

**HISTORIC
PRESERVATION
LEAGUE • OF
OREGON**

Special Report



COMPATIBLE INFILL DESIGN

Principles for New Construction in Oregon's Historic Districts



Recommendations by the Historic Preservation League of Oregon
based on the 2011 Preservation Roundtable

Table of Contents

Purpose	2
Why Good Infill Matters	3
The Value of Oregon’s Historic Districts	4
Advising, Encouraging, and Regulating	5
What Makes a Good Guideline?	7
Principles for Infill Construction	8
Strategies for Implementation	11
Acknowledgements and Notes	11

2011 Preservation Roundtable Process

Topic defined	Fall 2010
Research and planning	Spring 2011
Regional Workshop I	The Dalles June 25, 2011
Regional Workshop II	Ashland July 8, 2011
Regional Workshop III	Portland August 18, 2011
Online Survey	Early September 2011
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Cover photo: Drew Nasto

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The Purpose of the Preservation Roundtable

The Preservation Roundtable was created to bring together diverse stakeholders to analyze and develop solutions to the underlying issues that stymie preservation efforts. The inaugural topic in 2010 was “Healthy Historic Districts in a Changing World—Compatibility and Viability.” Nearly one hundred people participated, arriving at nine recommendations published in a report titled **Healthy Historic Districts – Solutions to Preserve and Revitalize Oregon’s Historic Downtowns**. An electronic copy is available on the HPLO website.

The 2011 Preservation Roundtable focused in on “Design Standards for Compatible Infill,” one of the recommendations from the 2010 report, to provide clarity and consistency for review of new construction projects in historic districts. The principles and approaches to implementation that follow come from the best source: the people that live, work, own property, govern, and build within the state’s 123 National Register historic districts.

Over 200 individuals from around the state shared their ideas, both in person and online. With backgrounds in development, engineering, architecture, city planning, property ownership, community development, and related disciplines, Roundtable participants brought a broad slate of experience and range of perspectives to the dialogue.

Like beauty, it may be said that good design is in the eye of the beholder thus opinions may differ on some of the recommendations in this report. But the HPLO is confident these principles represent an important foundation upon which new construction can fill the empty spaces of Oregon’s historic districts in a way that protects their historic integrity, promotes good land use, and enhances economic vitality.



Ashland Preservation Roundtable participants

Why Good Infill Matters

We've all seen it. A new building that looks like a spaceship dropped into a historic neighborhood, entirely out of character with its neighbors.

And we all know historic districts that seem more ghost town than downtown because of the empty lots dotted throughout like so many missing teeth.

The fact is that most historic districts need good new construction – to promote economic vitality, improve urban density, and to generate the activity that spurs investment in the rehabilitation of the existing historic fabric.

The Secretary of the Interior's *Standards for the Treatment of Historic Properties* mandates that additions to historic buildings must differentiate new from old. Furthermore, the *Standards* imply that a Modern or Postmodern approach is best for additions on historic structures (an interpretation with which the HPLO does not agree). Though there is no Secretary of Interior "Standard for Compatible Infill," it has often been assumed that new construction in Oregon's historic districts must also be differentiated – with widely differing ideas of what "differentiated" means.¹

Typically new construction projects in historic districts must go through a design review process. This process varies widely across the state, but is often described as complex, subjective, lengthy, expensive, and design rules are perceived as being unclear or inconsistent.

