

From: [MERYL LOGUE](#)
To: [Council Clerk – Testimony](#); [MERYL LOGUE](#)
Subject: City Council Meeting May 11, item # 372 - Testimony - Appeal
Date: Friday, May 6, 2022 3:12:04 PM

To Whom it May Concern:

I am writing in shock and dismay at the proposal to raise Type 1 Review fees from \$331 today to \$1,460 "tomorrow." I echo many when I say that so far, the fees have not pushed most people into dodging the requirements and make "bad changes" to exterior faces.

This will change that grudging acceptance. It will far outweigh many, many Type 1 project costs, and it will absolutely push many folks into ignoring the entire process.

I live in Irvington, on the edge, at 1927 NE 22nd Ave. I am dismayed at what feels like a constant attack on historic preservation. One of the things I am most proud of Portland about is its focus on preservation. These older buildings, once gone, are forever gone but for a few photos. Photos can never convey the sheer wonder of what came before us, and led us to where we are today.

I am not rich. I work hard as a single earner in my house. I work amazing numbers of hours to afford my home here. I do all my own restorations, because I simply do not have the money to hire it out (the exterior being the major exception). As I see these relentless attacks, it makes me want to give up and leave Portland, not in anger, but in tears. We try so hard, and the recurring attacks are debilitating.

Please do not do this to us. Please. We are not rich, and even those who are almost ALL work every single day, many 6 and 7 days, to afford Irvington prices. This isn't an enclave of "trust fund babies" or whatever other term one can apply. It is family after family, home after home, of people working hard every day. Should they be punished for this?

Sincerely, and sadly,

Meryl Logue
1927 NE 22nd Ave
Portland 97212
MerylLogue@comcast.net

From: [Dean P. Gisvold](#)
To: [Wheeler, Mayor](#)
Cc: [Commissioner Rubio](#); [Commissioner Hardesty](#); [Commissioner Ryan Office](#); [Commissioner Mapps](#); [Council Clerk – Testimony](#)
Subject: BDS Proposed Budget and Fee Increases
Date: Saturday, May 7, 2022 1:56:42 PM

Dear Mayor Wheeler and Portland City Commissioners:

We are writing you concerning the huge increase in the BDS type I historic review fees. Per the BDS summary of the fee increases, the fee increase percentages appear consistent with current inflation levels, or about 5%, **with one glaring exception. The charges for the Type I Historic Resource Review (HRR) are proposed to increase by 441%**

BDS is proposing to increase the current minimum fee of \$331 for very small projects (under 150 square feet) to a minimum of \$1,460. The new fee should be \$348 as it appeared in an earlier draft of the proposed fee schedule. Increasing the type I fee to \$348 would be in line with the other fee increases requested by BDS.

In March, 2013, City Council adopted the Historic Resource Code Improvement Project (HRCIP, the predecessor of the recent HRCP). This established a Type I review for small projects (under 150 square feet of alterations and a few other, rarely used, categories). City Council voted to approve HRCIP with a \$250 fee for Type I reviews. It was acknowledged while BDS might spend more than that on such reviews, the moderate fees would encourage compliance with the process and benefit Portland's historic resources. Type I reviews were also exempted from local appeal to eliminate potential BDS costs for defending their decisions in front of the Landmarks Commission. At City Council direction, the Type I review for small projects has been maintained from 2013 to today. The most recent vote where Council restrained the fees was in May, 2019, when BDS proposed a \$1,500 fee, and Council settled on \$300 reaffirming its commitment to minimize such fees.

Further, the HRCP in effect March 1, 2022, will keep BDS costs in check. First, it exempted smaller external ADU construction from HRR complying with specific objective standards. It clarified that larger ADUs were not covered by a plain Type I review. It defined many more basic exemptions than 2013 HRCIP had done while continuing to define **Type I reviews applicable to small projects** set forth in the 2013 version of HRCIP.

