

## Portland South Park Blocks and the National Register of Historic Places

Will Bruder <will.bruder@willbruderarchitects.com>

Wed 1/27/2021 2:32 PM

To: Kminor.phl@gmail.com <Kminor.phl@gmail.com>; Adam, Hillary <Hillary.Adam@portlandoregon.gov>

Dear Portland Historic Landmark Commission,

I write to support the nomination of the South Park Blocks placement on the National Register of Historic Places.

The most beloved aspects of South Park Blocks are the facts that these blocks are deeply rooted in the history of Portland, an early example of Portlander's love of and support for parks throughout our 'city in a park'. Over time cultural, religious, and civic institutions as well as commemorative elements have gathered at its edges and on its grounds. All who pass by, walk through or take pause in the South Park Blocks have enjoyed the glorious canopy of mature trees and plantings in their seasonal cycles over many years.

Indeed, this unique and historic urban park offers lessons that seemingly come straight out of a 'best practices' textbook for urban planners and elected officials. The South Park Blocks honor the pedestrian user by slowing traffic and offering crosswalks and streetcar access. They provide 'a breath of fresh air' in a dense city.

Anchored to the north by the Arlington Club and to the south by a highly regarded urban university, PSU, and the world-famous Portland Farmers' Market, the South Park Blocks are both historic and contemporary points of pride.

Elevation to the National Register of Historic Places is clearly warranted. I look forward to celebrating with you, your colleagues, and fellow Portlanders this designation.

Sincerely,

**Will Bruder, FAIA**  
President / Lead Design Architect  
Will Bruder Architects  
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602.312.7399

**willbruder**architects

# *Eastmoreland Neighborhood Association*

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Date: January 22, 2021

Subject: **Nomination of South Park Blocks, Portland Oregon to the National Register of Historic Places**

To: Chair and Members of the Oregon State Advisory Committee on Historic Preservation

Via: Robert Olguin, [Robert.olguin@oregon.gov](mailto:Robert.olguin@oregon.gov)

SACHP Coordinator & National Register Program Director Oregon SHPO

From: Eastmoreland Neighborhood Association

Rod Merrick, AIA, Board President

The Eastmoreland Neighborhood Association has voted to join others endorsing the nomination of the South Park Blocks to the National Register of Historic Places. These blocks are among the most historic in Portland and set an important precedent for the many similar green boulevards envisioned in the Olmstead Plan that add to the distinction of Portland as a city of great parks and neighborhoods. For over 150 years, and despite many changes around these blocks, they have offered a well preserved axis of calm and greenery and are among the most memorable in the city. The Nomination provides thorough documentation of the land donation, the development with axial rows of deciduous trees, the placement of public art, and the significant events that have occurred in the blocks over the decades.

The South Park Blocks are iconic and among the most well-loved places in Portland. They form a pedestrian mall that defines the north-south axis of the city, link the educational, cultural and commercial centers, provide respite from traffic, and include an extraordinary collection of a variety large deciduous trees that provide shade in the summer, color in the fall and spring, and sun in the winter. Their paver walkways, predominant green lawns and collection of sculptures make them an outstanding setting for walking, picnics, quiet contemplation and for any number of celebrations and events.

Our own neighborhood is defined by a comparable boulevard lined with a parallel arcade of linden trees that echo at a smaller scale the dignity, calm, color, environmentally beneficial, and place making characteristics of the Park Blocks.

We are concerned about the future of the Park Blocks. A master plan proposed for the South Park Blocks threatens to irreplaceably damage the historical character by transforming the blocks into a bicycle transportation corridor. This would be achieved by removing all trees along the western side of the park on most of the blocks, inserting evergreen trees here and there, and "activation" with the insertion of a two lane bike trail (redundant with the slow narrow streets flanking the blocks).

It is significant that this Nomination has been submitted by a coalition of citizen volunteers who, under the auspices of the Downtown Neighborhood Association, initiated and participated in the documentation process; yet another example of the essential nature of citizen participation in preserving Oregon history.

Recognition for these 12 blocks in the heart of a great Pacific Northwest city is long overdue. We appreciate the importance of your role in protecting Oregon History. Thank you.

C: Historic Landmark Commission, [kminor.phlc@gmail.com](mailto:kminor.phlc@gmail.com) , [Hillary.Adam@portlandoregon.gov](mailto:Hillary.Adam@portlandoregon.gov),  
Brandon Spencer-Hartle <[brandon.spencer@portlandoregon.gov](mailto:brandon.spencer@portlandoregon.gov)>

# Architectural HERITAGE CENTER

June 25, 2020

Dear Keeper,

The Architectural Heritage Center/Bosco-Milligan Foundation urges you to include the South Park Blocks in Portland Oregon on the National Register of Historic Places. The mission of the AHC is to “inspire people to conserve the art, craft, and context of historic buildings and places to promote our cultural heritage as a vital element of livable, sustainable, communities.” The South Park Blocks certainly qualifies as one of Portland’s earliest public places that has maintained much of its character for 150 years. It is therefore clearly eligible for a place on the National Register.