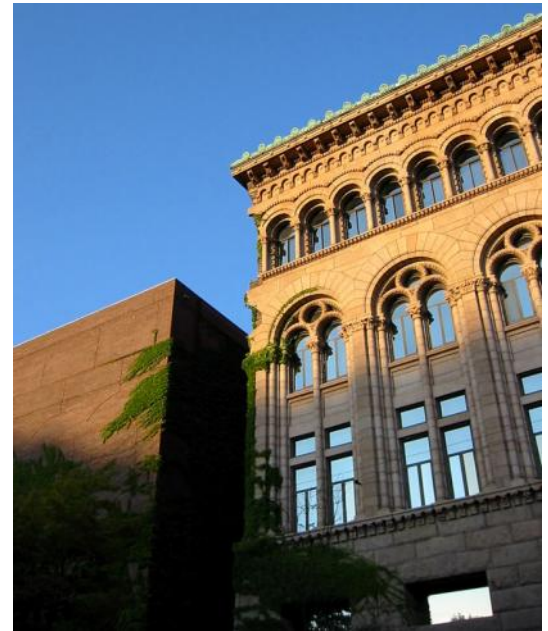
This inconsistency and lack of clarity creates uncertainty among the development team who would rather not waste time and money trying to navigate through an unpredictable design review process. A common argument is that it's too much of a hassle and too expensive to build in a historic district.

That isn't to say good infill hasn't been built, but one need not look further than the parking lots, ill-fitting Modernist buildings, and drive-through cubes to realize that a new and holistic approach is needed. Fortunately, in many cases developers haven't rushed to fill the missing teeth of the state's historic districts, so we have an opportunity now to do it right.

A quarter of the properties in Oregon's historic districts are vacant lots or classified as "non-contributing" to the district's historic character. Encouraging appropriate new construction on these parcels will be a defining component of the 21st century preservation ethos in Oregon.

Today, planners and politicians across the state are working to limit sprawl by diversifying and densifying existing urban areas to create walkable 20-minute neighborhoods. Although many still think there's a conflict between preserving historic places and boosting density, increasing the square footage in Oregon's historic districts represents an economic, social, and environmental opportunity.

This report outlines seven baseline *Principles for New Construction* intended to promote responsible infill within Oregon's historic districts. In practice, they would function as a Secretary of the Interior's *Standard for Compatible Infill*. While many of our recommended principles differ from the current Secretary's *Standards* and some preservation theories, they are intended to chart a course for Oregon predicated on the belief that historic districts are significant resources far greater than the sum of their component properties.



Chicago's Newberry Library (1893, with 1981 addition) is cited by the Secretary of the Interior Rehabilitation Guidelines as an example of the recommended treatment for a new addition to a historic building. Its harsh differentiation is a poor example of the type of new construction needed in Oregon's districts. Image by Payton Chung/Flickr.com



An 1860s Harrisburg building is swallowed up—literally!

The Value of Oregon's Historic Districts

Oregon has 123 historic districts listed in the National Register of Historic Places. Each is unique in its location, size, age, and historic significance. While some, like the Hells Canyon Archaeological District, are not collections of buildings, most of the state's National Register districts are places where we work, sleep, play, and shop. They range in size from Portland's Irvington District (2,813-properties) to Weston's Historic District (14-properties). Altogether there are over 15,000 properties within Oregon's Historic Districts – representing a very significant cultural and economic asset.²

The HPLO's *Healthy Historic Districts* (2010) identified the triple bottom line benefits of investing in Oregon's historic districts to:

- Increase heritage tourism, a \$192 billion market in the U.S.²
- Foster community pride and support mixed uses.
- Reduce sprawl and leverage existing infrastructure.

The report also identified nine practical ways Oregon preservation stakeholders can best invest in the state's historic districts. These ranged from creating district development plans to updating local preservation ordinances. One of the most distinct of the recommendations was the need to “create design guidelines and standards for infill to ensure the new is compatible with the old.” This recommendation is critical for Oregon's historic districts because appropriate new construction has the potential to:

- Provide skilled construction jobs and support long-term employment.
- Boost property tax revenues on parcels that are deserving of development.
- Increase density, fight sprawl, and maximize existing infrastructure.
- Support the preservation of historic buildings and help boost their economic potential.
- Provide a sense of continuity by differentiating the look and feel of historic and non-historic areas.

According to one participant in the Roundtable, developers face both opportunities and challenges when building in historic districts.

