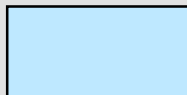


0 100 200 400 Feet

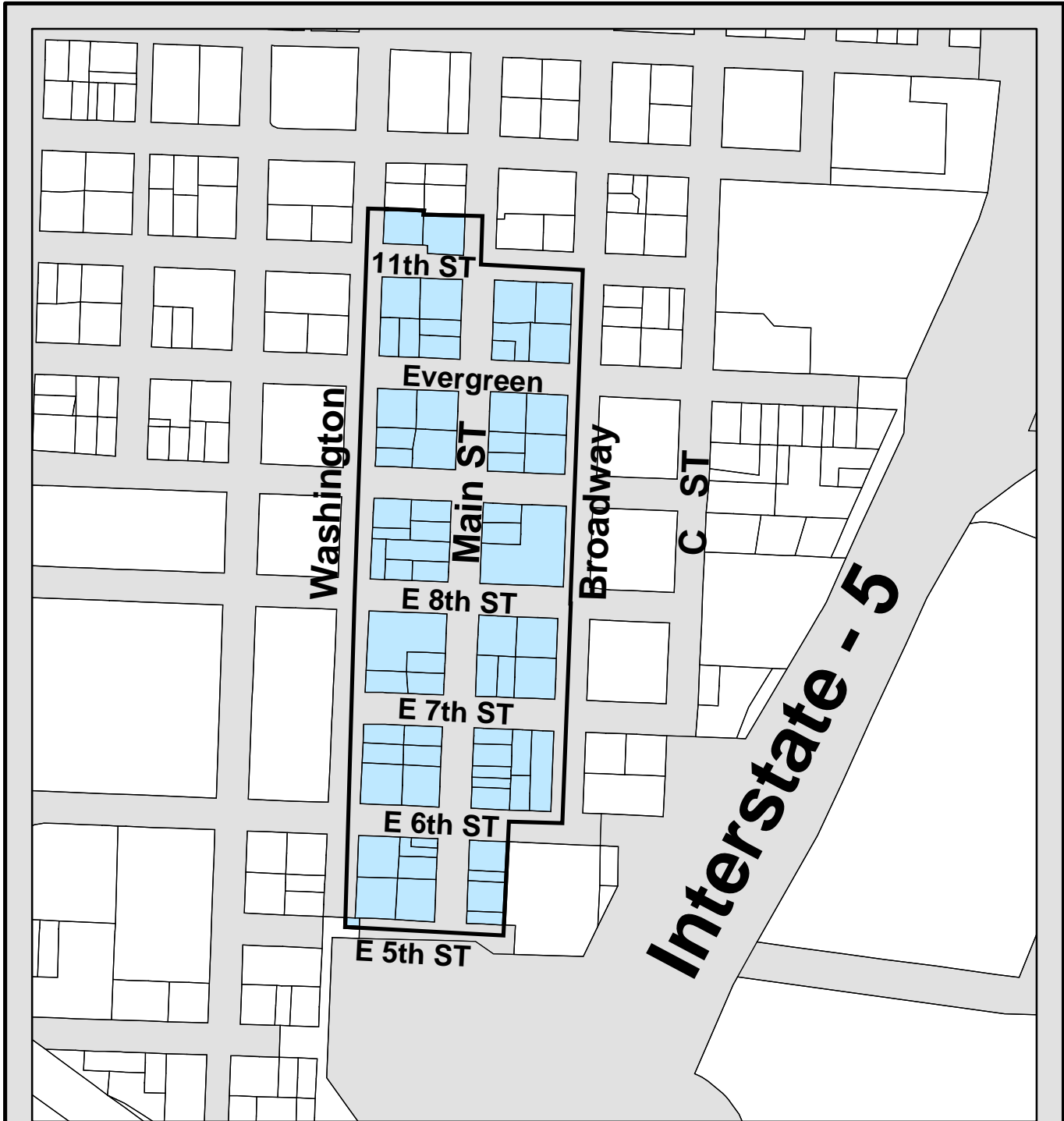


Heritage Overlay

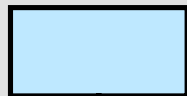
Heritage District Overlay

**FIGURE
20.510-1**





0 300 600 1,200 Feet



Heritage Overlay

Heritage District Overlay

**FIGURE
20.510-2**



Chapter 20.510

HERITAGE OVERLAY DISTRICT

Sections:

20.510.010	Purpose.
20.510.020	Heritage Overlay District Number One - Standards and Guidelines
20.510.030	Review Process.
20.510.040	Determination of Compliance.
20.510.050	Preservation, Restoration and Reuse.
20.510.060	Identification Plaque.

Section 20.510.010 Purpose.