We believe that the South Park Blocks should be eligible for inclusion on the National Register under two of the criteria for listing:

1. Criterion A: Community Planning and Development + Recreation and Culture
2. Criterion C: Distinctive Landscape Entity/Landscape Architecture

Additionally, the South Park Blocks may be eligible under Criterion D for its potential to yield information important to pre-contact history.

The South Park Blocks appear in very early mid-1800 Portland maps. In the mid-1800s, the evergreens were cleared from the Portland townsite. In the 1870s, the park blocks were planted with a simple palate of *deciduous* trees (predominantly Lombardy poplars and American elms) in five axially aligned rows. The park’s design and planting scheme was the work of Louis Pfunder, a European-born and trained horticulturalist and master gardener who worked briefly on two large American parks, New York’s Central Park and San Francisco’s Golden Gate Park. This is the only Portland park originally designed to provide an urban rest and long promenades. It is distinctly derivative of the formal, axial European design principles that Pfunder brought with him and has been described as “a simple cathedral of deciduous trees with a carpet of grass below.”

As an entity, it is a resilient space that has maintained this restrained character until the present day. Some changes have occurred, but miraculously very few and none that have altered the original design. Defining characteristics include:

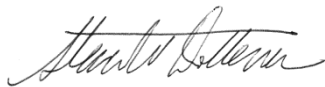
- Open Space – Flexible & Adaptive – For a variety of both restful and active uses
- Deciduous Trees in five axial rows
- Restrained Simplicity
- Defined Boundaries

Bosco-Milligan Foundation/Architectural Heritage Center  
701 SE Grand Ave. Portland, OR 97214 Tel. 503-231-7264  
[info@visitahc.org](mailto:info@visitahc.org) [www.visitahc.org](http://www.visitahc.org)

The significant additions over the years have included commemorative statuary, the creation of a “campus” for Portland State University by closing the adjacent park streets, and weekly public farmer’s markets, among other events. All of these changes have maintained and reinforced the primary design characteristics of the park space listed above. Inclusion on the National Register will help to insure that the South Park Blocks and their defining historical characteristics are recognized and maintained in that larger scheme.

The South Park Blocks remain one of Portland's most distinctive, valued, precious and significant historic open spaces. It has endured as the centerpiece for the city's educational and cultural institutions and continues to tell the story of its association with significant recreational, cultural, political, and landscape trends in Portland’s history.

Sincerely,

A handwritten signature in cursive script, reading "Steve Dotterer".

Steve Dotterer  
President

A handwritten signature in cursive script, reading "Stephanie Whitlock".

Stephanie Whitlock  
Executive Director

## Written Testimony: South Park Blocks - National Register of Historic Places nomination

Jessica Engelmann <jetump@gmail.com>

Tue 2/2/2021 2:54 PM

To: Adam, Hillary <Hillary.Adam@portlandoregon.gov>

To Whom it May Concern:

I'd like to submit written testimony in regard to the National Register of Historic Places nomination for the South Park Blocks. I've lived on the South Park Blocks for just over a decade, currently sit on Portland Parks and Recreation's South Park Blocks Master Plan Community Advisory Committee, and have a Master's Degree in City and Regional Planning.

I support Portland Parks & Recreation's position on this nomination and agree that historic designations should be consistent with city plans and should not unduly prohibit the City from meeting other important parks and recreation goals in the design and renovation of parks. Furthermore, the narrative of the current nomination should be improved to be more inclusive of Black, Indigenous, and other underrepresented stories connected to the South Park Blocks. Input from the Indigenous community and other Portlanders who have not yet been engaged should be included in the nomination.

Thank you for your consideration of these comments.

Sincerely,  
Jessica Engelmann

1500 SW Park Ave. #325  
Portland, OR 97201



### **Support for the National Register Nomination for the South Park Blocks**



**Ladd's Cathedral of Trees**

To: Robert Olguin - Oregon State Historic Preservation Office

As a neighborhood with the Ladd's Addition National Historic District, the Hosford Abernethy Neighborhood District (HAND) would like to extend our support for the National Register Nomination of the South Park Blocks that is being shepherded by the Downtown Neighborhood Association. HAND voted to support the nomination at our June 16<sup>th</sup>, 2020 meeting.

The South Park Blocks are a defining feature of the downtown core and provide a respite to the bustle of the urban environment as well as providing public spaces to gather. The civic, religious and educational institutions that circle the blocks complement and enhance the simple design of the space.

#### **Support for Landscape Design:**

The design of the park blocks compliments the landscape design of Ladd's Addition juxtaposed on the opposite side of town. Both were designed in a similar time period with similar design influences, such as the work of Fredrick Law Olmstead and the City Beautiful Movement. The Ladd family that developed Ladd's Addition had a home near the South Parks Blocks and the restored Ladd Carriage House is still nearby. The South Park Blocks concept of a '*cathedral of trees with a simple floor of grass*' could also describe the original design for the major boulevards in Ladd's Addition on Elliott and Ladd Avenue as well as the secondary streets at a

smaller scale. The planting of deciduous trees in an ordered rhythm punctuated with gardens/gathering space is another similarity both places have in common.