“As with any other commercial development project, there are both opportunities and challenges when building small-scale infill in historic districts. Current opportunities include low interest rates, lower construction and land costs, and New Markets Tax Credits. Also pre-leasing is easier in smaller scale projects, which is attractive to lenders. Challenges center around higher per square-foot construction costs for small-scale buildings, higher load factors in tight floor plates, and negotiating with unmotivated sellers who may have other income, low-capital basis and therefore high capital gains tax liabilities, and inflated perceptions of property value based upon zoning entitlements.” – Art DeMuro, *Venerable Properties*



Downtown Albany Historic District

Definition of Terms

Context: The physical and historic attributes of a specific place.

Contributing: A property identified as being a significant component of a historic district.

Floor Area Ratio (FAR): The size (total square feet) of a building compared to the size of the land on which it sits.

Fenestration: Window and door placement.

Guideline: Parameters describing the preferred look and feel of new construction in a specific historic district or area.

Massing: The general size and shape of a building in relation to its site and context.

Non-contributing: A property that does not add to the significance of a historic district, either due to its recent age, lack of historic significance, or compromised design.

Secretary Standards: The Secretary of the Interior's *Standards for the Treatment of Historic Properties* are administered by the National Park Service, defining best practices for Reconstruction, Rehabilitation, Preservation, and Restoration.

Siting: The positioning, orientation and set-back of a building on its lot.

Standards: Prescriptive metrics for directing new construction in a specific historic district or area.

Statement of Significance: A section of a National Register of Historic Places nomination that describes the features that define a property or district as historically significant.

Advising, Encouraging, or Regulating—What's Best?

Across Oregon, cities and towns have adopted a range of approaches to guide the design of new construction, whether in National Register districts, local conservation districts, or other areas deemed worthy of special consideration. Various socio-political factors have shaped the approaches, including:

- The cost of creating highly specific expectations for the design of new buildings, especially given the need for public involvement.
- The difficulty of reaching agreement on design and development goals.
- Worry that rigid rules will restrain creativity and infringe on property rights.
- Concern that too much flexibility would lead to out-of-character design that hurts district integrity.
- A lack of local expertise to develop or administer complex rules that require judgment.
- Fear that rules requiring judgment will result in “taste policing.”

In many cases across Oregon, local governments have elected to take a hands-off approach, leaving their historic districts at the whim of individuals on a property-by-property basis.

Communities across the state care deeply about their heritage and the quality of their historic districts. But how far their leaders and citizens are willing to go to ensure they are appropriately supported is the fundamental question surrounding whether to *advise*, *encourage*, or *regulate* aesthetics in historic districts.

Advisory Approach

Whether in the form of informational *policies*, educational *documents*, or semi-formal *processes*, advisory approaches to guiding infill are effective when all parties are equally motivated, well-intended, open-minded, and when project owners are willing to put their money where others' mouths are. While community sentiment can help inform and shape a project, there must be full and consistent willingness to commit to an altruistic direction for this approach to have any effectiveness. The advisory approach is only as strong as its weakest link. If the quality of the advice is not clear or correct, if there's an unwillingness to acknowledge advice, or if attitudes or commitments change over time, this approach fails to protect the values of the district.

One advisory tactic that has been helpful for some communities – even in the absence of mandatory requirements – is encouraging development teams to meet with city staff or confer with a historic review body prior to any application for permits. This process affords an opportunity to educate a development team about public expectations, programmatic opportunities, and/or regulatory requirements early in the design review process.

Ultimately, any advisory approach has to take place very early in the design process before the development team has become emotionally and monetarily committed to a particular design.

Encouragement Approach

Encouraging appropriate design can include tactics as simple and informal as *awards* programs, or as specific and measurable as *financial incentives*.

Encouragement helps to entice a development team to meet community expectations for what benefits the district, while not infringing on property rights or a development team's ability to make choices.

Awards programs have some value in acknowledging particularly successful efforts, but don't necessarily incentivize those who are not already passionate about preservation.



A new house in Ladd's Addition Historic District, Portland

Continued next page...

