

August 9, 2016

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Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201-5380

Re: The Pearl Building's Testimony Regarding CC 2035 Amendments that Impact the 13th Avenue Historic District (CC 2035 Proposed Draft, June 2016)

Dear Chair Schultz and Members of the Commission:

The Pearl Building LLC owns property located at NW 13th and Glisan Streets (best known as the current headquarters of Keen) in the center of the 13th Avenue Historic District. The building is a contributing resource to the Historic District. Al Solheim was the primary advocate to create this Historic District and has worked tirelessly to protect its significant value to the City and continued economic viability. Pearl Building LLC has reviewed Al's letter to the Commission and echo his comments. It is crucial for the continued success of the District that base heights remain (100 feet the Pearl Building) and that bonus height up to 45 feet can be earned through the FAR-related height bonus or 75 feet upon the Landmarks Commission's historic review. These height limit options will retain the necessary incentives to preserve and retain properties within the District.

Specifically, we ask the Commission to:

1. Retain the 100-foot base height limit between NW Davis and NW Hoyt Street where contributing buildings already exceed the proposed 75-foot height limit. Maintaining reasonable base heights for the District will keep these contributing buildings from becoming non-conforming developments and will allow reasonable additions to existing buildings as an alternative to redevelopment.
2. Retain the 45-foot bonus earned through floor area ratio ("FAR") transfers or bonuses. To ensure continued vitality of the District and encourage preservation of important historic buildings, some limited additional height options are needed. Historic Review by the Landmarks Commission will ensure that buildings of any height meet the District's guidelines.
3. Eliminate the prioritization of New Chinatown/Japantown and Old Town/Skidmore Historic Districts for FAR transfers. CC 2035 proposes that historic transfers to a building for its

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
August 9, 2016
Page 2

first 3:1 of additional FAR can only come from buildings in these specific Historic Districts, effectively prioritizing preservation of these Districts over others in the City, including 13th Avenue. This devalues the value of the NW 13th Avenue Historic District, and the City has not shown any reason that this and other Historic Districts do not deserve the same level of protection.

4. Allow the proposed phasing of seismic upgrades required for FAR transfers from historic buildings. The ability to transfer unused FAR before seismic upgrades are required and use funds gained through the transfer is crucial to help owners of historic buildings afford these seismic upgrades. We support this proposal and urge the Commission to adopt it.

5. Retain the current code's allowance to transfer floor area within a project, including across the right-of-way, in the River District (PCC 33.210.200.D of the current code), and allow such averaging of FAR prior to the requirement to earn bonus or transfer excess floor area.

Thank you for your consideration of these requests.

Very truly yours,



Dana L. Krawczuk

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