We feel adding the South Park Blocks to the National Historic Register will strengthen the City's portfolio of historic places and in turn provide for a better understanding of the design of the Ladd's Addition Historic District. Having a complementary park will allow for cross pollination of stewardship and design discussions.

### **Support for the Preservation of Open Space in the City:**

In the broader context of equity and access to green space we would like to lend support for the protection of a public park that is a defining feature of downtown Portland.

- While we would like to believe that open space and public property will always be protected and preserved for future generations, we have seen in the past that city property can be sold. At Mt. Tabor, a public reservoir at 60th and Division was sold to private developers. The adjacent greenhouse/nursery area was *almost* sold to Warner Pacific University for development. Many of Portland's parks, especially in HAND, are at PPS schools and are zoned residential and not open space. This makes them vulnerable to development. Having a historic designation for the South Park Blocks will relieve future pressure to develop or sell it.
- Recently with the Black Lives Matter protests we are seeing how critical open spaces are for gathering that allows for physical distancing. Having locations diversified across the city is important. These spaces are also important for physically distanced recreation.
- A historic designation for the South Park Blocks will allow for public input and discussion about how the space can be used and modified over time. An open and public discussion can bring many voices to the table for input and serves to document how the decisions are made and why. These discussions could help inform the management of the Ladd's Addition Street Tree Plan.

As the inner city is becomes more dense with people and buildings, protecting open space and spaces for large trees to grow is critical to a healthy future.

Thank you for considering these comments.

Joanne Stainbrook

HAND Historic Resources Subcommittee Member



# JUNIOR LEAGUE OF PORTLAND, OR

June 29, 2020

Wendy Rahm  
Downtown Neighborhood Association  
Land Use Transportation Committee  
SPB National Register Nomination Task Group  
1221 SW 10<sup>th</sup> Avenue, #1001  
Portland, OR 97205

Dear Ms. Rahm:

Our organization, the Junior League of Portland, Oregon, is writing this letter in support of the Downtown Neighborhood Association's National Register for Historic Places nomination for the South Park Blocks. We highly endorse the preservation of the historic treasures contained within the unique and elegant South Park Blocks.

In commemoration of our 75<sup>th</sup> anniversary, the Junior League of Portland donated fifty-two wood benches to the City of Portland for the South Park Blocks in 1985. The Victorian-style benches were placed in three park blocks as part of the park renovation taking place at that time. In donating the benches, we saw the opportunity for our gift to be enjoyed by park visitors of all ages as well as those visiting the Portland Centers for the Arts and the Portland Art Museum, all located in close proximity to the South Park Blocks.

Our organization has taken an active interest in historic preservation as well as Portland's community arts and culture scene over the years. League members have led historic walking tours through downtown Portland, of which the beautiful Park Blocks are a central feature. Our members have also served as docents at the Portland Art Museum and volunteered at the various centers for the arts. The South Park Blocks are significant not only as a beautiful, historic park but also as a central part of Portland's thriving arts and cultural scene.

For the last 110 years, the Junior League of Portland, Inc. has been committed to promoting voluntarism, developing the potential of women and improving communities. We are proud to have served as advocates for the welfare of Portland. The benches in the South Park Blocks are a testament to our belief that access to the arts and preserving history to educate future generations are both important parts of a healthy community.

Sincerely,

A handwritten signature in cursive script, reading "Abbey Hipple Margaret Leonard".

Abbey Hipple & Margaret Leonard  
Junior League of Portland Legacy Preservation Committee





# Northwest District Association

June 22, 2020

Oregon Heritage/State Historic Preservation Office  
725 Summer Street NE, Suite C  
Salem, OR 97301

**Attn.: Robert Olguin**, National Register Program Coordinator

**RE: South Park Blocks, Portland Oregon, NRHP Nomination**

Dear Robert:

The Northwest District Association strongly supports the application by the Downtown Neighborhood Association to the Oregon State Historic Preservation Office, nominating the South Park Blocks to the National Register of Historic Places. This nomination seeks to preserve the unique characteristics of this important park in the center of our city. We believe that this nomination is consistent with the goals and policies of preserving historic resources and green spaces articulated in Portland's 2035 Comprehensive Plan.

Best Regards,  
Northwest District Association

Greg Theisen  
*Chair, NWDA Planning Committee*



June 25, 2020

Robert Olguin  
National Register Program Coordinator  
Oregon Parks and Recreation Department  
Oregon Heritage/State Historic Preservation Office  
725 Summer Street NE, Suite C  
Salem, OR 97301

Re: Nomination of the South Park Blocks in Portland to the National Register of Historic Places

Dear Robert,

Restore Oregon strongly supports the application by the Downtown Neighborhood Association to the Oregon State Historic Preservation Office, nominating the South Park Blocks to the National Register of Historic Places. This nomination seeks to preserve the unique characteristics of this important park in the center of our city. We believe that this nomination is consistent with the goals and policies of preserving historic resources and green spaces articulated in Portland's 2035 Comprehensive Plan.

