policy direction in the Comp Plan will reinforce this provision and make it clearly applicable to Historic Districts.

But a precedence provision buried in a 1610 page document (Title 33), by itself, is small help to the average buyer who purchases land in a Historic District planning to develop it. That buyer looks first to the zoning, and all too often only discovers much later that a planned development will not meet Historic Resource Review guidelines. The solution to this common problem is zoning that intelligently tracks the allowable size, scale, and massing permitted by the guidelines, and is adjusted promptly when new Historic Districts are designated. This is the point of 4.46.b. (It must be noted that this is also the point of the requests by PCHR member neighborhoods for right-zoning in established Historic and Conservation Districts as listed in Section II of this document.)

Equally important, in large, complex Historic Districts like the Alphabet Historic District and the Irvington Historic District, multiple development patterns are found, from substantial sized mid-rise apartments, through modestly scaled streetcar commercial buildings, down to extensive blocks of modest Victorian Cottages or Craftsman Bungalows. A hierarchy of compatibility provides the flexibility to protect the localized patterns of development while allowing variation across the District. The proposed language is already found substantially in Portland Code in 33.846.060.G.10, but its fundamental importance in the flexible protection of our historic areas is such that we urge its incorporation directly into Comp Plan Policy language.

Finally, we urge zoning policies that recognize the need to preserve and protect signature historic areas of the city even where formal historic district designations have not yet been established.

Policy 4.49 Historic Resources Inventory. Maintain, *regularly* update, and publish in conveniently accessible on-line form Portland’s Historic Resources Inventory to inform historic and cultural resource preservation strategies.

4.49.a Include individual structures as well as districts, places, landscapes, areas, and (where appropriate) their viewsheds that are significant for historic and cultural values consistent with Policies 4.51 and 4.3.

4.49.b Develop programs for community participation and leadership in the process of historic resource inventory development leading to subsequent City designation, relying on both neighborhood-based entities and city-wide non-profit organizations

Rationale: Portland’s existing Historic Resources Inventory was developed roughly 30 years ago when the focus of historic preservation tended to be on individual buildings – typically with an architectural pedigree. While such buildings continue to be important as character defining elements of the city, it is now understood that the waymarks of history may be modest structures as well as areas, districts and neighborhoods, landscapes, and other places which resonate with the stories that led to their creation and the cultures that gave them life. 4.49.a and 4.49.b recognize this. Further 4.49.b addresses both a need for active participation in the process by residents who cherish these areas, together with an approach that leverages City of Portland resources with the work of volunteers from the community. Finally, it perhaps goes without

saying that the current sorry state of the inventory with no fully reliable published copy available on line for ready public reference must be corrected while the inventory is being updated.

Part 2 - Compilation of Comp Plan Change Requests for Historic Districts and Historic-Designation Eligible Neighborhoods in Portland

The following pages contain our best current understanding of the requests by neighborhood associations and concerned residents to better align zoning in the 2035 Comprehensive Plan with the compatibility requirements for new construction in historic zones. We include National Register Historic Districts, Portland Historic Conservation Districts, and neighborhoods which have either been declared to be “National Register Eligible” (but not formally designated as such) or are actively pursuing Historic District designation.

The point of these zoning change requests is to “right-zone” the Historic Districts, both current and potential, to reflect the allowable size, scale and massing under the applicable Historic Resource Review guidelines which reinforce historic patterns of development. The discussion in Part 1 of this document on Policy 4.46 – Continuity with Established Patterns provides the rationale for needing to minimize conflicts between base zoning and allowable patterns of new development under Historic Resource Review. Statements in the Code or in the Comprehensive Plan that give Historic Resource Review guidelines precedence over base zoning are insufficient for sound administration of protections of these Districts.

To those who object that this is a ploy to minimize density in traditional neighborhoods, we must highlight that we are addressing parts of the city which in most cases are already relatively densely populated, at least in comparison with the City’s overall population density -- and already tend to make significant use of low-carbon means of transport. This is clearly illustrated in the table below:

Historic Neighborhood or District at Risk	Population Density - Residents per Square Mile	Walk Score	Transit Score	Bicycle Score	Active Commuting (% of Commuters on Bikes and Walking)	Average Distance from Downtown	Average Age of Residential Structures
Alphabet District (NWDA)	17411	92	66	89	16.10%	1.4	103
Irvington	10312	83	63	93	9.50%	1.6	92
Eliot (Conservation District)	6698	83	64	96	15.60%	1.4	97
Kings Hill Historic District (Goose Hollow)	6587	92	81	80	17.60%	1.5	93
Ladd's Addition (Hosford-Abernethy)	5147	89	60	98	13.10%	1.7	90
Eastmoreland	5410	50	48	72	7.50%	4.5	78
Buckman (Proposed) Historic District (Buckman)	6699	88	61	99	N/A	1.2	99
Portland Overall	4298	63	51	72	13.00%	4.4	68

Notes:

- 1) Where neighborhood designation is shown, statistics are for the entire neighborhood unless otherwise indicated
- 2) Eliot % of Bike commuters not available, used Boise
- 3) Population density per city-data.com
- 4) Eliot density takes into account only land used for residential purposes
- 5) Alphabet District density based on "Nob Hill" area. Entire Northwest District density is 9334 including vacant, forest and industrial land
- 6) Eastmoreland density excludes Reed College property area
- 7) Distance from downtown measured to center of Burnside Bridge - stright-line miles
- 8) Portland's overall density of land used for residential purposes is approximately 6500 per square mile

Even with “right zoning”, additional density can be developed in these areas consistent with their current (or projected) Historic Resource Review guidelines. It should also be pointed out, quoting from a February 25, 2014, memo from BPS to the Planning and Sustainability Commission: “*The vacant and underutilized land within [RH through R20 zone] designated areas have a combined development capacity that is double the expected growth, after considering constraints. This means that it is possible to be more selective about where development occurs in residential zones.*”

Moreover, we note that the legal option of creating ADUs in single family zones provides for a near doubling of the number of housing units in such zones even with current or proposed single family zone designations. ADU construction has been flourishing in Portland’s Historic Districts. None of the proposed right-zoning requested for these districts would alter the trends in ADU development.