General. The Heritage Overlay Districts are intended to preserve the special architectural character and/or historic or cultural significance of certain areas within the City. The following additional regulations are imposed in areas so designated in order to do the following:

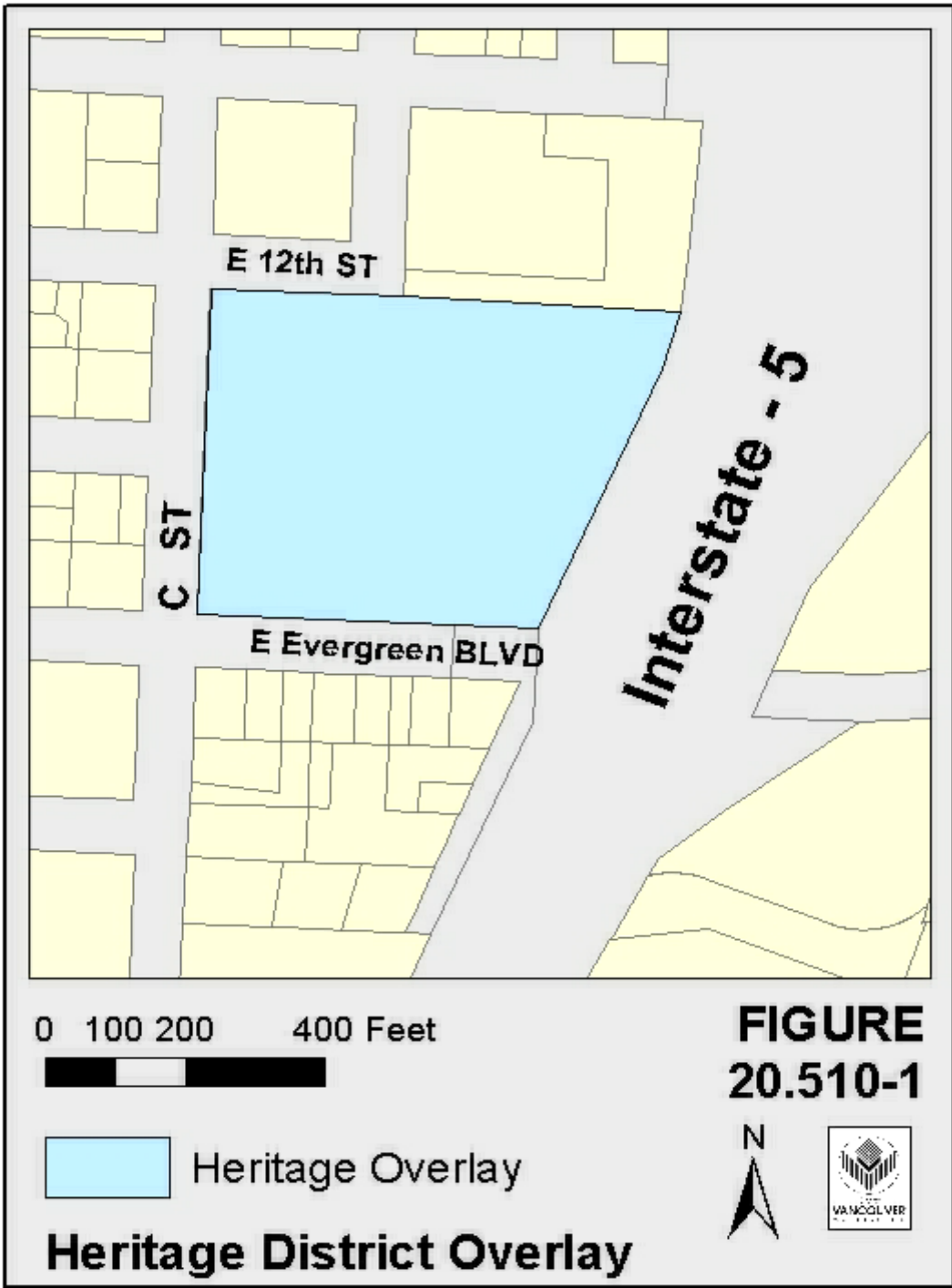
- A. Compatibility. To ensure that new development is compatible in scale, character, and design with existing buildings and with the preservation of existing architectural characteristics of significant buildings in the area.
- B. Preservation. To preserve and encourage the restoration of existing older buildings in their original architectural style.
- C. Retention of unique character. To retain, conserve, and improve historical, cultural, and architectural environments attractive to residents and to visitors, thereby promoting the economic health of the City while retaining its unique historical and architectural features.

