

May 4, 2018

To: Chair Sean Dundon, Planning Board Members and Planning Director Jeff Levine

Greater Portland Landmarks appreciates the work that the Planning Staff has done over the past several months to achieve a balance among preservation, renovation of existing buildings, and new construction so that Munjoy Hill may retain its key characteristics while it grows and changes.

### **1) Historic Designations on Munjoy Hill**

To this end Greater Portland Landmarks requests that the Planning Board recommend and that the City Council direct the Planning Department to compile existing research and additional materials as needed in order to assemble historic district designation reports and initiate nomination of the following by September 1, 2018:

- a North Street Historic District
- an Eastern Promenade and Worker Housing Historic District
- a multiple resource nomination for historic buildings located outside the boundaries of the potential historic districts outlined above.

This timeline should allow designations to be completed by the City Council by the end of 2018.

Munjoy Hill's historic buildings are significant features of the neighborhood's streetscapes and help make the area a desirable and attractive place to live, work and play. It is necessary to preserve the character defining buildings that reflect the neighborhood's development over a broad period of time and the role the buildings' residents played in the social and cultural history of the neighborhood, before more of the Hill's historic identity is lost.

Historic preservation is a key part of the City's 2017 Comprehensive Plan. In addition, in many cases these historic buildings include existing affordable housing units and their preservation is an important means to meeting affordable housing needs on Munjoy Hill. Also, the preservation of these buildings and their embodied energy fulfills City Comprehensive Plan goals to adopt sustainable building and land use polices.

### **2) R-6 Dimensional Standards**

The existing buildings in the neighborhood represent a range of scale and massing from one to four stories. Therefore, the subordination of the R-6 design standards to zoning dimensional standards as proposed by staff could result in buildings that meet the zoning ordinance for maximum height or set back, but are out of scale with the neighboring buildings. We believe that the maximum height standards as proposed will continue to be an incentive for demolition. Therefore, we urge the City to incorporate some of the design standards, especially those for scale, form and massing, into the dimensional standards of the zoning ordinance or that another means be incorporated to ensure that new designs are compatible with the neighborhood context.

We appreciate the portions of the current design standards that contain overarching principles in support of contextual new design on Munjoy Hill. We believe that the prescriptive standards are unnecessarily detailed and limiting. Revised design standards should focus on the high

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level goal of allowing new construction that responds to and fits into the Hill's eclectic neighborhood context without dictating specific details.

### **3) Alternative Design Review**

We support an Alternative Design Review only if it incorporates a public process that establishes the review authority as the Historic Preservation Board. The Historic Preservation Board has a proven track record of reviewing new residential construction for compatibility to its context, including the approval of modern designs.

### **4) Demolition Delay**

We support the proposed 18-month demolition delay. While a demolition delay in the overlay zone is an important step to protect important neighborhood buildings, applications for demolition should require a public posting or signage on the site and a public hearing or public comment period so that the public may participate in the demolition decision process to prevent the demolition of a preferably preserved building with historic, architectural or community value.

### **5) Non-conforming Building Extensions**

Lastly we urge the Planning Board to remove the language on non-conforming building extensions that would apply city wide until further study of the ramifications of these changes can be understood and to allow time for substantive public review and comment.

Thank you for considering our views.

Sincerely,

Hilary Bassett  
Executive Director

