

March 5, 2025

OR State Legislature  
Senate Committee on Housing & Development

I am writing in opposition to Section 4 of SB 49-1, on behalf of the Architectural Heritage Center and Bosco-Milligan Foundation. We are a Portland-based nonprofit dedicated to education, engagement, and advocacy focused on the region's historically and culturally significant places.

The Architectural Heritage Center is committed to furthering state housing goals – it has advocated for incentives and building code changes that would make it easier to realize internal conversion of structures to accommodate middle housing and larger adaptive reuse. This includes support of HB 3190, providing special assessment for commercial buildings, to make it easier for existing main street buildings to be converted to accommodate new uses, including housing.

Oregon's cities and towns include about 100 Historic Districts and 2,000 Historic Landmarks, from historic main streets to individual buildings. Historic areas and buildings, while comprising only a tiny portion of their cities and towns, are important to local tourism, dining, shopping, entertainment, and commerce. Local communities value, and have chosen to protect, the historic architecture, design, scale, and the irreplaceable look, feel, and appeal of these areas and buildings. Local governments apply that protection through special land use regulations and local historic review, tailored to local conditions to allow suitable new development in historic areas as well as changes and updates to historic buildings. Many of these historic protections have now been in place for over fifty or more years, during which time local governments, property owners, businesses, and communities have invested deeply in these places in reliance on this stability and protection.

To be clear: these protections **do not prohibit new development** in historic areas but only require that new buildings be designed in a manner and scale suitable for the surroundings. Which is important! Take a historic main street where people go to walk, dine, shop, and enjoy the colorful neighborhood, vintage architecture, and small storefronts while supporting local businesses and employment. Drop a couple large, wide, blank-faced high-rise buildings on each block, and the business district is irrevocably fragmented, significantly reducing the area's economic vitality, tourism interest, and causing harm to small businesses. Much of the housing built in the 1970's reflects poor city building - and policies like this proposal strip away necessary protections and encourage a return to a past we do not wish to repeat.

As a long range planner and urban designer, I've engaged many communities and architects about the question of what makes "good" development? **Quality housing need not be expensive, but it requires much more comprehensive evaluation than our predominant criteria of fast, cheap, and expedient.** At an infill housing symposium earlier this week, six modern architects presented their approaches. Context was universally mentioned as important by all. Attention to design (i.e., building form, relating to context, durable and low-maintenance materials, energy efficiency, access to sun and light, etc.) are in fact **critical ingredients in making buildings more cost efficient and affordable, long-lasting, and livable for ALL incomes.** When done well, communities champion good newly constructed housing examples as "density with sensitivity." When done poorly, it turns supporters of

infill away. Many new higher density buildings are unnecessarily made more expensive and less livable through poor design.

Ironically, most of our historic multi-family buildings are models of cost-efficient design and construction methods that can be an inspiration to multi-family housing builders today. We do not notice much of our historic “hidden density” because most of it is really well-designed and hides in plain sight. Design matters for making both good housing and good density which relates to and does not negate the quality of its surroundings.

Historic protections enable the local government to ensure the new buildings are built with enough design, massing, and context sensitivity to be compatible with the area – to reach a **win-win outcome and ensure adequate services and infrastructure**.

SB 49-1, Section 4 will prevent these local historic protections and upend many decades of local government and community commitment and effort. **The will, wisdom, and wishes of residents, voters, and elected governments in these cities and towns would be thrown overboard by the State’s pre-emptory top-down edict.**

Incentives for adaptive density and a state Rehab Tax Credit are what we need to add more missing middle housing and foster conversions of commercial to residential within existing buildings, not reductive policies that strip away land use checks and balances. We need more “low-carbon housing” incentives that leverages and invests in expanding our existing resources for expanded housing and economic vitality. England’s new “Retrofit First” Policy is what Oregon can and should be modeling for low-carbon housing strategies and leadership, not striping away long-standing policy frameworks.

As evidenced by overwhelming testimony against removal of demolition review in recent HB 2138 by communities across Oregon, citizens want to retain our existing historic area protections. Much of our existing historic houses and buildings will be further targeted for demolition, in pursuit of speculative real estate development profit, at the cost of the culturally and commercially vibrant areas that the people of the city, town, and state have **chosen** to protect and preserve. We have experienced significant cultural erasure at the expense of speculative real estate and gentrification that did more harm than good, and these lessons from history are critical lest we repeat them. **Please do not undermine the role of local jurisdictions.**

We support Restore Oregon and other local planning agencies in Oregon in opposing this bill. Please **strike Section 4 from SB 49-1.**

Thank you for considering these comments.

Sincerely,



Heather Flint Chatto, Executive Director  
Architectural Heritage Center & Bosco-Milligan Foundation  
701 SE Grand Avenue, Portland OR 97214