



October 21, 2020

Portland Planning and Sustainability Commission

Re: Historic Resources Code Project

Dear Commission Members:

Restore Oregon is a non-profit organization committed to passing forward the places that make Oregon, OREGON: the historic and culturally diverse homes and neighborhoods, bridges and barns, churches and Main Streets that make this place so authentic and livable. Historic places are cultural, environmental, and economic assets, and they need active stewardship or they will be lost to future generations. Stewardship takes many different forms including taking inventory of historic resources, education and outreach to ascertain what places matter most to a community, fiscal and regulatory incentives to effectively encourage the protection of those resources, and community-supported protections that incorporate the benefits of preservation with other land use goals.

Preservation, restoration, and adaptive reuse responds to the pressing challenges Portland faces by:

- Reducing demolition and the wasting of precious materials and craftsmanship
- Lowering CO₂ emissions
- Creating more jobs than new construction
- Providing affordable space for small and minority-owned businesses
- Accommodating affordable housing, especially for families. The most affordable home is already standing!
- Allowing greater density while retaining architectural and cultural heritage

Preservation, by its very nature, is local. Individual property owners and neighborhoods engage in a conversation to ensure that those places that resonate with a community are passed forward, whether it is a structure, a sign, a park, or an intersection. Preservation is not an attempt to freeze a place in amber.

As practiced today, preservation welcomes all-comers and embraces a diverse range of cultural, archeological, architectural and historic stories about the city's history and people. Historic and cultural resource protection is integral to Portland's livability as evidenced by the goals and policies as set forth in Portland's Comprehensive Plan. However, we can do more to make it accessible. Several of the proposed HRCP amendments advance that accessibility, and had they been in place earlier, may have reduced the level of displacement in many neighborhoods around the City such as Albina and Boise-Eliot.

The HRCP amendments will improve Portland's treatment of historic resources by:

- Offering options for designation – a “gold,” “silver,” and “bronze” level – and the flexibility to adjust the level of designation to meet the community's needs over time.
- Extending demolition review to designated historic resources in Conservation districts, thereby advancing equity and acknowledging the great cultural value of these resources.
- Clarifying that a historic resource inventory is simply an information-gathering effort to assess what resources may or may not be suitable for designation, which enables effective planning. Good management requires knowing what you have. Affirmatively removing an owner consent requirement for inventory work removes a significant barrier to assessing our historic assets, educating the public

about these resources, and making decisions based on up-to-date information. It also enables participation by neighborhood groups, civic, fraternal, or cultural organizations, and tribes, to contribute their story – even about resources that they do not own – in a way that has not been possible to date.

- Aligning the Code with the recently adopted Oregon Statewide Planning Goal 5 rule provisions will allow for clearer implementation and better understanding by the public.
- Requiring that demolition review be initially conducted by the Historic Landmarks Commission, the body most knowledgeable about critical contributions that these resources offer.
- Offering meaningful incentives to encourage adaptive reuse instead of demolition and making these incentives available to everyone. Authorizing additional density and greater flexibility in use will allow expanded access for residents and customers, furthering other City sustainability goals.

However, this substantial re-write of a well-established, deeply-invested historic preservation program is not without risk. A successful historic preservation program must take the long view, acknowledging a sustained commitment to education and outreach over time. Although prioritized in the comprehensive plan, a community conversation about what is worthy of protection and how to best achieve those goals is **highly vulnerable to being politicized.**

Restore Oregon understands that historic preservation carries with it certain responsibilities and should not be used as a tool to avoid other public policy objectives. Historic preservation can, and should, accommodate density (in fact its proximity to neighborhood centers or high walkability often make these areas better places to locate additional density), as well as housing affordability and accessibility to those at all income levels. With respect to districts, it may well be that they should demonstrate their contributions towards goals such as affordable housing. A successful example of that is the embrace by the Laurelhurst neighborhood of the redevelopment of the Mann House to create 129 units of affordable housing.

There are important aspects of the HRCF that still need improvement. Restore Oregon has the following concerns about the proposed amendments:

- Additional clarification is necessary in the language regarding historic district removal and boundary changes, as the Goal 5 rule stipulates that removal is authorized only in cases where a resource has been altered such that it lost its significance, it was mistakenly designated, or in limited circumstances relating to owner consent.
- The Historic Landmarks Commission’s role in designating and determining the appropriate level of protections should be increased. This might happen by prescribing an equal weight to Landmarks Commission recommendations as those offered by the Planning and Sustainability Commission as part of City Council review, or by enabling the Landmarks Commission to recommend a district for designation in cases where the Planning and Sustainability Commission refuses to make a recommendation.
- We appreciate the critical role of providing affordable housing in ZC 33.846.080(D)(4), demolition review. However, a meaningful definition of “affordable” must be included. Also, a provision must be made for the public to access a property to evaluate the potential of adaptive reuse or rehabilitation as necessary to satisfy the standard. And if demolition is approved, some mechanism must be put in place for retaining affordability of the replacement dwelling units.
- The proposed amendment to the criteria for Historic Landmark Commission membership fails to recognize the technical expertise, subject matter education, and professional experience required to discharge the Commission’s responsibilities under city, SHPO and National Register mandates. The great majority of membership must have deep experience and professional expertise in a historic

preservation related field. Real estate, finance, law, construction and similar experience is not directly relevant to Historic Landmark Commission work. A self-professed “interest” in preservation is not an adequate substitute for the qualification and training required to serve as advisor to the City on historic and urban preservation matters.

In conclusion, Restore Oregon acknowledges all of the effort that City Staff and the Historic Landmarks Commission has put into this update. Restore Oregon also thanks the Planning and Sustainability Commission for its commitment to creating a livable, affordable, equitable, and sustainable city. We urge you to recognize that the preservation and use of Portland’s historic resources advances these goals and, subject to the important modifications noted above, recommend the HRCP amendments for adoption by the City Council.

Sincerely,



Peggy Moretti
Executive Director



Matthew M. Davis
Board President