Restore Oregon is a statewide historic preservation non-profit representing thousands of local supporters working to protect and restore the historic places that make our state like no place else. For some time, we have worked to draw attention to the rapid loss of historic fabric throughout the state. Acceleration in the growth of the Portland-metro region's population has spurred a spike in the demolition of historic homes, structures, and green space and resulted in the loss of historically significant resources and an irrevocably diminished historical record.

The South Park Blocks certainly qualifies as one of Portland's earliest public places that has maintained much of its character for 150 years. It is therefore clearly eligible for a place on the National Register. We believe that the South Park Blocks should be eligible for inclusion on the National Register under the following criteria:

1. Criterion A: Community Planning and Development + Recreation and Culture
2. Criterion C: Distinctive Landscape Entity/Landscape Architecture

Additionally, the South Park Blocks may be eligible under Criterion D for its potential to yield information important to pre-contact history.

As an entity, it is a resilient space that has maintained its historic integrity until the present day. Some changes have occurred, but miraculously very few and none that have altered the original design. Defining characteristics include:

- Open Space – Flexible & Adaptive – For a variety of both restful and active uses
- Deciduous Trees in five axial rows

- 
- Restrained Simplicity
  - Defined Boundaries

Inclusion on the National Register will help to ensure that the South Park Blocks and their defining historical characteristics are recognized and maintained during future planning. The South Park Blocks remain the centerpiece for the city's educational and cultural institutions and continues to tell the story of its association with significant recreational, cultural, political, and landscape trends in Portland's history.

Restore Oregon and its partners and members appreciate your consideration of our comments in support of the application by the Downtown Neighborhood Association to the Oregon State Historic Preservation Office, nominating the South Park Blocks to the National Register of Historic Places.

Thank you.

Sincerely,



Katelyn Weber  
*Program Director*



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## Irvington Community Association Resolution

The Downtown Neighborhood Association (DNA) land use task group will submit a National Register Nomination of the South Park Blocks (SPB) to the Oregon State Historic Preservation Office on or about July 1, 2020.

DNA has requested from the Irvington Community Association (ICA) a letter of support be sent to Story Swett and Wendy Rahm.

DNA's task group is comprised of five volunteers who have been working on the nomination for about a year conducting interviews and serious and impressive research. They are now engaged in writing the actual nomination.

The South Park Blocks appear in very early mid 1800 Portland maps. After clearing the land of all evergreens in the mid 1800's, the park was later designed and planted with *deciduous* trees in five rows in alignment, a classic design, by Pfunder, a German immigrant who was European trained and worked at one point with the Olmsteads. The park is the only Portland park originally designed without evergreens. It is a simple cathedral of deciduous trees with a carpet of grass below. Over time, some changes have occurred, but miraculously very few and none that have altered the original design.

Defining characteristics are:

- Open Space
- Deciduous Trees in Ordered Ranks and Axial Alignment
- Restrained Simplicity
- Defined Boundaries

Like development pressure of other historic places, a threat of overdevelopment of the South Park Blocks has spurred the DNA task force into seeking more review of proposed alterations through the historic nomination process. Portland Parks & Recreation has recently supported the nomination by DNA and is working with the DNA on the nomination. Support from the Irvington Community Association will be valuable to the nomination process and, as importantly, demonstrate to Portland Parks that there is broad community appreciation in the variety and uniqueness of each park in the City.

THEREFORE, after due consideration at a special meeting on Thursday, June 25, 2020, the Board of Directors of the ICA voted to support the SPB nomination by DNA, and to encourage continued collaboration between DNA and Portland Parks.

Respectfully submitted,

*Robert Dobrich*

Robert Dobrich  
President  
Irvington Community Association

## South Park Blocks National Register nomination

Catherine Thompson <thompsoca@gmail.com>

Wed 2/3/2021 3:13 PM

To: Adam, Hillary <Hillary.Adam@portlandoregon.gov>

 1 attachments (396 KB)

SPB national register nomination.pages;

Hillary Adam

Bureau of Development Services

1900 SW 4th Ave, Suite 5000

Portland, OR 97201

Dear Ms. Adam and members of the Portland Historic Landmarks Commission,

I am writing to offer my enthusiastic support for the National Register Nomination of the South Park Blocks and to commend the volunteer effort that has so conscientiously brought the nomination to this juncture. It brings to fruition a long standing goal shared by citizens, governing bodies and several central city planning documents.

As we acknowledge historic inequities, our designation of historic places on the National Register is under increased scrutiny. Our appreciation of history has benefited from expanding our narrative to include stories of both the conquered and the conquerors, the leaders, the warriors, the artisans, the slaves, the mothers, the injured and the displaced. We can see both the greatness and the weaknesses of those who have led us to this juncture and understand better the bondage of the time in history in which they lived. Going forward as we examine our historically registered properties we may find it necessary and reasonable to see these places through the lens of equity in today's world.

