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PEARL DISTRICT
NEIGHBORHOOD ASSOCIATION
EST. 1991

August 9, 2016
Re: 2035 Central City Plan

Dear Planning and Sustainability Commission:

I had the honor of representing the Pearl District Neighborhood Association on the West Quadrant Portion of the 2035 Plan. In that role, I was a chief advocate of changes to protect historic buildings and districts through the zoning code. The Pearl District Neighborhood Association has long been concerned about market pressures on our historic resources. We created a bonus to transfer FAR as part of the North Pearl Plan in 2008 that is the genesis for the ideas for the proposal for the FAR transfer bonus in the 2035 Central City Plan. We have long been advocates for a bonus to create a market for air rights to save our historic resources.

I am unfortunately quite dismayed to read the proposed FAR Transfer bonus as it is not what is envisioned in the West Quadrant Plan. Even worse, it is our opinion that it will effectively imperil all of the Pearl District's Historic Buildings and the 13th Avenue Historic District.

The decision to prioritize FAR transfers from the Skidmore/Old Town and Chinatown/Japantown over all the other Central City Historic Districts and Buildings has no basis in any discussion during the West Quadrant Process. It was unanimous at the CAC that all of the historic districts and as many historic buildings as possible need to be preserved - not just the ones in Old Town. Prioritizing Skidmore/Old Town & Chinatown/Japantown Historic Districts over all the other central city historic districts and structures in the bonus effectively kills any market for saving any historic structure in any other part of the Central City. I am certain that this prioritization would have had no support at the West Quadrant CAC had it been discussed (which it was not). There should be no prioritization of any district above any others in this bonus. We advocated for boundaries to be drawn around neighborhoods for use of the transfer bonus to ensure that historic buildings and districts could be saved throughout the Central City. The current North Pearl bonus draws a boundary around the Pearl District - only transfers from the Pearl District can be used in the North Pearl Plan. We still believe this to be a good idea as it creates air rights markets that work in every district and neighborhood. It means that development in a neighborhood can save a building in the same neighborhood. It is both fair and equitable. This bonus needs to be revised.

The decision to have the FAR transfer only from seismically upgraded buildings is a failure and misses the point of the bonus entirely. Seismically upgrading a structure is expensive and historic buildings need all the help they can get. By only allowing the transfer from already upgraded buildings, only buildings that are already rehabilitated will be saved. Because these types of structures have already been rehabilitated, there is a high probability that they were already going to be around for a long time. The goal is to save the historic structures that are on the bubble. The goal of FAR transfers should be to create a market for air rights which in turn creates money for historic structures to be able to seismically upgrade their buildings. This part of the proposed code needs to be revised.

We advocated for the elimination of the height and FAR bonuses from the 13th Avenue Historic District back to the base FAR and height (100' and 75' according to the current zoning maps). We continue to support the elimination of the bonuses on this district and going back to the base FAR.

Regards,

Patricia Gardner
Co-Planning Chair, PDNA