



July 3, 2017

Portland Historic Landmarks Commission
1900 SW 4th Ave
Portland, OR 97201

Dear Commissioners,

As the preservation consultant for the Portland Building team, I am writing to address concerns related to the letter from the National Park Service (NPS) dated 3/15/17, in which NPS expressed that the proposed alterations could result in the building's ineligibility for listing in the National Register of Historic Places and ultimate removal of this designation.

Follow-up with SHPO & NPS

Per the Commission's request, I reached out to Lisa Deline at NPS and Ian Johnson at the Oregon State Historic Preservation Office (SHPO) on 6/27/17—the day after the hearing. I asked NPS if they would review the drawing package that is currently before the Commission and provide revised comments, as this package now has renderings, photos of the mock-up, and other drawings that provide more information about the proposed rainscreen. These were not developed at the time of the Design Advice Request (DAR) package that was shared with SHPO in November 2016, upon which NPS's March letter was based. I provided NPS and SHPO with a link to the current drawings on the Auditor's website and I made them aware that the record for new evidence was closing on 7/3/17 at 5 pm.

As of the issuance of this letter, no response has been received from NPS. The attached email was received from Deputy SHPO Ian Johnson on 6/30/17, acknowledging the follow-up request to NPS and confirming the delisting process.

SHPO & NPS – Roles and Responsibilities

The project team initially reached out to SHPO in November 2016 to obtain feedback on the Portland Building project. At a meeting in Salem with Ian Johnson and Jessica Gabriel, we mutually agreed that given the complexities and circumstances of this particular historic resource, it was appropriate to seek the opinion of NPS on the building's ongoing eligibility even though the National Register program generally does not provide design review commentary. All of us at this meeting recognized that modern and post-modern resources present new challenges to the field of preservation compared to pre-WWII historic resources, and the body of literature and guidance around their treatment is still being developed. As is typical for the National Register program, SHPO was the conduit for all communications with NPS.

In our meeting with SHPO, it was made clear to us that SHPO's role was to assess potential adverse effects to the building's historical integrity and National Register eligibility—not to ultimately determine the best solution to solve the building's technical issues. SHPO and NPS are not burdened with considerations of condition, deterioration, functionality, etc., in their evaluation. The feedback we got from SHPO was later

echoed in the NPS letter where Lisa Deline wrote that the rainscreen system, “while understandable to correct a system problem,” would conceal the exterior physical features that convey historic significance.

March 15th Letter from NPS

During the hearing, Commissioner Chung pointed out that the 3/15/17 NPS letter leaves the door open to further discussion about the project, including alternate materials that could be used in the rainscreen system that might not result in the same loss of integrity. Ms. Deline’s reference to “in-kind materials,” presumably means she is envisioning concrete panel.

As the project team explained at the 6/26/17 hearing, concrete panel is not feasible from a structural perspective, as the building cannot support these additional loads. The use of concrete panel thickens the rainscreen and also does not allow for the application of elastomeric paint, which is currently applied to the building’s concrete walls. Therefore, surface quality, texture, and color would not match existing and would not be “in-kind.” The aluminum plate panel provides a thinner rainscreen system and is the closest match to the essential qualities of Graves’ design.

Neither SHPO nor NPS has had the benefit of viewing the mock-up and the material samples that have been provided to the Commission. While the mock-up photos have been shared with them, without their follow up comments, we cannot know if seeing these high-quality materials and the careful attention to recreating the skin would result in any change in their opinion of the project’s effect on National Register eligibility. As a team, we certainly found the mock-up to be confirmation that this approach will retain the building’s design integrity and we hope they would as well.

National Register Delisting Process

Some Commissioners expressed concerns that pursuing the proposed project would result in the Portland Building’s delisting from the National Register. We cannot know for certain at this time if the property would be delisted, as it would need to be evaluated after the project is complete in 2020. Additionally, the removal process, which is outlined in Section 60.15 of Title 36 of the Code of Federal Regulations, would not be “automatic.” Ian Johnson confirmed in his 6/30/17 email that a request to delist the Portland Building would be formally reviewed by the State Advisory Committee for Historic Preservation (SACHP) – the state-level body that reviews all National Register requests. Their review of a petition to delist would determine if the building “ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed.” The SACHP would then make a recommendation to SHPO and the Keeper regarding the building’s eligibility and whether it should continue to be recognized in the National Register.

If any attempts at delisting are made after the project is complete, the City would provide a rebuttal focusing on our long-held argument that the Portland Building’s key aspects of integrity (location, setting, design, feeling, and association) are intact given that the significance of the Portland Building is not tied to its materials or craftsmanship, but instead to its importance as an influential Postmodern work of architecture and its importance as a defining building in the career of architect Michael Graves. The attention to detail and the high-quality materials used in the rainscreen system ensure that the significance of Graves’s design is preserved.

