Submitter:	Dan Volkmer
On Behalf Of:	Architectural Heritage Center
Committee:	House Committee On Housing and Homelessness
Measure, Appointment or Topic:	HB2138

National Register districts often represent the collective cultural heritage of a community. Contributing structures are integral to understanding a district's social, economic, and architectural history. Retaining them allows future generations to appreciate and learn from the past.

Oregon has over 138 National Register Historic Districts and thousands of designated homes across our state. If retained, the section of the bill would greatly impact our historically significant places, potentially leading to unrestricted demolition. 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.

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.