



City of Portland Historic Landmarks Commission

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December 21, 2011

Chair Baugh and Commissioners
Portland Planning and Sustainability Commission
1900 SW 4th Ave, #7100
Portland, OR 97201

Re: The Portland Plan

Dear Chair Baugh and Commissioners:

Thank you for giving the Portland Historic Landmarks Commission (HLC) the opportunity to review and comment on the draft Portland Plan. We have found several areas where the Plan can be enhanced with the inclusion of guiding policies and action items related to the protection of historic resources and the reuse of existing buildings. The attached matrix details our requested revisions.

We commend the Commission, as well as Planning and Sustainability staff, for tackling challenging issues of providing equity through a series of integrated objectives; however, we believe that protecting historical and cultural resources plays an integral role in furthering those objectives and should be featured prominently in the Plan. As an issue of social equity, all of Portland's older neighborhoods and commercial corridors deserve protection from demolition of irreplaceable historic resources and the construction of incompatible infill, which is highly disruptive to their character and identity. Underserved areas with disadvantaged populations have often been overlooked when it comes to historical and cultural resource protection and the incentivizing of building rehabilitation. In order to fully realize the Plan's goals toward social equity, historic preservation and adaptive reuse must be included as critical ingredients, especially in the plan sections that relate to vibrant neighborhood hubs, connections for people and places, educational facilities that meet 21st century needs, and a coordinated inter-agency approach. Engaging the community to address equity and the elevation of racial justice requires a concurrent commitment to the inventory and preservation of the built environment that has been constructed to house and serve our diverse population and that embodies their rich and varied histories.

In particular, when the ingredients of vibrant neighborhood hubs are discussed, preservation of Portland's existing built environment should be at the top of the list. Vintage neighborhoods and districts, with their tree-lined streets, interconnected blocks, and varied texture of high-quality building materials, provide a sense of place and unique identity that is critical to each neighborhood's social and economic vitality. Additionally, these older neighborhoods typically have smaller building footprints, human-scaled streets, and centralized commercial areas that provide some of the most walkable and transit-accessible places within the City – the ultimate in a neighborhood hub. In summary, we can say that the diverse identities of

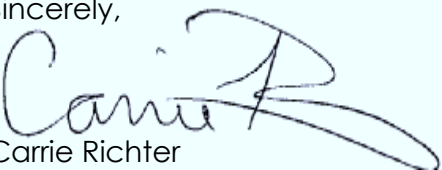
Portland's neighborhoods and districts are an undeniable and irreplaceable part of the City's appeal and livability, and it is this existing built environment that is a central component of their vibrancy.

We would also like to elevate the intrinsic connection between building reuse/rehabilitation and ecological sustainability by recognizing within the Plan that protecting existing historic and cultural fabric is as essential to maintaining vibrant, livable neighborhoods as protecting natural habitat areas. A stated 2035 Objective within the Plan is to reduce transportation-related carbon emissions in an effort to address climate change. Although transportation choices contribute 34% to greenhouse gas emissions in Oregon, residential and commercial construction and operations contribute a very close 31%.¹ Reducing carbon emissions is enhanced by embracing the goal of using what you have. Adaptive reuse of our existing buildings reduces the amount of demolition and construction waste deposited in landfills, lessens unnecessary demand for energy and other natural resources, and conserves embodied energy. Many historic and older buildings are remarkably energy efficient because of their site sensitivity, quality of construction, and use of passive heating and cooling. According to the U.S. Energy Information Administration, commercial buildings constructed prior to 1920 have an average energy consumption of 80,127 BTUs per square foot. For the more efficient buildings built since 2000, that number is 79,703 BTUs.

In sum, identifying and preserving historically and culturally significant resources is a key component in furthering equitable practices, supporting environmental responsibility, and maintaining the diverse and vibrant identities of Portland's neighborhoods, communities, and hubs. A healthy livable city protects its built heritage just as vigorously as it protects the natural environment. The Portland Plan must recognize and make a commitment to the equitable inventory and preservation of our diverse and rich built environment to ensure the continued promotion of thoughtful policy development related to these irreplaceable resources in the forthcoming Comprehensive Plan and other focused planning and policy documents.

Again, thank you for giving HLC an opportunity to comment on this herculean effort. Please do not hesitate to call on the Commission if we can be of further assistance or if you wish to discuss our recommendations further.

Sincerely,

A handwritten signature in black ink on a light blue background. The signature is cursive and appears to read "Carrie Richter".

Carrie Richter
Historic Landmarks Commission Chair

Cc: Commission
Tim Heron

¹ Oregon Department of Forestry, Background Report: Status of Oregon Greenhouse Gas Emissions and Analysis (2009).