(M-3832, Amended, 06/18/2007, Sec 29; M-3777, Amended, 12/04/2006, Sec 3; M-3643, Added, 01/26/2004)

Section 20.510.020 Heritage Overlay District Number One - Standards and Guidelines

A. Heritage Overlay District Number One

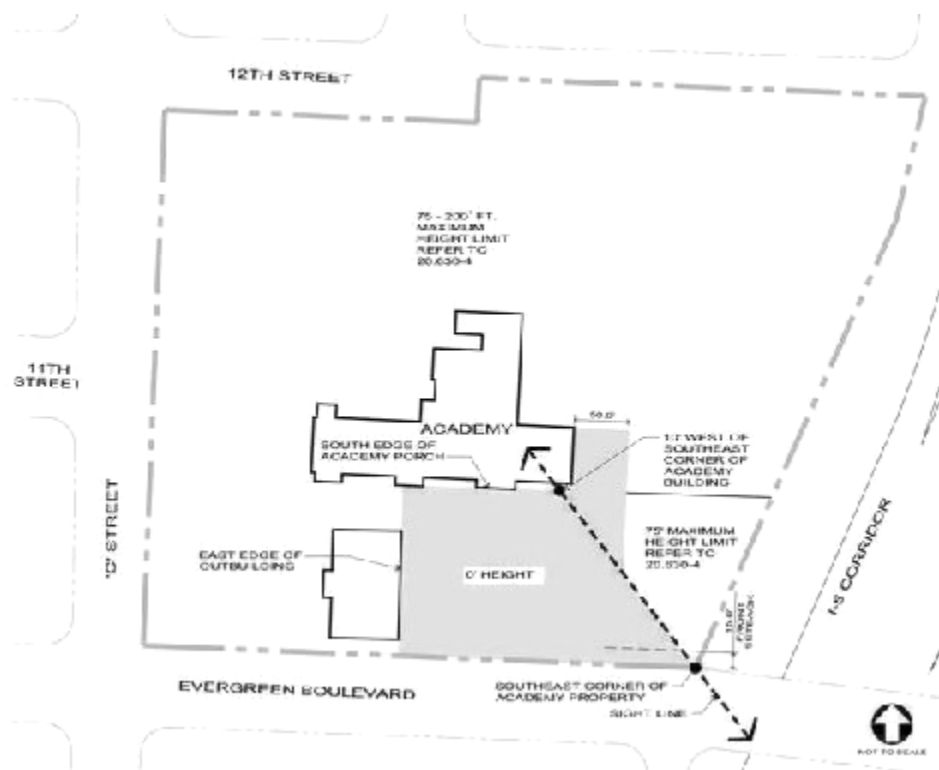
1. Establishment. Heritage Overlay District Number One shall be bounded by 12th Street, West Reserve Street, the north curb line of East Evergreen Boulevard, and C Street; Figure 20.510-1. This is primarily the site of Providence Academy, the dominant landmark and most important historic building in downtown Vancouver. The main Academy building is the major historic asset in the area, but the outbuildings and the grounds of the Academy are also important historical and architectural features because of their relationship to the main building, and their influence on views of the main building and on the character of the immediate environs.



2. Policy. Due to the importance of the site of Providence Academy, the Academy buildings, and the Academy grounds to the cultural, economic, and architectural history of Vancouver, and due to the unique character established by the buildings and grounds in combination with each other and with their surroundings, it is the policy of the city to preserve Providence Academy and critical open spaces integral to its site, and to ensure the compatibility of new construction or alterations to existing buildings, with the character of the historical buildings on the site. In order to accomplish this policy, special regulations are deemed necessary as an exercise of the city's legislative and police powers for the preservation and enhancement of the area.

3. Standards and requirements. The following requirements shall apply within Heritage Overlay District Number One, in addition to any other Zoning Ordinance regulations applicable to the area. The regulations are necessary to preserve the unique open space which provides a setting for and which is an integral part of the Providence Academy site, and to preserve views of the Academy from the East Evergreen Boulevard entrance to the downtown area.

a. Construction shall not be allowed in the identified (0 ft) height limit area shown and described in the diagram below. New construction in the identified (75 ft) area and the (75 ft - 200 ft) area shall comply with VMC20.630.050 and the standards and guidelines of this section VMC20.510.020.



b. A view corridor of 50 feet in width and a 0 foot height limit from approximately 11th Street looking east to the Main Academy building shall be preserved. In addition, there shall be one or two view corridors with a 0 foot height limit looking south from 12th Street into the Academy site which shall be a cumulative total of 50 feet in width.

