



City of Portland
Historic Landmarks Commission

1900 SW Fourth Ave., Suite 5000 / 16
Portland, Oregon 97201
Telephone: (503) 823-7300
TDD: (503) 823-6868
FAX: (503) 823-5630
www.portlandonline.com/bds

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Portland Planning and Sustainability Commission
1221 SW 4th Avenue
Portland, OR 97204

Re: 2035 Comprehensive Plan Proposed Draft

Dear Commissioners,

The Historic Landmarks Commission was recently briefed on the 2035 Comprehensive Plan Proposed Draft at our August 18, 2014 meeting by staff members from the Bureau of Planning and Sustainability. The Commission appreciates these opportunities to ask questions and offer advice on important policy documents such as the Comprehensive Plan. Since it is not possible for the entire Commission to attend a Planning and Sustainability Commission hearing about the Comprehensive Plan Draft prior to the next phase of plan development, we are offering this letter which outlines our concerns and suggested changes to the current document. We feel that these issues are important to address at this time to ensure adequate protection of Portland's historic and cultural resources.

Maintain Consistency. Having participated in the crafting of the individual Quadrant Plans, we want to emphasize that the various policy documents be developed together into a cohesive whole. Items of importance mentioned in a Quadrant Plan should be folded into the final Comprehensive Plan.

Promote Inventory. One of our ongoing priorities is updating and expanding the Historic Resource Inventory (HRI). Efforts to update the HRI should be coordinated with areas designated in the Comprehensive Plan as high growth potential areas so that important historic and cultural resources are identified and recognized. The drive for growth and development fostered by current zoning designations raises serious concerns and risks potential loss of key resources not included in the existing outdated and non-comprehensive Historic Resource Inventory.

Encourage Reuse. The Landmarks Commission has been hearing a great deal of public concern over demolitions in established neighborhoods and wants to emphasize that the language in the Comprehensive Plan Draft document calling for resource reuse, rehabilitation, and retention be

retained and that similar language be added at the front of the applicable Chapters of the plan document. This will make it very clear that retention of existing structures is a viable sustainability strategy that is encouraged by the City of Portland in its Comprehensive Plan. We believe that it is important to continue to tie sustainability to historic preservation. Building new “sustainably constructed” structures is not something we wish to promote as a reason for demolition of existing resources.

Discourage Demolition. Further emphasis on the benefits of reusing existing buildings and reducing demolition should be added to Key Direction 3 as a major factor in carbon-reduction efforts. A bullet point should be added to the "foundation of sound land use..." list discouraging demolition. Consider incorporating the following findings from *The Greenest Building: Quantifying the Environmental Value of Building Reuse* by the Preservation Green Lab of the National Trust for Historic Preservation:

Reuse Matters. Building reuse typically offers greater environmental savings than demolition and new construction. It can take between 10 to 80 years for a new energy efficient building to overcome, through efficient operations, the climate change impacts created by its construction. The study finds that the majority of building types in different climates will take between 20-30 years to compensate for the initial carbon impacts from construction.

Scale Matters. Collectively, building reuse and retrofits substantially reduce climate change impacts. Retrofitting, rather than demolishing and replacing, just 1% of the city of Portland’s office buildings and single family homes over the next ten years would help to meet 15% of their county’s total CO2 reduction targets over the next decade.

Design Matters. The environmental benefits of reuse are maximized by minimizing the input of new construction materials. Renovation projects that require many new materials can reduce or even negate the benefits of reuse.

The Bottom Line: Reusing existing buildings is good for the economy, the community and the environment. At a time when our country’s foreclosure and unemployment rates remain high, communities would be wise to reinvest in their existing building stock. Historic rehabilitation has a thirty-two year track record of creating 2 million jobs and generating \$90 billion in private investment. Studies show residential rehabilitation creates 50% more jobs than new construction.

Support Seismic Upgrades. We are very concerned about the fate of unreinforced masonry buildings (URMs) throughout the City and the safety of their occupants. Greater emphasis should be directly placed on encouraging and funding seismic upgrades for historic and existing URMs as a chief component of Key Direction 6: Improve Resiliency.

Additionally, the Landmarks Commission recommends the following edits to the Chapter 4: Design and Development Goals and Policies draft:

- Page GP4-8, Policy 4.24. Remove "on adopted inventories". This is an uncertainty.
- Page GP4-11, opening paragraph. Remove "statewide" from the last sentence. Historic and cultural resources can be of local, statewide, or national significance.
- Policy 4.36. Remove "high-quality" and "where feasible". Quality is subjective and adding a qualifier such as "where feasible" is not strong enough language and creates a loophole.
- Policy 4.38. Remove "significant". This policy should apply to every historic resource. Adding a qualifier such as this creates loopholes.
- Policy 4.38. Add language to the effect that demolition of historic resources is "discouraged" or "not the preferred course of action". The City should encourage retaining the resource until other alternatives to demolition can be explored.
- Policy 4.40. Add language to the effect that while historic and cultural resource survey work may focus on areas of anticipated growth, surveying should not be limited to those areas. All areas of the City need to be surveyed as the opportunity arises. Also add language for long-term maintenance of the Historic Resource Inventory.

The Historic Landmarks Commission thanks you for taking our concerns and suggested changes into consideration as the 2035 Comprehensive Plan document continues to develop.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brian Emerick", with a long horizontal flourish extending to the right.

Brian Emerick, AIA
Chair