

# City of Portland, Oregon Bureau of Development Services Land Use Services

Carmen Rubio, Commissioner David Kuhnhausen, Interim Director Phone: (503) 823-7300 TTY: 711 www.portland.gov/bds

FROM CONCEPT TO CONSTRUCTION

 RECORDER

 Please stamp the County Recorder's copy of the recording sheet and return with the attached decision to City of Portland, BDS 299/5000/BDS LUR

 Multnomah County Official Records
 2024-012640

 J.D. Riddle, Deputy Clerk
 03/05/2024 03:55:08 PM

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# FINAL FINDINGS AND DECISION BY THE LANDMARKS COMMISSION RENDERED ON 1-22-2024.

The Historic Landmarks Commission has **approved** a proposal in your neighborhood. This document is only a summary of the decision. The reasons for the decision, including the written response to the approval criteria and to public comments received on this application, are included in the version located on the BDS website https://www.portland.gov/bds/zoning-land-use/news/notices. . Click on the relevant Neighborhood, and search the case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

# CASE FILE NUMBER: LU 23-088549 HR DM PC # 23-047200

Replacement of Mt Tabor Light Poles and Fixtures

**BUREAU OF DEVELOPMENT SERVICES STAFF**: Grace Jeffreys 503-865-6521 <u>/</u> <u>Grace.Jeffreys@portlandoregon.gov</u>

## **GENERAL INFORMATION**

Applicant:	Brett Horner, Portland Parks & Recreation 1210 SW 5th Ave Suite 800, Portland, OR 97204 971.409.3518   <u>Brett.Horner@Portlandoregon.gov</u>
Owner:	City of Portland 1900 SW 4th Ave Ste 7007, Portland, OR 97201-5380
Site Address:	6325 SE DIVISION ST

Final Findings and Decision for Replacement of Mt Tabor Light Poles and Fixtures Page 2 Case Number LU 23-088549 HR DM

Legal Description: Tax Account No.: State ID No.: Quarter Section:	TL 100 190.32 ACRES, SECTION 05 1S 2E R992050130 1S2E05 00100 3136,3137,3236,3237
Neighborhood:	Mt. Tabor, contact at <u>contact.MTNA@gmail.com</u>
Business District:	NONE
District Coalition:	Southeast Uplift, contact at <u>operations@seuplift.org</u>
Plan District: Other Designations:	NONE Mount Tabor Parks Historic District, Mount Tabor Park Reservoirs
8	Historic District
Zoning:	<b>OSc,s:</b> Open Space base zone (33.100 Multi-Dwelling Zone) and Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
Case Type:	HR DM: Historic Resource Review, Demolition Review
Procedure:	<b>Type III HR and DM,</b> with a public hearing before the Landmarks Commission. The decision of the Landmarks Commission can be appealed to City Council.

#### **Proposal:**

Type III Historic Resource Review and Demolition Review for the replacement of 88 light poles and fixtures which are part of part an existing historic lighting system which is considered a contributing aspect of the Mt Tabor Historic District. Of the 88 existing poles to be replaced:

- 84 are located within Mt. Tabor Park.
- 4 are located in the SE Taylor St. right-of-way (ROW).

The new concrete light poles will be hexagonal to match existing, and the new light fixtures will be acrylic/metal light fixtures with decorative metal strapping. The proposed replacement poles and fixtures will be installed in approximately the same location as the current poles.

Reviews Required:

- <u>Demolition Review</u> is required because the proposal to remove historic light poles and fixtures is for non-exempt demolition of contributing features within a Historic District, per Section 33.445.200.E.
- <u>Historic Resource Review</u> is required because the proposal to add new light poles and fixtures is for non-exempt development within a historic overlay zone, per Section 33.846.

#### **Relevant Approval Criteria:**

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- Demolition Review: One of the four criteria listed under 33.846.080.C.
- <u>Historic Resource Review</u>: 33.846.060.G. Other Approval Criteria.

#### CONCLUSIONS

The purpose of the Historic Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance.

This project will replace 88 light poles and fixtures adjacent to the park's circulation system. Approximately 60 of the poles may date from the park district's historic period of significance, and none of the fixtures do. Options to retain, rehabilitate, and reuse the existing light poles were explored. However, there was not an acceptable way for them to be anchored in a manner that would meet current building codes while also retaining enough of the pole's historic and design integrity. The materials and design of replacement poles closely resembles existing ones and will preserve the historic character of the lighting system. Efforts have been made to preserve the spatial pattern of the illumination system. Replacement of the poles and the fixtures will ensure the system of illuminated pathways, staircases, and historic drives continues to provide comfort and safety as community members explore the historic landscape and cherished scenic views of Mt. Tabor Park. By replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

This proposal meets the applicable Historic Resource Review criteria and Demolition Review criteria and therefore warrants approval.