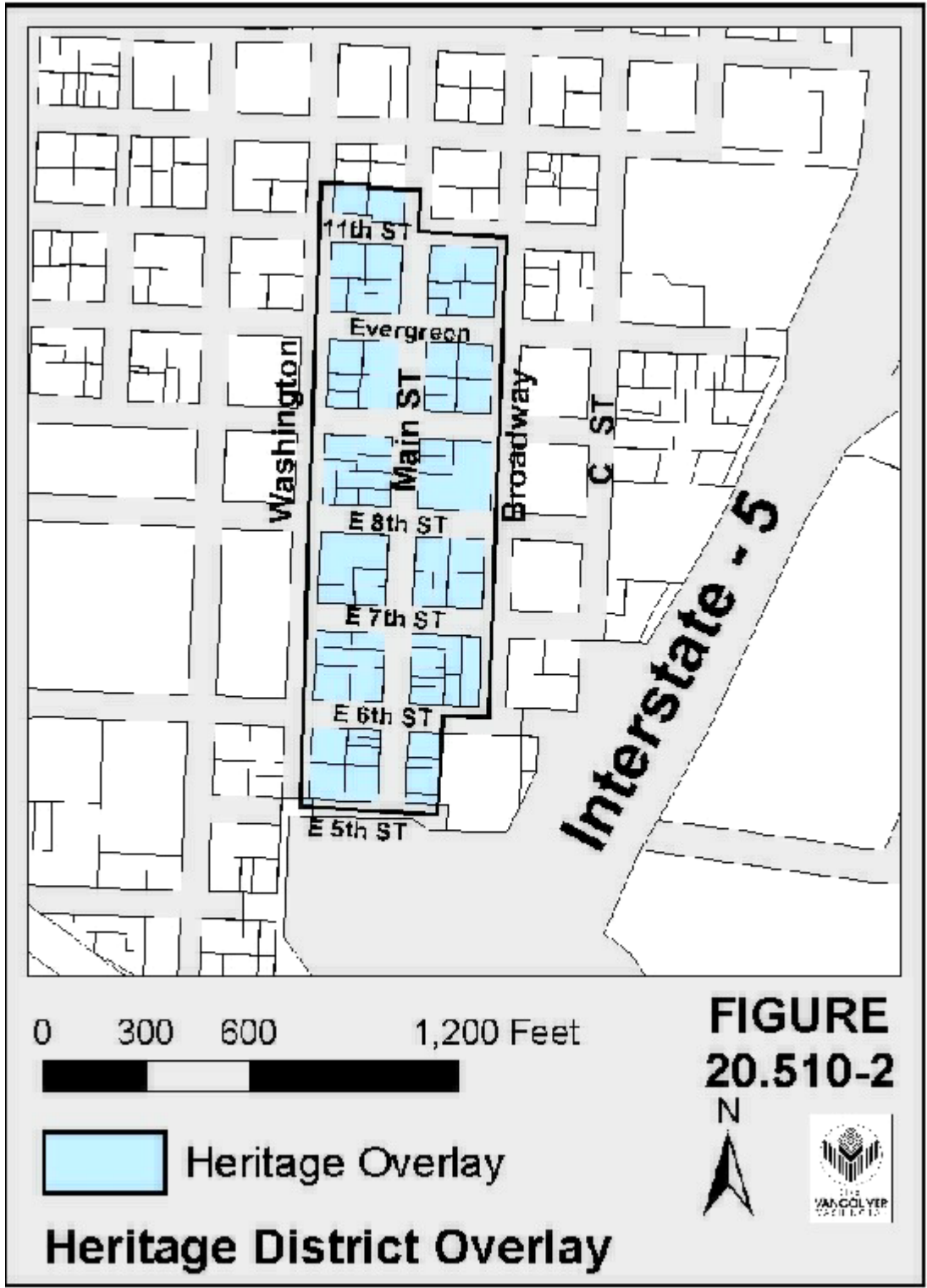
c. All new construction shall be similar in materials and texture to that of the main Academy building, and shall be primarily composed of brick facing, similar in color to that of the main building.

d. No sign shall be installed on the main Academy building above the first story. Free-standing signs on the property shall be limited to directional signs and necessary for parking and traffic control, and a limited number of signs advertising businesses on the premises containing an aggregate signage area of not more than 100 sq ft. No sign or sign structure shall be more than 10 feet in height above the ground level.

e. New construction shall minimize the removal of existing, mature trees exceeding 30 feet in height, and such construction shall be so located and designed as to preserve views of the main Academy building from East Evergreen Boulevard between the freeway and C Street, and shall preserve a setback from East Evergreen Boulevard of not less than 15 feet for open space and substantial planting, and such setback area shall not be used for parking.

B. Heritage Overlay District Number Two

1. Establishment. Heritage Overlay District Number Two shall consist of the area along the east and west sides of Main Street, between 5th Street and 11th Street, and the ½ block area north of 11th Street and on the west side of Main Street and the area along both sides of 5th, 6th, 7th, 8th, 9th Streets and Evergreen Blvd., between Washington and Broadway and both sides of 11th Street on the ½ block north of 11th and west of Main Street; Figure 20.510-2. The area contains a concentration of older buildings either entirely preserved in the architectural style of the early 1900's, or having significant key remaining characteristics of such style, and which are capable of restoration to their original character. Although there are few buildings of historical or architectural significance, the concentration of several older buildings and remaining parts of older buildings in the area collectively provide a street facade reminiscent and characteristic of turn-of-the-century downtown Vancouver, and provides both a historical asset and the potential to recreate the original character of lower Main as a cultural and economic asset.



