



IRVINGTON
COMMUNITY ASSOCIATION

February 17, 2017

Re: Flyer by "Keep Eastmoreland Free"

Eastmoreland residents,

It has come to our attention that a flyer has been sent out by the organization "Keep Eastmoreland Free" which purports to state certain facts involving the Irvington National Historic District. The flyer is insidious in that it mixes partially true statements with falsehoods and then mixes those with statements that are very misleading.

We are including a point-by-point rebuttal of the assertions made by KEF. I think after reading the attached rebuttal, it will be clear that the KEF flyer was not an honest representation of the Irvington National Historic District.

The reality is that in making Irvington a National Historic District, the neighborhood has saved itself from a spate of demolitions; a number of which are occurring within blocks of the historic district's periphery, in Grant Park, Sabin, and Alameda, where a significant number of homes are being demolished and replaced with much more expensive, yet out-of-scale homes.

Most Irvington residents will tell you that the advantages of living in a National Historic District are readily apparent in the current environment of developers swooping in and tearing down perfectly good homes before anyone knows what's happening. The more affordable homes are the first to go. While no one likes to have to pay a design review fee, many people believe that the trade-off is worth it.

Which brings me to the implication in KEF's flyer that the design review process is a highly contentious and very expensive process. This could not be further from the truth. The majority of applicants are doing small projects which only warrant a \$250 type 1 review fee. Some applicants have heard horror stories about historic districts and are surprised at how helpful the Irvington Land Use Committee is with getting their project approved or providing them with potential solutions to their problem that they may not have previously considered. Contrary to KEF's implication, properly scaled rear additions and dormers are often allowed.

In summary, Irvington is not advising Eastmoreland as to whether they should become a National Historic District. There are trade-offs and the residents will have to decide whether they are worth it. However, the flyer which was passed out attempting to use the Irvington National Historic District as a cautionary tale was, at best, misleading. I would urge you to disregard it. If you have any questions about Irvington, I invite you to contact me. I will do my best to answer your questions.

Regards,

Steven Cole

President,

Irvington Community Association

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To: Our Friends in the Eastmoreland Neighborhood

February 18, 2017

From: The Irvington Community Association Board of Directors and Land Use Committee

In the intense debate over designating Eastmoreland as a National Register Historic District, the partisans have made assertions about the experience in the Irvington Neighborhood since our designation as a National Register Historic District in October, 2010. Those assertions have been a mix of accurate statements, correct but misleading statements, and outright inaccuracies. We recognize that the Eastmoreland debate is not our debate, but we are concerned when our community policies and practices and their results are misrepresented in public ways. Since 1966, the Irvington Community Association, its board of directors and functional committees, have worked tirelessly for the benefit of our great neighborhood, and we carry on that tradition today. Accordingly, we have drawn up this review of assertions made about our neighborhood, ranking their truthfulness and correcting the record where that is required:

Assertion about Irvington and the IHD	Assessment	The Facts
“Any home not designated as historic (contributing) can be demolished without special review...”	True, but misleading	In the more than 6 years since the District was created, there has been just one non-contributing house demolished in Irvington , while dozens have been demolished in surrounding neighborhoods. Replacement houses must go through a historic resource review that mass-production developers are unwilling to undertake. The result is rehabilitation rather than demolition of our smaller scaled houses.
“[demolitions] of non-contributing houses happen frequently”	False	See the Facts above
“Irvington residents have not been allowed to use energy-efficient, durable fiberglass windows...”	Misleading	The overwhelming preference for window weatherization is rehabilitation of historic windows, preserving their character and beauty while achieving energy efficiency equivalent to that of new windows. This is both economically and environmentally sound practice. Replacement with new windows (wood windows preferred, but fiberglass and aluminum clad allowed in some situations) is allowed when the existing historic windows are beyond reasonable repair. Many Irvington residents have expressed appreciation that they were encouraged to repair rather than replace their windows, when they found the results both cheaper and nicer than those proposed by replacement window salesmen.
“Most exterior alterations are required to go through a burdensome and costly Land Use Review process...”	Misleading	Current historic resource review rules provide for 22 exemptions including roof replacement, all types of repair and maintenance including repainting, and many other common projects. Landscaping, detached decks and other yard/garden features, and accessory structures under 250 square feet are all exempt from review. In fact, the most typical exterior projects are exempt from review. Physical re-arrangement of the building itself, including replacement and relocation of windows comes under historic resource review. As to cost, roughly half of all historic resource review applications filed in the last few years, including all new external ADU construction reviews, are Type I with a cost of \$250.
“No significant alterations have been approved for street facing sides of historic homes... Adding a second story to a home that is contributing is impossible...”	True	Protection of historic character means that some alterations will not be approved. Strolling along Irvington’s beautiful streets is a pleasure due to the high degree of preservation and architectural distinction of its many historic homes both small and large. We do not feel it necessary to apologize for wanting to protect that for our children and grandchildren to enjoy as well.
“The Historic District will have	False	City Code expressly puts Historic Resource Review guidelines above zoning when they conflict. It is true