## LANDMARKS COMMISSION DECISION

It is the decision of the Landmarks Commission to approve Historic Design Review for Historic Resource Review and Demolition Review for the replacement of 88 light poles and light fixtures in Mt Tabor Park. Of the 88 existing poles to be replaced:

- 84 are located within Mt. Tabor Park.
- 4 are located in the SE Taylor St. right-of-way (ROW).

The new concrete light poles will be hexagonal to match existing, and the new light fixtures will be acrylic/metal light fixtures with decorative metal strapping. The proposed replacement poles and fixtures will be installed in approximately the same location as the current poles.

Approvals per Exhibits C.1-C-36, signed, stamped, and dated January 25, 2024, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B C) must be noted on each of the 4 required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE- Case File LU 23-088549 HR DM. All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- **B.** At the time of building permit submittal, a signed Certificate of Compliance form (<u>Certificate of</u> <u>Compliance for Design and Historic Resource Review Approvals | Portland.gov</u>) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- C. No field changes allowed.

Bv:

Historic Landmarks Commission Chair Andrew Smith

Application Filed: September 28, 2023. Decision Filed: January 23, 2024. Decision Rendered: January 22, 2024 Decision Mailed: January 29, 2024

Last date to Appeal: February 12, 2024 by 4:30 pm Effective Date (if no appeal): February 13, 2024 Decision may be recorded on this date

#### **Kimberly Tallant, Principal Planner**

**City of Portland** Bureau of Development Services 1900 SW Fourth Ave, #5000 Portland, OR 97201 Date: February 13, 2024

Representative





MOUNT TABOR PARK HISTORIC DIST

Site

Also Owned Parcels

- Historic District
- $\triangle$  Historic Landmark

File No.	LU 23 - 088549 HR DM
1/4 Section	3136-37,3236-37
Scale	1 inch =800 feet
State ID	1S2E05 100
Exhibit	B Sep 28, 2023



Light pole locations with Conservation and Scenic Overlays



LU 23-088549 HR DM, Exhibit C.4

#### Light poles and fixture schematics





LU 23-088549 HR DM, Exhibit C.5



LU 23-088549 HR DM, Exhibit C.7



City of Portland, Oregon Bureau of Development Services Land Use Services

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Neighborhood: Business District: District Coalition:	Mt. Tabor, contact at <u>contact.MTNA@gmail.com</u> NONE Southeast Uplift, contact at <u>operations@seuplift.org</u>
Plan District: Other Designations:	NONE Mount Tabor Parks Historic District, Mount Tabor Park Reservoirs Historic District
Zoning:	<b>OSc,s:</b> Open Space base zone (33.100 Multi-Dwelling Zone) and Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
Case Type:	HR DM: Historic Resource Review, Demolition Review

Procedure:Type III HR and DM, with a public hearing before the Landmarks<br/>Commission. The decision of the Landmarks Commission can be<br/>appealed to City Council.

#### Proposal:

Type III Historic Resource Review and Demolition Review for the replacement of 88 light poles and fixtures which are part of part an existing historic lighting system which is considered a contributing aspect of the Mt Tabor Historic District. Of the 88 existing poles to be replaced:

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The new concrete light poles will be hexagonal to match existing, and the new light fixtures will be acrylic/metal light fixtures with decorative metal strapping. The proposed replacement poles and fixtures will be installed in approximately the same location as the current poles.

**Reviews Required:** 

- <u>Demolition Review</u> is required because the proposal to remove historic light poles and fixtures is for non-exempt demolition of contributing features within a Historic District, per Section 33.445.200.E.
- <u>Historic Resource Review</u> is required because the proposal to add new light poles and fixtures is for non-exempt development within a historic overlay zone, per Section 33.846.

#### **Relevant Approval Criteria**:

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- Demolition Review: One of the four criteria listed under 33.846.080.C.
- <u>Historic Resource Review</u>: 33.846.060.G. Other Approval Criteria.

