



City of Portland
Historic Landmarks Commission

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Date: October 28, 2024
To: City Council
Cc: Phil Nameny, Bureau of Planning & Sustainability (BPS)
From: Portland Historic Landmarks Commission (PHLC)
Re: Housing Adjustments Compliance Project (HACP) Recommended Draft

Dear City Council:

The Historic Landmarks Commission has been briefed on the HACP related to Senate Bill 1537 by senior staff of the Bureau of Planning and Sustainability (BPS) on October 14th. **We are in support of allowances for additional housing units in Portland's Central City where new growth is to be focused.**

We offer this recommendation:

- 1. We concur with bullet A of the Design Commission's letter in support for meeting the state mandate for limiting Adjustments to 20% or 1 story** until such time as an appropriate analysis can be conducted on the impact of additional height allowances. We understand such analysis will be part of a future Central City refinement code project.
- 2. Historic Districts in Central City require special consideration:**
 - Upzoning incentivizes demolition. In addition to the loss of unique and beloved neighborhood identity, view corridors and shadow impacts, the significant carbon emissions impact of demolition works against the City's sustainability goals.
 - Upzoning increases land costs, which in turn significantly increases the cost of development. We question whether this additional height will actually improve affordability of the resulting housing.
 - A policy to allow unlimited height may well create false expectations for developers seeking additional height in historic districts and sets up a conflict when proposals fail to meet approval criteria and design guidelines.
- 3. Finally, the lack of public engagement** or input prior to the Planning Commission vote sets a bad precedent, especially for decisions whose impact will affect the built environment for 50+ years.

Thank you for your consideration for how this policy will impact Portland's historic resources.

Sincerely,

Andrew Smith

Peggy Moretti

Maya Foty

Hannah Bronfman

Hugo Hamblin-Agosto

This letter represents the comments from the commissioners present at the October 28, 2024 meeting.