

Portland Coalition for Historic Resources

V2.1 Subject: Support for HRCP City Council Amendments

Dear Mayor Wheeler and Portland City Commissioners:

We join with many other groups in supporting the purpose of the Historic Resource Code Project. In earlier testimony, we identified four critically important elements in the existing draft that *fail* to align with Oregon Administrative Rules (OAR) and will, in effect, cripple the HRCP for Portland. We thank Commissioners Rubio, Matts, and Ryan for proposing amendments which address the three most problematic elements and ask for your support.

- **Amendment 3, clarifies criteria for demolition review based on the totality of the factors to be addressed under state and federal protections** for National Register resources and for local Historic and Conservation districts while adding additional considerations to the process. The single criteria in the draft HRC compromises AOR standards and is demonstrably detrimental to the purpose of the code. We thank Commissioner Rubio. **Support!**

New State regulations place more responsibility on City Council for identifying and designating historic resources. Missing from HRCP is a framework to provide qualified, balanced advice to Council that takes into account the value of Portland's irreplaceable legacy of historic resources as well as the needs of the city to accommodate growth and change. Amendments #5 and #6 correct this problem. We thank Commissioner Mapps for recognizing and addressing this important issue. We ask for your approval!

- **Amendment 5 maintains the existing OAR standards for the role of the Portland Historic Landmarks Commission as the primary, not the only, advisory voice in advising City Council** on matters pertaining to the designation and preservation of historic resources including districts. The draft HRCP compromises established City code and AOR standards by reassigning such authority to the PSC. That conflicts with the purpose of the code. **Support!**
- **Amendment 6 restores to the code the existing standard of qualifications for service on the Portland Historic Landmarks Commission.** These include recognized, extensive professional experience in the areas in which the PHLC is charged to provide advice and have review authority. The draft HRCP severely compromises established OAR guidelines for the mix of qualifications and is clearly detrimental to the purpose of the code. **Support!**

In Amendment 4, Commissioner Ryan provides needed clarifications to remove procedural obstacles for unrelated work during the historic protection process.

Amendment 1 includes clarifications to address unintended consequences implicit in height bonuses including incentives for demolition and displacement. In Amendment 2, the review of deeply affordable housing is streamlined to address that need. Amendment 8 proposes a number of technical code changes for which we offer no comment.

In Summary, it's time to wrap up the HRCP. Amendments # 3, #5, and #6 offered by Commissioners Rubio and Mapps remove provisions that are fatally detrimental to the purposes of the Historic

Resources Code. And, while not every concern with the HRCP is addressed including the problematic definition of “Demolition”, these **amendments are bedrock to supporting the purposes of historic preservation**; the many benefits of which are absolutely essential to the health, equity, vibrancy, and future of the city.

Mayor Wheeler and Commissioners, please support and approve the amendments.

With Regards,

Rod Merrick

John Liu

Co-chairs, Portland Coalition for Historic Resources

C: Council Clerk