## ANALYSIS

**Site and Vicinity:** The project site, Mt. Tabor Park, is roughly bound by SE Division Street on the south, SE 64<sup>th</sup> Avenue and SE 60<sup>th</sup> Avenue on the east, SE Yamhill on the north, and SE 71<sup>st</sup> Avenue on the west.

Mt. Tabor Park is a 196-acre public park located in a residential area of southeast Portland. The park encompasses most of a volcanic butte, with four peaks. The tallest summit rises to an elevation of 643 feet, making it a prime landmark visible from points all around the city. Because of its elevation, the site became a distribution site for Portland's gravity-fed, mountain-source drinking water in 1894 with the construction of two open reservoirs, Reservoir 1, and the since-demolished Reservoir 2. In 1903, Mt. Tabor was identified as a potential city park by John Charles Olmsted, adopted son of Frederick Law Olmsted, and who, along with his brother Frederick Law Olmsted Jr., operated the landscape firm Olmsted Brothers landscape firm which carried forth the legacy of their father. In 1909, voter-approved bonds were used to purchase the properties that made up the park. Emanuel Tillman Mische, who had previously worked for Olmsted Brothers, was hired the prior year as Portland's Park superintendent and designed the park. Two additional open reservoirs, Reservoirs 5 and 6, were constructed in 1911 on the western slope of the park.

Mt. Tabor Park is individually listed in the National Register and is classified as a Historic District. The "historic lighting system" is identified as one of the contributing aspects of the site. In the Nomination for the Historic District, the lighting system is described in detail:

Adding distinctive charm and illumination is the period lighting system comprised of eighty-eight single concrete standard lampposts that follow the drives and some of the main interior pathways throughout the park. These lampposts give off a soft, friendly light, reminiscent of gaslights, especially in the interior forested areas where they serve as a reminder of the original design of accessibility. The lighting encourages pedestrian exploration of the hills and dells throughout the park even in the short days of the colder months. Originally topped with a single, white, glass globe, polygonal lantern-style shades have replaced the globes. In 1911, Superintendent Mische requested of the Park Board, lampposts with glass globes to be serviced by an alternating current feed. He also requested underground conduits. The lampposts are serviced via underground conduits. The lighting system dates from 1924 and 1925.

**Zoning:** The <u>Open Space</u> (OS) zone is intended to preserve public and private open, natural, and improved park and recreation areas identified in the Comprehensive Plan. These areas serve many functions including: providing opportunities for outdoor recreation; providing contrasts to the built environment; preserving scenic qualities; protecting sensitive or fragile environmental areas; preserving the capacity and water quality of the stormwater drainage system; and providing pedestrian and bicycle transportation connections.

The Environmental Conservation Zone "c" overlay conserves important resources and functional values in areas where the resources and functional values can be protected while following environmentally sensitive urban development.

The historic resource overlay zone protects historic resources that have been identified as significant to the history of the city and region. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting education and enjoyment for those living in and visiting the region. The regulations foster awareness, memory, and pride among the region's current and future residents in their city and its diverse architecture, culture, and history. Historic preservation recognizes social and cultural history, retains significant architecture, promotes economic and environmental health, and stewards' important resources for the use, education, and enjoyment of future generations.

The Scenic Resource Zone "s" overlay is intended to protect Portland's significant scenic resources as identified in the Scenic Resources Protection Plan (1991) and the Central City Scenic Resources Protection Plan (2017); enhance the appearance of Portland to make it a better place to live and work; create attractive entrance ways to Portland and its districts; improve Portland's economic vitality by enhancing the City's attractiveness to its citizens and to visitors; and implement the scenic resource policies and objectives of Portland's Comprehensive Plan. The purposes of the Scenic Recourse zone are achieved by establishing height limits within view corridors to protect significant views and by establishing additional landscaping and screening standards to preserve and enhance identified scenic resources.

**Land Use History:** City records indicate that prior land use reviews include the following:

- LU 61-001380 (ref. file: CU 029-61) Conditional Use approval for a small storage building;
- LU 64-002651 CU (ref. file: CU 067-64) Conditional Uwe approval to construct a plant potting building on the SW corner of Mt. Tabor Park on park warehouse land;
- LU 65-002285 CU (ref. file: CU 056-65) Conditional Use Approval with the condition that planting.
- be provided to screen the facilities from adjacent park and residential areas;
- LU 67-003406 (ref. file: CU 93-67) Conditional Use approval for a maintenance building and office;
- LU 74-000650 (ref. file: CU 007-74) Conditional Use approval for a greenhouse; .
- LU 74-002392 (ref. file: CU 059-74) Conditional Use approval for a picnic shelter;
- <u>LU 77-002064 (ref. file: CU 49-77)</u> Conditional Use approval for a water pumping station; .
- LU 89-003906 CU (ref. file: CU 26-89) Conditional Use approval for parking lot expansion; LU 89-021552 (ref. file: MP 107-89) – Approval of a 3-lot minor partition;
- LU 90-024202 Approval to locate and maintain a motor vehicle service building;

