

November 4, 2008

Mayor Tom Potter and Portland City Council
c/o Karla Moore-Love, Clerk
City of Portland
1221 SW 4th Ave, Room 140
Portland, OR 97204

**NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®**

**Western
OFFICE**

RE: Skidmore/Old Town Code Amendments-Design Guidelines

Dear Mayor Potter and City Council members:

On behalf of the National Trust for Historic Preservation, I am writing to express our concerns regarding the proposed Skidmore /Old Town Code Amendments and Design Guidelines. While we find many of the stated goals of the 2006 Ankeny Burnside Development Framework to be laudable, and support some of the currently proposed amendments to Title 33: Planning and Zoning, we strongly oppose the proposed introduction of new construction within the Skidmore/Old Town that would be out of scale with the district's existing 40 to 60-foot-tall historic structures.

The National Trust for Historic Preservation provides leadership, education, advocacy and resources to a national network of people, organizations and local communities seeking to protect, enhance and enjoy the places that matter to them. In Portland, we work closely with our local Partner, the Bosco-Milligan Foundation.

By saving the places where great moments from history – and the important moments of everyday life – took place, the National Trust for Historic Preservation and our partners help revitalize neighborhoods and communities, spark economic development and promote environmental sustainability. The National Trust has a long history of efforts to support preservation in Portland, including a 2003 report for the Portland Development Commission providing an overview of local preservation incentives and regulations across the country, with specific recommendations for increasing the effectiveness of the City's preservation program.

Arguably Portland's most outstanding historical asset is the Skidmore/Old Town district. Skidmore/Old Town is significant for its central role in the early development and economic growth of the Pacific Northwest in the last half of the nineteenth century. But the characteristic for which the district is best known is the exceptional architecture in its mid- and late-nineteenth-century cast-iron commercial buildings—"one of the finest collections in the nation and perhaps the most outstanding in the Far West" (April 4, 2008 Draft Revised NHL Nomination.)

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The district's significance is underscored by its designation as a National Historic Landmark District. In the State of Oregon there are just fifteen National Historic Landmarks, only two of which (Jacksonville and Skidmore/Old Town) are neighborhood districts.

The very survival of the Skidmore/Old Town district has often been cast in doubt. In his 1976 book The Grand Era of Cast Iron Architecture in Portland, William John Hawkins III charted in a passage titled "The Wrecker's Zeal" the devastation brought about by a tragic pattern of city "improvements" in the name of "progress." Construction of the riverfront highway and the Morrison Bridge and Harrison Bridge ramps devastated many square blocks of the historic district.

Portlanders watched in dismay as the city they loved was eviscerated to accommodate the automobile. Horror led to action, eventually leading to one of the nation's first successful "freeway revolts" and the removal of the riverfront highway in 1974. By then, much of the damage had already been done, and the Skidmore/Old Town neighborhood was left a shadow of its old self, resembling "Dresden after the war" in Hawkins' words. (Hawkins also noted, perhaps presciently, that "today, height is too often a builder's first standard," and argued for the need to protect the remaining cast-iron structures through historic designation.)

Through the efforts of Hawkins and other preservation and community activists, historic designation did occur. The Skidmore/Old Town National Historic Landmark District was designated in 1977. In addition, while many buildings were pointlessly demolished, much of the cast iron from those structures was saved.

Due to a combination of factors, the anticipated revitalization of Skidmore/Old Town failed to meet expectations. Today, Portland continues to search for ways to "facilitate new development while ensuring the preservation of the district's special character embodied in its robust collection of historic buildings, spaces, and structures" ("Skidmore/Old Town Historic District Code and Design Guidelines Project Description", City of Portland Planning Department website.) We understand the project currently under consideration is part of an effort to fulfill this goal. Following are our comments on the specific elements of the project.

33.510.200 Floor Area Ratios

The National Trust does not oppose the concept of the Transfer of Development Rights (TDR's) or "Transfer of Floor Area" as proposed in the recommended draft. TDR's have proven to be an effective preservation tool, by allowing the owner of a historic property to transfer unused development rights from her lot to another site where a new building is to be constructed. This allows the property owner to realize some of the present-day value of her land without destroying the historic building. Given these potential benefits, it makes sense to extend the floor area transfer benefit from the 17 historic landmarks to the additional 40 structures that, while not landmarks, are contributing buildings to the district.