Approving this exorbitant fee increase will encourage “midnight modifications” rather than compliance with City Code which can result in code compliance complaints, costly inspections, reviews and staff time to correct. Further, BDS assumptions that that property owners in historic districts can afford big fees is false. There are roughly 6,000 single family homes and small plexes in Portland’s historic districts subject to Historic Resource Review. Of these some 3,500 are under 2,000 square feet in size. The continuation of the moderate Type I fee is an equity issue when you consider that of the 6000 residential properties referenced, some 1500 are contributing resources in Historic Conservation Districts, which are subject to Historic Resource Review and are still, despite gentrification, home to a significant Black population, as they have been for decades.

The Council will take testimony on the new fee structure on May 11. Thus, we strongly urge City Council to retain the moderate Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation since 2013 and the other increases proposed by BDS, a fee of \$348 is reasonable.

Dean Gisvold and Susan Gisvold
2225 NE 15th Ave
Portland 97212

From: [Rod Merrick](#)
To: [Council Clerk – Testimony](#); [Clerk General](#)
Subject: May 11 - Item 372 Budget Hearing- Proposed 441% fee increase for BDS Type 1 HRR
Date: Saturday, May 7, 2022 4:07:18 PM
Attachments: [HRR FEES. PCHR to CITY May 2022 Final.pdf](#)

Dear Mayor and Commissioners,

Please see the attached letter concerning the unreasonable proposed escalation of fees that is counterproductive to preservation efforts. We ask that you hold the line at \$348 as originally proposed. The letter details the history and the reasons for maintaining moderate fees. Your consideration is appreciated,

Rod Merrick
John Liu

CO-chairs PCHR

Portland, OR 503.771.7762

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For the exclusive use of members of the Portland Coalition for Historic Resources.

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Portland Coalition for Historic Resources

May 6, 2022

Subject: BDS Proposed Budget – Unsupportable Fee Increases

Dear Mayor Wheeler and Portland City Commissioners:

We are writing you with a concern that should be alarming to all Historic Districts subject to historic design review. According to a notice we received recently you will be voting on a new fee schedule for the Bureau of Development Services at the May 11 Council meeting. While the overall fee increase percentages appear consistent with current inflation levels, this letter is to alert you to one aspect of those fees: the **charges for the Type I Historic Resource Review (HRR)** are proposed **to increase by 441%**! BDS is proposing to increase the current minimum fee of \$331 for very small projects (under 150 SF) to a minimum of \$1,460. The new fee should be \$348 as it appeared in an earlier draft of the proposed fee schedule.

Increasing the fee to \$348 would be in line with the BDS published summary showing a 5% increase in land use fees. Such an increase is consistent with city policies to expedite plan review and encourage citizens to file for permits when making changes to their homes and businesses. The **Council's recent approval of the Historic Resources Code Project (HRCP) is a confirmation of the importance of preservation** and at the same time provides more latitude for preservation related work.

Background:

In a previous dramatic cost escalation for Historic Resource Review fees in 2010, following the formation of the Irvington Historic District, BDS argued that the fee jump was needed to recoup prior losses. As a result, Historic Review fees for small projects often exceeded the construction costs themselves. There were many complaints by home owners in all affected historic districts.

After a great deal of lobbying by the affected neighborhoods and the Portland Coalition for Historic Resources, in March, 2013, City Council adopted the Historic Resource Code Improvement Project (HRCIP, the predecessor of the recent HRCP). This established a Type I review for small projects (under 150 square feet of alterations and a few other, rarely used, categories). City Council voted to approve HRCIP with a \$250 fee for Type I reviews. It was acknowledged while BDS might spend more than that on such reviews, the moderate fees would encourage compliance with the process and benefit Portland's historic resources. Type I reviews were also exempted from local appeal to eliminate potential BDS costs for defending their decisions in front of the Historic Landmarks Commission.