Final Findings and Decision for Replacement of Mt Tabor Light Poles and Fixtures Case Number LU 23-088549 HR DM

- Page 4
- <u>LU 99-017214 EN (ref. file: LUR 99-00809)</u> Environmental Review approval of trail constructions and improvements in the Environmental Concern zone;
- <u>LU 06-178213 HDZ</u> Historic Design Review approval for an 8' wide accessible path on the north side of Reservoir #6;
- <u>LU 07-139442 HDZ</u> Historic Design Review approval for interim security and deferred maintenance improvements;
- <u>LU 14-218444 HR EN</u> Historic Resource Review and Environmental Review approval of disconnection of reservoirs #1, #5, and #6 from the public drinking water system;
- <u>LU 16-148005 HR</u> Historic Resource Review approval for rehabilitation of the Mt. Tabor Summit Restroom building;
- <u>LU 17-158467 HRM</u> Historic Resource Review approval for exterior alterations to the Mount Tabor Yards;
- <u>LU 17-206893 HR</u> Historic Resource Review approval for the replacement of existing and addition of new railings along the existing stairway of the Mount Tabor steps and the Summit Comfort Station;
- <u>LU 17-245440 HR</u> Conditional Use approval for uses and improvements for the 13.3-acre project area including the Yard, Upper Nursery and Long Block areas of the park in the Mount Tabor Park Historic District;
- <u>LU 18-103566 HR</u> Historic Resource Review approval for replacement of existing nonhistoric light poles with new, historically-appropriate pole lighting; and
- <u>LU 21-053526 HR</u> Historic Resource Review approval for installation of an Interpretive Program to satisfy the requirement per Condition of Approval 'C' of LU 14-218444 HR EN.

**Agency Review:** A "Notice of proposal in Your Neighborhood" was mailed **January 2, 2024**. The following seven Bureaus, Divisions and/or Sections responded with no objections, and three of these included written comments, found in Exhibits E.1-E.3:

- Bureau of Transportation Engineering (Exhibit E.1)
- Bureau of Parks-Forestry Division (Exhibit E.2)
- Life Safety Section of BDS (Exhibit E.3)
- Bureau of Environmental Services
- Water Bureau
- Fire Bureau
- Site Development Section of BDS

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on **January 2**, **2024**. Three written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

- 1. Jesse Powell, 1-2-2024, wrote in opposition of removing historic lighting posts.
- 2. David Kaplan, 1-4-2024, wrote in support of the replacement design because it closely resembles the original posts and lanterns.
- 3. Linda Raveaux, 1-10-24, wrote in support of low light that is aimed downward to maintain the award winning "quiet" aspect of the park. Also supported maintaining existing historic appearance of the posts and fixtures.

*Staff Response:* Staff appreciates these neighbors for taking the time to share their thoughtful comments. Commission (Exhibit G.3) and Staff agree that repair is preferable to replacement However, the applicant's submittals show that options to retain, rehabilitate, and reuse the existing light poles were explored, and an acceptable way was not found for them to be anchored in a manner that would meet current building codes while also retaining enough of the pole's historic and design integrity. Commission and Staff also support a replacement design that closely resembles the original posts and lanterns, with respect for Dark Skys.

At the 1-22-24 hearing the following people testified:

Final Findings and Decision for Replacement of Mt Tabor Light Poles and FixturesPage 5Case Number LU 23-088549 HR DMPage 5

1. Aaron Andretti asked a question about the proposed light levels. The applicant responded that the overall light levels will be lower than current levels, while still providing visibility and safety.

#### **Procedural History:**

1. A voluntary <u>Briefing on Lighting in Historic Parks</u> was held in 3-13-2023, which included this work (Exhibit G.3). From the Summary Memo:

Commissioners suggested that repair is preferable to replacement. Commissioners noted a desire to better understand the structural issues and expressed a desire to see the engineer's report when it is released, adding that this information should be in the public record. Commissioners noted that the issue seems to primarily be the anchoring system rather than the concrete poles and noted that this should be further explored so that repair could be further explored as an option. Commissioners expressed a desire for coherency within each park with regard to each park's lighting scheme.

