



# Oregon

Kate Brown, Governor

## Parks and Recreation Department

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Hillary Adam, Senior Planner  
City of Portland  
Bureau of Development Services  
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Portland, Oregon 97201

RE: Eric Ladd Collection and Skidmore-Old Town Historic District NHL

Dear Hillary:

I hope this letter finds you well. I am writing with regard to Bill Hawkins' recent concerns about the new construction being planned for the site originally occupied by the Reed Bank, and the failure of the design to incorporate any of the elements from the Eric Ladd Cast Iron Collection.

While the regulation of the Skidmore-Old Town Historic District, including the reinstallation of the Ladd Collection elements, is entirely a local issue, there are unique circumstances around this property that compel me to offer these unsolicited comments. This office has been involved in conversations around the reinstallation of the Ladd Collection for 14 years, largely through two projects: the Save America's Treasures grant that the City received (but did not use) through the National Park Service, and the drafting of the design guidelines for the District. The District's National Historic Landmark designation, one of only 17 in the state, also elevates our interest in how the District is being managed at the local level.

Our main concern mirrors that brought to your attention recently by Bill Hawkins; which is, while the City of Portland in its Ankeny-Burnside Development Framework (2006), its Skidmore/Old-Town Historic District Design Guidelines (2016), and City of Portland Resolution No. 37207 (2016) includes a call to action to make every reasonable effort to reuse pieces of the cast iron collection in new construction within the District, there does not seem to be an intentional mechanism for the Landmarks Commission (PHLC) to address that expectation. Since the City has made it clear that it values the Eric Ladd Collection and the reuse of it inside the District, then why doesn't the PHLC hold developers accountable to it?

I can't help but wonder if issues of authenticity and integrity are being relitigated by decision-makers who may not realize the deep analysis conducted over the years on this issue. While the SHPO has no authority over development decisions in the District, I have some thoughts for those who may remain unconvinced that an interpretive installation or facade or element reintegration would meet the Secretary of the Interior's Standards for Treatment of Historic Properties.

I want to point to Standard No. 3 in the *Secretary of the Interior's Standards for Rehabilitation*, because it is sometimes used to discourage the reuse of the cast iron in the District: "Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken." If



we remember that the resource at hand is a District, not an individual building, this Standard does not preclude the reuse of the Ladd Collection in new construction. The features are not conjectural – the elements themselves are original, we know exactly where they came from, and their original placement is well documented. There are no elements being added to the historic property (the District) from other properties. The elements originated from inside the District itself. I don't know of any other city facing this preservation opportunity. Going back to that "sense of place" that was documented for, and accepted into, the National Register of Historic Places, it is the cast iron that is the primary character-defining feature of the Skidmore-Old Town District. More is better.

For those who resist the notion of placing arches and other large-scale features in the District for interest and interpretive purposes, I would draw their attention to the historic property as historic urban setting. Is cast iron appropriate in Skidmore-Old Town? Absolutely. Does it have to exist there in its original forms to convey the District's historical associations? No, it does not. It needs to be sensitively handled and clearly interpreted; it needs to contribute to the continuity of character. And while you can't improve authenticity, you can support and strengthen the historic integrity of the District by reinstalling the Ladd Collection at every opportunity.

It is clear that the City of Portland has committed publicly to the preservation and reinstallation of the Ladd Collection, so any continued questions about the appropriateness of reinstallation ought to be quickly dispatched, saving time and energy for the questions and solutions around reinvestment in the District and conservation of the Ladd Collection.

My second point centers around the Ladd Collection itself. In 2006, the National Park Service (NPS) granted to the Portland Development Commission \$195,832 through the Save America's Treasures program to develop a plan to reuse the Ladd Collection on building facades within the Skidmore-Old Town Historic District, and the cleaning and repair of the cast iron pieces. While some evaluation and planning work related to this grant was completed, the work on the cast iron was not. Not a penny of the federal grant was used, and the NPS closed it out in April 2011. The bulk of this cast iron collection, a collection so significant to warrant a nationally competitive conservation grant, remains stacked under a bridgehead in southeast Portland. I think we would all agree this is not a great stewardship model.

As a Certified Local Government, the City of Portland has been a solid preservation partner with the Oregon SHPO for many years. The Portland Development Commission (now Prosper Portland) demonstrated public investment in Portland's heritage when it purchased the Ladd Collection all those years ago. While the SHPO stands ready to assist with the conservation and reuse of the Ladd Collection in any way that is most beneficial, we recognize that the heavy lifting has already been done by the City to clear the way for the reintroduction of the Ladd Collection into the Skidmore-Old Town District, and we applaud its significant efforts. With the combined re-commitment of staff, commissioners, property owners, advocates, and agency partners, I know the City can take this project to the next level, as originally envisioned by the community. Please let us know how we can help.

Sincerely,



Christine Curran  
Director, State Historic Preservation Office  
Deputy State Historic Preservation Officer