For example, Ashland’s annual Architectural Preservation Awards program includes a category for “historically compatible” new construction that helps set the stage for future design excellence (see photo).

Incentives can serve as a very effective voluntary way to guide design. Specific incentives such as expedited review or zoning flexibility can have great value if well conceived for the economics and opportunities in a particular district. Low-interest loans, grants, and tax incentives are very successful at compelling property owners to invest in design that fits community expectations. Urban renewal agencies typically provide financial incentives for downtown revitalization and new construction programs and are often focused within commercial historic districts.

Voluntary approaches are effective tools for encouraging appropriate design in historic districts when implemented in conjunction with thoughtful regulations.



Award-winning infill from Ashland, Oregon

Regulatory Approach

The most certain, and equitable, path to a desired design result is regulation. Regulation can take the form of specific code-based prescriptive *standards*, or it can utilize more discretionary design *guidelines*. Both standards and guidelines can be supplemented by the advisory and voluntary approaches discussed earlier.

Standards: Prescriptive standards are an effective means to address elements such as height, massing, and setbacks from property lines in order to ensure new construction shares attributes typical to a particular area. Standards are generally black and white, providing a measurable box in which new construction can take shape. Standards that provide across-the-board clarity for what can and cannot be built in a historic district are objective and highly effective.

However, it is difficult for standards to guide the textural compatibility needed for new construction to fit comfortably and appropriately in a historic district. Design guidelines, discussed in the next section, better address the more subjective compatibility that cannot be expressed in standards. The advantage of standards is that they are clear and objective in nature, easily applied across the board with a minimum amount of discretion and training.

Design guidelines: The application of design guidelines blends guidance and rules. Guidelines are aspirational and descriptive; standards are prescriptive. Guidelines are discretionary in nature since judgment is required to determine whether aspects of a project are consistent with their intent. Guidelines can be advisory or serve as approval criteria applicants must meet. Design guidelines therefore require more expertise to apply on the part of city staff, project designers, and other regulatory decision makers. However, it is this expertise and judgment that is their strength. Guidelines demand more of projects, but provide for flexibility in their interpretation. In order to balance this flexibility while providing projects certainty and predictability, guidelines must be well crafted.

Recommended Approach

Ultimately, regulatory approaches are the most effective means of directing the design of new construction in historic districts. Well-articulated standards and guidelines can ensure that infill construction will be of a quality and compatibility that works for the specific historic district.

However, the HPLO recognizes that *regulations are most successful when combined with added rights and incentives*. In order to encourage the realization of new construction that meets the expectations set forth by regulations, supportive advisory and voluntary tactics are critical. Early opportunities for design advice, honorary awards programs, relaxing of certain zoning restrictions, and financial incentives can balance the weight of regulations, and make clear that public expectations are in line with the financial realities of development.

What Makes a Good Guideline?

Guidelines must consist of simple and clear wording that can be understood and applied by professionals and the public alike. Good design guidelines define and describe their purpose. The guideline language itself must be directive in a manner that is legally defensible (in Oregon, guidelines are applied through a “quasi-judicial” process, where the result is a decision that has legal standing).

Of Oregon's 123 National Register historic districts, only 21 are known to have developed district design guidelines. Some of these guidelines, like Oregon City's, apply to more than one district.

Where they exist, guideline documents—like design itself—are products of their time. Their crafting has been defined by available resources, local knowledge, public support, examples available to emulate, local leadership, and views about what constitutes appropriate preservation. As such, some guidelines are more effective and more suitable to today's views and expectations than others.

A comparative analysis of the district design guidelines found in Oregon today has helped identify some of the strengths and limitations that render a guideline effective, or not.

Successful Design Guidelines:

- Include a clear background statement, giving context for the guidelines within the specific historic district.
- Define clearly what the specific criteria are, distinct from the rest of the text.
- Provide and describe various ways in which the guidelines might be met, including illustrations and discussions of community goals.
- Use district-specific photographic examples from both the past and the present.
- Employ simple understandable language, including definitions and explanations.
- Educate through detailed explanation and accurate historical information.