For the purpose of this nomination, the history of the South Park Blocks is by definition limited to a period that began in 1850. This is primarily because of technical and financial constraints. Although it leaves out the long time of human habitation that predates 1850 and most significantly the time of habitation by indigenous people, this designation would not preclude future inquiry into that earlier time. In fact, by preserving the South Park Blocks as a canopied park, rather than developing it with structures and additional pavement, it will make further inquiry possible. This can be initiated using such techniques as Lidar that can detect hidden structures below the surface of the earth without disturbing the soil.

Equally important is to ask how the historic designation of this park, envisioned and platted as a park for the people, stands up to the scrutiny of an equity lens today. By these standards it exceeds the inclusiveness of most publicly owned buildings and historically designated places. Seven days a week it is both open and welcoming to all. People of all skin tones, ethnicities and economic status enjoy the park. One only needs the ability to walk, or if one cannot walk a wheeled conveyance. There is no ticket, no membership, no matriculation required to enter. People come here for solitude, socialization and celebration. Music of every genre and ethnicity is played here. Native people come to reclaim their birth right of this place in music, ceremony and story. Locally grown sustainable food is sold and shared at the Farmers' Market where the aroma of ethnic cuisines perfumes the air.

Finally one must name the citizens of the earth that we are just beginning to acknowledge as our peers, not only entitled to an existence and a place along side humans, but essential to our very survival. In this case I am referring to the magnificent trees, part of our living history, some having been planted over 140 years ago. As with Daniel H Lownsdale's innovative concept of a People's park, the planting of trees for a future canopy was a visionary design by Louis Gustav Pfunder to serve contemporary and future generations. With its 5 axial rows of deciduous trees and 4 pedestrian walkways it maximizes both canopy cover and human access.

The design as a treed park serves as a modern respite for humans in an urban heat island, providing shade in the

summer and filtered sun in the winter. The majestic elms, which constitute 50% of the park trees, silently and efficiently clean the air by sequestering more carbon than any other tree species in downtown Portland. They also cool and absorb rainwater and mitigate heat generated by adjacent buildings. Our stewardship thus far has been extremely effective such that 97% of the elms are healthy. The value of our urban tree canopy has been elevated in contemporary times from a nicety to a necessity.

I would propose that the qualifications of this park for the National Register are singularly robust by historic standards and through a contemporary equity lens. Such a designation would protect and preserve an historic park designed with a beauty and functionality that has stood the test of time. Its pedestrian focus with accommodations for handicapped access provides equitable and safe enjoyment by all. If the existing design is conserved it will continue to outperform any other real-estate downtown as a mitigator of our current climate emergency. I urge you to approve the National Register nomination of the South Park Blocks.

Catherine Thompson, M.D., M.S.  
Portland, OR 97201

For your convenience I have also attached a PF copy of my testimony.



February 3, 2021

To: City of Portland Historic Landmarks Commissions

From: Adena Long, Portland Parks & Recreation (PPR) Director

**RE: South Park Blocks National Register of Historic Places Nomination**

Dear Commissioners :

Portland Parks & Recreation (PPR) appreciates that the Downtown Neighborhood Association has prepared a National Register of Historic Places (NRHP) nomination for the South Park Blocks. PPR supports historic designations of our properties that are consistent with plans for those properties, and that do not unduly prohibit the City from meeting other important parks and recreation goals in the design and renovation of parks, including PPR goals related to diversity, equity, and inclusion, antiracism, and dismantling White supremacy. NRHP nomination documentation should be complete, accurate, and inclusive. PPR staff have identified some opportunities for improvement of the current submitted nomination that are outlined in this letter.

Background:

Portland Parks & Recreation (PPR) has been engaging the community in a master planning process for the South Park Blocks since April 2019.

PPR met with representatives from the Oregon State Historic Preservation Office (SHPO) in the fall of 2019 to provide an introduction and overview of the South Park Blocks master planning process with a focus on initial research and documentation of significant historic features through the [Existing Conditions, Issues, and Opportunities Report](#) and the hiring of a consultant team with expertise in historic cultural landscapes. A historic overview of the park was provided at several public touchpoints, and the 2019 report linked to above was made available for public review during the master planning concept development phase.

The SHPO representatives have been and continue to be supportive of PPR's South Park Blocks Master Plan approach and have shared information about the [ORS 358.653 compliance process](#). Oregon SHPO has asked that this compliance process be engaged when specific tangible implementation work is funded and goes through more detailed design and construction. This process facilitates compliance of projects for historic resources that are either eligible for listing or already listed in the National Register.

**Administration**

1120 SW 5th Avenue, Suite 858  
Portland, Oregon 97204  
503-823-PLAY (7529) | Fax 503-823-6007

**PORTLANDPARKS.ORG**  
Commissioner Carmen Rubio  
Director Adena Long



The South Park Blocks were previously determined to be eligible. During the compliance process, SHPO will review and consider options to minimize adverse effects to the park.