2. This <u>Land Use Review</u> was submitted on 9-28-23. The applicant requested the application to be deemed complete on 12-7-23. A hearing was scheduled for 1-22-24, which was 45 days of after the complete date.

#### **ZONING CODE APPROVAL CRITERIA**

#### **Historic Resource Review Process**

# Chapters 33.445, Historic Resource Overlay Zone, and 33.846, Historic Resource Reviews

#### 33.445.010 Purpose [of Historic Resource Overlay Zone]

The historic resource overlay zone protects historic resources that have been identified as significant to the history of the city and region. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting education and enjoyment for those living in and visiting the region. The regulations foster awareness, memory, and pride among the region's current and future residents in their city and its diverse architecture, culture, and history. Historic preservation recognizes social and cultural history, retains significant architecture, promotes economic and environmental health, and stewards' important resources for the use, education, and enjoyment of future generations.

#### 33.846.010 Purpose [of Historic Resource Review]

This chapter provides procedures and establishes the approval criteria for all historic reviews. The approval criteria protect the region's historic resources and preserve significant parts of the region's heritage. The reviews recognize and protect the region's historic and architectural resources, ensuring that changes to a designated historic resource preserve historic and architectural values and provide incentives for historic preservation.

#### 33.846.080 Demolition Review

#### 33.445.200.E Demolition of resources in a Historic District.

Demolition of contributing resources within a Historic District requires demolition review to ensure their historic value is considered and that there is an opportunity for the owner and community to consider alternatives to demolition.

#### 33.846.080 A. Purpose of Demolition Review

Demolition review protects landmarks and contributing resources in districts. Demolition review recognizes that historic resources are irreplaceable assets significant to the region's architectural, cultural, and historical identity and their preservation promotes economic and

community vitality, resilience, and memory. In the event that demolition of a historic resource is approved, demolition review also addresses the potential for mitigation of the loss.

**Findings:** The applicant has applied for Demolition Review to demolish contributing resources within the boundary of an existing Historic District.

Mt. Tabor Park is individually listed in the National Register and is classified as a Historic District. Within that District, the park land is counted as a contributing feature, and the historic lighting system is a component of the park land, as noted in the Nomination:

Mount Tabor Park contains one contributing site, seven contributing buildings, five contributing structures, and one contributing object...

The park land was counted as one contributing site; infrastructure such as driveways, paths, maintenance yard, and the lighting system, as well as those areas with loose physical definition such as play and picnic grounds, and the nursery, are included as part of the site.

The light poles and light fixtures, which are part of that historic lighting system, are therefore subject to demolition review.

#### 33.846.080.C. Demolition Review Approval criteria

Proposals to demolish a historic resource will be approved if the review body finds that one of the following approval criteria is met:

- 1. Demolition of the resource has been evaluated against and, on balance, demolition has been found to be equally or more supportive of the relevant goals and policies of the Comprehensive Plan, and any relevant area plans, than preservation, rehabilitation, or reuse of the resource. The evaluation must consider:
  - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
  - b. The economic consequences for the owner and the community;
  - c. The merits of demolition;
  - d. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
  - e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
  - f. Any proposed mitigation for the demolition.
- 2. The proposal is to demolish a contributing resource in a Conservation District or National Register District, and demolition of the resource will be mitigated to enhance, preserve, or restore the archaeological, architectural, cultural, or historic significance or integrity of the district. The mitigation must be responsive to the significance and integrity of the resource proposed for demolition. The evaluation must consider:
  - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
  - b. The economic consequences for the owner and the community;
  - c. Relevant goals and policies of the Comprehensive Plan.
- **3.** The proposal is to demolish a contributing resource in a single-dwelling zone in a National Register District, and demolition of the resource will facilitate the creation of more deeply affordable dwelling units than could practicably result from preservation, rehabilitation, or reuse of the resource. In this case, deeply affordable means permanently

affordable to those earning no more than 60 percent of the area median family income. The evaluation must consider:

- a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
- b. The economic consequences for the owner and the community;
- c. Relevant goals and policies of the Comprehensive Plan.
- **4.** The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

#### Findings:

One of the four approval criteria under 33.846.080.C must be shown to be met to demolish these contributing features.