At City Council direction, the Type I review for small projects has been maintained since 2013. The most recent vote where Council had to act to restrain the fees was in May, 2019, when BDS proposed a \$1,500 fee, and Council reaffirmed its commitment to minimize such fees. Council's vote recognized that there are roughly 6,000 single family homes and small plexes in Portland's historic districts subject to Historic Resource Review. Of these some 3,500 are under 2,000 square feet in size. The continuation of the moderate Type I fee is both a practical fairness issue and an equity issue when you consider that of the 6000 residential properties referenced, some 1500 are contributing resources in Historic Conservation Districts, which are subject to Historic Resource Review and are still, despite gentrification, home to a significant Black population, as they have been for decades.

The HRCIP in effect March 1, 2022, should keep BDS costs in check. First, it exempted smaller external ADU construction from HRR complying with specific objective standards. It clarified that larger ADUs were not covered by a plain Type I review. It defined many more basic exemptions than 2013 HRCIP had done while continuing to define **Type I reviews applicable to small projects** set forth in the 2013 version of HRCIP.

If the exorbitant fees are approved, affected neighborhoods will again strongly object. The proposed fees will encourage "midnight modifications" rather than compliance with City Code which can result in costly inspections, review and staff time to correct. Further, as indicated above, BDS assumptions that property owners in historic districts can afford big fees is false. **It is our understanding that Council will vote on the new fee structure on May 11. Thus, we strongly urge City Council to retain the moderate Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation since 2013, a fee of \$348 is reasonable.**

Portland Coalition for Historic Resources (PCHR), is an all-volunteer body including neighborhood leaders concerned with land use issues, housing, and historic preservation, together with participation by representatives from the two leading historic preservation organizations. Our members include experts in the designation, protection, and preservation of historic resources.

Sincerely,

Portland Coalition for Historic Resources

Rod Merrick
John Liu
Co-Chairs

cc: Mayor Wheeler, Commissioner Hardesty, Commissioner Mapps, Commissioner Rubio,
Commissioner Ryan

From: [Valerie Weiss](#)
To: [Council Clerk – Testimony](#)
Subject: May 11 Agenda Item #372”
Date: Sunday, May 8, 2022 8:29:06 AM

I strongly urge City Council to reinstate the equitable, less punitive Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation over the past 10 years, a fee hike to possibly \$348 would be understandable.

Valerie Weiss
3200 NE 21st Avenue
Portland 97212

Sent from my iPhone

From: [AR Nicholas](#)
To: [Council Clerk – Testimony](#)
Subject: In Re: May 11 Meeting, Item #372
Date: Sunday, May 8, 2022 8:42:59 AM

From: AR Nicholas <annanicholas@me.com>

Subject: In Re: May 11 Meeting, Item #372

Date: May 7, 2022 at 6:58:25 AM PDT

To: mayorwheeler@portlandoregon.gov,
mappsoffice@portlandoregon.gov, Comm.Rubio@portlandoregon.gov,
joann@portlandoregon.gov,
CommissionerRyanOffice@portlandoregon.gov,
cctestimony@portlandoregon.com

Hello,

I am a resident and homeowner living in the Portland historic district known as Irvington and I went through Historic Research Review with my house in 2016.

It is my understanding that a proposal (item #372 on the agenda for the May 11 meeting) has been put forward to increase the cost of the review process from the current \$331 to \$1,460 for even the tiniest of projects by a whopping 441%!

Yes, all of us are suffering from the impacts of inflation in most sectors but this is an absurd increase. Most of the city's other proposed increases don't go above a 5% increase.

What is the intention of making it more financially painful to begin the process of Historic Review?

Is it:

- to keep people from following the rules regarding making exterior changes to their homes, hoping to fine people for breaking them?
- to encourage only the wealthiest in historic districts to improve their homes?
- to discourage most from doing anything to their homes, letting them go to ruin, when they can be purchased by developers and turned into multi-unit housing? (You might be waiting awhile)

The city should be *encouraging* people to improve their homes, not only for the immediate improvement of neighborhoods, but because of the additional taxes that can be collected from valuation increases that occur post-improvement.