Finally, it should be pointed out that the total land area in residential use encompassed by ALL Historic and Conservation Districts in the City of Portland is currently less than 3% of total land area used for residential purposes in the city. Providing enhanced protections to these Districts will have *de minimis* impact on Portland’s capacity for absorbing population growth while significantly helping to preserve the character that draws newcomers to our city in the first place.

The remainder of this section is devoted to the recommendations for individual Historic Districts. The specific recommendations were developed by the neighborhoods referenced here; however, PCHR supports their positions overall.

Irvington Historic District

The Irvington Community Association Board of Directors has formally petitioned the Mayor and the City Council with the following requested changes to the Comp Plan:

“The ICA proposes the following amendments to the zoning code and to the Comp Plan.

1. The RH zoning in the Irvington Historic District with its FAR of 4.0 is incompatible with the fabric of the district. The RH zoning where currently found in Irvington should be restricted to FAR of 2.0 or, if north of Schuyler Ave, the RH designation should be reduced to R1 to achieve compatibility [with the applicable guidelines for new development in the Irvington Historic District and with the transition from the Broadway commercial strip] to a predominantly residential neighborhood. (see the zoning map on the following page) Note that the standard FAR allowed in RH zones is 2.0. The special RH designation of FAR of 4.0 is limited to sites shown on the zoning maps in the zoning code.

2. The maximum height of 75 feet along Broadway on the north side between 7th and 16th is not justified either by market needs nor by consistency with the compatibility with the historic development pattern and should be adjusted downward in that stretch to match the 45 foot height currently established along the north side of Broadway between 16th and 27th.

3. The CX zoning along the north side of Broadway between 7th and 16th is also not compatible with an historic district, and should be changed to CM 2, but without the benefit of bonuses. The bonuses [would incentivize height of structures well in excess of the historic context, which would not be allowed under the Historic District guidelines and the Hierarchy of Compatibility] in the historic district. This request may be best dealt with in the Central City discussion because the half block north of Broadway and between 7th and 16th is covered by the Central City Plan and the North/Northeast Quadrant plan.

4. Additional specific changes affecting the Irvington Historic District on the Comp Plan map are proposed below:

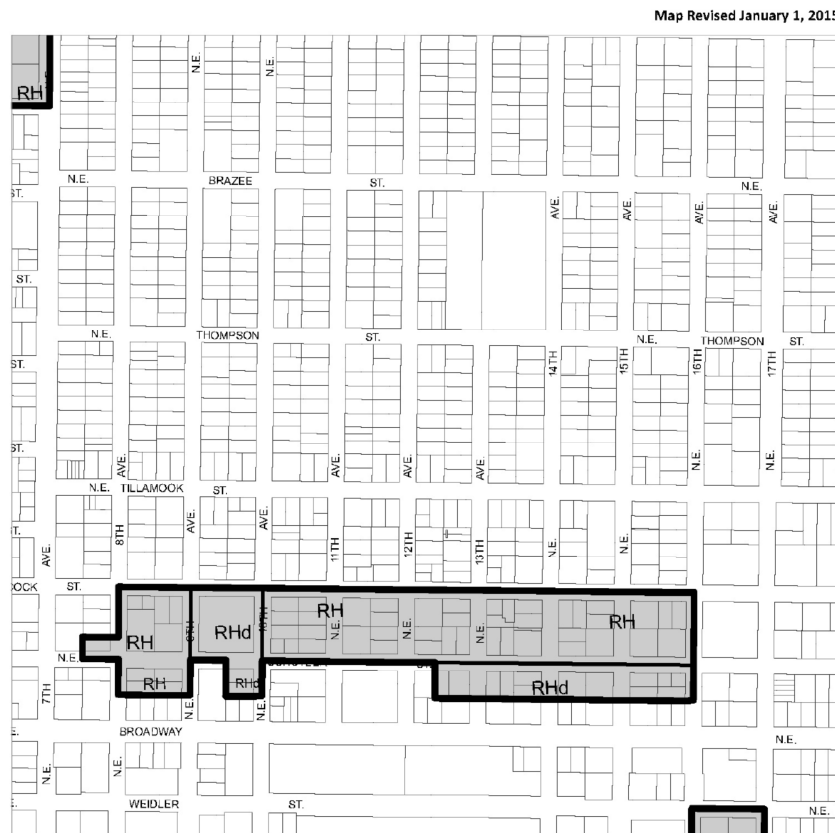
a. Half block east of 7th, between Schuyler and Tillamook, and the full block between 7th and 8th, Schuyler and Hancock—change from EX to CM3. CM3 allows heights well in excess of historic patterns, and is an example of “over zoning” rather than “right zoning” to be compatible with the fabric of the Historic District. The proposed CM3 designation should be changed to CM1

b. Half block north of Broadway between 16 and 27th, change CS to CM2. This is acceptable **if bonuses are not allowed**; the bonuses would push the height and FAR above levels compatible with an historic district.

c. 15th and Brazeo commercial node—change from R5 to CM1. This area is in the middle of the residential heart of Irvington, and one block from Irvington School. The original commercial building on this site was allowed in the 1920s (during the Period of Significance of the Historic District) only if it looked like a library building which it did. This commercial node is surrounded on all sides by residential dwellings. Yes,

