To: Portland Planning and Sustainability Commission

From: Bruce Burns – Chairman and CEO of Burns Bros., Inc.

Re: Proposed New Building Heights in the Central Eastside Historic District

Dear Commissioners:

I was a member of the SE Advisory Committee, which worked on the CC2035 Plan.

My company has owned three and a half blocks in the Central Eastside Industrial District for many decades. We are opposed to the newly-proposed height limitations within the Central Eastside Historic District.

For context, we are ardent historic preservationists. We own two well-known historic buildings in the CEID, the beautiful Victorian-Italianate Barber Block at SE Grand and Washington, and the Nathaniel West-designed River City Bicycle building at SE MLK and Alder. I am a former Board member and capital campaign chairman of the Bosco Milligan Foundation (Architectural Heritage Center), which is a champion of historic preservation education.

Our 3 ½ blocks are right in the heart of the CEID, essentially on the "50-yard line" of the district, just a block or two from the Morrison bridgehead. The streetcar and bus lines run on MLK and Grand, directly in front of our properties. With their EX-zoning, these locations are perfect for high density office and residential development with structured parking.

I would like to give you one example of how one of our blocks is potentially affected by new height limitations. As we know from the latest proposal, new height limitations would be <u>below</u> the allowable heights proposed in the current version of the CC2035 Plan.

This particular example is a block bordered by MLK and Grand and Alder and Washington Streets. A gas station occupies the entire block....as it has since we opened the original gas station in 1947. The <u>eastern half</u> of this gas station block is in the historic district, and is non-contributing to the historic district. Utilizing

the EX zoning in the current CC2035 Plan, our plans call for a higher-rise office and/or residential building on this site of up to 200 feet on the eastern half of that block, and up to 275 feet on the western half.

Any new limitation on height on the eastern half of this block within in the historic district would dramatically reduce the density we have long been planning for, and for which we have worked so diligently during the last two Central City Plans. We have asked an appraiser to appraise the negative impact a reduction in height will have on our future property development. I will forward that to you when it is completed.

Adjacent taller buildings and historic properties co-exist every day around urban areas in America. Many examples of this are evident today, even in Portland. There is no reason why we cannot design beautifully-compatible buildings to compliment surrounding historic properties. After all, we are the owners of some of those historic buildings and would aspire, in our designs, for them to be complimented.

I would argue that the conspicuous contrast of a new, higher-rise building adjacent to an historic property actually enhances the historic property in a visual sense. It seems to me that prioritizing such differentiation might improve and strengthen pre-existing historic character, and this should be welcomed.

Lastly, a variety of constituents of the City and region have worked long and hard to develop the infrastructure and mass transportation systems in and around Portland. Doesn't it, therefore, make sense that owners, like us, of non-contributing EX-zoned properties within an historic district be allowed to maximize their developable FAR to help support the density the City has planned for, which in turn supports mass transit and fully utilizes that infrastructure?

Co-existence of divergent architectural streetscapes is, after all, a hallmark of a vibrant American city. Let's assist Portland's journey toward that hallmark.

Thank you to the Commission for your dedication and service to the community.

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