

August 5, 2016

Planning & Sustainability Commission 1900 SW Fourth Avenue, Suite 7100 Portland, OR 97201

RE: Testimony on CC2035 Plan

Not since the 1960s have Portland's historic commercial buildings and neighborhoods come under greater threat of the bulldozer and wrecking ball. Drives to increase density, ramped up market demand, requirements for seismic retrofitting, and the lack of meaningful incentives for preservation have resulted in the loss of hundreds of homes, wholesale change in neighborhood character, and the loss of landmark buildings such as the United Workmen Temple and Lotus Café.

The provisions of the Central City 2035 Plan – and the subsequent actions taken to implement it – will make or break whether future generations inherit the extraordinary, livable, and authentic sense of Place we enjoy today.

On behalf of the members of Restore Oregon, a non-profit organization whose mission is to preserve, reuse, and pass forward the historic places that make our communities livable and sustainable, I offer the following comments on the proposed 2035 plan.

Restore Oregon applauds and supports:

Overall:

- The greater consideration preservation of historic homes, buildings, and neighborhoods have received throughout the public process and in the draft document and specifically in Urban Design policies 5.18 - 5.20.
- Policies (5.3 5.7) goals for a Dynamic Skyline and Scenic Resources calling for compatible heights in historic districts and protection of the public's view of beloved landmarks.
- Its good policy to encourage a transition between areas of great height and density and surrounding neighborhoods.
- The application of thoughtful design standards to guide new development (5.8) will protect neighborhood character.
- Historic designation for the South Park Blocks.

Of particular importance, we support:

- The proposed height reductions in Historic Districts. We cannot stress enough how absolutely essential this is to the retention of historic character in the district. It is central to ensuring that infill development is compatible and for thwarting demolition-by-neglect. Ideally, Restore Oregon would like to see even further reduction in the Grand Avenue and Chinatown districts.
- The transfer of FAR from historic buildings. With so few economic incentives available to historic projects, this is highly important to help fund rehabilitation and phased seismic retrofitting. Every effort must be made to ensure FAR transfer is workable and to increase the market demand for the transfers.

- Allowing flexible, phased implementation of seismic upgrades. The magnitude of the investment required is more achievable when properties have an opportunity to execute the work in phases and generate income as they go.
- Lobby for a State Historic Rehabilitation Incentive. This is the single most important thing we can do to make more redevelopment of historic buildings financially viable, and to help pay for proposed mandated seismic upgrades. The city must make this a TOP LEGISLATIVE PRIORITY!

Restore Oregon encourages the following changes to areas that fall short:

- Revise heights that block key view corridors such as the Vista Bridge toward Mt Hood, and looking back towards the Vista Bridge.
- Prevent the Park Blocks from becoming a dark tunnel by lowering heights along the Park Blocks and ensuring sufficient sunlight can penetrate through nearby development.

With this said, the devil's in the details of implementation!

"Encouraging" the preservation and rehab of historic buildings as stated in the Plan is good, but the city will need to take meaningful steps to make this more than lip service. If zoning changes incentivize demolition (or demolition-by-neglect) and there is nothing to counter-balance market forces that make replacement far more lucrative than restoration, Portland will lose its character-defining historic buildings and neighborhoods.

Sincerely,

Zeggy Morethi

Peggy Moretti Executive Director