I submit that the decision makers either lower the proposed increases for Historic Review to an amount more reflective of inflation generally (say to \$450) or keep it exactly the same.

In the alternative, I think everyone living in Historic Districts needs a good, transparent excuse from y'all as to why the increase needs to be 441%.

Most Sincerely,

Anna Nicholas

Anna Nicholas JD, LLM
Portland, OR 97212
323.627.6659
arnicholas@mac.com

 **Please consider the environment before printing this email.**

From: [nikki_johnston](#)
To: [Council Clerk – Testimony](#)
Subject: Item #372 -- May 11 Council Meeting
Date: Sunday, May 8, 2022 11:49:19 AM

- I'm deeply troubled by the Bureau of Development Services proposal to increase the cost of the Type I Historic Resource Review for small projects from \$331 to \$1460!
-
- The Type I Historic Review with its reasonable cost and faster time line encouraged everyone to go through the process and be a responsible owner in the Historic District
-
- I'm proud to own a part of Portland's history and grateful to the City for keeping fees for review proportional to the size of the project since 2013
-
- We all recognize that costs and prices are going up, but a 441% increase in the cost of a review of simple projects is unconscionable and will discourage so many citizens from "doing the right thing" for the benefit of the entire community!

I worked in the business community for 44 years. Thoroughly examining every step in every business process always uncovered opportunities to reduce costs which, in the previous paragraph, offers a good opportunity to change the way BDS functions.

Nikki Johnston
2125 NE 16th
Portland, 97212

From: [woody.mosby](#)
To: [Council Clerk – Testimony](#)
Subject: May 11 Agenda Item #372".
Date: Sunday, May 8, 2022 8:10:08 PM

Dear Mayor Wheeler and Commissioners,

The proposed \$1,460 for Type 1 review is a 441% increase -- and is to be the minimum amount, even for the smallest of projects less than 150 square feet. That of course means the review by the city will in many cases cost far more than the cost of the minor exterior project. How is that equitable? On what are we basing public policy?

The current process with its reasonable cost and faster time lines has encouraged hundreds of local citizens to be responsible and play by the rules, for the benefit of the community at large and endangered historic resources. The proposal, if passed, will have unintended consequences. There are approx. 6,000 homes of all types within Portland's historic districts and more than half are less than 2,000 square feet.

This fee should be set by Council to the \$348 that appeared in an earlier draft of the Bureau of Development Services' proposed fee schedule, but was stricken in favor of the much higher fee. That would also be consistent with the May 4 headline in The Oregonian: "Portland, flush with cash, expands and cuts almost nothing."

I strongly urge City Council to reinstate the equitable, less punitive Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation over the past 10 years, a fee hike to possibly \$348 would be understandable.

Thanks,

Woody Mosby
3114 NE 21st Ave.
Portland, OR 97212
215/806-4902

Sent from my iPhone

From: [Patty Mizutani](#)
To: [Council Clerk – Testimony](#)
Subject: UNFAIR FEE INCREASE
Date: Sunday, May 8, 2022 9:10:18 PM

To the City Council regarding May 11, 2022 Agenda Item #372:

The proposed fee of \$1460 for Type 1 Historic Resource Review for the smallest exterior projects of less than 150 square feet of altered surface area represents an exorbitant increase over the previous fee of \$331. This is an unfair fee hike when other proposed fees by the Bureau of Development Services are in the 5% range.

A more equitable fee hike of \$348 is what was proposed in an earlier draft and I urge City Council to vote for the original fee increase.