**RH Areas with
Maximum FAR of 4:1**

Map 120-10



Requests for Changes to 203 Submitted in Response to M:

----- City Boundary
 [Thick black line] Boundary of Existing/Potential RH-Zoned Area

0 300 600
 Scale in Feet
 Bureau of Planning and Sustainability
 Portland, Oregon

Quarter Section(s): 2831, 2832

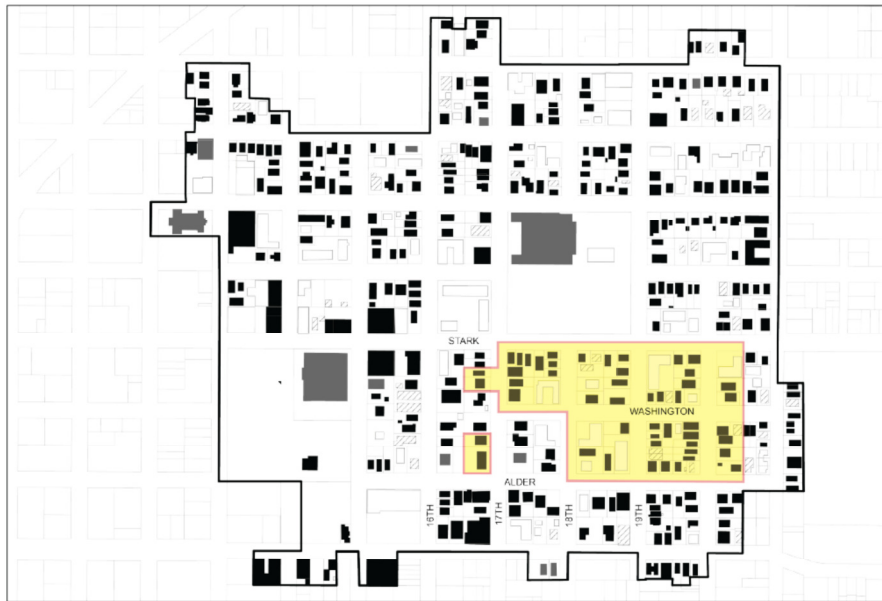
the current uses are nonconforming, but the owners knew this when they relocated.

Since the historic pattern of development at this site is already reflected by the size and scale of the existing building, it is evident that the CM1 zoning can NEVER be realized by new development under the Historic Resource Review guidelines which apply in this District, especially when the Hierarchy of Compatibility in 33.846.060G.10 is applied. This change is opposed by the ICA and virtually all the surrounding neighbors, who value the amenities provided by the current building but object strongly to the potential intrusion of a building at the maximum size and with the potential uses allowed by CM1.

The map on the previous page is taken from Title 33 of the Zoning Code, Map 120-10 showing the FAR 4.0 exceptions in Irvington for RH zoning. Note that the standard RH zone calls for a maximum FAR of 2.0. Several areas of RH zoning have been called out specifically for a higher FAR of 4.0, and this map is one of several detailing the exceptions with greater FAR. Irvington is requesting that this RH zoned area be reverted back to its base RH zone FAR of 2.0. All of the area indicated by the map is included in the Irvington Historic District.

Buckman Neighborhood – Portion Designated as “Eligible for Historic District Status” by the State Advisory Committee on Historic Preservation

Christine Yun, resident of Buckman and member of the Buckman Neighborhood Association Historic Preservation Committee submitted the following request to remove all proposed up-zoning for the portions of Buckman in the proposed historic district:



