

The Portland Coalition for Historic Resources (PCHR) respectfully submits these comments on House Bill 2558.

1. The bill conflicts with the principle of local control and public input. It would automatically compel the re-zoning of portions of each city and town, without giving local governments and elected officials, or local communities and other stakeholders, any control or even input to reflect local or neighborhood-specific conditions and concerns.
2. The bill is unnecessary. Local governments are capable of re-zoning parcels and blocks of their cities and towns as appropriate. In Portland, for example, in recent years the city has increased the permitted height, floor area ratio and density to accommodate middle housing and multi-family uses throughout all residential zones, as well as substantially increasing permitted height and density in the Central City.
3. The bill fails to respect existing historic neighborhoods as protected resources under Statewide Planning Goal 5. Just like protections for natural area and scenic vistas, Goal 5 includes the preservation of historic resources. HB 2558 includes exceptions for designated natural resources; it should similarly include an exclusion for recognized historic and cultural resources, sites and areas. In Portland, for example, the bill will rezone portions of multiple state and federally listed historic districts and many designated historic landmark sites, which are adjacent to existing or currently planned light rail, streetcar, and bus rapid transit routes. These include portions of the Alphabet Historic District in NW Portland, the Ladds Addition and Laurelhurst Historic Districts in SE Portland, the Irvington Historic District in NE Portland, the Kenton Conservation District in North Portland, and multiple sites listed in the recent National Register of Historic Places multiple property listing of African-American Resources in Portland, Oregon. The outcome of mandating zoned density that greatly exceeds established densities, as will happen with HB 2558, will create a patchwork of new high-density development that compromises the architectural, historical and cultural character and significance of these districts. Local governments and communities should have a role in such decisions.
4. The bill may impede voter approval of future transit funding. Depriving local governments of flexibility to address local conditions and community and stakeholder concerns may reduce popular support for the bond measures vital to the funding of future transit projects.

John Liu, Chair PCHR