



City of Portland
Historic Landmarks Commission

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October 29, 2008

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

Dear Mayor Potter and City Commissioners,

The Skidmore/Old Town Historic District is where the City of Portland began. It is truly one of the most special places in the city, featuring signature works of architecture, intimate open spaces around the Skidmore Fountain, and unique streets not found anywhere else in the city. In order to acknowledge, celebrate and protect its robust collection of buildings with intricate cast iron facades, the district was listed in the National Register of Historic Places in 1975 and designated a National Historic Landmark in 1977 in recognition of its national historic significance. It is one of only two such nationally designated landmarks in the City of Portland.

DESIGN GUIDELINES

The Landmarks Commission is pleased to forward you the *Skidmore/Old Town Historic District Design Guidelines*. These new design guidelines will ensure that future historic renovations and new construction in the Skidmore/Old Town Historic District will preserve and enhance the historic character and scale of the district.

The guidelines powerfully fulfill two missions. First, they lay out clear directions regarding design, scale, materials, texture, proportions, etc. that will best guide applicants. The ambiguity of the guidelines these replace is gone. Second, these guidelines will serve as a strong economic development tool by establishing a high standard of congruent historic design. The Skidmore/Old Town Historic District can become a key cultural attraction in the region, showcasing its one-of-a-kind collection of Italianate architecture and cast-iron fronted buildings and tell the story of our great city. Portland will be able to boast an Old Town to rival that of San Francisco, Charleston, Savannah and Boston.

CAST IRON

The Commission fully supports the work of William J. Hawkins, III, FAIA and the goal of reintroducing cast-iron building façade elements into the historic district, as a part of restoration projects, new construction, or other interpretive works accessible to the public. However, up to now, support for the reuse of this marvelous collection has been limited to words of encouragement. As a means to this goal, the commission urges your support of the resolution to direct City bureaus to prioritize reuse of artifacts from the Eric Ladd and other cast-iron artifact collections in the Skidmore/Old Town Historic District. This will help to ensure at least some reuse of the artifacts within the district—potentially in the near term—as Block 8 (NW Davis and Naito Parkway) and Fire Station 1 are both already publicly-owned. This is critical because the cast-iron is the reason that this district obtained national recognition and landmark protection.

RECOMMENDED CODE AMENDMENTS

The Landmarks Commission recognizes that there are numerous sites for potential redevelopment within the district—sites currently used for surface parking—that present challenges to the district's continuity and character. However, the Commission believes that the City's first duty is to "do no harm" to the character of the historic district, and to preserve and enhance the quality of the district's historic structures and scale. The vitality and future success of this neighborhood is directly related to reinforcement of a cohesive historic identity and not in blurring the perception of the district.

As you consider Planning Commission's proposed amendments to Title 33 of the *Portland Zoning Code*, the following advice and recommendations are offered for your consideration:

HEIGHT

The Commission does not support the code proposal that identifies five "opportunity sites" within the boundary of the historic district, where new buildings could achieve heights greater than the existing maximum of 75 feet.

The Commission opposes this proposal for several reasons. First, the guidelines have been carefully crafted to protect the delicate resources of this district and promote compatible additions and infill. Consistency and balance is critical. However, the code amendments were composed while the proposed guidelines were being drafted. Though not expressly conflicting, in effect, they are in jarring conflict with our guidelines such that no less than eight of the proposed guidelines would have to be substantially diluted and thereby threaten the value and strength of the entire document.

Second, the Commission is gravely concerned about the impacts of taller buildings on the district's character. A primary goal in this (or any) historic district is to preserve its historic character, a character defined today in Skidmore/Old Town by a majority of buildings between two and four stories, between 40 and 60 feet tall. The scale of buildings at 100 or 130 feet would be incompatible with that of the smaller, pedestrian-scaled and finely crafted historic structures throughout the district. There are no historic precedents for buildings of this scale in Skidmore/Old Town and no evidence that such tall building can be designed in a way that is compatible. We strongly oppose introducing a new building paradigm of large floor plate, view-oriented mid-rise structures with underground parking into this relatively tiny district and its uniquely quaint scale. Bluntly put, it is reasonable to direct these more typical new construction designs toward the countless sites in our city where they are compatible with their surroundings. Additionally, while some may see peripheral non-conformance as minimized intrusion, we see it as a threat to distinct district boundaries which are critical to neighborhood definition, especially one that is only 20 blocks in size.

Third, the Commission remains unconvinced that allowing additional height will catalyze redevelopment activity in the district. There are numerous examples of mid- to high- rise development in Portland having very little or no "catalytic" impact on surrounding pedestrian-scale development, as well as vacant or underutilized sites with generous height and floor area ratio (FAR) allowances continuing to languish. Entitlements alone have little to do with development energy. Strong market demand, creative developers, innovative designers and competitive land prices are all needed to capitalize on the potential of a special opportunity such as the one presented by Skidmore/Old Town. The district is already changing before our eyes as \$100 million of investment is strategically catalyzing new tenancies, converting street life, raising rents and investment returns and uplifting perceptions. Please note, also, that this investment is in the form of sensitive historic renovation as well as additions and infrastructure improvements sensitive in scale and design—all approved by the Landmarks Commission.

FLOOR AREA RATIO (FAR) TRANSFER

While we understand that the transfer of development potential, or FAR, from contributing historic structures is directly linked to the potential receiving opportunity sites, we believe that this transfer provision is warranted by its own merit. Today, it is possible to transfer FAR from designated landmarks, but not from contributing structures in a historic district. However, many important structures in Skidmore/Old Town are not individual landmarks. Increasing the flexibility to transfer development potential would increase the likelihood that more contributing structures could be preserved.

DISTRICT IMPROVEMENT FUND AND OTHER BONUSES

The Commission supports the creation of a Skidmore/Old Town District Improvement Fund, administered as a density bonus option. We also recommend the proposed reduction in the allowable density bonus options for the historic district to only the residential bonus and the district improvement fund bonus. Tailoring the bonuses to the specific needs of the historic district is consistent with the approach taken in other parts of the Central City, and will ensure that multiple community and preservation objectives can be achieved. However, we do not wish to exchange height and FAR increases quid pro quo for creation of this Fund, as has been proposed. The resulting financial benefit is dwarfed by the irreparable damage that would be done to our National Landmark District by out-of-scale new development.

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You appointed us as stewards for our city's historic resources. As a National Landmark District, Skidmore/Old Town is THE single most important commercial historic neighborhood of our community. We ask for your support of these Design Guidelines and Cast Iron Resolution submitted by the Landmarks Commission without major revision.

Sincerely,

A handwritten signature in black ink, appearing to read 'Art DeMuro', with a stylized, sweeping flourish extending to the right.

Art DeMuro, Chair, Portland Historic Landmarks Commission

c. Portland Historic Landmarks Commission