Respectfully,
Patty Mizutani
Resident of Irvington District

From: [Kay Mosby](#)
To: [Council Clerk – Testimony](#)
Subject: May 11 Agenda for Council - Item #372
Date: Sunday, May 8, 2022 10:17:29 PM

Dear Mayor Wheeler & Commissioners,

Explain to me how it can be fair to increase the cost of a Type 1 Historic Resource Review for the smallest exterior projects from the current \$331 to \$1,460? **That's a 441% increase at a time when the bureau plans to raise other fees by about 5%.**

There are approximately 6,000 homes of all types within Portland's historic districts and more than half are less than 2,000 square feet. The review fee by the city will in many cases cost far more than the cost of the minor exterior project. How is that equitable? It is so outrageously out of whack, one would wonder if this is yet another attempt by some at City Hall to punish residents of Historic Districts (only 4% of residences in Portland) for having special building restrictions related to preserving the historic nature of the housing and neighborhood according to standards set by their National Historic Designation. Begs the question of whose agenda does this excessive fee serve?

I urge the Council to set the cost of a Type 1 Historic Resource Review at \$348, an amount that appeared in an earlier draft of the Bureau of Development Services' proposed fee schedule, but was stricken in favor of the much higher fee. That would be in line with inflation and the fee increases for other City permits. If you chose not to, you will owe us an explanation of why you support inequitable and damaging practices by the City toward its residents and taxpayers. Thank you for your attention to this matter.

Respectfully submitted,

Kay Mosby

kwmosby@gmail.com
3114 NE 21st Ave
Portland, OR 97212
Cell# 215.880.8530

From: [Susan Sater](#)
To: [Council Clerk – Testimony](#)
Subject: Regarding May 11 Agenda Item #372
Date: Monday, May 9, 2022 8:00:05 AM

> Hello,

>

> I am writing to object to the proposal to increase the cost of Type I Historic Resource Review for the smallest exterior projects from the current \$331 to \$1,460. That's a 441% increase at a time when the bureau plans to raise other fees by only about 5%! The permit fee could well cost more than the project.

>

> I strongly urge City Council to reinstate the equitable, less punitive Type I fees for projects under 150 square feet of altered surface area. Considering overall cost increases over the past 10 years, a fee hike to possibly \$348 would be understandable.

>

> Residents of historic districts have cooperated with the current process, reasonable cost, and faster time lines. That's how our city government should work, it benefits our whole community and also our endangered historic resources.

>

> Sincerely,
> Susan Sater

>

From: [Pei Lu](#)
To: [Council Clerk – Testimony](#)
Subject: Regarding May 11 Agenda Item #372
Date: Monday, May 9, 2022 10:51:18 AM

Dear Portland City Council,

The proposed \$1,460 for Type 1 review is a 441% increase -- and is to be the minimum amount, even for the smallest of projects less than 150 square feet. That of course means the review by the city will in many cases cost far more than the cost of the minor exterior project. How is that equitable? On what are we basing public policy?

The current process with its reasonable cost and faster time lines has encouraged hundreds of local citizens to be responsible and play by the rules, for the benefit of the community at large and endangered historic resources. The proposal, if passed, will have unintended consequences. There are approx. 6,000 homes of all types within Portland's historic districts and more than half are less than 2,000 square feet.

This fee should be set by Council to the \$348 that appeared in an earlier draft of the Bureau of Development Services' proposed fee schedule, but was stricken in favor of the much higher fee. That would also be consistent with the May 4 headline in The Oregonian: "Portland, flush with cash, expands and cuts almost nothing."

We strongly urge City Council to reinstate the equitable, less punitive Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation over the past 10 years, a fee hike to possibly \$348 would be understandable.

Thank you for consideration.

Sincerely,
Pei and Ken Kupperman
2536 NE 19th

From: [Kathy Ludlow](#)
To: [Wheeler, Mayor](#); [Commissioner Mapps](#); [Commissioner Rubio](#); [Commissioner Hardesty](#); [Commissioner Ryan Office](#); [Council Clerk – Testimony](#)
Subject: May 11 Agenda Item #372
Date: Monday, May 9, 2022 11:22:32 AM

Dear Mayor and Council Members,

Regarding May 11 Agenda Item #372

I can't imagine where this came from - A 441% increase in cost for a Type 1 Historic Resource Review - which translates to \$1460 for the smallest of projects.

