



City of Portland  
**Bureau of Development Services**  
Land Use Services Division

1900 SW Fourth Ave., Suite 5000  
Portland, Oregon 97201  
Telephone: (503) 823-7300  
TDD: (503) 823-6868  
FAX: (503) 823-5630  
[www.bds.ci.portland.or.us](http://www.bds.ci.portland.or.us)

## MEMORANDUM

**Date:** September 3, 2014  
**To:** Bill Cunningham, Nicholas Starin, Mark Raggett - Bureau of Planning and Sustainability  
**From:** Chris Caruso, Land Use Review  
503-823-5747, [chris.caruso@portlandoregon.gov](mailto:chris.caruso@portlandoregon.gov)  
**Re:** Briefing on the 2035 Comprehensive Plan Proposed Draft

Thank you for taking advantage of the opportunity to present the 2035 Comprehensive Plan Proposed Draft to the Historic Landmarks Commission. I hope you find it informative and valuable as you continue with the project development. Attached is a summary of the comments provided by the Historic Landmarks Commission at the August 18<sup>th</sup> meeting. This summary was generated from notes taken at the public meeting, a subsequent review of the public meeting recording, and a final review by the Design Commissioners. To review the meeting recordings, please visit:

[http://efiles.portlandoregon.gov/webdrawer.dll/webdrawer/search/rec&sm\\_clastext=historic%20landmarks%20commission&sm\\_recnbr=\\*/eb/\\*&bool=and&sort1=rs\\_datecreated&count&rows=50](http://efiles.portlandoregon.gov/webdrawer.dll/webdrawer/search/rec&sm_clastext=historic%20landmarks%20commission&sm_recnbr=*/eb/*&bool=and&sort1=rs_datecreated&count&rows=50)

These Historic Landmarks Commission comments are intended to guide you in further development of the project. These comments may also inform City staff when giving guidance over the course of future related information. It should be understood that these comments address the project as presented on August 18, 2014. As the project evolves, the comments may also evolve or may no longer be pertinent.

Please continue to coordinate with me as you refine the Comprehensive Plan so that additional briefings can be presented to the Historic Landmarks Commission as appropriate.

*Encl:* Summary Memo

*cc:* Landmarks Commission

Commissioners present at the briefing included: Brian Emerick, Jessica Engeman, Carin Carlson, Paul Solimano, Harris Matarazzo and Caroline Dao.

General Comments:

- There was a general question about how the Quadrant Plans fit into the overall Comprehensive Plan development schedule.
- One of the top priorities of the Landmarks Commission is updating and expanding the Historic Resource Inventory. Effort should be coordinated with areas designated in the Comprehensive Plan as high growth potential areas.
- The Commission is very concerned about the loss of key resources that are not yet listed due to the age and non-comprehensiveness of the Historic Resource Inventory, as well as by the drive for growth and development fostered by current zoning designations.
- The Commission has been dealing with a lot of public concern over demolitions in established neighborhoods and wants to emphasize that the language in the Comprehensive Plan Draft document calling for resource reuse, rehabilitation, and retention be retained where it is mentioned now and be added at the front of the applicable Chapters so it is very clear that retention of existing structures is a viable sustainability strategy that is encouraged by the City of Portland in its Comprehensive Plan. Sustainability is not supported reasoning for demolition.
- The Commission stressed again that it is important to continue to tie sustainability to historic preservation and is glad to see it remains in the current draft. Further emphasized on the benefits of reusing existing buildings and reducing demolition should be added to Key Direction 3 as a major factor in carbon-reduction efforts. A bullet point should be added to the "foundation of sound land use..." list discouraging demolition. Consider incorporating the following findings from *The Greenest Building: Quantifying the Environmental Value of Building Reuse* by the Preservation Green Lab of the National Trust for Historic Preservation:
  - **Reuse Matters.** Building reuse typically offers greater environmental savings than demolition and new construction. It can take between 10 to 80 years for a new energy efficient building to overcome, through efficient operations, the climate change impacts created by its construction. The study finds that the majority of building types in different climates will take between 20-30 years to compensate for the initial carbon impacts from construction.
  - **Scale Matters.** Collectively, building reuse and retrofits substantially reduce climate change impacts. Retrofitting, rather than demolishing and replacing, just 1% of the city of Portland's office buildings and single family homes over the next ten years would help to meet 15% of their county's total CO2 reduction targets over the next decade.
  - **Design Matters.** The environmental benefits of reuse are maximized by minimizing the input of new construction materials. Renovation projects that require many new materials can reduce or even negate the benefits of reuse.
  - **The Bottom Line:** Reusing existing buildings is good for the economy, the community and the environment. At a time when our country's foreclosure and unemployment rates remain high, communities would be wise to reinvest in their existing building stock. Historic rehabilitation has a **thirty-two year track record of creating 2 million jobs** and **generating \$90 billion in private investment**. Studies show residential rehabilitation **creates 50% more jobs** than new construction.
- The Commission is very concerned about the fate of unreinforced masonry buildings throughout the City and the safety of their occupants. Greater emphasis should be placed directly on encouraging and funding seismic upgrades for historic and existing URMs as a key component of Key Direction 6: Improve Resiliency.
- The Commission recommends the following edits to the Chapter 4: Design and Development Goals and Policies draft:
  - Page GP4-8 – Policy 4.24. Remove "on adopted inventories" – this is an uncertainty.
  - Page GP4-11 opening paragraph. Remove "statewide" from last sentence – resources can be of local, statewide, or national significance.

- Policy 4.36. Remove "high-quality" and "where feasible" – quality is subjective.
- Policy 4.36. Remove "where feasible" – we don't qualify the protection of scenic resources this way, this policy is encouraging, not mandating.
- Policy 4.38. Remove "significant" – this should apply to any historic resource, adding a qualifier could create loopholes.
- Policy 4.38. Add language to the effect that demolition of historic resources is discouraged or not the preferred course of action. Protection until other alternatives can be explored should be the last effort and we should encourage avoiding this by retaining the resource.
- Policy 4.40. Add language to the effect that while survey work may focus on areas of anticipated growth, it should not be limited to those areas – all areas of the City need to be surveyed as the opportunity arises. Also add language regarding the maintenance of the inventory.

The Bureau of Planning and Sustainability will coordinate additional briefings with BDS staff as the Comprehensive Plan is further developed.

### **Exhibit List**

- A. Bureau of Planning and Sustainability Submittals
  - 1. 2035 Comprehensive Plan Proposed Draft
  - 2. Chapter 4: Design and Development
  - 3. Urban Design Framework
  - 4. Get to Know the Comprehensive Plan Map App
- B. Other
  - 1. Memo to Commission with BPS introduction, July 21, 2014
  - 2. BDS Staff Memo, August 11, 2014