



October 27, 2020

RE: Historic Resource Code Project Testimony

Dear Mayor Wheeler and Members of the Planning and Sustainability Commission,

Three weeks ago, the Hosford-Abernethy Neighborhood District (HAND) held a special meeting to discuss the revisions to the Historic Preservation Code, a topic too complex for our regular meeting structure.

The historic code has not been revised for 30 years, and the changes proposed are nuanced and offer tradeoffs that require time to reflect. It is unrealistic to expect the lay public to study, consider, and provide meaningful input in just 30 days, especially when there appears to be no urgent timeline for enacting the proposal.

Nonetheless, because the Ladd's Addition Historic District is in HAND, and we are fortunate enough to have residents who are already familiar with the issues surrounding historic preservation, we are better positioned than many neighborhoods to respond in the given timeline. As you consider our input, it is important that you understand that none of these comments are offered in the context of restricting development or otherwise opposing the thoughtful addition of density to our residential areas. We have always taken the position that well considered development can be beneficial to our neighborhood.

- HAND supports recognizing and weighing cultural importance when considering determining historic landmark status. Structures and places that may be unremarkable architecturally may well be meaningful to Portland's varied histories, and we support adopting a broader definition of historic significance.
- We ask that the Landmarks Commission, in consultation with the PSC, take the lead in preparing recommendations regarding what deserves historic designation.
- We continue to support adaptive reuse as a mechanism for preserving older buildings, so long as those uses are not incompatible with and minimize impact on the surrounding existing uses. There may be some uses that would be permitted by the proposed rules (an all-ages music venue, for example) that would not be a good match, and while we support the concept, we ask that you carefully consider what would be allowed.
- We agree that the 1984 Historic Resources Inventory (HRI) needs to be updated, and we ask that a clear process and criteria, including cultural values, be created for adding and removing

sites from the list. We also ask that steps required to apply for designation as a historic or conservation district be spelled out clearly.

- HAND has witnessed the demolition of structures that are significant for our neighborhood, and we ask that you find a way to provide more demolition protection for important buildings. We strongly support the added protection of demolition review for contributing structures in conservation districts.
- We ask that you more carefully consider the transfer of development rights (TDRs) from historic sites to other locations. These transfers can be a way of incentivizing preservation of structures, but the cost is often borne by the neighbors of a development that is larger than otherwise allowed by the zoning code. This creates an inequity, where the costs of historic preservation are not borne by the larger community that benefits from preservation. It might be worth revising the regulations governing TDRs and/or evaluating how much preservation value such transfers really offer, and consider whether those benefits justify their inherent unfairness.

We know that preservation and heritage conservation as compatible with growth, and support policies that give more weight to preservation than has been the practice in recent years.

Thank you,

Chris Eykamp
Chair Hosford-Abernethy Neighborhood District