



September 27, 2019

Mayor Ted Wheeler  
Commissioner Chloe Eudaley  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Jo Ann Hardesty

**RE: Better Housing by Design**

Dear Mayor and Commissioners,

The HAND Board discussed Better Housing by Design (BHD) at our September meeting. There is much to like in the proposal, but one area of concern is its potential negative impact on our historic resources. In multifamily zones, we support the transfer of FAR bonuses in exchange for implementing seismic upgrades to historic structures, and ask that you disallow all development bonuses when a project involves destruction of historic resources.

Specifically:

1. We support the provision in the Recommended Draft that permits the transfer of additional FAR for making seismic upgrades to historic buildings. Any landmark or contributing building in a historic district in which seismic retrofits are installed could "transfer" additional FAR beyond any underutilized amount. This FAR transfer "bump" could help defray the high costs of seismic upgrades to historic structures.
2. We request a change to the Recommended Draft to disallow development incentives such as FAR bonuses and transfers on sites in a historic district where a landmark or contributing building is demolished. While the demolition of historic buildings have been rare, we believe that they may become more common when the BHD comes into effect, making multi-dwelling zones in historic districts eligible for more bonuses and transfers.

We hope you will support these provisions/changes; we do not believe either will significantly limit development, but may help it be more compatible with the existing neighborhood fabric.

Thank you,

Chris Eykamp  
Chair, Hosford-Abernethy Neighborhood District