NATIONAL REGISTER ELIGIBLE DISTRICT WITH PROPOSED COMP PLAN CHANGES
UPZONING FROM R5 TO R2.5 AND R1



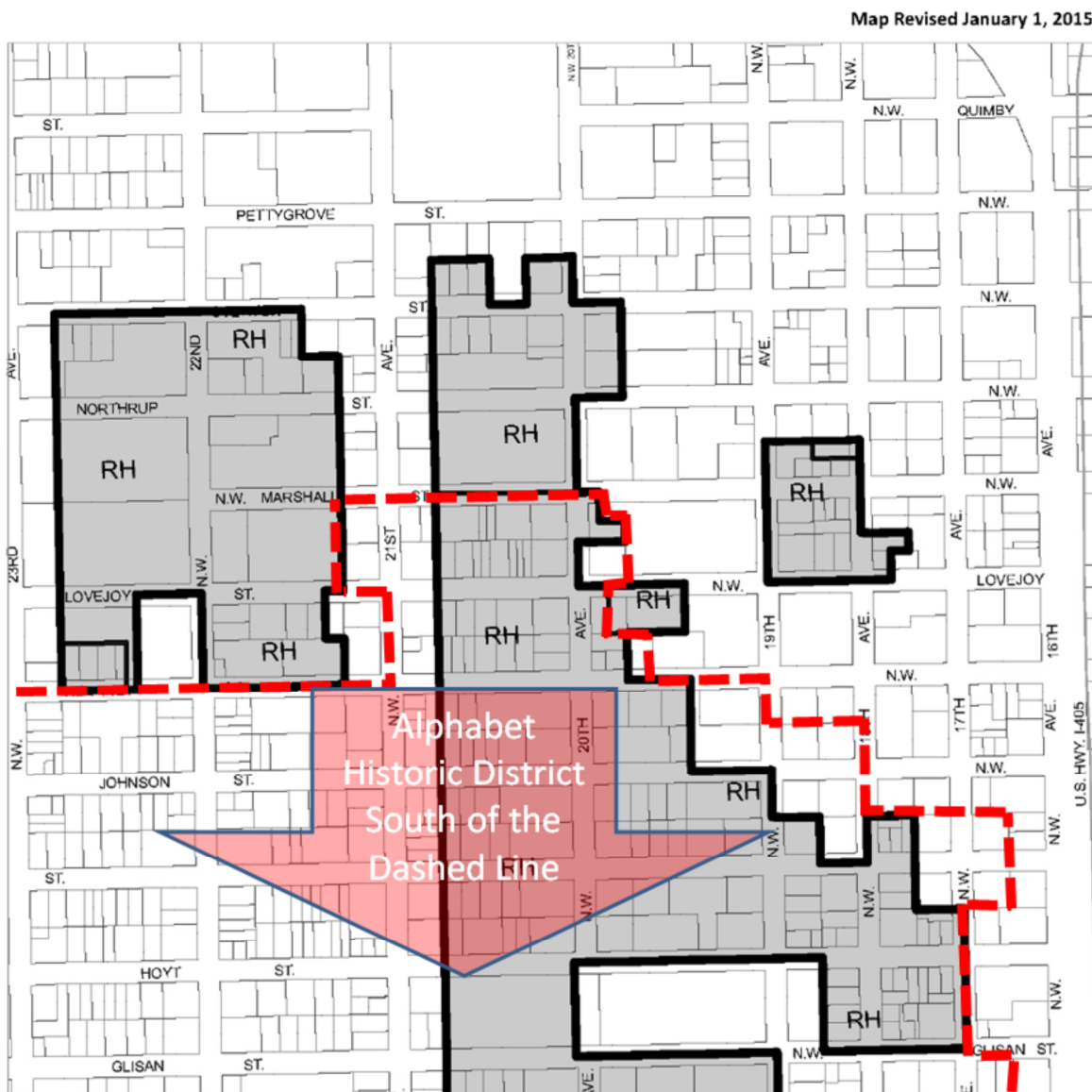
DETAIL OF DISTRICT MAP
BLACK = CONTRIBUTING STRUCTURE

Alphabet Historic District, part of Northwest District Association Request for Re-aligning Zoning inside the Historic District

The Northwest District Association has requested adjustment of the RH zone from a FAR of 4.0 to the base RH zone FAR of 2.0. This applies to the same type of RH over-zoning as found in the Irvington Historic District. The overzone designations are found in the Title 33 section 120 maps 120-8 and 120-9. These are shown below with the boundary of the Historic District shown to indicate the portions which should be rezoned for compatibility with the District’s historic resource review guidelines:

**RH Areas with
Maximum FAR of 4:1**

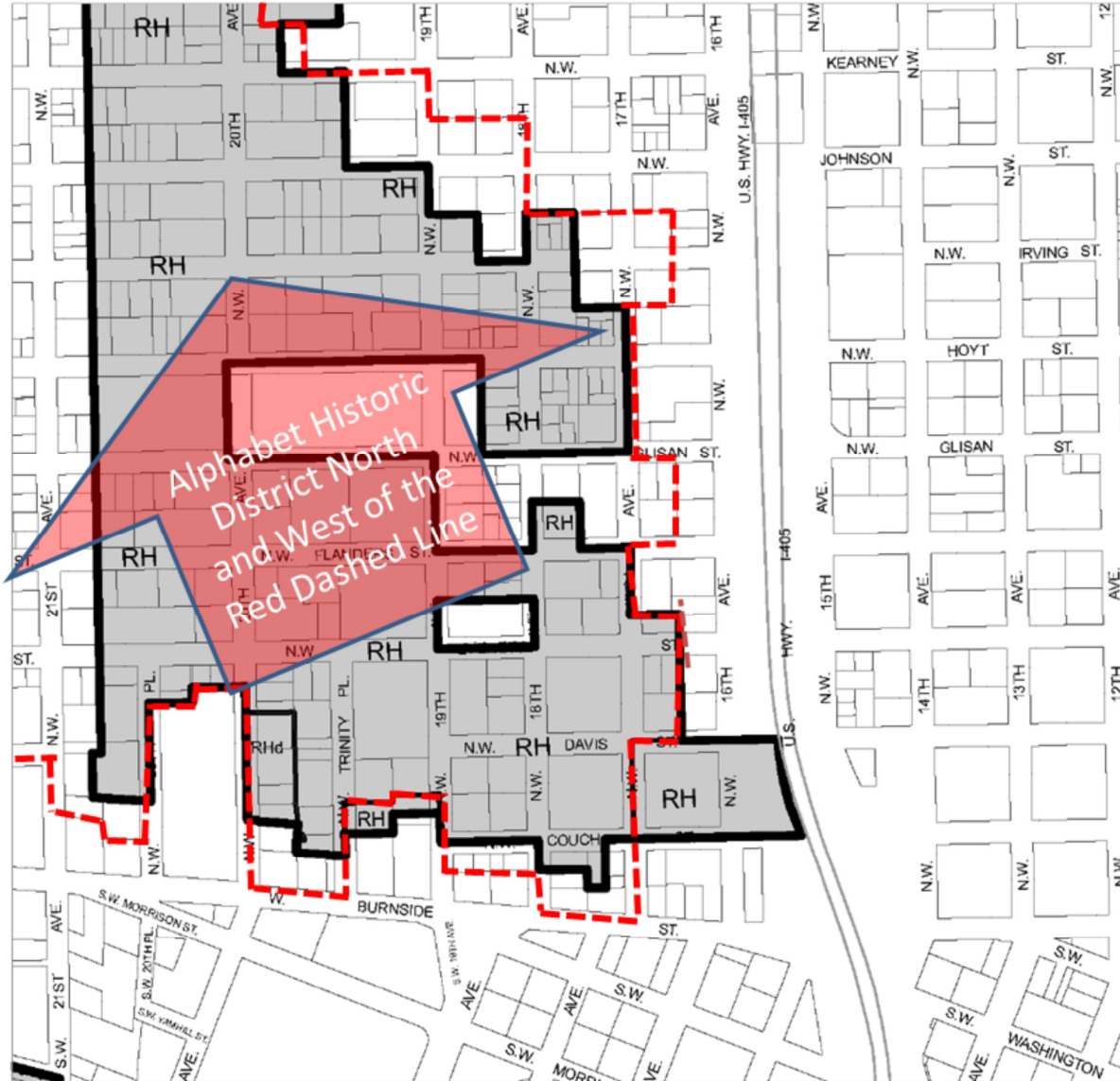
Map 120-8



RH Areas with Maximum FAR of 4:1

Map 120-9

Map Revised January 1, 2015



Goose Hollow Neighborhood Association Request for Kings Hill Historic District

Amendment #94--In 2001 Goose Hollow established development protections for our historic buildings by creating the King's Hill Historic District. Goose Hollow strenuously objects to proposed Land Use Amendment #94 which will upzone a block of historic buildings in the King's Hill Historic District from single-dwelling to multi-dwelling zoning. This will absolutely incentivize the destruction of these historic buildings - buildings that Portland has worked hard to protect.

The owners of these historic buildings, nearby residents, businesses, and all of the many neighborhood association members we have heard from object to this upzoning. Yet city staff ignored the overwhelming outpouring of objections from the neighborhood and upzoned anyway. Frankly, this has been a recurring pattern with city staff and something that many neighborhoods are very upset about.

If having historic districts means anything at all, it means that Portland will not upzone these districts and incentivize demolition. If [the City Council] care[s] about preserving historic districts in Portland, please remove this upzoning from King' s Hill. Goose Hollow requests for the zoning to remain as is. We also support the Architectural Heritage Center' s call for removing upzoning in the King' s Hill, Alphabet, and Irvington Historic Districts and upzoning that threatens areas that aspire to apply for historic designations in Buckman and Eastmoreland. Such upzoning does not support the heritage conservation goals of Historic Districts.

Eastmoreland Neighborhood Assotiaion Requests for R7 Zoning

In February, 2015, the Eastmoreland Neighborhood Association developed a thoroughly documented and solidly grounded request for right-zoning the neighborhood from R5 to R7 zone designation to better reflect the actual patterns of development in the neighborhood. In the process, the ENA provided extensive documentation of the historic character of the neighborhood and its genesis as a streetcar era suburb – as well as its (up until now) high degree of preservation. They also demonstrated the threats of demolition and replacement with large, out of scale, un-affordable new homes being erected on lots subject to lot splitting and other artifacts of the current zoning under R5 designation.

The Portland Coalition for Historic Resources supports the ENA request on the grounds that this neighborhood is very arguably eligible for National Register Historic District status, that it exhibits a high percentage of potentially contributing properties, and as such is worthy of protection.

The neighborhood has supplied the Comprehensive Plan Team with all of their documentation, including the following exhibit showing a map of the neighborhood and the average lot sizes throughout:

ENA Average Lot Sizes by Quadrant in 2011

- NW Quadrant = 8,086 sq. ft.
- NE Quadrant = 7,062 sq. ft.
- SW Quadrant = 6,764 sq. ft.
- SE Quadrant = 5,592 sq. ft.



We believe that these statistics alone demonstrate the appropriateness of R7 zoning. We further are concerned that leaving the current R5 zoning in place is a deliberate attempt to encourage the obliteration of this historic neighborhood in a misguided attempt to achieve greater density in this area – with the exact opposite result happening, as demonstrated by ENA examples showing the construction on McMansions on the site of demolished homes.

We are including relevant commentary and documentation prepared by ENA in the appendices of this document.

Other Historic Districts and Historic Conservation Districts

It must be noted that not all Historic Districts and Historic Conservation Districts are included here. The Eliot Neighborhood Association has submitted a request to BPS for selective right-zoning to protect contributing properties in the Eliot Historic Conservation District. We support the Comp Plan approval of their request. However, we must point out that there are 6 Historic Conservation Districts, 5 of which have not been systematically surveyed for proper alignment of zoning with historic character and the parameters of district Historic Resource Review guidelines.

In addition to approving the specific requests already made by affected neighborhood associations by adoption of appropriate amendments, we request the City Council to mandate a refinement task to review the zoning designations in all Historic Districts and Historic Conservation Districts not already addressed by these recommendations.

Appendix A – Documentation and Testimony Submitted by Northwest District Association Relative to Right-Zoning in the Alphabet Historic District and Related Issues

January 13, 2016

Mayor Charlie Hales and City Commissioners

City of Portland, City Hall
1221 SW 4th Avenue
Portland, Oregon 97204

RE: Comprehensive Plan Update – Historic Districts

Dear Mayor Hales and Commissioners:

I writing to supplement my testimony of January 7, 2016. As I mentioned in that testimony, I am a member of the NWDA Board and its Planning Committee and own a home in the Alphabet Historic District in northwest Portland.

As you know, Goal 5 of Oregon's Statewide Planning Goals and Guidelines (OAR 660-015-0000(5)) requires local governments to “**adopt programs** that ... **conserve ... historic**, and open space resources for present and future generations.” The specific changes to the Comp Plan language proposed in my testimony last week, I would like to make two suggestions for changes to the zoning code that will support this body’s obligations under Goal 5:

- 1) Change the FAR from 4:1 to 2:1 for properties zoned RH within the Alphabet Historic District (and other historic districts) to prevent out-of-scale development.
- 2) Encourage the transfer of air rights FROM historic to non-historic properties but prohibit the transfer of air rights TO properties within historic districts whether contributing or not, so as to preserve the historic character of such districts.

Thank you,

Sincerely,



Wendy Chung

Encl.

