



July 6, 2021

Mayor Ted Wheeler
City Commissioners Rubio, Mapps, Hardesty and Ryan
Portland City Hall
1221 SW 4th Ave #110,
Portland, Oregon 97204

Subject: Testimony on South Park Blocks Draft Master Plan

Dear Mayor Wheeler and Commissioners,

The Architectural Heritage Center of the Bosco-Milligan Foundation (AHC/BMF) is a Portland nonprofit organization committed to the preservation of our city's history as reflected in its built environment, including historic cultural landscapes. The AHC/BMF would like to submit the following comments on the Draft South Park Blocks Master Plan (SPBMP), dated May 2021, prepared by Portland Parks & Recreation Bureau (PP&R). We support efforts to serve the larger community and improve the park's resiliency to impacts of climate change and population growth.

The South Park Blocks, dedicated in 1852 (before Statehood) as one of Portland's earliest official greenspaces, has survived as one of the "gems of nature" in the heart of downtown. The South Park Blocks' most iconic feature is its majestic American elms and other deciduous tree species including maples, oaks, sycamores, and lindens. It is the trees that define the essential character of the park:

Like a rough-hewn colonnade, five rows of trees stretch the length of the twelve blocks, creating a high canopy that shelters the grass, walkways, and benches below. From the center, looking either to the north or the south between any two rows of trees, you have a vista down a long, green, arched tunnel narrowing into an indistinct vanishing point blocks away (South Park Blocks: Benefits of Trees brochure, prepared by PP&R, 2005).

However, we have a number of concerns about what the Master Plan proposes.

1. PP&R's assertion that it is taking a "rehabilitation" approach, using the Secretary of the Interior's Standards for Rehabilitation which allows making alterations "while preserving those portions or features which convey its historic, cultural, or architectural values." Yet, what's proposed in the Master Plan seems to contradict most of the Standards. The Green Loop concept, a multi-modal bike/pedestrian pathway, proposes removing the existing sidewalk and regrading along the park's western edge. This poses a threat to the western row of trees and alters the spatial relationships by impinging on the park's historic boundaries. (It also contradicts the city's own Title II Tree Code prohibiting construction activities in the protected root zone, an area that extends one foot in radius for each inch of diameter of the tree's girth.) Proposed changes in Blocks 7-12 depict the two existing parallel, central north-south pathways getting collapsed into a single, wider central promenade. This implies removal of the central

row of trees to create a single allée—a significant alteration to the park’s defining element of five rows of trees in axial alignment.

2. The AHC/BMF understands that a National Register nomination for the South Park Blocks is being submitted by the Downtown Neighborhood Association. We feel strongly that the Master Plan should not precede the National Register nomination since it is intended to inform the park’s stewardship and future design decisions. It should also be noted that the Central City 2035 plan cites as a priority the completion of a historic district nomination; it does not mention a master plan.

3. The Executive Summary claims that many of trees are reaching the end of their “designed” lifespan; however, this is not the same as their actual lifespan. Properly maintained and stewarded, they can last up to 300 years. A May 2019 report by City consulting arborist Morgan Holen & Associates concluded that 97% of the trees were healthy but needed proper maintenance to ensure longevity. The park is now entirely free of Dutch elm disease (DED) as a result of the cost effective inoculation program that has kept them in good health.

4. The potential impacts of the proposed Master Plan on the mature tree canopy. The Master Plan includes a Tree Succession Plan that seems to imply that the trees will be maintained and that only dead and dying trees, or trees damaged during construction, will be removed. An analysis by a group of concerned citizens (including an experienced architect and former Parks Board member) shows that the plan’s “before” and “after” two-dimensional images (pp. 50-51) are, in fact, overwhelmingly replacement trees.

5. The SPBMP Tree Succession Plan does not include a comprehensive maintenance plan (or budget) to ensure responsible stewardship of the historic iconic tree canopy. This is not aligned with how the City cares for Heritage Trees and essentially amounts to a case of death by neglect. What is needed to preserve the SPB’s historic tree canopy is a tree protection plan that includes regular inoculations, professional thinning of the upper canopy branches, and cabling of large lateral branches.

In summary, our review of the Master Plan identifies several flaws. Although the Master Plan suggests that the changes it outlines will result in a better park, it needs to be revised to embrace the heritage of the cultural landscape.

The South Park Blocks belong to all of the members of our community. It exists as one of the City’s most beloved parks. The South Park Blocks deserves a robust conservation plan to ensure the future stewardship and majestic nature of this historic cultural landscape.

Thank you for the opportunity to share our comments.

Sincerely,



Denyse McGriff

President, on behalf of the Board of Directors