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November 10, 2008

TO: Mayor Tom Potter and Portland City Council

FROM: Cathy Galbraith, Executive Director, Bosco-Milligan Foundation

RE: Zoning Code Amendments and Design Guidelines:
Skidmore – Old Town Historic District

The Bosco-Milligan Foundation is one of Oregon's most active non-profit historic preservation organizations and a Local Partner of the National Trust for Historic Preservation; we have served nearly 45,000 people in preservation programs at our Architectural Heritage Center in the historic West's Block Building at 701 SE Grand Avenue. We (1) Oppose the Skidmore/Old Town zoning code amendments as proposed; (2) Support the design guidelines as proposed; and (3) Support the Cast Iron Resolution.

The Bosco-Milligan Foundation has acute concern about the importance of Skidmore-Old Town as Portland's oldest & most important historic district. Skidmore-Old Town's lasting preservation should be one of the City's highest priorities. The proposed zoning code amendments are instead more focused on the importance of encouraging new and large developments, rather than historic preservation as of at least equal importance.

We are unable to find any other examples of historic districts anywhere in the United States where Portland's proposed strategy of "opportunity sites" allowing immensely larger buildings has been implemented. Is the City of Portland really about to sacrifice the integrity and future of this National Historic Landmark District for the benefit of five property owners? Instead, the Council has the opportunity to make a once-in-a-lifetime decision to plant the seeds for creation of a nationally compelling historic destination in Skidmore/Old Town.

The design guidelines that will be used to review new development are now of the utmost importance. The guidelines state that "*Developing sensitive height transitions for new buildings that may be taller to older historic structures will strengthen the character of both.*" This is beyond idealistic and the fatal flaw is the zoning code amendments as proposed. We oppose the massive amounts of square footage potentially available for Floor Area Ratio (FAR) transfers for new development from sites with historic buildings to sites without them; this amount of new development in a district the size of Skidmore-Old Town will bring substantial negative impacts.

The five identified so-called "edge sites" for new construction at 100' or 130' in height is followed in the code amendments by the option of requesting additional height on these

sites through Historic Design Review. Three of the five "edge sites" sit fully one half block within the district's boundaries, rather than at the edge.

Skidmore-Old Town is a landmark district of national significance. It is fragile and vulnerable and deserves our very best effort to improve it. The identification of "opportunity sites" for new development is one means of potentially improving the district's economic viability. But at the proposed allowed heights, one or more inappropriately designed and out-of-scale buildings will only further erode the district's significance and jeopardize its status as a National Historic Landmark. Surely a city like Portland can be as creative and visionary as it prides itself – truly preserving its oldest and most significant neighborhood, rather than considering Skidmore/Old Town as just another location for construction of large new buildings. We can build large new buildings anywhere. This one small and nationally significant district deserves some better strategy than is proposed in the zoning code amendments – development of infill construction at its maximum, which is increasingly becoming Portland's norm. We have a finite number of historic structures and should not pursue a strategy that will only erode the essence of the district's character, squandering the opportunity now before you.

The City and the public have shared understandable concerns regarding the need to increase the economic health and vitality of Skidmore/Old Town. There are, in fact, good things happening in the area, such as Mercy Corps new headquarters and the University of Oregon's Portland campus in the White Stag Block. Historic preservation is not a roadblock – but part of a thoughtful strategy to restore the once-vibrant cast iron district, through the sensitive rehabilitation of surviving historic buildings, coupled with the re-use of the unique trove of the Eric Ladd salvaged cast iron in the construction and reconstruction of well-documented buildings lost over time.

Why are historic preservation projects like the re-use of the Eric Ladd cast iron not a priority for the urban renewal funds allocated to fund multiple other projects? Every effort must be taken to re-use the cast iron that was thrown away once but rescued, bringing interpretation and purpose to the district, reflecting the unique level of architectural detail that was envisioned and constructed in the last century. Where is the "weighing" of the value of historic preservation in the district, compared to all of the other potential projects? Where is the public appetite to buy out or otherwise provide incentives for the owners of surface parking lots (for which many an historic building was lost) to build compatible and appropriately scaled new buildings?

A new Skidmore-Old Town Improvement Fund to be generated by payments for the FARs is an interesting concept but woefully inadequate. The amendments note that *"it is impossible to estimate how often this option would be used..."* We wish the analysis was more hopeful of the likelihood of revenue generation, but the discussion is a realistic one. In the earlier days of historic preservation in Portland, the city had an Urban Conservation Fund - and did not look to development-funded dollars to achieve all desirable outcomes.

The City of Portland provides substantial subsidies for every possible “green” building feature in new construction projects. There is no “greener” or more sustainable building than one that already exists, with all of its embodied energy. Substantial subsidies have also been provided to developers of transit-oriented-developments (TODs). Why can we not allocate similar incentives for the public purpose of historic preservation projects and construction of truly compatible new buildings, including those that re-use the Eric Ladd cast iron? Most of the cast iron is already in public ownership and re-using it in new construction is the “greenest” possible measure.

Meanwhile, the community is still waiting for any additional historic preservation incentives, as promised in late 2004, when demolition denial provisions for National Register properties were restored in the zoning code. At that time, the National Trust devoted substantial research efforts to assist PDC and BOP staff in investigating the full array of preservation incentives throughout the United States.

The Skidmore-Old Town Historic District needs incentives for the seismic retrofit of its historic buildings, incentives for commercial occupancy of its storefronts, and incentives for occupancy of upper floors, at a minimum – before we can conclude that new construction is the primary “solution” to its challenges.

In the late 1970s, as the district’s economic livelihood was growing and improving, construction of light rail destroyed dozens of small businesses who never returned, sapping the district’s street life. The void was filled by predatory drug dealing activities and then followed with the concentration of additional social service facilities for transient populations. This series of circumstances that were permitted - and also abetted - resulted in an environment that is not conducive to business development and is unwelcoming to Portland visitors and residents alike. The city of Portland now has the opportunity to reverse these tragedies of past actions, and inactions.

The proposed code amendments are hardly worthy of the Skidmore-Old Town Historic district. This cast-iron district is unlike any other in Portland or the United States. As a city, we need to be much more creative and visionary if this important area of Portland is to have any chance of being successfully preserved and its once-vibrant streetscape restored.

As a final comment on process, the importance of the proposed zoning code amendments and design guidelines for Skidmore-Old Town is in direct contrast to the lack of public distribution of information to the wider community, beyond the parties directly involved in the public process to date. As the revisions have progressed, it has been immensely difficult for the general public to wade through the City’s website, find the most up-to-date version, and determine exactly what is under consideration. The burden has been on the public to stay abreast of these issues and the separation of the zoning code amendments from the design guidelines is especially problematic. The separation of the two issues has resulted in proposed zoning code amendments that ignore the preservation goals that are the foundation of the design guidelines, and should be the primary goals of both packages.