Less Successful Guidelines:

- Use technical and less-accessible language through code-based text descriptions.
- Provide few or no illustrative examples or photographs.
- Offer little background or educational information.
- Are generic, and may not be grounded in the defining characteristics of the specific historic district.

The Relationship of Principles and Design Guidelines

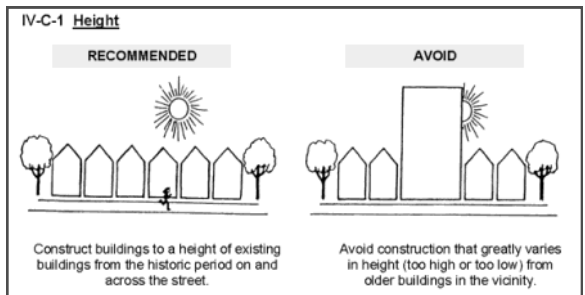
The Principles for New Construction that follow are intended to be a baseline for any approach to guiding new construction in Oregon's historic districts. They can be adopted to serve as guidelines unto themselves, or used as an underpinning in the development of local, district-specific guidelines. In either case, documents and outreach describing local processes, and the qualities and characteristics specific to the respective historic district, are critical to developing appropriate, complete district guidelines.

This guideline may be accomplished in the King's Hill Historic District by:

B. Using a setback that respects the existing setbacks along the block. These residences on SW Park Place share a similar setback, along with uniform massing and scale characteristics. In combination, these elements contribute to the uniform appearance that is characteristic for that block.



An illustration used by a successful design guideline (above) that shows photographic evidence from the district; and a less successful guideline (below) that is too general and not specific to the district.



Principles for Compatible Infill

The following principles are intended to serve as a foundation for local, state, and federal programs that evaluate new construction in National Register historic districts, including standards and guidelines. They represent a distillation of input by approximately 200 Preservation Roundtable participants, and the research and analysis conducted by the HPLO staff and consultants on the effectiveness of various design standards found around the country.

The intent of the principles is to:

- Encourage stakeholders to think critically about the future of their districts.
- Protect the integrity and coherence of Oregon’s historic places.
- Provide clarity and consistency for developers, designers, and regulators to make it easier to construct new projects.
- Provide criteria for incentive programs to spur investment and revitalize historic districts.

Each principle consists of a **title**, **statement of intent**, and **bulleted considerations** about how each might be implemented. The principles are intended to be similar in character to the Secretary of Interior’s *Standards*, however, they are specific to new construction and unique in content. Since the term “standards” in Oregon typically refers to specific measurable characteristics (see page 6), this report has chosen to use the word “principles” to describe these foundational tenets.



1. The District is the Resource, Not its Individual Parts

Designated historic districts are significant as a **collective whole** and must be considered as such, and protected in their entirety. This is the primary, overarching principle.

- New construction must respond to and protect the integrity of the overall historic district in much the same way as an addition does to a historic building.
- The National Register nomination is the primary source for district significance and defining characteristics, and should inform the design of new construction.⁴

2. New Construction Will Reinforce the Historic Significance of the District

Infill buildings should relate to and strengthen the core characteristics of the district, as identified in the National Register nomination Statement of Significance. New construction should build upon the story of the district through its design, landscape, use, cultural expression, and associated interpretive displays.

- An understanding of the character and significance of the district should predicate any design or development activities.
- If applicable, cultural expressions and/or historic uses within the district should be considered in design or development activities.



The Freimann Building in Portland is a successful reconstruction based on thorough documentation.

3. New Construction Will Complement and Support the District

Most historic districts have a discernable aesthetic rhythm of massing, scale, and siting. Infill buildings should not deviate in a detracting manner from these elements, but appear as complementary members of the district.

- Lot size, massing, siting, floor area ratio, and height must correspond to the contributing buildings within the district.
- Whenever possible, new construction should support the viability of adjacent historic buildings through shared ADA and upper story access, structural stability, and mechanical and environmental systems.
- New buildings may provide uses not found within the district if such uses are in demand and if adapting historic buildings for such uses would be detrimental to the historic fabric.



