

The Public Works Presentations one on April 6, 2017 to the MNA and the other on April 25, 2017 to the HRB did not conform to the HRB Guidelines as adopted by the Historic Review Board on September 18, 2006 as represented by the included highlighted sections of the guidelines and as indicated below.

When the OC Manager at the May 4, 2017 MNA meeting and was asked, "Is the PW Dept. exempt from the Historic District Guidelines?", he stated, "No, they are not exempt". Therefore, we expect the PW Department to address these and all issues in the Historic District Guidelines.

Page 2-A,B,C: This section establishes the frame work for district improvement and development standards.

Page 3-A,B: The guidelines were adopted by the HRB (Historic Review Board) to guide the HRB in the interpretation of the code standards.

Page 5 -A: The guidelines apply to new public works projects.

Page 7-A,B: "New construction shall complement one of these styles to support the historic context of the district". Vernacular and Bungalow styles appear appropriate of this area.

Page 8-A,B: "Public Improvement Principles" addresses other regulatory requirements for the McLoughlin Historic District on public construction in a public right of way. The PW proposal of 10 garage doors with a 32 inch setback from the sidewalk present a public safety issue. Before the truck driver exits the garage to look both directions to look for oncoming traffic and pedestrians, the truck is far out onto the sidewalk. The development of the Willamette Falls Project and the PW development of a passage to the upper Water Board Park will increase foot and bicycle traffic in this neighborhood. It should be noted that there may also be a conflict with the ADA (Americans with Disability Act) requirements for safe passage for the physically challenged.

Page 19-A: The PW presentations repeatedly compare their proposal to buildings in the Seventh Street Commercial Corridor, however, the Historic District Guidelines specifically requires, "commercial uses shall employ a residential style architecture to better integrate into the neighborhood fabric".

Page 20-A: "Vehicle access and storage at the side or rear". "otherwise street trees". The PW proposal shows 4 street trees over a 350 ft frontage on Center St.

Page 33-A: "Vehicle drive in front of primary facade". NOT ALLOWED. PW proposes 10 garage doors on the building frontage.

Page 34-A: "Buildings may be set back to better integrate with houses where adjacent and to facilitate grade change." Neighboring residences are setback greater than 10 feet. PW proposes a 32 inch front setback.

Page 37-A: "McLoughlin Commercial use buildings on Center and High: provide front setback of 6 ft or fit to existing historic and newer building context; provide side setbacks of 6 ft for buildings using a residential style." PW proposes a 32 inch setback along Center Street and zero setback from their north property line adjacent to an existing residence.

Page 38-A: Under "Good Example"; "McLoughlin commercial use buildings in a residential style: maximum height similar to residential use." PW proposes 31 foot high walls along Center Street and adjacent to the residents to the north cutting off their access from the sun during the winter months.

Page 40-A: NOT ALLOWED: "Long uninterrupted wall planes facing the public way: utilize projections, recesses or wall elements to breakup such planes." PW does not follow this guideline.

Page 50-A: "Materials". "Materials that through their nature are not historically appropriate" are NOT ALLOWED. PW needs to address this issue as it relates to the item above, (Page 7-A,B).

Page 52-A,B,C: Improvements in the public right of way are to support pedestrian use and fit the historic pattern and dimension of the district.

Page 54-A: "Garage doors on front or forward side elevations." NOT ALLOWED. PW proposes 10 such garage doors.

Page 58-A: Concrete block is not consistent with the Historic District and is NOT ALLOWED. PW is proposing concrete block. A material such as "Clay All Tile" with a smaller scale and fitting the recommended "brick" designation would be a conforming choice.

Many of the HD Guidelines could have a profound effect to the Master Plan such as building setbacks and front elevation garage doors on Center St. Thus, these HD Guideline issues should be resolved prior or during the Phase One HRB Review.

The PW design team should provide a written response to all PW issues within the Historic District Guidelines including these highlighted issues. The HRB should provide the City Planner and the MNA a written response to the PW proposal indicating areas of conformance and areas of non-conformance, and areas of acceptable mediation. This would provide transparency for the review process and indicate the city's commitment to the Historic District designation.

Trent Premore  
101 S. Center St.  
[premorejt@gmail.com](mailto:premorejt@gmail.com)  
503.319-7904 (after June 10)

RECEIVED  
CITY OF PORTLAND

2017 MAY -8 AM 9:18