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Portland Plan – Requested Revisions

Vibrant Neighborhood Hubs, pp 66-69	
<p>Introduction Text</p> <p>Add to the first paragraph on p. 66 →</p>	<p>Vibrant neighborhood hubs are also characterized by the quality, texture, and history of the built environment. Older and historic buildings, public infrastructure and parks, and archeological resources are defining features of a community's identity and sense of place.</p>
<p>Introduction Text</p> <p>Add to bulleted list on p. 66 →</p>	<ul style="list-style-type: none"> ▪ Identifiable sense of place
<p>Guiding Policy</p> <p>Revise first policy on p. 66 by adding italicized text →</p>	<p>Support strong, vibrant neighborhoods hubs through land use, <i>rehabilitation of existing buildings, historic resource identification and protection</i>, infrastructure and technology investment, and community economic development with a focus on underserved areas with disadvantaged populations.</p>
<p>Guiding Policy</p> <p>Revise fourth policy on p. 68 by adding italicized text →</p>	<p>Promote energy and resource conservation at a district scale in neighborhood hubs through compact development, <i>rehabilitation of existing buildings</i>, and eco-district approaches.</p>
<p>Guiding Policy</p> <p style="text-align: center;">add →</p>	<p>Support neighborhood- and public-agency-initiated historic preservation efforts including the updating and adopting of historic inventories, the designation of historic or conservation districts, and the establishment of density restrictions to encourage adaptive reuse and compatible infill.</p>
<p><i>5-Year Action Plan Items</i></p> <p style="text-align: center;">add →</p>	<p>Resource Conservation: Include in the Comprehensive Plan, codification of the Secretary of Interior Standards for the Treatment of Historic Property to provide a stop-gap of design standards for historic and conservation districts that either do not have district-specific historic guidelines or guidelines that are woefully out-of-date, allowing for uniform decision-making across districts.</p> <p>Potential Partners: BPS, BDS</p>

Coordinated Inter-Agency Approach pp. 78-79

<p>Introduction Text</p> <p>Revise the first paragraph on p. 78 by adding italicized text →</p>	<p>Implementing the Healthy, Connected City's network of neighborhood hubs and city greenways must begin with a coordinated interagency and community-based approach that prioritizes and aligns land use, urban design and investments in community development, <i>historic preservation and adaptive reuse</i>, green infrastructure, parks and trails; natural areas; bicycle, pedestrian and transit facilities; and sustainable storm water systems.</p>
<p>Introduction Text</p> <p>Revise bulleted list on p. 78 by adding italicized text →</p>	<ul style="list-style-type: none"> ▪ Identifying, monitoring and mitigating potential unintended social consequences of investment, such as displacement of communities due to declines in housing affordability <i>or loss of historic resources due to development pressures</i>. ▪ Continued and expanded support of programs and community initiatives that support a vibrant network, <i>environmental and historic resource stewardship</i>, and that encourage people to walk, bike and take transit, recreate, and make other healthy choices.
<p>Guiding Policy</p> <p>add →</p>	<p>Prioritize the investment of public dollars in projects that enhance stewardship of City-owned resources and that encourage maintenance and rehabilitation of existing building over demolition to clear land for new construction.</p>
<p>Guiding Policy</p> <p>add →</p>	<p>Coordinate planning, implementation of development regulations, and design standards that are internally consistent and that support protecting historic and cultural resources.</p>
<p><i>5-Year Action Plan Items</i></p> <p>add →</p>	<p>Planning and Investments: When adopting or amending comprehensive plan and zoning regulations, eliminate zoning authorizations that do not reinforce, complement, or support the historical significance of historic and conservation districts. Identify and implement an agency- and bureau-wide strategy for eliminating the expenditure of public funds in the demolition or neglect of historic buildings. Encourage other public entities to do the same.</p> <p>Potential Partners: BPS, BDS, PDC</p>
<p><i>5-Year Action Plan Items</i></p> <p>Revise Item #40 →</p>	<p>Planning and investment: Coordinate with neighborhoods and identify a strategy for a phased inventory of historic resources to be adopted by the City. Priority shall be given to areas of the Central City and neighborhood hubs and corridors that have or are most likely to experience more immediate redevelopment pressure.</p> <p>Potential Partners: BPS, BDS, PDC</p>

Connections for People, Places, Water, and Wildlife, pp. 74-75

Guiding Policy add →	Emphasize the role of older and historic buildings along our civic corridors, which enhance the pedestrian realm and create a unique sense of place and neighborhood identity that connects Portlanders with their city. Promote identification of historic resources along civic corridors and promote sensitive building rehabilitation to enhance pedestrian connections, corridor identity, and sustainability through historic resource conservation.
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Facilities and Programs that Meet 21st Century Opportunities and Challenges, pp. 30-31

Introduction Text Add this text to the end of paragraph two on p. 30 →	However, many historic school buildings are beloved, integral parts of the character and identity of Portland's neighborhoods. Their demolition or incompatible alteration would have a detrimental effect on this community character, along with the loss of significant existing building materials and embodied energy that offer opportunities for sustainable rehabilitation.
Guiding Policy add →	Support innovative adaptive reuse of historic school buildings to maintain them as focal points in our neighborhoods, as well as models of sustainability and resource stewardship for generations of students to come.
Guiding Policy add →	Encourage public involvement and formal adoption of institutional master plans to ensure campus expansions do not negatively impact surrounding neighborhoods.

Miscellaneous Revisions

Page 4 Add statistic →	Portland has 14 historic districts and six conservation districts with a total of 5,436 contributing resources. The diverse character of the city's built environment enhances the quality of life for which Portland is well-known.
Page 60 Add statistic →	Approximately 63% of Portland's building stock is at least 50 years old and potentially historic; however, only 4.5% is subject to historic design review and an even smaller percentage is protected from demolition.
Page 76 Add section →	Historic and older buildings are a key component of community identity and vibrancy due to their built-to-last construction, rich palette of materials, and pedestrian-friendly nature.