January 7, 2016

Mayor Charlie Hales and City Commissioners

City of Portland, City Hall

1221 SW 4th Avenue

Portland, Oregon 97204

RE: Comprehensive Plan Update – Historic Districts

Dear Mayor Hales and Commissioners:

I am a member of the NWDA Board and its Planning Committee. I am privileged to live in the Alphet Historic District in northwest Portland. The Historic District enhances livability in Northwest and attracts tourism and development, but out-of-scale, incompatible apartment buildings are dwarfing historic buildings and homes, jeopardizing its character. This is not an only a Northwest Portland issue. There is a city-wide concern about the destruction of **neighborhood character**, especially in historic districts.

The draft Comp Plan describes Northwest as an “Inner Ring District” where **“historic preservation and design review tools”** should be used **“to accommodate growth in ways that preserve historic resources and enhance [its] distinctive characteristics.”** Too often, however, existing tools fail to effectively prevent incompatible development. This is because 1) underlying base-zoning conflicts directly with historic district guidelines such as those that apply to the Alphet Historic District, causing confusion during the development and design review process; and 2) only a small number of Portland’s historic properties are protected under our current code.

There are many examples of this in our neighborhood. For instance, my home, and the single-family Victorian houses on either side of it, are zoned RH, or high-density residential. In fact, much of the Alphet Historic District is zoned RH or EXd, which allows for 6-story apartment buildings that are inconsistent with the fine-grain, small-scale development contemplated by the Alphet Historic District Guidelines, which City Council adopted as an addendum to the Community Design Guidelines in 2000.

While some properties, like mine, enjoy protection from demolition because they are described as “contributing properties” on the US National Register of Historic Places, most of the properties in the Alphet Historic District and in other historic districts are “non-contributing” and are therefore not protected. Many other historic properties in Portland are located outside of historic districts yet still deserve protection. Thirty years ago, 5,000 properties were listed on the City’s Historic Resources Inventory “HRI.” The list has not been updated since. Many properties originally listed have since been removed. **In addition to being incomplete and outdated, the HRI has no teeth because there is virtually no protection for HRI properties under the Portland Code.**


The Landmarks Commission has urged Council to **update the HRI**, and to allow for a **mandated waiting period for removal**. We support this recommendation and also recommend

updating the draft Comp Plan by 1) including protection for all HRI properties and 2) reconcile base-zoning to comport with historic design guidelines.

Specific suggestions for editing the draft Comp Plan language are attached.

Thank you,

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy Chung", is centered on a light gray rectangular background.

Wendy Chung

Encl.

Suggested Comp Plan Edits

Inner Ring Districts (PAGE GP3□14)

The Inner Ring Districts include some of Portland’s oldest neighborhoods, with several historic districts and a broad diversity of housing types. These areas include distinct plan districts, such as Albina and Northwest Portland (within which the Alphabet Historic District resides), that have multiple mixed-use corridors in proximity (see the shaded areas in the Urban Design Framework), allowing most residents to live within a quarter-mile distance of frequent-service transit and neighborhood businesses. The Inner Ring Districts are also served by a highly interconnected system of streets and sidewalks, and are within a three-mile biking distance of the Central City’s array of services, jobs, and amenities.

These policies acknowledge that growth in the Inner Ring Districts plays an important role in allowing more people to have access to their many opportunities, but also acknowledge that this growth should be integrated into these areas’ historic urban fabric. The Inner Ring Districts, especially along their corridors, play a similar role to Town Centers in accommodating growth.

Policy 3.40 Growth. Expand the range of housing and employment opportunities in the Inner Ring Districts. Emphasize growth that replaces gaps in the historic urban fabric, such as redevelopment of surface parking lots and 20th century auto-oriented development.

Policy 3.41 Corridors. Guide growth in corridors to transition to mid-rise scale close to the Central City, especially along Civic Corridors.

Policy 3.42 Distinct identities. Maintain and enhance the distinct identities of the Inner Ring Districts and their corridors. Use and expand existing historic preservation and design review tools to accommodate growth in ways that identify and preserve historic resources and enhance the distinctive characteristics of the Inner Ring Districts, especially in areas experiencing significant development.

Policy 3.43 Diverse residential areas. Provide a diversity of housing opportunities in the Inner Ring Districts’ residential areas. Encourage approaches that preserve or are compatible with existing historic properties in these areas. Acknowledge that these areas are historic assets and should retain their established characteristics and development patterns, even as Inner Ring centers and corridors grow, by applying adopted historic design guidelines in a manner that takes precedence over conflicting base zoning.

Goal 4.B: Historic and cultural resources (PAGE GP4□5)

Historic and cultural resources are integral parts of an urban environment that continue to evolve and are preserved.

Policy 4.27 Historic buildings in centers and corridors. (PAGE GP4□8)

Designate, protect and encourage the restoration and improvement of historic resources in centers and corridors.

Historic and cultural resources (PAGE GP4□11)

Portland has several hundred designated historic landmarks and historic and conservation districts. These special places help create a sense of place, contribute to neighborhood character, and recognize Portland's history. More than half of Portland's buildings are over 50 years old, creating a vast pool of potentially significant properties to be evaluated for historic designation. These policies support the identification, protection and preservation of historic and culturally significant resources in a city that continues to grow and change.

Policy 4.45 Historic and cultural resource protection. Identify, protect and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

Policy 4.46 Continuity with established patterns. Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources by prioritizing historic design guidelines over conflicting base zoning.

Policy 4.47 Demolition. Protect historic resources from demolition. Provide opportunities for public comment, and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

Policy 4.48 City□owned historic resources. Maintain City□owned historic resources with necessary upkeep and repair.

Policy 4.49 Historic Resources Inventory. Update and regularly maintain Portland's Historic Resources Inventory to inform historic and cultural resource preservation strategies.

