

Submitter: Laura Turnbull  
On Behalf Of:  
Committee: House Committee On Housing and Homelessness  
Measure, Appointment or Topic: HB2138

Dear Committee Members,

I am writing as an OR resident, former city planner and landscape architect (KS) so my opposition stems from both the citizen and design professional perspectives.

Please remove Section 22(1)(f) from HB2138-1. The intent of HB 2138 is to create more middle housing in Oregon, which I generally support. As written, middle or affordable housing is not required as a condition for removing demolition review. As written, this new rule would eliminate the minimal protection of a process that is designed to review and balance the needs of local communities and their historic homes and places.

Points to consider:

- \*Demolition review does NOT equal automatic demolition denial. It is a weighing of the public benefit of retention vs replacement.
- \*Demolition review is the only protection we offer in Oregon - to remove it will nullify Oregon's Land Use Goal 5 for historic resources.
- \*Removing demolition review denies the public a voice (counter to State Land Use Goal 1). The community or stakeholder group should have an opportunity to weigh in on places that matter to them and reflect their heritage. Should the developer be the only voice?
- \*The Demolition Review process has been shown to balance the public benefit and often times has helped create more housing, not hindering it.
- \*As written, Section 22(1)(f) has no requirement that middle housing or affordable housing replace the demolished historic structure. It has NO connection to the bill's goal.
- \*Historic designation requires rigorous research and vetting to prove cultural significance. They should not be erased without careful consideration.
- \*No protection + no restoration & reuse incentives means Oregon is dead last in the U.S. for stewardship of its heritage places
- \*Demolition is forever and more demolition works against our climate goals
- \*Contributing structures play a vital role in maintaining the historical integrity and character of a district. Removing or altering them can change the district's historical narrative and erode its authenticity.
- \*We can move the needle for increased housing in heritage areas by creating an inclusive "both-and" strategy that would add more units within designated historic areas through an incentive package for adapting existing residential, to multi-unit housing in non-contributing properties, adding ADU's, offering affordability incentives

to retain existing affordable heritage properties and more.

\*Low-carbon strategies that add affordable housing should be a priority for climate action over climate-impactful demolition and resource-intensive costly new construction whenever possible. Oregon needs all the tools in our toolbox for housing including a state rehab tax incentive that 39 other states use.

As a former public servant myself, I point out that our goal is to look at the community as a whole and to preserve it's identity and cultural heritage. I've seen numerous planning projects and city initiatives focused on developing community continuity and celebrating cultural heritage. Often, it's the loss of historically and culturally significant buildings that make such projects necessary.

Thank you for your time. Laura G Turnbull, PLA (KS)