The primary uses on this site are Parks and Open Areas, and the light poles and fixtures that are the subject of this demolition review are of secondary importance to these primary uses. Therefore, they are considered "accessory structures" under PZC 33.190 Definitions:

**33.910 Definitions; Accessory Structure.** A structure of secondary importance or function on a site. In general, the primary use of the site is not carried on in an accessory structure. Accessory structures may be attached or detached from the primary structure. Examples of accessory structures include garages, decks, fences, trellises, flag poles, stairways, heat pumps, awnings, and other structures.

Because the light poles and fixtures are accessory structures, the proposal to remove and replace light poles within Mt. Tabor Park may be reviewed under the approval criterion of C.4.

**4.** *The proposal is to demolish an accessory structure*, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

As the findings below will describe, the demolition and replacement of the existing light poles and fixtures will not significantly diminish the architectural, cultural, or historic significance or integrity of the district.

<u>The light fixtures are not original fixtures.</u> All of the current fixtures to be removed and replaced are not original. The Nomination notes that while the lighting system dates from 1924 and 1925, the original single, white, glass globes were later replaced with polygonal lantern-style shades seen today.

Parks notes in their narrative that the current fixtures are consistent in design to existing lantern-style metal framed fixtures within Mt. Tabor Park and those found in other city parks (Irvington, Lair Hill Parks, Laurelhurst, Washington, etc.). Archival records indicate the now iconic lantern-style fixtures were first installed at Mt. Tabor Park in the 1950s.

The proposed replacement fixtures will match the existing fixtures in both materials and design (see Exhibit A-10, pages 15APP-G).

Some light poles may be original, however, documentation for individual poles varies. Some of the light poles were replaced at least once before with installation dates ranging from the 1950s through the 1980s (See Exhibit A.10, page 15). Currently, there are only 81 poles are installed at Mt. Tabor Park along the circulation system, and at most, 61 of the poles currently illuminating the park's circulation system are original installations.

The light poles are showing their age and the foundations do not meet current building <u>code</u>. Conditions include cracking and flaking in the concrete surface, as well as efflorescence (white discoloration from moisture loss), pitting, and even external evidence of corrosion of internal metal components, or 'spalling' (see photographs included in Exhibit A.10 – APP H).

The earlier poles were installed using an anchoring system that does not meet current building code (Exhibit A.6, pages 2-3). The primary issue with the wire anchor connector is that the steel tie wire connection was not designed to meet lateral loads. Additionally, some tie wires have deteriorated over time because of water/moisture influence. According to consulting engineers, even with a retrofit to replace the wire anchor, the following light pole elements would not meet code requirements (Exhibit A.6, pages 4-10):

- Footing depth
- Reinforcing steel; and
- lack of vertical steel with transverse ties.

These code deficiencies led the consultant to recommend replacement of the entire light poles and their footings, as documented in the Emergency declaration issued by the Commissioner-in-charge on December 28, 2022 (Exhibit A.10 – APP K).

The project team and engineering consultants explored options to retain, rehabilitate, and reuse the existing light poles in Mt. Tabor Park. However, this is not practicable as there is not an acceptable way for them to be anchored in a manner that would meet current building code for anchoring, while also retaining enough of the pole's historic and design integrity. Therefore, all the poles must be removed and replaced.

The light system will be restored to 88 light poles to match the number of poles identified in the historic nomination. All of the new replacement poles will match the existing ones in design and material (see Exhibit C.5-7 drawings, and Exhibit A.10 – APP G photos).

Finally, the quality of the overall illumination that the historic light system provides to the circulation system is valued as an important feature within the park site, rather than the individual light poles and fixtures.

In terms of the historical listing, the primary cultural or historic significance of Mt. Tabor Park is the Park's association with the Olmsted Brothers through the 1903 Olmsted Plan, which identified Mt. Tabor as a desirable site for a public park, and its design, which embodies the principles of landscape architecture espoused by the Olmsteds.

As such, the historic lighting system is a feature within the contributing resource of the park landscape as a whole and provides historic and functional value by illuminating the park's circulation system. In the nomination, some care was taken to determine when the various drives and formal pathways were constructed for the historical nomination, however, no such attempt was made regarding the lighting system. Further, no attempt was made to distinguish individual poles or their location, date

individual poles to the period of significance, or assign historical value to individual poles in the nomination.

Updating the light poles within the existing landscape will do nothing to erode the cultural importance of Mt. Tabor Park as a significant park within the Portland Park System, nor will it impact the integrity of the landscape itself. In fact, by replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

This criterion is met.

