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September 29, 2008

Mayor Tom Potter and Portland City Council
City Hall
1220 SW 4th Avenue
Portland OR 97204

Dear Mayor Potter and City Commissioners:

On August 12, 2008, the Portland Planning Commission voted unanimously to forward the Skidmore/Old Town Amendments to Title 33: Planning and Zoning to Council for adoption.

These code amendments and the design guidelines being forwarded to you by the Portland Historic Landmarks Commission are part of the implementation program described in the *Ankeny Burnside Development Framework* (2006). The code amendments are intended to increase opportunities for development in the district while at the same time increasing restoration and renovation opportunities for historic buildings.

The Skidmore/Old Town National Historic Landmark District is clearly one of Portland's most distinct places and has long been recognized as an area of tremendous opportunity as well as nostalgic value. It is also an area that faces some significant challenges to redevelop. We enthusiastically support the ongoing efforts of the City to reinvest and revitalize the area as described in the *Ankeny Burnside Development Framework*. The Bureau of Planning and the Portland Development Commission are working together with neighborhood residents, stakeholders and developers to increase reinvestment and help re-create this vibrant, dynamic and historic heart of the City.

These code amendments increase maximum building heights and floor area ratios on select sites around the edges of the district, but only through the transfer of development potential off of contributing historic structures or payments into district-oriented funds to achieve these larger building forms. The Planning Commission endorses this approach, but does not do so lightly. The Planning Commission listened to considerable testimony and discussed issues thoroughly and thoughtfully. The commission heard testimony that this additional flexibility is desirable and will both encourage investment and bring new life to the area. Commissioners heard supportive testimony from the State Historic Preservation Office (SHPO), which endorses the link between development and funding for preservation of historic buildings in the district. Commissioners also heard testimony that expressed doubt these measures will be effective. Commissioners believe that code amendments and design guidelines alone will not accomplish revitalization of the district. Amendments must be accompanied by other actions recommended by testifiers and in the *Ankeny Burnside Development Framework*, including consideration of measures to promote the redevelopment of surface parking lots.

In approving the Code amendments proposals, the Planning Commission stresses that the relationship of floor area to height is critical to this conclusion. By allowing more height than floor area on opportunity sites, taller buildings can be stepped back from historic street frontages and sculpted to reduce potential impacts on the district. Increasing floor area ratios



without also increasing height limits would result in bulkier buildings with fewer step backs and distinctions, negatively impacting the character of the historic district.

The Planning Commission is aware that this recommendation to allow additional height and floor area on five opportunity sites at the periphery of the historic district is in conflict with the views of the Portland Historic Landmarks Commission. The Planning Commission understands the perspective of the Landmarks Commission and the significance of preserving the character of this historic district. However, the Planning Commission believes this proposal balances community desires for new development opportunities with the preservation of the contributing structures in the district. The Planning Commission encourages City Council to continue this conversation at the upcoming public hearing on the amendments.

Finally, the Planning Commission supports the adoption of new design guidelines for the Skidmore/Old Town Historic District along with these code amendments. The Planning Commission would like to see that the design guidelines forwarded to you by the Portland Historic Landmarks Commission ensure that setbacks are incorporated on at least one side of buildings proposed on height opportunity sites. Planning Commission believes that with guidelines that encourage taller new buildings to step back from the street wall at heights similar to nearby historic structures, taller buildings can be a positive addition to the area without negatively impacting the historic character of the historic district.

In conclusion, the Portland Planning Commission recommends the Portland City Council adopt the Ordinance which approves the proposed Skidmore/Old Town Zoning Code Amendments and amends Title 33: Planning and Zoning to include these amendments.

Specifically, the commission recommends that City Council:

- Increase development opportunities on select sites around the edges of the Skidmore/Old Town Historic District by linking additional height and density to historic district improvements.
- Restrict the available floor area bonuses within the historic district to those that encourage housing or are clearly targeted to improving the historic character of that district.
- Continue to seek new ways to reinvest in and encourage others to reinvest in and contribute to the revitalization of the Skidmore/Old Town Historic District.

The commission looks forward to the discussion at Council on this set of regulatory changes for the historic heart of the City of Portland. Several commissioners plan to testify at Council in November to explain their recommendations. Thank you for your consideration.

Sincerely,



Michelle Rudd, Vice President
Portland Planning Commission

c: Portland Planning Commission