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NO impact on what is allowed by city zoning, nor would it prevent any code changes that are a result of the Residential Infill Project.		that HRR regulates the exterior dimensions and characteristics, not the number of housing units contained in the building. The number of units and the uses allowed in the building are regulated by the zoning code. Still, the limits on scale, massing and demolition resulting from historic review guidelines inevitably limit developer enthusiasm for wholesale alteration of existing buildings, even when non-contributing.
“Solar panels are prohibited on street-facing sides”	Mostly true, but incomplete	The City of Portland historic review guidelines prohibit solar panels on roof surfaces facing the street. In some situations, solar panels have been allowed on garage roofs. In 2017, we intend to pursue changes to the guidelines which would allow solar power shingles to be allowed on all roof surfaces.
“In many cases, multiple appeals have been required...”	False	In the Irvington Historic District a total of 6 appeals have been filed out of roughly 400+ historic reviews. Of these 3 were filed by the applicant and 3 by the ICA protesting a BDS decision we felt did not comply with City Code. If anything, the availability of the appeal process is a protection for property owners in the event of over-reach by the Bureau of Development Services. The neighborhood association has standing to file an appeal, and can assist home owners who feel an incorrect decision has been made. Note that Type I reviews are appealable only to the State LUBA, and no such appeals have been filed.
“forty-six Irvington homeowners were reported for ‘non-compliance... requiring [them] to proceed through Historic Resource Review”	True, but incomplete	The majority of the complaint cases were filed in the first couple years the District was in effect. The ICA works with property owners to encourage compliance with the HRR rules prior to any complaint being filed and with those same owners to assist them in getting to compliance. The overwhelming majority of our neighbors understand the rules and comply with them. A few, often out-of-town owners or “flippers”, have not been so law abiding. We feel that thoughtful enforcement is essential to have the protections of the Historic District be meaningful.
“Developers have been able to relocate historic homes on large lots and build new homes alongside them”	True, but misleading	Most of Irvington is zoned for 5000 square foot lots with single family homes on them. A few homes sit on half of a 10,000 square foot lot. In such instances, the ICA does not oppose the increase in density resulting from building on the empty lot. Irvington is, after all, an inner city neighborhood, and we recognize our responsibility to take more density, even though we are already the 3 rd densest neighborhood in the city. In just ONE instance, a beautiful craftsman bungalow in very bad condition will be moved to half of its original 10,000 square foot lot, be completely restored to its historic appearance and will retain its contributing status. We regard this as a “win” for the neighborhood. Of course, the new home to be built in the space next to it must comply with all the historic resource review rules for compatibility. Demolition of a contributing house on a 10,000 square foot lot to build two or more replacement homes is not permitted.
“Adding carriage-house style garage doors, exterior decorative moldings and shutters have not been allowed...”	Partly true	Garage doors are routinely replaced, and since the range of doors applied during the “historic period” covers a broad gamut, much flexibility of design has been allowed, including carriage-house style doors and traditional panel roll-ups. Restoration of lost historic detailing is encouraged, and Irvington home owners are proud of their efforts in that regard. Addition of speculative features that may-or-not fit the period of the house are generally not permitted.
“Irvington homeowners who have sought to replace their existing garages have faced tremendous obstacles”	Misleading	Roughly half of Irvington garages are classed as contributing. In such cases, while demolition is not really an option, remodeling, expansion, and rehabilitation are. This includes expansion to accommodate longer cars and conversions to ADUs, all of which have been approved in the District.