Planning and Sustainability Commissioners:

I am submitting this testimony on the proposed zoning changes for NW Portland Alphabet district. I am the owner of 526 NW 18<sup>th</sup> Ave., one of the Trenkmann homes which are National Historic Landmarks. I am opposed to the proposed downzoning in the area, and would prefer to retain the existing RH zoning.

My reasons include 1) Density Planning: Existing Structures 2) Planning for Natural Disaster/Unplanned Demolition 3) Minimal benefit/Larger Cost

1) **Density Planning: Existing Structures.** Certain density has been allocated to the broader NW Alphabet area to prepare for the future surge in population expected in Portland, and the Historic Preservation Zoning Incentives allow for the transfer of this density should particular homeowners wish to dispose of it – which is a nice flexibility. As the Trenkmann homes are National Historic landmarks, there are protections in place to prevent demolition and preserve the structures. Removing an entire layer of density in one of Portland's most close-in neighborhoods takes the away the option to retain the density from all homeowners (rather than individual homeowners having a choice to transfer it), and seems inconsistent with Portland's longer term urban planning goals of infill.

2) **Planning for Natural Disaster/Unplanned Demolition.** Much of the discussion around development deals with the ramifications to existing structures. However, in the event of an earthquake, major fire or any other circumstance that would demolish the existing structures, it is far more sensible to have the land zoned appropriately. If the Trenkmann homes on were to collapse, it would seem illogical, inconsistent with Portland's sustainable development goals, and far from the public's best interest to allow R1 density residential construction in a full city block minutes from the city center and surrounded by RH apartment buildings with FAR allowances. The land would be far better utilized to house a greater number of smaller scale living units.

3) **Minimal Benefit/Larger Cost.** Since most of the land in question is already used in an RH capacity, and most of the single family structures are either historic landmarks or contributing historic resources, there are very few actual properties that would be impacted on a practical level by downzoning, so any net protection from high density or incompatability would be minimal. Most of the neighborhood is already high density residential or commercial. This benefit is far outweighed by the costs associated with #1 and #2.

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