January 17, 2017

Land Conservation and Development Commission
635 Capitol St NE
Salem, OR 97301-2540


Dear Chair Macpherson and Commissioners,

The Oregon Chapter of the American Planning Association (OAPA) is an independent, statewide, not-for-profit educational organization with 850 members that provides leadership in the development of vital communities by advocating excellence in community planning, promoting education and citizen empowerment, and providing the tools and support necessary to meet the challenges of growth and change.

In 2016, we celebrated the 50th Anniversary of the visionary National Historic Preservation Act, which predates Oregon’s land use system. With respect to the proposed rulemaking, OAPA would like to offer comments and thoughts on the issues and principles that have been identified by the Rulemaking Advisory Committee.

OAPA supports the value of historic preservation and considers it one of the land use tools for creating strong communities in Oregon. As planners we support historic preservation of individual sites, and in the aggregate, the larger contributions of historic districts and of historic places to community and place making. We support the following goals of the rule amendments:

- Adding specificity to the inventory, designation, and review process for cultural resource in Oregon. In particular, separating the process of inventory from the act of property or neighborhood designation. This change will allow communities to update local cultural resource inventories without requiring owners to consent because the inventory will not directly affect or restrict private property use.
- Promoting consistent baseline protection for cultural resources, but allowing additional guidelines or regulations for individual jurisdiction following a public process. This will allow communities to apply additional protections to National Register listed properties or districts, but only after a public process that would allow the community members input on regulations for their districts.

Oregon APA welcomes the opportunity to participate in the ongoing work of the Land Conservation and Development Commission to improve conservation of Oregon’s historic
resources. We request to be included in future efforts and notifications to complete or continue Goal 5 rulemaking.

Sincerely,

Jeanine Rustad, JD
President