**FIGURE
20.510-2**

2. Policy. Due to the special character established by several significant older buildings of historical and architectural interest in the lower Main Street area of downtown Vancouver, and due to the potential which such buildings in combination with compatible new development have as a cultural, historical, and economic asset to the city, including the enhancement of a potentially significant visitor attraction. It is the policy of the city to ensure the preservation of important street frontages representative of downtown Vancouver at an earlier time, to encourage the restoration of the facades of older buildings to their original character, to enhance and expand the economic, cultural, and architectural attraction of the area, and to coordinate the actions of individual property owners to the benefit of all property owners. In order to accomplish this policy, the regulations set forth in this chapter are deemed necessary to preservation and enhancement of the area.

3. Key architectural features. Certain architectural features, both existing on certain key buildings in the area, and formerly present on these and other buildings in the area, are key elements to be preserved and to be used for guidance in restoration of existing buildings and in construction of new buildings, consisting of the following:

a. Windows which are narrow and vertical in emphasis, symmetrically spaced, generally with large panels, and door openings which are generally narrow and high; windows and door openings generally occupy less than half of the total wall area of the building frontage; bay windows are occasionally present.

b. Construction generally of standard brick masonry, and occasionally stone block, sometimes exposed and at times painted, and side walls generally of brick.

c. Window and door frames generally of wood or painted metal, and most trim in wood or painted metal.

d. A prominent upper cornice, with occasional lower cornices, with occasional repetition of the upper cornice detail above bay windows and prominent window sills or heavily recessed windows.

e. A texture which is generally rough but firm-grained, and a color typically that of red brick or gray stone.

f. Dark and unobtrusive roofing materials.

g. Arches generally repeated at upper floors when present on the ground floors.

h. A clear articulation between floors.

i. Signs integrated into the architecture of the building or relatively inconspicuous additions to the building with lettering characteristic of that common at the beginning of this century.

4. Key buildings. Parts or all of the following key buildings in Heritage Overlay District Number Two illustrate one or more of the features identified in the previous Section. These buildings should be restored as much as possible to their original appearance, where it has been altered, and these should be used as guidance in the alteration or new construction of adjacent and nearby buildings.

a. The Ford Building, 601 Main Street.

b. Donnegan's, 614 Main Street.

- c. C & C Department Store Building, 715 Main Street.
- d. Vancouver National Bank Building, 518 Main Street.
- e. Schofield Building, 602-606 Main Street.

5. Exterior alteration and new construction guidelines. The following guidelines shall be adhered to in the construction of new buildings and alterations to all existing buildings in Heritage Overlay District Number Two.

a. Every effort should be made to provide a compatible new use for property, one that will require minimal alteration of the building and site; or, effort should be made to utilize the property for its originally intended purpose.

b. Alterations to facades and the construction of new facades should incorporate as many as possible of the key architectural features, and should be compatible with any adjacent or nearby key buildings. If possible, the original distinguishing qualities and character of a building, especially of its street facade, should be retained. Whenever possible, care should be taken to avoid altering or removing any historic material or significant architectural features such as cornices, display windows, recessed entries, original siding materials, or other features.

c. Canopies should be compatible with the building to which they are attached, and should not disrupt key horizontal or vertical details of existing or adjacent buildings; and shall provide adequate lighting underneath.

d. Attempts should be made in new construction to articulate the street facade by the use of bay windows above the first story, and by rhythmically spacing building projections and recessions and other details, while maintaining the continuity of building lines along the street.

e. Facade materials should be restricted to those commonly in use in the early 1900's, such as brick and wood. Metal window and door frames should have nonmetallic finishes and colors.

f. Buildings and accessories should not imitate styles inappropriate to the period exemplified by the key buildings (such as Spanish, Colonial, Federal, Georgian, etc.), which are not characteristic of or compatible with examples of architecture common in Vancouver in the early 1900's.

g. Dark glass or opaque window panes should be avoided in favor of clear or textured glass similar to that in the key buildings.

h. Colors should contribute to the distinct character of the building. For non-listed structures, colors should be compatible with neighboring buildings. For listed structures, period-appropriate building colors shall be researched and incorporated in any new color scheme. Significant departures from these standards shall be reviewed and approved by the Historic Preservation Commission.