The Central City 2035 Plan (adopted by City Council in 2018) includes an action item to obtain a historic designation for the South Park Blocks by 2023 to be implemented by PPR and/or private partners. One of the Portland's Design Commission's conditions of approval in the [Broadway Tower Land Use Decision \(LU 15 281248 DZM MS\)](#) was for the developer to provide funding to PPR to complete a master plan for the South Park Blocks and implement master plan-recommended improvements (totaling approximately \$225,000) to the park block between SW Columbia and Clay Streets as part of the public benefit package.

With the knowledge that a park master plan does not preclude a NRHP nomination, PPR leadership made the decision in 2016 to pursue a Master Plan for the South Park Blocks in advance of a historic designation to provide comprehensive guidance for future decisions about the park. What PPR has learned from the planning and community engagement process should be used to inform the NRHP nomination.

PPR believes the following changes would improve the nomination drafted by the Downtown Neighborhood Association.

## **1. Period of Significance and Criteria Inconsistencies:**

- A. Shorten the period of significance identified in the South Park Blocks NRHP nomination to exclude the last 50-years and therefore remove the South Park Blocks southernmost six blocks (in the University District) from the nomination boundary.**
- B. Alternatively, classify the southernmost six blocks (in the University District) and renovation elements like the Smith Amphitheater as non-contributing, if the period of significance is retained as proposed.**

University District renovations made in the 1970s changed the character of the southernmost six park blocks significantly enough to merit exclusion from a nomination focused on the South Park Blocks as a “distinguishable entity whose components lack individual distinction” (Criteria C). The identified period of significance and inclusion of the University District seems inappropriate for Criteria C. The nomination acknowledges that the redesign and renovations of the University District extend beyond the conventional 50-year threshold for historic consideration and claims these blocks meet Criteria G in achieving significance within the last 50 years. The argument for why the University District meets Criteria G and how this may or may not conflict with Criteria C is unclear. Initially the South Park Blocks Master Plan consultants thought the University District may be of historic



significance if Hideo Sasaki was directly involved; however, they contacted Yost Grube Hall Architects and discovered that Hideo Sasaki was not very involved in the design.

## **2. District Boundary Modifications:**

- A. Utilize the edges of the South Park Blocks landscaping to provide a more accurate boundary rather than the existing curb location (that is located 20+ feet inward of the right-of-way and built in the 1980s).**
- B. Remove the six blocks in the University District from the district boundary - depending on resolution of the period of significance and criteria inconsistencies.**

The nomination repeatedly refers to the South Park Blocks being 100 feet by 200 feet and articulates well-defined boundaries as a character-defining feature. In fact, the 1857 Brady Map has no dimensions assigned to it but shows the park blocks as slightly under half of the other 200-foot-wide blocks. City Ordinance 619 dedicated the streets and public spaces of Downtown Portland with an accompanying expansion of the Brady Map surveyed in 1866 and recorded in 1869. The narrow park blocks look and measure to be under half of the normal Portland blocks, i.e. closer to 80 ft. than 100 ft. Additional records from the Portland Bureau of Transportation and Multnomah County confirm this historic information as well as the current park parcel's legal width of 80 feet. The park has experienced significant alterations over the identified period of significance that have continuously reshaped and redefined the parks boundaries and the characteristics of the edges of the park that overlap with the right-of-way.

## **3. Character-defining Features and Contributing Resources Modifications:**

- A. Do not include the materials palette, well-defined boundaries, perimeter, or diagonal pathways as character-defining features.**
- B. Alternatively, clarify the materials palette, well-defined boundaries, perimeter or diagonal pathways as character-defining features - given how much these features have changed over time (especially in the 1980s).**

The current identified period of significance ends in 1973 to mark the last significant redesign of the University District, but it is not inclusive of the last significant redesign of the Cultural District in the 1980s. At that time, the northernmost six blocks were renovated by the landscape architecture firm Walker Macy. Part of that renovation included the removal of diagonal walkways, the addition of dual north-south walkways and the addition of perimeter sidewalks in the right-of-way with hexagonal pavers used for these new

pathways. It's important to note how much the walkways in and around the South Park Blocks have changed over time in terms of materials, layout, and design details.

- C. Focus the nomination for the South Park Blocks on the dominance of large stature trees as a defining characteristic rather than being overly specific about the number of rows, species, specific locations of trees, or planes of grass.**

The inclusion of the South Park Blocks landscaping as a contributing feature is inconsistent to the noted level of change over time. For example, none of the existing trees (or replacement trees planted in the 1877 planting locations) were on site during the first 25 years of the stated period of significance.

- D. Remove the Smith Amphitheater in the University District as a contributing feature or remove the Smith Amphitheater from the district boundary entirely.**
- E. Do not include the Abraham Lincoln and Roosevelt Rough Rider statues as contributing features (given their absence from the South Park Blocks today and equity considerations discussed below).**

#### **4. Diversity, Equity, and Inclusion in Historic Preservation of Public Land:**

- A. Incorporate input from the Native American community and other Portlanders for a NRHP nomination process for the South Park Blocks.**

Landscapes have a history made up of many different perspectives and experiences and are not defined by a single period of significance. Publicly owned landscapes present a shared responsibility to acknowledge and reconcile these realities. The current NRHP nomination celebrates one story of history, but it is not representative of all stories. The language in the current version of the nomination glorifies European settlers and depicts the land as previously empty instead of more respectfully acknowledging the many groups who made significant contributions to the landscape before this period for time immemorial and continue to today.