New construction on the Oregon State University campus provides additional egress to the historic building.

4. Infill Will Be Compatible Yet Distinct

New buildings should be identifiable as being of their period of construction; however, they should not be so differentiated that they detract from – or visually compete with – their historic neighbors. Within historic districts, compatibility is more important than differentiation.

- Because the district is the resource, the reconstruction of buildings that existed within the district during the period of significance is allowed. Reconstructions should be done in accordance with the Secretary of the Interior *Standards for Reconstruction*.
- New buildings should be identified through signage or other interpretative means to relate them to the context of the district's historic significance.
- Style is discouraged from being the primary indicator of differentiation.
- Means of differentiation may include materials, mechanical systems, construction methods, and signage.

5. The Exterior Envelope and Patterning of New Buildings Will Reflect District Characteristics

Infill design elements, patterning, texture, and materials should reflect the aesthetic and historic themes of the district.

- Patterns of fenestration, building divisions, setbacks, and landscapes that are characteristic of the district should inform the design of new buildings.
- Mechanical and automobile infrastructure should be appropriately concealed when not consistent with the district's character.



Two distinct approaches to infill over time. The original historic building is on the left.

6. Contributing Buildings Will Not Be Demolished to Create Infill Opportunities

Properties deemed “contributing” in the National Register nomination or through subsequent research or rehabilitation must not be removed or rendered non-contributing to make way for new construction. Consideration should be given to the demolition of non-contributing buildings 50 years of age or older on a case-by-case basis, dependent on the character of the district.

- Buildings deteriorated beyond repair may be demolished if so determined by the State Historic Preservation Office and local preservation staff/commission.
- Properties deemed non-contributing to the district should be retained and/or documented if they have achieved historic significance over time.



Demolition of a contributing building, 2011

7. Archeological Resources Will Be Preserved in Place or Mitigated

When new construction must disturb archaeological resources, mitigation measures should contribute to the story of the district.

- Archaeological mitigation must conform to local, state, and federal laws and accepted professional standards.
- When appropriate, archaeological mitigation should be accessible to the general public in an educational capacity.
- Information yielded from archaeological mitigation should be interpreted in the new building and throughout the district.



Vancouver, WA archeological dig. Image by Rick Minor

Our Survey Said... *(a selection of comments from participants)*

When possible, infill should benefit the district and surrounding buildings by providing "something more." This could include shared elevators and egress for adjacent buildings, subsurface parking, seismic stabilization if there are common side walls, courtyard space that can serve surrounding buildings, solar panel installation for neighboring properties that can't accommodate panels of their own, etc.

There is history in a neighborhood other than architecture, for example, past ethnic makeup. A historic district also needs to help serve the overall objectives of urban planning, such as density and energy efficiency.

I can support both reproductions of historic buildings and wonderful new modern buildings. The new buildings should be of the quality of design that would warrant future landmark status.

We can't require the original uses be preserved – historic uses [may not be] viable. Generally speaking, I believe historic districts should evolve along with the City.

At best, infill buildings should contribute to the established narrative of the district. At the very least, they should be neutral in their effect. They should never skew excessive attention to themselves at the detriment of the district.

The design goal should be to create an infill building that is compatible, but uses contemporary elements in doing so. I'm less concerned with conscientious efforts to make the building so different as to not confuse, and instead allowing the contemporary materials, floor heights, construction techniques and so on do so in a quiet, honest manner. I don't fear the reconstructions, but there should be some way to designate, like putting the building's date of construction in an obvious location.

Strategies for Implementation

Knowing that Oregon's communities and their historic districts are unique, the HPLO expects that these principles will serve as a baseline, adapted as appropriate by local communities. The HPLO has sought to craft principles that complement, rather than conflict with, the diversity of local preservation preferences to provide clarity and consistency. How these principles are received, modified, and incorporated over time will be the decision of Oregon's local and state preservation leaders.

