

June 1, 2022

Mayor Snyder and Members of the City Council:

Founded in 1964, Greater Portland Landmarks is a non-profit advocacy organization that works toward the preservation and revitalization of greater Portland's built environment. Our goal is to save greater Portland's historic places through preservation and adaptive use while promoting creative new architecture that enhances historic neighborhoods. We appreciate the opportunity to comment on projects that impact the historic character of the city.

Landmarks has been working with and in the Munjoy Hill neighborhood for many years and was deeply involved in the successful adoption of the Munjoy Hill Historic District. We have extensive knowledge of the neighborhood and the processes that led to both the Overlay and the Historic District. We are pleased to offer comments to City Council on its review of the Munjoy Hill Neighborhood Conservation Overlay Zone (MHNCOZ) and to express our concerns over the Planning Board's February 2022 recommendation for its dissolution.

Evaluation of the MHNCOZ should occur as part of the broader review of the impact of historic preservation being completed by Place Economics, as well as ReCode Phase II and the revision of the R6 design standards. With these three major reviews coming up, it is premature to pull the MHNCOZ out for review.

If the MHNCOZ is repealed, we would lose:

- Demolition delay, which allows the city, the property owner and the community an opportunity for conversation and study about the best path forward for the property
- Workforce housing incentive specific only to Munjoy Hill
- Opportunity for review in context of ReCode Phase II

There are a significant amount of historic properties located outside the historic district boundaries. Historic districts must be contiguous, and the approach to this particular district was intentionally conservative, including less than half of the overlay zone. While the 100ft site plan standard does provide a limited opportunity for staff review, this process does not provide demolition delay for properties located within 100ft of the district boundary or an individual landmark. Removing the only form of protection for historic structures on more than half of Munjoy Hill will not only negatively impact this dense district, it will remove the opportunity for thoughtful review and analysis that is helping shape the dynamic future of the eastern peninsula. We are afraid that removing the Overlay Zone, which was never meant to be temporary, will result in a divided neighborhood – creating two Munjoy Hill's – and destroy the cohesive and vibrant neighborhood we know today.

We are unclear as to why there is a sense of urgency surrounding this decision. The Munjoy Hill Historic District has officially been in place just over a year, and we do not believe there has been enough time to adequately evaluate how the MHNCOZ functions in concert with the historic district. Additionally, in the materials for the January 25th Planning Board workshop, staff noted that there are elements of the MHNCOZ that could successfully be applied throughout the R6 zone. We believe this warrants further study and conversation.

We agree with the planning staff's notation that the current limitations on rooftop appurtenances create challenges for accommodating mechanical equipment, especially including elevator overruns. We would recommend updating this provision of the overlay to expand the definition of appurtenances to include elevator overruns as an element that is permitted up to five feet above maximum height if adequately screened, set back from the building edge, and integrated into the building design, and not visible from the public right-of-way as regulated elsewhere in the Land Use Code.

With the above noted update, we believe the MHNCOZ supports the goals of Portland's Comprehensive Plan to identify, document, designate, and preserve Portland's historic resources and to stabilize and enhance historic areas by ensuring quality investment in existing structures and compatible infill development. We strongly encourage the City Council to hold off on making a decision about the overlay until the economic impact report is complete and there has been further opportunity for review through ReCode Phase II. Thank you for considering our views.

Cordially,



Sarah Hansen
Executive Director



C. Ian Stevenson
Director of Advocacy