



16 October 2018

Chair Sheridan and Members of the Historic Preservation Board,

Thank you for the opportunity to comment on the proposed project at 37 Montreal Street. We have two questions that we would like to see addressed at the public hearing on Wednesday evening.

First, the average grade as shown on the drawings is 136'-3". It is difficult to verify without a scale on the various elevation drawings. Has this been confirmed by city staff? We are concerned that the average is not correctly calculated and may need to be adjusted to bring the overall height below what zoning allows.

Second, does there need to be a formal vote on the Alternative Design Review at this time? The staff report says that a formal finding of conformance with ADR requirements is not required at this time, but is only being requested. The application does not contain the level of detail and documentation that would be required at the time of site plan approval. As noted in the staff report there are a number of not met and partially met items listed. Given the level of detail and the number of concerns expressed in the staff report, we ask the board to consider whether it is appropriate to determine at this stage that the design will likely meet the ADR requirements?

We thank the applicant for responding to board, staff and public comments that have improved the building's interaction at the street level. However, we continue to believe that the proposed design is visually incompatible with structures to which it is visually related as stated in Chapter 5 of the Historic Resources Design Manual. As we have commented previously, a threshold question for the board is whether the massing of the proposed project is harmonious with its context. While the building is much larger in volume than its immediate neighbors, the board suggested to the applicant in the workshop sessions strategies that might help mitigate the impact of the height and massing to make the development reasonably compatible with its context. Those suggestions included reducing part of the building's height as it stepped down Montreal Street. Greater Portland Landmarks does not believe the applicant has taken sufficient steps to mitigate or reduce the scale of the building along Montreal Street in its revised design. At the eastern end of the site the building appears to be five stories in height and this is incongruous with the height of neighboring buildings.

Landmarks does not agree with the staff conclusion that it is appropriate to move forward with conditional approval, utilizing staff prepared sketches included in the public hearing packet. The applicant had ample opportunity to make similar changes before the public hearing based on comments from the board, staff, and the public at the workshop sessions and chose not to do so. Building design is a complex and holistic process. We believe that the process of approving staff submitted elevations is not a good precedent and we urge you not to approve the project based on these sketches. Therefore, we ask that you find the application is not consistent with the historic preservation ordinance's Standards for Review of New Construction.

This project will help to set the precedent for future reviews under the new Munjoy Hill Overlay Conservation District. While the board always carefully considers the impact of any proposed development on its neighborhood, we also ask that you carefully consider the process of your decision making on Wednesday evening given the ambiguity between the applicant and staff proposals. Your review and the building that results from your decision will have a long term effect on neighborhood character, the building's immediate neighbors, and the success or failure of the overlay district.

Thank you for considering our views.

Sincerely,

Julie Ann Larry  
Director of Advocacy