For example, the inclusion of the Roosevelt Rough Rider and Abraham Lincoln Statues as contributing features is in conflict with community conversations currently happening about needing to reevaluate the appropriateness of celebrating such figures so prominently in our public spaces. Portland, like many cities across the country, has an obligation and an opportunity to revisit how public art represents its communities and reflects its values.

## **5. Historic Cultural Landscapes and Change over Time**

### **A. Recognize the significant amount of change over time the South Park Blocks have experienced throughout NRHP nomination documentation.**

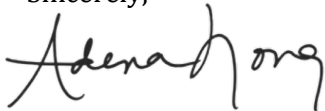
The South Park Blocks are a historic cultural landscape. Landscapes are living and changing; therefore, protection and management of ecological, historic, and cultural resources must be considered together. Significant changes to the park's circulation, planting, furnishings, and design details have taken place over time (before, during, and after the current stated period of significance). For these reasons, the master planning team determined that a rehabilitation approach is most appropriate.

A rehabilitation approach for properties listed in the National Register of Historic Places (NRHP) is defined as "the act or process of making possible compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."<sup>1</sup> A rehabilitation approach is conducive to changes to accommodate contemporary use.

The South Park Blocks Master Planning process is working towards establishing a Tree Succession Strategy for the whole park that provides guidance on the characteristics of trees that should be planted to retain the park's aesthetic and urban forest infrastructure functions. To retain the continuous healthy tree canopy that is the significant contributing resource, the ecological needs of the trees cannot be ignored and must be prioritized. The City cannot continue to replant the same types of trees that would perpetuate existing problems with ensuring the health and vibrancy of the trees which are so integral to the experience and enjoyment of the South Park Blocks. The plan makes recommendations for the regeneration of the historic tree canopy over time, so newly planted trees are able to reach the same grandeur as the current oldest trees in the park. Doing so requires flexibility so long swaths of trees don't have to be preemptively removed at the same time and replanted to replicate the same growing conditions.

Thank you for your time and consideration of the many perspectives that must be considered when making decisions that impact our shared public spaces. We recommend you consider the issues outlined here and request revisions to the nomination accordingly.

Sincerely,



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<sup>1</sup> A Guide to Cultural Landscape Reports: Contents, Process and Techniques, National Park Service, U.S. Department of the Interior, Washington, DC, 1998.

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February 5, 2021

Historic Landmarks Commission  
City of Portland  
Portland, OR  
via electronic mail

RE: South Park Blocks

Dear Commissioners:

Portland State University opposes the current nomination of the South Park Blocks to the National Register of Historic Places. Furthermore, we request that the University District be removed from the nomination due to substantial renovations that took place in the 1970s. Since 1952, the university has been a committed steward of this vital open space. We recognize its placemaking and environmental importance and believe any action affecting the South Park Blocks must be done collaboratively and equitably. We strongly oppose this nomination because we feel that it does not represent the views of our diverse community.

Any determination of the park's significant resources must be an open and inclusive process that includes all of the Park Blocks' stakeholders and centers the views of Black, Indigenous, and people of color. To that end, we acknowledge Portland Parks and Recreation for their extensive outreach efforts and their attention to the needs of our diverse community during their recent South Park Blocks Master Plan process. The plan aligns with PSU's long range planning goals, infrastructure needs, and landscaping programs.

When considering the term "historic," it is important to recognize that the South Park Blocks is located on Indigenous land that was taken from native peoples before it became the park space that we know today. The current nomination describes it as "a designed historic landscape that is distinctly derivative of its European-inspired design principles." Any consideration of this space must include the full story of the land where the South Park Blocks now stand and should represent Black, Indigenous, and other underrepresented histories. These factors are absent from the nomination.

Specific to the details of the nomination, it lists the current grid and canopy of deciduous trees as character-defining features. PSU agrees that the continuous tree canopy should be protected and maintained, however, it is important to recognize and plan for changing climate conditions and tree

health concerns. A monoculture planting approach creates an ecological disadvantage and elevates disease risks. The South Park Blocks Master Plan consulted with experts and carefully considered the park's health and longevity while creating a strategic succession plan that respects the historic character of the park.

The nomination also lists the perimeter promenade as a character-defining feature. This will have severe implications for the City Council adopted Green Loop project, which PSU supports. Now, more than ever, it is vital that we expand our network of safe and accessible bike and pedestrian infrastructure. Walking, biking, and rolling are sustainable ways to get to, from, and around our campus. This part of downtown has a lack of safe and accessible bikeways. A 2017 study by Amy Lubitow of PSU showed that women and minorities are less likely to use a bicycle due to safety concerns, citing protected bike lanes as a key intervention. The South Park Blocks is a community resource that should be accessible to everyone.