Staff note: While the light poles clearly met criterion C.4. for accessory structures, the applicant's submittal, Exhibit A.7, provide findings demonstrating how the proposal also meets criteria C.1. and C.2.

#### **33.846 Historic Resource Review**

#### 33.846.060 E. Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

**Findings:** The site is within in a Historic District, and the proposal is for non-exempt treatments. Therefore, the proposal requires Historic Resource Review approval. The approval criteria are those listed in *33.846.060 G. – Other Historic Approval Criteria.* 

Staff has considered all of the approval criteria and addressed only those applicable to this proposal.

#### 33.846.060 G. Other Historic Approval Criteria

**1. Historic character.** The historic character of the landmark or contributing resource will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the historic significance of the landmark or contributing resource will be avoided.

#### **Findings:**

The historic listing identifies multiple parcels totaling 196-acres for the Mt. Tabor Park historical district, including both the park and maintenance yard. The district contains multiple contributing resources in addition to the park's landscape. The lighting system is just one component of the overall park site.

The replacement of the existing light poles and fixtures will have little to no impact on the existing natural areas and decorative landscaping, as the areas around the poles are typically kept clear of vegetation. Minor refinements to pole locations to avoid impacts to landscaping and tree could occur if needed to preserve the character of the landscaping and ensure trees are protected (See Exhibit C.31-36). The vast majority of the landscape, the historic vehicle entrances, and meandering drives, and all of the contributing buildings and structures will remain untouched by the light pole replacement project.

The lighting system itself will remain, even if components are replaced. Many of the original system components were replaced prior to the historical nomination, including all the light fixtures and 27 of the poles currently in use. The alternative to removing current poles would be to rehabilitate the existing poles despite their age and condition.

Bureau staff has verified with the consulting engineers at KPFF that the work necessary to mount existing poles to current code (installing rebar or other structural supports within the pole) is not considered practicable or cost-effective. For reuse, poles and footings would need to be removed and poles structurally altered to increase their structural capacity and then anchored to a new footing to meet current code standards. External alterations to enhance structural capacity would have a detrimental effect on the look and character of the pole, while internal alterations to replace or add reinforcing steel would significantly impact the structural integrity of the concrete. Internal alterations to 99-year-old concrete that was not originally built to meet current building code standards would significantly compromise the integrity of the poles (Exhibit A.6, pages 1-9)

By preserving the spatial pattern of poles (adjacent to the circulation system and distributed across the landscape), and installing poles of similar materials and design, the illuminated pathways will retain their historical character. The compelling nature of the park's landscape as a place of urban refuge offering a variety of forested, pastoral, and scenic experiences will be preserved through this project. Therefore, the contributing resource, the park's landscape will not be negatively affected by this project.

#### This criterion is met.

**2. Record of its time.** The landmark or contributing resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.

#### **Findings:**

The illuminated circulation system provided vehicular access at the dawning of the automobile age to one of the city's most prominent natural features and ensured even nighttime visits would be safe and enjoyable. Pole and fixture replacement will result in a restoration of the illumination system at the time of the historic nomination, thus preserving the warmly illuminated meandering drives that provide access throughout the park, even in the darkest of forested areas.

#### This criterion is met.

**3. Historic changes.** Most resources change over time. Those changes that have acquired historic significance will be preserved.

#### **Findings:**

The project proposes to provide light pole replacements consistent in number to the historical listing. Locations will match that documented in 1988 and 1989 to the extent possible. Although not part of the period of significance, the current lantern-style fixtures, and the metal strapping at the top of certain light poles have acquired significance and are considered representative of Mt. Tabor Park in particular. The proposed new light poles will be topped with lantern-style fixtures along with metal strapping of similar in design and style, as shown in the Exhibit A.10 - APP G, to maintain the iconic significance these features have acquired over time.

#### This criterion is met.

**4. Historic features.** Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the historic feature in design, color, texture, and other visual qualities and, where practical, in

materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.

#### **Findings:**

The lighting system that illuminates the circulation system is identified as contributing to the park's historic landscape. The replacement of 88 poles is needed to maintain structural safety of the lighting system due to severe deterioration, as certified by the city's consulting engineers. Installing modern fixtures at the same time poles are replaced will ensure the illumination system meets current electrical code, will reduce the need for future spot replacements, and will generate significant saving by reducing energy consumption. The new poles will match the historic ones in material, texture, color, and design (as shown in the comparison photographs in Exhibit A.10 - APP Exhibit G).

