



THE BUREAU OF **PLANNING
& SUSTAINABILITY**

Portland Planning and Sustainability Commission

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December 14, 2021

Mayor Wheeler and City Commissioners

Portland City Hall
1220 SW 4th Avenue
Portland, Oregon 97205

Dear Mayor Wheeler and City Commissioners:

The Planning and Sustainability Commission (PSC) appreciates City Council's continued interest in the Historic Resources Code Project (HRCP) and the efforts that have gone into crafting potential amendments in response to public testimony received on the Recommended Draft.

The PSC had an opportunity to review the eight proposed amendments at our regular meeting on December 14, 2021. Upon review of these amendments, PSC offers the following comments:

- **Amendment 2.** The PSC is supportive of lowering the historic resource review procedure types available for affordable housing developments in Historic and Conservation Districts. This amendment aligns with City Council's approach in the Design Overlay Zone Amendments project to provide flexibility for affordable housing developers. *The PSC recommends support for Amendment 2.*
- **Amendment 5.** The PSC supports the Recommended Draft's existing approach to the designation and removal of Historic and Conservation Districts, requiring a joint hearing between the PSC and the Historic Landmarks Commission (HLC) prior to the PSC making a recommendation to City Council for final action. Dual recommendations to City Council on



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legislative land use proposals are avoided elsewhere in the zoning code for good reason – requiring independent recommendations from two commissions would create public confusion, additional work for staff preparing findings and reports, and the potential for inconsistencies in tallying necessary owner consent. *The PSC recommends against Amendment 5.*

- **Amendment 6.** The PSC supports the Recommended Draft approach to more inclusive membership categories for the Historic Landmarks Commission, in alignment with the general approach codified for the PSC and Design Commission. However, the PSC also recognizes that quasi-judicial applicants rely on the Historic Landmarks Commissioners for their professional and lived experience – and that overly-prescriptive membership requirements might, in practice, create an undo obstacle to meeting diversity goals for the HLC’s membership. *The PSC supports a friendly amendment to Amendment 6 that would require two seats to be filled by individuals with professional expertise in historic preservation.*

The HRCP Zoning Code package provides Portland with a once-in-a-generation opportunity to rewrite the City’s regulatory approach to historic preservation. We are eager for City Council to take final action on the potential amendments and the whole HRCP package.

Sincerely,

Eli Spevak
Chair