Additional Protections

The City is prepared to execute a covenant requiring Type IV demolition review for this building in perpetuity, which counteracts the removal of any demolition protections that would otherwise be lost through a potential future delisting from the National Register. The City would also consider local landmark listing to ensure future work to the building is reviewed for historic compatibility and to publically acknowledge the significance of this building in Portland's history.

My review of the requirements for local landmark status indicates the building would still be eligible for local listing after the proposed alterations are complete, even if the building is deemed no longer eligible for the National Register. This is due to the fact that a resource must meet at least three out of the twelve "significant value" criteria set forth in 33.846.030(C) of the Zoning Code, and only one of these criteria directly addresses integrity: *h. The resource retains sufficient original design characteristics, craft work, or material to serve as an example of a significant architectural period, building type, or style.* The Portland Building would likely meet five to six of the twelve criteria, including:

- a. The resource represents a significant example of a development, architectural style, or structural type once common or among the last examples in the region;*
- b. The resource represents a significant work of a developer, architect, builder, or engineer noted in the history or architecture of the region;*
- d. The resource is associated with culture, activities, events, persons, groups, organizations, trends, or values that are a significant part of history;*
- f. The resource significantly contributes to the historic or cultural development of the area or neighborhood;*
- g. The resource symbolizes a significant idea, institution, political entity, or period;*
- i. The resource significantly contributes to the character and identity of the neighborhood district or city;*

Commissioners, thank you for your time in considering these points related to the building's National Register status. The Portland Building team is committed to the goals of this project, which include historic preservation, and we believe there is a solution that allows for technical resolution of the building's deficiencies and ongoing recognition and protection of this significant historic resource.

Sincerely,



Jessica Engeman
Historic Preservation Specialist

From: JOHNSON Ian * OPRD <Ian.Johnson@oregon.gov>
Sent: Friday, June 30, 2017 12:49 PM
To: Jessica Engeman
Cc: Ian Johnson; Ceder, Erica
Subject: RE: SHPO Case No.: 17-0102; DLR Group, The Portland Building Project

Hello Jessica,

Sorry I missed you before you left town.

It will be interesting to see if NPS responds to your request. In the past they have been unwilling to serve as a review body. In this case, I called and asked if they would consider looking over the information once we reviewed the project and came our own conclusion. Of course, we would welcome their response. I believe that we'll see the issues raised by the Portland Building again in the future, and any guidance would be useful for all our programs.

Let us know what you find out.

As far as the delisting procedure, generally this happens after the demolition or alteration has taken place. If the building is demolished it is handled administratively. If the building is proposed for removal due to alterations it goes to the SACHP.

Ian



Ian P. Johnson | Associate Deputy State Historic Preservation Officer

Desk: 503.986.0678 cell: 971.718.1137

From: Jessica Engeman [<mailto:jessica@venerableproperties.com>]
Sent: Tuesday, June 27, 2017 11:02 AM
To: lisa_deline@nps.gov
Cc: Ian Johnson; Erica Ceder (eceder@dlrgroup.com)
Subject: FW: SHPO Case No.: 17-0102; DLR Group, The Portland Building Project

Hi Lisa,

As the preservation consultant for the Portland Building project, I wanted to follow up on your attached letter from March. Our team presented the project to the Portland Historic Landmarks Commission yesterday at a design review hearing and it is weighing heavily on some commissioners that the building could potentially be delisted after the proposed project is completed in 2020.

At the Commission's request, I'm reaching out to you to find out if there would be an opportunity for you to comment again on our revised design review package. This package clarifies the exterior alterations with additional drawings, renderings, and photos of a full-scale mock-up on the building. The dimensions of the rainscreen system, which you noted were not provided in the previous submittal, are included in this revised package. Additionally, an opportunity to discuss

the project via video/phone conference would allow us to walk you through the project and answer any additional questions you might have.

Thank you in advance for your consideration of this request. The project team will be returning to the Landmarks Commission on 7/24 for a continuation of our hearing.

Jessica Engeman

Project Manager | Historic Preservation Specialist

Venerable Group, LLC

DEVELOPMENT | PROPERTY MANAGEMENT

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From: Jessica Engeman <jessica@venerableproperties.com>
Sent: Tuesday, June 27, 2017 3:51 PM
To: lisa_deline@nps.gov; Ian Johnson
Cc: Ceder, Erica
Subject: RE: SHPO Case No.: 17-0102; DLR Group, The Portland Building Project

Lisa and Ian,

I know you are both currently out of the office, but I wanted to follow up with a link to the revised project drawings that are on the City of Portland's website:

<http://efiles.portlandoregon.gov/Record/10880633/>

Additionally, I wanted to clarify that while our hearing resumes on 7/24, the public record closes on 7/3 at 5 pm for any new evidence to be submitted for the Commission's consideration.

Jessica Engeman

Project Manager | Historic Preservation Specialist

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