Policy 4.50 Preservation equity. Expand historic resource inventories, regulations, and programs to encourage historic preservation in areas and in communities that have not benefited from past historic preservation efforts, especially in areas with high concentrations of under□served and/or under□ represented people.

Policy 4.51 Cultural diversity. Work with Portland's diverse communities to identify and preserve places of historic and cultural significance.

Policy 4.52 Cultural and social significance. Encourage awareness and appreciation of cultural diversity and the social significance of both beautiful and ordinary historic places and their roles in enhancing community identity and sense of place.

Policy 4.53 Community structures. Encourage the adaptive reuse of historic community structures, such as former schools, meeting halls, and places of worship, for arts, cultural, and community uses that continue their role as anchors for community and culture.

Policy 4.54 Archaeological resources. Protect and preserve archaeological resources, especially those sites and objects associated with Native American cultures. Work in partnership with Sovereign tribes, Native American communities, and the state to protect against disturbance to Native American archaeological resources.

Appendix B – Eastmoreland Neighborhood Association Request for R7 Zoning

Eastmoreland Neighborhood Specific Requests and Analysis

Neighborhood Comprehensive Plan goals remain focused on two essential objectives from our letter of request for comprehensive plan changes dated December 2013:

- R7 designation extended to the entire area within the neighborhood association boundary except as noted.
- Development of a well-crafted Plan District that encompassing the entire neighborhood. The goals for the plan district have been adopted by the ENA Board and are widely supported in the neighborhood. The *implementation plan* for the plan district is in development. The *expanded plan district* should be acknowledged in the Comprehensive Plan.

The requested inclusions for *both the expanded plan district and the zone designation change* are *consistent with the goals and policies identified in the comprehensive plan* such as contextual design and community participation. ENA analysis supports both addressing the following comprehensive plan criteria:

- Existing land use patterns and density
- Historical development patterns
- Housing Diversity
- Historic and Cultural Resources: streetscape and architecture
- Access to transit
- Access to Services

Existing Land Use Patterns and Density

Lot size and lot size frequency within the neighborhood boundary was analyzed by the ENA as a whole in our original request and in discrete areas in this analysis to demonstrate consistency. For the western portion extending east to SE 36th Avenue the mean lot size is **7247 SF**, for the northeast quadrant the mean lot size is **7,062 SF**, and for the southeast **5,592 SF**. With the exception discussed below, **R7 is the appropriate designation** for all quadrants under current **33.110** and **33.610** standards. Please refer to the attached map, bar chart, and pie chart (**Exhibit A, Exhibit B**). In addition consider the following:

- Public support is very positive on the MapApp and in other forums. Reviewing the MapApp comments as of December 1 there were approximate 90 out of 100 comments in favor of expanding R7 to the full neighborhood boundary (Half the opposed do not live in Eastmoreland and of those some appear to be duplicates). Many are in favor of expanding R7 to the full neighborhood boundary and none expressed opposition to this point.
- For the northeast quadrant, lots facing SE Woodstock Blvd east of SE 36th Ave and lots abutting SE CCB (39th Ave) north of SE Glenwood are appropriately classed as R5 for their convenient access to transit and services.

- Only 2% of the lots in the neighborhood are 4200 SF or smaller. These were developed in recent years as the result of tear-down lot splitting primarily in the most vulnerable southeast quadrant. They are clearly incompatible with the scale, streetscape, and character of the neighborhood. Again supporting R7 designation.
- Lots sizes, development, architectural character and land use patterns in the all but the southeast quadrant are indistinguishable although density patterns vary somewhat by the block and topography.
- There are a *large number of 7500 SF* and larger lots many with random underlying lots of record. Establishing the minimum lot size at 4200 SF (R7 standards) is critically important to reduce haphazard lot splitting and to preserve the historic streetscape.

The southeast quadrant (or Berkeley Addition) consists of blocks of 25 x 100 lots of record. The mean lot size in the quadrant (in 2011) was 5,592 sq. ft. with 23% of these lots 6,000 sq. ft. or larger. Using current R5 standards, all of these lots could be split into minimum 3,000 SF lots following demolition of existing housing stock and all corner lots can be split by right into 2,500 SF lots. For these reasons and as well as lacking access to transit and access to services discussed below, the *R-5 zoning definition is clearly inappropriate* for this quadrant.

Housing Affordability

The incentives in the code and market conditions are reducing affordability. The southeast quadrant contains some of the oldest houses and the largest number of post World War II workforce housing that is the most affordable. With a predominance of 25 foot wide lots of record it is also the most vulnerable to the lot splitting. Encouraged by the “alternative development options” and compromised density standards, these are being replaced by much larger and more expensive production housing. *The value of retaining houses under R7 zoning standards is to maintain diversity of housing types and affordability and to discourage upward price pressures on land values resulting from speculative teardowns.*

Housing Diversity

The neighborhood has a wide range of house and lot sizes and prices, a reflection of the economic times during which they were built as well as marketing and design preferences. As house sizes trend larger and more expensive this diversity is eroded. The proposed plan district standards and the R7 designation are intended to check this by limiting lot coverage and house sizes to comport with the existing scale, favor renovation, and discourage teardowns.

Substantial pressure to remodel and redevelop will continue. The application of “alternative development options”, reduced lot size standards, and application of lots of record entitlements has incentivized and rapidly accelerated this activity in the last 2 years. The effect is to raise land and thus house prices. The result is larger, less diverse, and less affordable housing, as well as serious damage to the distinctive neighborhood character.

Historical Development Patterns

The Eastmoreland subdivision, the northeast quadrant (College View, Campus Heights, etc.) and the Berkeley Addition share the heritage of being street car suburbs served first by the suburban line running along the Springwater corridor with a station at the foot of SE 37th Ave.