It is erroneous thinking that owners in Historic Districts can afford this type of price increase, when most homes in these districts are less than 2000sq ft and owners have a wide range of financial resources. This proposed increase is contrary to the equity issues that were stressed in the Historic Resources Proposal recently passed by City Council.

You, our City Council, need to be about encouraging people to be responsible and follow the rules, for the benefit of our larger community and our historic resources.

I strongly urge City Council to reinstate the equitable, less punitive Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation over the past 10 years, a fee hike to possibly \$348 would be understandable.

Thank you,
Kathy Ludlow
2006 NE Stanton St
Portland

From: [Nancy Anderson](#)
To: [Council Clerk – Testimony](#)
Subject: May 11 Agenda Item #372
Date: Monday, May 9, 2022 1:09:34 PM

City Council Member,

I would like to voice my opinion of the proposed astronomical increase of 441% for the Type 1 Historic Resource review for exterior projects in Irvington. To go from \$331 to \$1,460 is not only preposterous, but greedy, especially as the bureau plans are to raise other fees by about 5%.

What would justify this large increase especially on projects less than 150 square feet? It is not equitable when the cost of the review outweighs the minor exterior project.

How can you even propose such an increase given the current state of our economy facing a recession?

The current process is working and it is reasonable and we have been responsible to go through the proper channels. I sincerely hope the City Council will reconsider lesser fee more in line with normal inflation rates over the last 10 years.

Sincerely,
Nancy Anderson

Sent from my iPad

From: [Jared Morris](#)
To: [Council Clerk – Testimony](#)
Cc: [Wheeler, Mayor](#); [Commissioner Mapps](#); [Commissioner Rubio](#); [Commissioner Hardesty](#); [Commissioner Ryan Office](#)
Subject: May 11 Agenda Item #372
Date: Monday, May 9, 2022 3:11:07 PM

Council:

Nowhere in the proposed fee increase executive summary does it call out a larger outlier -- the proposed \$1,460 for Type 1 review is a 441% increase -- and is to be the minimum amount, even for the smallest of projects less than 150 square feet.

That of course means the review by the city will in many cases cost far more than the cost of the minor exterior project. How is that equitable? On what are we basing public policy?

The current process with its reasonable cost and faster time lines has encouraged hundreds of local citizens to be responsible and play by the rules, for the benefit of the community at large and endangered historic resources.

I know this because I'm one of them and know of what I speak. We went through the Type 1 process in a way that felt reasonable and equitable.

The proposal, if passed, will have unintended consequences. There are approx. 6,000 homes of all types within Portland's historic districts and more than half are less than 2,000 square feet.

This fee should be set by Council to the \$348 that appeared in an earlier draft of the Bureau of Development Services' proposed fee schedule, but was stricken in favor of the much higher fee.

That would also be consistent with the May 4 headline in The Oregonian: "Portland, flush with cash, expands and cuts almost nothing."

I strongly urge City Council to reinstate the less punitive Type I fees for projects under 150 square feet of altered surface area. Considering normal inflation over the past 10 years, a fee hike to possibly \$348 would be understandable.

Thank you,
JD Morris

From: [Kathy Craig](#)
To: [Council Clerk – Testimony](#)
Subject: Regarding May 11 Agenda Item #372
Date: Monday, May 9, 2022 2:44:20 PM

The proposed \$1,460 for Type I review is a 441% increase! That could mean the review by the city could cost far more than a minor project. How is that equitable? What is public policy based on?

The current process is far more reasonable and encourages hundreds of citizens to be responsible and play by the rules for the benefit of the community and endangered historic resources.

Please, have the fee of \$348 be reinstated, as was in the earlier draft by the Bureau of Developmental Services. That is a more normal and reasonable fee hike. The Council needs to do this.

Thank you,

Kathy Craig

City Council Meeting - Wednesday May 11, 2022 9:30 a.m.

Agenda No.	First Name	Last Name
372.1	James	Heuer