

22 January 2021

Mayor Snyder and Members of the City Council:

Greater Portland Landmarks strongly supports designation of the proposed Munjoy Hill Local Historic District and six individual landmark structures. They meet the minimum criteria for designation in Division 3 of the historic preservation ordinance and are consistent with the City's comprehensive plan, which identifies historic preservation as an integral part of the city's planning strategy.

- The proposed Munjoy Hill Historic District meets the historic preservation ordinance's minimum criteria for designation as set forth in Sec. 17.4.1A and B, as well as the integrity criterion in Sec. 17.4.2 for its value as a significant example of the cultural, historic, & architectural aspect of the heritage of the City of Portland. The neighborhood's dense development pattern, shared building characteristics, and history as a diverse, working-class neighborhood for generations of maritime workers and immigrant families unifies much of the neighborhood and gives it its own identifiable visual character. *This is supported by materials in the 12/3/2019 Staff Memo, the district's Context Statement, List of Properties with Classifications, and the 3/10/2020 district boundary map.*
- The designation of the Munjoy Hill Historic District is consistent with the Sustainability, Housing, Economy, & Historic Resources goals of Portland's Plan 2030. "Stewardship of Portland's historic, cultural, and architectural assets has been an integral part of the City's planning strategy since the Historic Preservation program began in 1990 ... and is supported throughout the document." *2/7/20 Staff Analysis of District Designation to Comprehensive Plan Goals*

The value and benefit of historic preservation is central to achieving the multi-faceted vision in *Portland's Plan 2030* because it is integral to the City's economic development strategy, sustainability goals, and a multidimensional housing strategy. Designation of the Munjoy Hill Historic District will materially advance achieving the following comprehensive plan goals and strategies:

- Ensure an appropriate balance of continuity and change as Portland grows and evolves.
- Stabilize and enhance historic areas of the city by ensuring quality investment in existing structures and compatible infill development.
- Maintain and enhance the uniqueness and integrity of our neighborhoods.
- Support sustainable land use and transportation policies that support the One Climate Future plan as well as connectivity, walkable neighborhoods, and multi-modal transportation.
- Respect that our unique quality of place is key to our current and future economic success.
- Encourage additional contextually appropriate housing density in and proximate to neighborhood centers, concentrations of services, and transit nodes and corridors as a means of supporting complete neighborhoods.
- Encourage rehabilitation of existing historic buildings and materials.

It may be helpful to recall the words in support of designation from David Silk, Planning Board member, at the August 11, 2020 Public Hearing. David stated that he believes the historic district clearly meets the historic preservation criteria and then continued:

"Balancing the benefits to the City over time of capturing the sense of place, and mindful that anything has costs ... we've look at energy, we've looked at rents, we've looked at the burdens imposed just from the exterior facades that are within the public view. I think that although there will be some costs, I don't see those as being so significant that they

out-weigh the benefits that the comp plan clearly places on celebrating the history of Portland over the last 375 years or so.”

The historic district will preserve properties associated with underrepresented communities in Portland. The sites and neighborhoods that represent the cultural and social history of Portland’s minority communities deserve preservation. The proposed boundaries of the Munjoy Hill Local Historic District encompass properties that represent the social and cultural history of several underrepresented communities. Portland’s immigrant stories are celebrated in part through the designations of House Island and India Street. However, few properties associated with the city’s African American history are protected, with the exception of the Abyssinian Meeting House and the Green Memorial A.M.E. Zion Church on Munjoy Hill. Some of Munjoy Hill’s earliest residents were African Americans connected to Portland’s maritime history. The neighborhood was later home to residents that came to Portland from the West Indies, Azores, and Cape Verde. Their homes, mostly centered on the northern end of Lafayette and Quebec Streets, deserve protection.

Historic district and landmark designation do not prevent change but apply design standards in a reasonable and flexible manner to conserve the features of a neighborhood that contribute to its distinct sense of place and to ensure compatible new development. A certificate of appropriateness is not required for replacement of in-kind materials such as vinyl siding or asphalt shingles. Designation does protect designated properties from demolition and ensures proposed alterations or additions are compatible with a property’s original design. New construction within designated historic districts is also reviewed to ensure a respectful relationship between new and old.

The Hill’s visual character is defined by its streetscapes and the collection of buildings more than by its individual buildings. Individual local landmarks are not an appropriate substitute for a district. One incentive of designation is the opportunity to use federal and state historic tax credits to rehabilitate income-producing properties. Local landmarks are not equivalent to individual landmarks listed on the National Register of Historic Places and would deny property owners access to historic tax credits.

More than 280 residents and property owners have offered support for the historic district in oral and written testimony since the designation process formally began in 2019. Consistently about 80% of all comments have favored designation. These comments have demonstrated overwhelmingly that:

- Munjoy Hill has a strong identity and sense of visual character.
- The stories of its current residents, a number of whose families have connections to past generations of residents on the Hill, illustrate how the physical fabric of this proposed historic district embodies a unique sense of place that is valuable to Portland’s citizens and visitors.
- Since 2015, the neighborhood has expressed a growing desire for a land use tool that will stabilize and enhance this historic area by ensuring quality investment in existing structures and compatible infill development.

We strongly urge the City Council to designate the proposed Munjoy Hill Historic District and six individual landmark structures next month.



Sarah Hansen
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Greater Portland Landmarks