The later Bybee street car line extended through the center of the Eastmoreland subdivision and into the Berkley subdivision along SE Knapp to SE 45th Ave.(the City boundary at the time). **Exhibit C** shows the rail and streetcar lines circa 1924. The oldest and newest houses are found in the southeast quadrant platted as the Berkeley Addition. The original neighborhood post-office, Ward's store, was replaced by a house at 7405 SE 37th. The entire neighborhood was developed with lots of at least 5,000 SF and many larger. **Exhibit D** shows houses the year built from 1888 to 2011 (from BDS permit records) indicating that the oldest houses were built and streets surveyed in the eastern quadrants prior to the platting of the Eastmoreland subdivision dating from 1910.

The neighborhood shares a common historical development pattern *and most important a common streetscape* characterized by substantial areas of front and rear yard ornamental landscaping, minimized driveways and garage presence, and houses proportioned to lot size. All these qualities are threatened by the application of lots of record entitlements, R5 standards and "alternative development options". All of these qualities are to be preserved and enhanced under the goals of the proposed plan district.

Historic and Cultural Resources : Streetscape and Architecture

The Eastmoreland Neighborhood strength of identity lies in its historic character on several levels. The unique street pattern of straight, gridded north-south avenues bisected by curving east-west streets that follow old streambeds is unique in the Northwest and has few precedents elsewhere in the country. The east west curvilinear streets align with the earlier platted streets of subdivisions to the east. Reinforcing this grid-and-meander street pattern, linked in spirit to the earlier Ladd/Olmsteadean developments of Ladds Addition and Laurelhurst, is a dominant pattern of large deciduous tree planting with Elms lining the east-west streets and maples lining the north-south streets.

The relatively wide planting zones for these trees and proportion of lot size relative to the size of houses creates a park-like setting that accommodates and unifies a diverse architectural heritage. The axis of the neighborhood and its iconic central feature is the mile long park-boulevard featuring an arcade of linden trees that extends to the 'great lawn' of Reed College. This combination of landscape and street plan is of unique and historic importance and the defining character that unifies all quadrants of the neighborhood.

Eastmoreland's architecture on first viewing might seem a picturesque variety of sizes and styles from craftsman to mid-century modern, builder customized plan houses to distinguished work of Portland architects. It is impossible to find any two of identical design but characteristically the architecture is dominated by three revival influences—Colonial Revival , English cottage styles and California mission style. Two-thirds of the neighborhoods 1500 houses were built in variations of these styles during two relatively short periods, 1925-30, and 1936-40 giving a surprising unity to the outward variety. On the streets east of the Ladd Corporation development, between 36th and 39th Avenues, this unity of house types and styles is continued without interruption in the northeast quadrant. Giving further unity to the whole is a neighborhood tradition of large street trees and extensively landscaped yards even for modest houses distinctively visible from aerial view and widely appreciated and worthy of preservation.

Access to transit. Portions of the Eastmoreland neighborhood are served by three routes only one of which is more than tangential. These routes and their predicted quarter mile walking catchment areas are shown on **Exhibit E**. Frequency of service is not shown but described below.

The 19 bus line is accessed on alternate routes either along the northern edge of the neighborhood on SE Woodstock Boulevard or on an inner loop extending along Se 29th and SE 32nd as far south as SE Rex before rejoining the common route east and west. Service frequency for prime weekday commuting hours is roughly on twenty to thirty minute intervals for each alternate. Saturday service is closer to hourly, begins mid-morning and ends mid evening. For the inner loop there are only two trips on Sunday. (Trip time to and from downtown is increasingly unpredictable during rush hour and will become gradually less viable in future as a result of congestion through the Brooklyn neighborhood.) The second bus route is the 75 that provides frequent (approx. 15 minute) north-south service from the northeast corner of the neighborhood (SE Woodstock Blvd at SE CCB (SE 39th Ave.) The third route will be the nearly complete Orange light rail line. Presumably this will be a draw for bicycle and kiss and ride commuters as well as transfers from the 19 and pedestrians from within a ten to fifteen minute walk from the station platform.

The importance of this analysis is to demonstrate that *the least served (or unserved) area of the neighborhood is the southeast quadrant*. As a result of the lot splitting encouraged by application of lots of record entitlements, R5 standards and “alternative development options” it is *effectively zoned for the highest density*. This is an essential point supporting R-7 designation for this area of the neighborhood.

Access to Services

Currently only the northeast corner of the neighborhood, primarily a small portion along Caesar Chavez Boulevard and along Woodstock Boulevard, could be considered to be within a 20 minute walk of the Woodstock corridor commercial area. Note that SE Martins street is not a through street. For these reasons we support the R-5 designation in the limited areas shown on **Exhibit A**. Again the least served area of the neighborhood is the southern half especially the southeast and southwest quadrants. As a result of the lot splitting encouraged by the current zoning code and narrow lots of record the south east quadrant is inappropriately zoned for the highest density. This is yet another cogent argument for this area of the neighborhood to be assigned the R-7 designation.

Summary

Considering *the criteria of the comprehensive plan* the research and analysis points to the conclusion that for now and in the foreseeable future the the medium density zoning (**R7**) is the appropriate Comprehensive Plan designation for the Eastmoreland Neighborhood.

We hope you will agree that all quadrants deserve equal attention in shaping future development that can best be facilitated with an expanded and well-crafted neighborhood

developed and approved Plan District. We look forward to continuing the good working relationship with neighborhood liaisons and City staff in ~~bringing this to fruition.~~

Thank you for your consideration.

Rod Merrick AIA, Clark Nelson Land Use Co-Chairs



Eastmoreland Neighborhood Association

Robert McCullough, President