At the local level, the principles can be incorporated into advisory, voluntary, and regulatory approaches to guide new construction in historic districts. They are best used as the basis for design standards and guidelines, as well as criteria for incentive programs. In communities that have no existing guidelines for evaluating infill in historic districts, the HPLO recommends that these principles serve as the baseline for urban renewal or other sources of public funding.

At the state level, the HPLO recommends that these principles be provided to all participants in the Certified Local Government program and adopted as a starting point for allocating Historic Preservation Fund monies to local communities.⁵ Additionally, the principles should be used as a baseline for any new or revised state program of incentives for new construction in historic districts. The HPLO firmly believes any tax expenditure conferred to new construction in historic districts should uphold these tenets.

At the federal level, these principles can help chart a new national course for infill in historic districts. Given a pending initiative to revise the Secretary of the Interior's Standards, we encourage the National Park Service to include updated, compatibility-oriented standards for building additions and infill projects. Furthermore, we believe these principles provide solid criteria for broadening the Federal Rehabilitation Tax Credit program to include compatible infill construction. Such an incentive would have a tremendous positive impact on the revitalization of historic districts and on job creation across the entire country.



In both these examples, the infill construction is on the right.



Acknowledgements & Notes

The 2011 HPLO Preservation Roundtable was facilitated by, and the Special Report on Compatible Infill Design was principally authored by, Jeff Joslin, Karen Karlsson, and Rick Michaelson of KLK Consulting. Their decades-long history of collaboration on preservation projects, includes entitlements facilitation, management of review processes, the development of historic and design regulation, and redevelopment of historic structures.

The Special Report was edited by Brandon Spencer-Hartle and Peggy Moretti. Many thanks to our Roundtable Task Force and the HPLO Advocacy Committee, chaired by Natalie Perrin, for their extensive input and vetting.

The wonderful historic venues for our workshops were Old St. Peter's Landmark in The Dalles, the City of Ashland's Community Center, and the Architectural Heritage Center in Portland which also co-sponsored our Portland workshop.

The 2011 Preservation Roundtable was supported by a grant from the National Trust for Historic Preservation – and by the members of the HPLO.

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1. The Standards were first published in 1976 as *The Secretary of the Interior's Standards for Historic Preservation Projects with Guidelines for Applying the Standards*. They were revised in 1992. In August 2011, the National Park Service announced they would be updating the standards and guidelines; however, the effect of the revisions on setting best practices for new construction is still to be determined.

2. Oregon State Historic Preservation Office.

3. Research conducted published in 2010 by Heritage Travel, Inc., a subsidiary of the National Trust for Historic Preservation

4. Some early National Register nominations lack a Statement of Significance for the district. In these cases, local Statements of Significance or other context research should be consulted.

5. The Certified Local Government (CLG) program is a partnership between local governments and the State Historic Preservation Office, funded by the National Park Service. Federal grants are offered to CLGs on an annual basis and often pay for preservation planning activities such as the creation or revision of design guidelines.

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About the HPLO

The mission of the Historic Preservation League of Oregon is to **Preserve, Reuse, and Pass Forward Oregon's Historic Resources to Ensure Livable, Sustainable Communities.** Founded in 1977 as a 501 (c)(3) non-profit, the HPLO provides education programs, advocacy, technical assistance, and stewardship of over 40 conservation easements on historic properties across the state, protecting them from demolition in perpetuity. Our recent programs have included:

- *Preservation 101*, a series of half-day workshops with the Oregon Main Street Program.
- *How to Save an Endangered Building*, an overview presentation of best practices in preservation advocacy.
- Legislative testimony encouraging sustainability retrofits that protect historic properties.
- Providing technical assistance, community education, and advocacy to Oregon's Most Endangered Places.
- Regional preservation "field trips" that engage Oregonians with their built heritage.

The HPLO office is located in the historic White Stag Block in Portland's Skidmore Old Town National Historic Landmark District. Programming is delivered across the state.



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