However, saving historic buildings alone is not the only measure of successful a historic preservation program. Frequently, protection of the historic context of a historic property is essential to maintaining the property's historic integrity. This is especially the case in a historic district, and even more important in a historic district that features a cohesive historic building typology as is the case in Skidmore-Old Town. Attempting to accommodate the transferred floor area exclusively on receiving sites within the National Historic Landmark District makes little sense. The resulting out-of-scale new development would undermine the integrity of the district and diminish those qualities that made the district eligible for National Historic Landmark designation. Careful consideration must be given to what makes the District eligible as a Landmark before individual development projects are approved in order to preserve the neighborhood's historic integrity.

We understand that the five "Opportunity Sites" specified in the proposal represent winnowing down of a larger number of sites originally considered. While we are grateful for the reduction in eligible sites, we nonetheless believe the proposed maximum FAR's and building heights to be excessive.

The proposal currently would require that in the case of contributing structures, both the sending and receiving sites for TDRs must be within the district. While it certainly makes sense to require the any floor area credit earned by receiving site come from a sending site in the district, the inverse makes little sense. If one understands the historic resource to be the *district*, then moving around FAR's and building heights within the district amounts to little more than a shell game. At a bare minimum, sites outside of the district should be eligible to receive floor area. Should the City fail to develop alternative incentives, then at a minimum it should limit the creation of opportunity sites to those that would have the least impact on the historic district—namely the two sites on the south side of Davis N.W. between Naito N.W. and 2nd N.W.

33.510.205 Height

The purpose statement notes that it "may be appropriate to transition from the low scale of the historic district to the larger buildings allowed outside the district." While a transition zone may be desirable, the transition should take place *outside* of the district. As it is, the proposal effectively would shrink the area retaining the district's historic scale and character.

We support the proposed language that makes additional height conditional on a finding by the Historic Landmarks Commission that the proposal is consistent with the purpose statement. Realistically speaking, however, we don't see how new construction up to 130 feet in height with FAR's of 8:1 can be found to "successfully respond...to the qualities the district's historic designation is intended to preserve."

33.510.210 Floor Area Height Bonus Options

We support the proposal to limit bonus options to those that reflect longstanding community planning goals for the district.

33.700.075 Automatic Changes to Specified Dollar

We support the automatic annual adjustment of dollar amounts to reflect inflation.

Design Guidelines

We have reviewed the October 29, 2008 draft Design Guidelines, which we believe will provide valuable and much-needed guidance on future historic rehabilitations and especially new infill construction in the Skidmore/Old Town Historic District.

One omission in the current draft is guidance for infill construction on the “Opportunity Sites.” This is perhaps just as well, as we oppose the density and height currently proposed for these sites. However, it is essential that the final design guidelines respond to whatever building heights and densities are incorporated in the approved plan, and that the guidelines clearly articulate what scale and massing would be feasible without diminishing the integrity of the National Historic Landmark District.

While we believe that allowances for buildings of this scale would seriously undermine the integrity of the National Historic Landmark District, we do agree conceptually with the Portland Planning Commission’s support in its letter dated September 29, 2008, for “guidelines that encourage taller new buildings to step back from the street wall at heights similar to nearby historic structures...” We disagree, however, that designing new buildings in this manner “can be a positive addition to the area without negatively impacting the historic character of the historic district.”

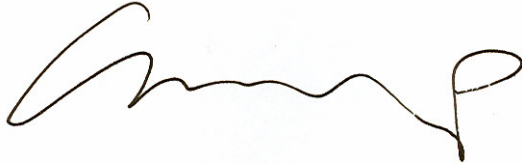
Reuse of Historic Cast Iron

We believe that the City of Portland is presented with a unique opportunity to use the collections of salvaged historic cast iron develop sensitive infill construction that helps to fit in the “missing teeth” of the historic district. Cast iron is a unique historic building material in that it at once reflects and embodies historic craftsmanship while also being mass produced and easily reproduced.

However, we recognize that the reuse of historic building elements in a conjectural manner can have negative consequences on the integrity of historic resources, and we note that previous efforts to incorporate historic cast-iron elements in to Skidmore/Old Town have not always been successful. Under no circumstances should the historic district become a boneyard of cast-iron remnants, nor should new infill be designed as a pastiche of unrelated building components. Both historic rehabilitations and new infill construction should conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties. We believe that the draft Design Guidelines go a long way to ensuring that

the historic cast iron is used in an appropriate manner that conforms to the Secretary's Standards, and supports the Historic Landmarks Commission's Cast Iron Resolution.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Veerkamp'. The signature is fluid and cursive, with a large initial 'A' and a distinct 'P' at the end.

Anthony Veerkamp
Senior Program Officer

cc: Art DeMuro, City of Portland Historic Landmarks Commission
Michelle Rudd, City of Portland Planning Commission
Elaine Jackson-Retondo, National Park Service,
National Historic Landmarks Program
Cathy Galbraith, Bosco-Milligan Foundation