On a policy level, inclusion of the University District of the South Park Blocks is unsupported. The PSU component was significantly renovated in the 1970s, less than 50 years ago, which misses the conventional threshold for historic significance. This nomination calls features such as the Smith Pavilion, which are less than 50 years in age, character-defining features. The nomination further states that "The South Park Blocks also meet Criterion Consideration G, as the last major development of the park occurred in 1973, fully integrating the existing design of the park blocks to the future growth and integration of the downtown university and cultural district." This claim is problematic as it seeks to preserve features that no longer meet the needs of the PSU community and our partners. PSU continues to evolve as a campus, and as a result our priorities and needs evolve with us.

PSU's students, faculty, and staff compose one of the largest populations that lives, works, and recreates in the neighborhood surrounding the South Park Blocks. The South Park Blocks is our front yard and we respect its character and its role as a vital community green space. We are also cognizant of the lessons that 2020 has taught us; that we need to be flexible, resilient, and above all, focused on equity and inclusivity. The process for this nomination did not take into account the diverse needs of our community. Furthermore, this nomination would prevent or inhibit necessary upgrades to infrastructure and ecology to meet the needs of our evolving university. Let's work together to create a South Park Blocks that is a thriving space for our entire community, capable of reflecting our history while also adapting to embrace our future.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Neely", with a stylized flourish extending from the end.

Kevin Neely

Vice President, University Relations



4 February 2021

Portland Historic Landmarks Commission  
City of Portland, OR

Greetings:

I am pleased to provide comments on the draft nomination of the Portland South Park Blocks to the National Register of Historic Places. I understand that the Portland Historic Landmarks Commission will be reviewing this nomination on February 8, 2021, prior to submitting comments to the Oregon State Advisory Committee on Historic Preservation. I request that my comments be included in the record of the February 8, 2021 meeting.

Following a careful and detailed reading of the draft nomination, it is evident and clear that the South Park Blocks are a significant historic landscape in Portland and deserve to be listed on the National Register as a historic district. The blocks reflect, and are indicative of, Portland's urban development over the past 150 years. They are especially important for the long-term community vision they embody, and deserve to be recognized nationally and locally for their significance. The nomination clearly develops the history of the South Park Blocks, and establishes their significance under National Register criteria A and C. The nomination is impressive and especially clear on the connection between the South Park Blocks, national park movements in the 19<sup>th</sup> Century, and local historic personages.

I am especially impressed by the detailed block-by-block description of the proposed historic district, as it provides a clear understanding of the detailed elements, both contributing and non-contributing.

Unfortunately, there are many serious problems and inconsistencies with this nomination. I will limit these comments to three major areas of concern.

- The summary paragraph of the nomination (beginning on page 3) is a poor and grossly inadequate description of this historic landscape. The phrase 'open space' does not, in any way, characterize this property. That term derives from an architecture-centric view in which any site lacking architecture is considered 'open.' Describing the South Park Blocks in this way is inconsistent with the text that follows and needs to be corrected.



The summarized list of eight contributing resources (p.3) fails to recognize the interrelationship of these resources and highlights the objects in the landscape. Based upon the subsequent text, the cultural landscape resources should be understood through an analysis based on the National Park Service cultural landscape characteristics, such as spatial organization, circulation, clusters, and historic views. These are the tangible and intangible resources evident in this landscape. They are missing in this nomination.

- Change through time is an integral cultural landscape process. The nomination seems to recognize this, but only in the cursory way, often demeaning. Terms such as “susceptible to change” (p. 20) reflect a lack of understanding of cultural landscape dynamics. Cultural landscapes are not susceptible to change; change, as process, contributes to the landscape’s significance and integrity. There needs to be a careful and extensive revision of this entire nomination to reflect the degree to which change over time has characterized this landscape.
- The integrity discussion (p.3+20) is insufficient, in that it does not adequately consider, describe and analyze the multiple National Register aspects of integrity. The nomination lists some of these, but does not link them to the historic record in a manner that provides evidence of historic integrity. The discussion of change and its relationship to integrity (p.20) is limited to the Elm trees, and appears more as apology for change (“Despite this, the park still reflects its original design intent ...”) rather than as a discussion of a defining attribute. Rather, change can be understood as a process that is linked to integrity, and should be considered as such in this nomination. Cultural landscapes are both process and feature, although not recognized as such in this draft nomination.

Based on the reading of the nomination and familiarity with the South Park Blocks, it is clear that this property possesses a high degree of integrity. I strongly recommend that the integrity discussion be completely rewritten to reflect a cultural landscape application of the National Register aspects of integrity.

Reading this nomination, there is no doubt that the South Parks Blocks warrant listing on the National Register of Historic Places as a district recognized as a significant cultural landscape. This draft nomination, however, does not meet the high standards for such a nomination. I urge the Commission to request major revisions to the nomination for further review in the future.



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School of Architecture  
& Environment

Thank you very much for considering my comments. Feel free to contact me ([rzm@uoregon.edu](mailto:rzm@uoregon.edu)) should you require any explanatory notes.

Sincerely,

Robert Z. Melnick, FASLA  
Professor Emeritus, University of Oregon  
Director, Cultural Landscape Research Group