

Maine Preservation

Our Heritage, Our Legacy

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June 24, 2015

Members of the Historic Preservation Board:

On behalf of Maine Preservation, the statewide nonprofit historic preservation organization, I am writing to support designation of The Portland Company complex site on Fore Street as a Local Historic District.

The Portland Company complex has local, statewide and national historic significance, yet years of deferred maintenance have left the complex buildings in serious disrepair. As noted in the memo to the HP Board by Deborah Andrews dated June 19, 2015, the preservation ordinance requires the nominated resource to have sufficient integrity of location, design, *condition*, materials and workmanship to make it worthy of preservation. Maine Preservation (MP) concurs with the HP Board assessment that several of the buildings are noncontributing because of their severely deteriorated condition including buildings No. 7, 10 and 11.

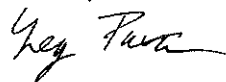
Maine Preservation shares the opinion that Building No. 4 is a key historic element of the complex core. But based on the Resurgence Engineering and Becker Structural Engineers assessments of the complex, the structural design of the building is greatly flawed. As such, the building requires demolition in whole or major part and reconstruction with a different structural design, which is not historic preservation. We urge the HP Board to thus determine this historically important building noncontributing due to condition.

MP in several conversations with the principals of CPB2, LLC has shared the goal of helping the project pursue historic tax credits, which will greatly improve the economic feasibility of the project as well as ensure rehab to preservation standards. Based on our conversation with Maine Historic Preservation Commission, we believe that a strong and unified case must be made to the National Park Service (NPS) to allow for certain buildings within the District to be determined noncontributing.

Buildings No. 14 and 16 appear in more dire condition than any other buildings on the site, but an engineer has not evaluated them. MP supports the goal of retaining their siting and the alleyway and any significant fabric that can be feasibly rehabilitated. But we support a local determination of contributing for 14 and 16 only if: 1) the owners may present further evidence of their condition which may remove them as contributing; 2) that significant fabric be retained as feasible in rehab; and 3) that additions atop these buildings be permitted, as has been previously discussed. MP requests that such a conditional determination of contributing be made for local review purposes only, with clear direction to the staff that if Portland nominates this district for state and national historic tax credits that these buildings *not be included as contributing for the tax credits*. This is based on their deterioration as well as the prohibition by the NPS for tax credit projects with rooftop additions visible from the street.

With the possibility of acquiring historic tax credits, Portland has an opportunity for a revitalized complex to become once again a vital community asset. Reaching too far to require reconstruction projects of the magnitude required by Buildings No. 4, 14, and 16 could place in jeopardy the entire redevelopment project. We hope the preservation community and the developers can come to a consensus around the rehabilitation of key buildings in order to preserve and enhance the architectural integrity, feel and spirit of the complex as a whole. Thank you for your service.

Sincerely,



Greg Paxton

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