- i. Continuity of cornice lines should be maintained physically or visually, between adjacent buildings.

j. Each building should be recognized as a product of its own time and place. Efforts should be made to avoid designs that seek to create an early appearance but which have no historic basis (Colonial, Bavarian, wild west and other artificial themes).

k. Changes have taken place over the course of time and are the evidence of the history on a building and its site. These changes may have acquired significance in their own right and should be recognized and respected during alteration work.

l. Stylistic features or examples of skilled craftsmanship that characterize the building should be treated with great sensitivity.

m. Architectural features that have deteriorated should be repaired rather than replaced whenever possible. Repair or replacement of missing architectural features on historic buildings should be based on physical or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings.

n. Building surfaces should be cleaned with the gentlest means possible. Sandblasting or other cleaning methods that could damage the historic building materials should be avoided.

o. Contemporary designs for new alterations or additions to the existing buildings should not destroy the significant architectural and historical material present on those buildings. Such designs must be compatible with the size, color, material and character of the building and the conservation district as a whole.

p. Whenever possible, new additions or alterations to a building should be designed in such a way that if they are removed in the future, the essential form and integrity of the original building would remain unimpaired.

q. In strict restoration projects, any reinforcement required for structural stability and any installation of protective or code-required mechanical system should be concealed so as not to detract from the property's historical quality, except when concealment would result in the alteration or destruction of historically significant materials or spaces.

r. Mortar joints on brick or masonry-face buildings should be repointed only when moisture problems are evident or when enough mortar is missing that water stands in the joint. The old mortar should be duplicated to the greatest extent possible in composition, color, and texture. Most old mortar is high in lime content and "softer" than newer Portland cement types. When new mortar types are combined with old brick, changes in compression, expansion and contraction, caused by moisture migration stresses can damage the brick and break the mortar bond. In all joint repairs, the original joint size should be duplicated along with the method of application and joint profile.

6. Standards and Requirements. The following requirements shall apply on Main Street within Heritage Overlay District Number Two, in addition to any other requirements of this Title.

a. Building Heights shall comply with Maximum Building Heights, VMC20.630.050.D.

b. Ground level of all new buildings fronting Main Street shall be retail-ready. The term retail-ready recognizes that street-level uses may not all be retail initially, but new construction shall be designed to accommodate for future active retail uses. The following standards shall be met to comply with retail-ready:

1. A clear floor to ceiling height of not less than 15 feet; and
2. Storefront architectural features; and
3. A majority of building front windows and glass doors shall be clear glazed.

c. In the case of existing building renovations, the above retail-ready standards should be followed when practicable.

C. Relation to VMC 17.39

The provisions of VMC 17.39 shall apply to the Heritage Overlay Districts, except in the case of a conflict, in which case the provisions of VMC 20.510 shall apply.

(M-4034, Amended, 12/03/2012, Sec 16-Effective 01/03/2013; ACM, Amended, 09/23/2010, Map Correction ; M-3828, Amended, 06/18/2007, Sec 2 & 3; M-3832, Amended, 06/18/2007, Sec 29; M-3777, Amended, 12/04/2006, Sec 4; M-3643, Added, 01/26/2004)

Section 20.510.030 Review Process.

A. New construction. All new construction within a Heritage Overlay District, shall require review by the Planning Official. The standards for such review shall be those standards pertaining to architectural style, design, arrangement, texture, materials, color, and other pertinent factors designated in this section as standards for review of new construction and alterations to buildings within this specific Heritage Overlay District within which such property is located. The Planning Official shall consult with the Clark County Historic Preservation Commission on any new construction project within a Heritage Overlay District.

B. Exterior Alterations. All exterior alterations to a historic building or a structure located within a Heritage Overlay District, visible from a public street or other public place, and all exterior alterations to a building listed on the State or National Registers of Historic Places, including changes to signs, marquees, awnings, canopies or other building appendages, whether a building permit is required or not, as well as wall murals shall require advisory review by the Clark County Historic Preservation Commission. The standards for such review shall be those standards pertaining to architectural style, design, arrangement, texture, materials, color, and other pertinent factors designated in this section as standards for review of new construction and alterations to buildings within the specific Heritage Overlay District within which such property is located. The Clark County Historic Preservation Commission shall apply the standards for historic preservation projects which appear as Title 36, C.F.R., Part 67 of the Federal Register and shall consult with the Planning Official on any exterior alterations to a historic building within Heritage Overlay District.

C. Permission for removal of a registered building. No building located within a designated Heritage Overlay District which is of special historical interest or value, as indicated by its having been listed on the National Register of Historic Places, the Washington Heritage Register or the Clark County Heritage Register of Historic Places or identified as an "eligible building" for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Site and Buildings, shall be torn down, demolished, or removed unless such building is or has become so dilapidated or damaged, whether from damage by fire or other elements or from natural deterioration, that it is unusable and cannot be reasonably repaired or restored; provided, that such a building may be relocated to another site within the Heritage Overlay District with the approval of the Hearings Examiner; provided, further that such a building may be relocated outside of a historic

preservation overlay district after review and recommendation from the Clark County Historic Preservation Commission and approval of the City Council.

D. Conditional uses. The Hearings Examiner may authorize a use or uses of an existing building in a designated Heritage Overlay District not otherwise permitted within the regular use district with which the downtown development and Heritage Overlay District is combined as a conditional exception, in the same manner as for conditional exceptions regularly permitted; provided that:

1. The Hearings Examiner finds that allowing such use is necessary to the preservation and/or restoration of an existing building of historical or architectural merit (although not necessarily a designated historical building or structure).

