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February 22, 2021

To: Ordinance Committee

Re: Historic Resources Ordinance Amendments
Ordinance Committee agenda, February 23, 2021

Chair Jordan and Committee Members Gutierrez and Sneddon,

Allied Neighborhoods Association is very pleased the Historic Resources Ordinance Amendments (agenda item 1) are before you for review and recommendation. We would like to thank staff in the Planning Division and the Attorney's Office, especially over the past year or so, who worked on the Amendments.

We urge you to keep the Historic Resources Ordinance Amendments moving forward to Council.

Allied would like to provide the following additional comments:

1) From the bullet point list, Staff Report (pg.2) – *"Changes Project Compatibility "Considerations" to "Findings" and refines Finding "a" of the Project Compatibility Analysis that is outside the purview of design review boards"*

a) We agree with the recommended refinement for "a" described above, and appreciate the change.

b) Operationally, there has been a problem with the Project Compatibility Considerations at design review, particularly ABR.

Especially on larger projects, applicants have not yet submitted a formal project application to the City. Projects are at design review at the Concept level, and the next step may be to Planning Commission for a land use approval (height exception, for example). Design Review is pressured to "make" Project Compatibility Considerations this early in the process as it's presented to them as necessary to move the project on to Planning Commission. (which is before Project Design Approval at design review)

We understand Project Compatibility Considerations (or soon to be "Findings") are necessary when Project Design Approval is granted by design review (HLC or ABR); this is after a formal application has been submitted, and the DART review as applicable. We also understand that Planning Commission would like to know what design review thinks of the project at the Concept level, but design review should not be required to make the "Considerations" at this stage. They should provide comments to inform Planning Commission.

2) Please move the Historic Resources Ordinance Amendments forward to Council. It has taken many many years to get to this point.

It does not seem reasonable or necessary to delay these Amendments once again, speaking specifically to Planning Commission's additional recommendation *"…to concurrently update the design guidelines as they relate to historic resources, including residential and larger commercial structure solar guidelines."*

It's our understanding the design guidelines regarding historic resources were completed a number of years ago and put on hold (on the shelf) awaiting the Amendments. After the Amendments are adopted, the design guidelines can be dusted off and reviewed for consistency, etc. with the adopted Amendments. Solar guidelines could follow shortly thereafter.

Thank you for your time and consideration.

Sincerely,
Allied Neighborhoods Association

PS – It has just been brought to our attention of a possible conflict between language in the Amendments and in the Charter (both described below). We ask that staff please clarify or explain for the Ordinance Committee and the public, whether these can work together or whether there needs to be some language change in the specific ordinance subsection. Thank you.

(Attachment 1) Proposed New Chapter, Chapter 30.157 (Historic Resources), **30.157.110, B.** – talks about minor exterior alterations and the City Architectural Historian's role.

The Charter, **S 817 (c)**, talks about HLC's power and duty regarding exterior alterations.

Cc: Nicole Hernandez, Rebecca Bjork, Renee Brooke, Dan Gullett, Irma Unzueta, Ariel Calonne, Paul Casey