2. Such use would not be detrimental to other regularly permitted uses in the district or to the historical or architectural character of the building.

3. The Hearings Examiner has received such assurances as it deems satisfactory (which may include covenants or conditions attached to its approval of a conditional exception), that allowing such use will ensure preservation and/or restoration of the building or key features of the building.

4. The Hearings Examiner is authorized to waive ordinances relating to setback distances or encroachment distances on public rights-of-way or parking requirements, or other requirements in the event the same are found by it to be necessary and reasonable for the development of any property so as to conform with the provisions of this Section. The Building Official pursuant to Chapter 11, Laws of 1976, may allow repairs, alterations, and/or additions necessary for preservation, rehabilitation, or continued use of a building which has been designated as a historic structure under this chapter without conformance to all city codes; provided, he shall do so only if he finds in writing that the repaired or altered building will be less hazardous, based on life and fire risk, than the existing building.

(M-4147, Amended, 12/07/2015, Sec 4-Effective 1/7/2016; M-4034, Amended, 12/03/2012, Sec 17-Effective 01/03/2013; M-3959, Amended, 07/19/2010, Sec 29-Effective 08/19/2010; M-3777, Amended, 12/04/2006, Sec 5; M-3643, Added, 01/26/2004)

Section 20.510.040 Determination of Compliance.

General. Determination as to whether a proposed alteration to the exterior of a building, or the design of a new building in a designated historic zone, meets the intent, purposes, and requirements of this chapter, shall be made by the Planning Official, with input from the Clark County Historic Preservation Commission as needed. Demolition permits for buildings listed on the Clark County Heritage Register, State Heritage Register or National Register of Historic Register are subject to approval by the Clark County Historic Preservation Commission, subject to appeal to the City Council, as provided herein.

(M-3959, Amended, 07/19/2010, Sec 30-Effective 8/19/2010; M-3777, Amended, 12/04/2006, Sec 6; M-3643, Added, 01/26/2004)

Section 20.510.050 Preservation, Restoration and Reuse.

A. General provisions for registered structures. Any structure which has been included within a Historic Preservation Overlay District, and which is listed on the Clark County Heritage Register, State Heritage Register, or National Registers of Historic Places or identified as an “eligible building” for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings, shall be subject to the following regulatory provisions hereby adopted to encourage preservation, restoration and reuse of historic structures:

1. Building Code Regulations applicable to the preservation, restoration and reuse of historic buildings and structures are contained in VMC 17. VMC 17.08 provides for the Building Official to approve alternate methods of construction and materials. Documents that the Building Official uses to make determinations on alternate methods and materials for the preservation, restoration and related reconstruction, rehabilitation, strengthening or relocation of buildings or structures designated as historic buildings include but are not limited to the State Building Code(s) designated in RCW 19.27, VMC 17, the Washington State Historic Building Code WAC 51-19, the International Existing Building Code and other technical resources related to historic buildings and structures.

2. Any developer may transfer the unused development potential of a historic building site to any other site in the same zoning district provided that such transfer would not create a hazard to low flying aircraft. The unused development potential shall be computed in terms of allowable floor area and building height for a site the same size as that on which the historic structure is located, minus the area in the historic building. This transfer of development potential is divisible and may be used only once. The owner of such property must have first recorded a covenant approved by City Council, being on all successor owners, heirs and assigns, that the historic building will be maintained in its historic condition in consideration of the special rights granted by this Section.

3. A structure as identified above shall not be demolished except in the following manner:

a. Demolition of Unsafe Buildings. If the City Building Official has found the structure to be unsafe under the provisions of the Uniform Code for the Abatement of Dangerous Buildings (Chapter 17.32, VMC) and has ordered that the structure be demolished.

b. Demolition of Other Buildings in a Historic Preservation Overlay District. If a proposed reuse of the site requires the demolition of a structure listed on the Clark County Heritage Register, State Heritage Register, or National Register of Historic Places or identified as an "eligible building" for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings, and such structure is located within a Historic Preservation Overlay District. The proponent of the demolition shall submit an Application for Demolition together with a report demonstrating that preservation of the building or structure and important features thereof proposed for demolition will impose an economic hardship upon the owner, rendering it impractical to renovate, restore, or reuse the structure. The report shall contain the following information:

i. Ownership history during the past ten years including the buyers and sellers, sales prices, dates of sales and the relationships, if any, between the present owner(s) and the most recent previous owner(s).

ii. The outstanding balance of the mortgage and other financing secured by the property.

iii. The most recent assessed value and present property taxes levied.

iv. All appraisals on the property performed during the past three years and an estimate of the property's present fair market value.

v. A summary of listed prices, if any, for the property during the most recent three years.

vi. Cultural significance as described in nominations for listing in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places or in any consultant report determining that the building may be an “eligible building” for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places.

vii. Professional quality as-built drawings of the building and renderings of all exterior elevations showing the building’s architectural features and black and white photographs on acid free photographic paper of the building interior and exterior, its site and adjacent structures.

viii. Current level of economic return including annual gross income, itemized operating and maintenance expenses, capital expenditures, depreciation and debt service for the most recent three full years.

ix. An analysis of reasonable economic alternatives to demolition, including:

1. redevelopment of the building in its present location independent of other development of the site;

2. redevelopment of the building in its present location in conjunction with new development on the balance of the site;

3. and relocation to a different location and whether such redeveloped or relocated alternatives are capable of providing reasonable economic return upon completion of renovation / repair / relocation activities.

c. Procedures for Processing Applications for Demolition. Applications for Demolition shall be processed as follows:

i. For buildings listed in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places or identified as an “eligible building” for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings and located within a Historic Preservation Overlay District a legal notice shall be published in the local newspaper that a completed application for demolition has been accepted by the Planning Official and providing the date that such application will be reviewed by the Clark County Historic Preservation Commission. A copy of such legal notice will be mailed to all property owners within 500 feet of the property on which the demolition is proposed. Such legal notice publication and mailing shall occur at least 30 days prior to the review of the application by the Clark County Historic Preservation Commission.

ii. For buildings listed in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places the Clark County Historic Preservation Commission will review the application and associated reports and recommend approval or denial of the permit application.

iii. For buildings identified as an “eligible building” for future listing on the Clark County Heritage Register, State Heritage Register or National Register of Historic Places in the Washington State Inventory of Historical Sites and Buildings and located within a Historic Preservation Overlay District, but not listed in the Clark County Heritage Register, State Heritage Register or National Register of Historic Places, the Planning Official will review the application and associated reports and approve or deny the application subject to appeal to the Hearings Examiner. The Planning Official shall consult with the Clark County Historic Preservation Commission prior to approving or denying the application.

d. **Criteria for Approval of an Application for Demolition.** The following criteria for approval or denial shall be considered when reviewing an Application for Demolition:

i. The extent to which the demolition of the building will have a serious adverse impact on the cultural significance of the Historic Preservation Overlay District.

ii. The extent to which the building is so deteriorated and so lacking in historical fabric, that it would not be viable to retain the historic, cultural and architectural significance of the building through rehabilitation or renovation.

iii. There is no reasonable alternative to demolition that would provide the owner with a reasonable economic return.

iv. The extent to which the denial will deprive the owner of reasonable economic use of the underlying property.

e. **Conditions on a Permit for Demolition.** Conditions including but not limited to the following conditions may be attached to a permit for demolition when a permit for the complete or partial demolition of a building in the Historic Preservation Overlay District is issued:

i. The effective date of the permit may be delayed by up to 90 days to allow third parties to propose alternatives to demolition to the owner. A longer period of time may be set if agreed to by the applicant.

ii. The submission of information that supplements and completes the information required by Section 20.510.050 (3)(b) above.

f. **Expiration of a Permit for Demolition:** A permit for complete or partial demolition shall expire if the demolition authorized by the permit is not commenced within 180 days from the date of issuance of the permit. The Building Official or his designee may extend the time for commencement of work upon determining that delays in commencing the work were beyond the control of the owner. If the permit for demolition expires, a new application for demolition must be submitted and approved before demolition can be commenced.

(M-3777, Amended, 12/04/2006, Sec 7; M-3643, Added, 01/26/2004)

Section 20.510.060 Identification Plaque.

Installation plaque criteria. The owner of a designated historic building or site, or the occupant thereof, with the consent of the owner, may at his own expense install, in addition to any other signs permitted by ordinance, an identification plaque indicating name, date, architect or other appropriate information upon the property, provided that the size, material, design, location and text of such plaque has been first reviewed by the Clark County Historic Preservation Commission with final approval by the Planning Official.

(M-3777, Amended, 12/04/2006, Sec 8; M-3643, Added, 01/26/2004)

City of Vancouver Heritage Overlay – Type of Work and Review Process

Type of Work (visible from the street)	No Review	Staff Review*	HPC review
Exterior Repairs (visible from the street)			
Repairs using same materials and design as original		X	
Repairs using different materials and design as original			X
Reroofing using the same material and color		X	
Reroofing using new material or color			X
Structural or seismic upgrades which do not alter or affect significant features		X	
Exterior Renovations (visible from the street)			
Paint with same color	X		
Paint with new color		X	
Awning – same color, size and shape	X		
Awning – new color, size and shape		X	
Replacing windows/doors		X	
New windows/doors or moving of windows/doors			X
New exterior siding			X
New sign		X	
Changing roofline			X
Installation of mechanical equipment (visible from street)			X
Installation of exterior fire exit stairs			X
Light fixtures		X	
Murals			X
New Construction			
New building			X
Building addition			X

*Staff may make the determination that minor alterations even though listed as only needing staff review should be reviewed by the HPC