Written and graphic evidence regarding the existing system is provided in Exhibit A.10 - APP Exhibit F, which documents at least 27 pole replacements over time and the installation of the now iconic lantern-style fixtures. While the first elements of the lighting system were installed in 1924 and 1925, development of the park's physical elements occurred over time and it is likely some individual poles were added later, for example when the bridle path was established in 1929 and Mt. Tabor Drive was constructed (circa 1934). The earliest record of the number and location of light poles dates from the 1950s (outside the period of significance). Over time, individual poles have been replaced as needed – however the overall system of illuminated drives and paths providing circulation through the landscape has been maintained. Documentation of the lighting system is also located in the historic listing (Exhibit A.10 - APP J, pages 7-8, 44, 78, 86, 88). The existing light poles and fixtures are compared in photographs in Exhibit A.10 - APP G and details of the proposed replacements are shown in the specification sheets in Exhibit C.5-7.

#### This criterion is met.

**5. Historic materials.** Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

#### **Findings:**

Poles will be ground-mounted, and the installation will not affect historic materials. Under normal circumstances, a direct buried concrete pole can be set directly into an augered hole that minimizes the amount of ground disturbance or impacts to surrounding soils or any historic concrete. Depending on the strength of the soil, backfilling can be accomplished with aggregate, concrete, or the original soil. This technique does not require the use of sandblasting or chemicals and meets modern building code requirements for structural safety.

#### This criterion is met.

**6. Archaeological resources.** Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.

#### **Findings:**

There are no known archaeological resources on site. Development, including significant ground disturbance and excavation on the site has been documented since 1894. Given the project will install replacement light poles in previously developed locations using modern techniques that limit ground disturbance, it is very unlikely any materials of archaeological interest will be encountered. Regardless, should any archaeological discoveries occur, work will be stopped in the affected area and the Bureau will notify the State Historic Preservation Office (SHPO). Prior to submitting this application, the Parks Bureau contacted the SHPO but has not heard back from them regarding any state requirements, concerns, or suggestions about this project.

#### This criterion is met.

7. Differentiate new from old. New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a landmark or contributing resource. New work may be differentiated from the old if the differentiation does not diminish the character, features, materials, form, or integrity of the landmark or contributing resource and, if in a Historic District, the district as a whole.

**8.** Architectural compatibility. New additions, exterior alterations, or new construction will be compatible with the massing, size, scale, and architectural features of the landmark or contributing resource and, if in a district, the district as a whole. When retrofitting to improve accessibility for persons with disabilities or accommodate seismic improvements, design solutions will not compromise the architectural integrity of the landmark or contributing resource.

#### Findings for 7 and 8:

The integrity of the park's landscape (the contributing resource) will not be affected by the replacement poles, as they will maintain the existing spatial pattern of the lighting system adjacent to the circulation system. As previously noted, poles will match those in existence today and at the time of the historical listing. Any new conduit needed will be concealed.

Many of the current components of the light system are almost a hundred years old. By replacing the poles now, the structural integrity of the lighting system is assured for a long time to come. No other changes to the landscape or to any of the contributing architectural structures or buildings are proposed.

#### These criteria are met.

**9. Preserve the form and integrity of historic resources.** New additions, exterior alterations, or new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the landmark or contributing resource and, if in a district, the district as a whole would be unimpaired.

#### **Findings:**

The lighted circulation system is an integral component of the landscape in the Mt. Tabor Park Historic District, as the illumination provided alongside the historic drives and formal pathways enhances access to the park's various experiences. However, individual pole replacement has occurred repeatedly over time without affecting the integrity of the overall system of lighting or circulation. Therefore, it is reasonable to conclude that if an individual pole needs to be removed in the future, as long as it was replaced in the same vicinity and with similar materials and design, neither the system of illumination or circulation would be affected, and the character of the landscape would remain unimpaired.

#### This criterion is met.

**10. Hierarchy of compatibility.** New additions, exterior alterations, or new construction will be designed to be compatible primarily with the landmark or contributing resource and, if located within a district, secondarily with contributing resources within 200 feet and, finally,

with the rest of the district. Where practical, compatibility in districts will be pursued on all three levels.

#### **Findings:**

The lighting system will maintain its function and role of illuminating the park's circulation system. Replacement poles will maintain the look and design of the current poles within the illumination system. There is a compelling relationship between the lighting system and the circulation system. Areas in the vicinity of the existing lighting system that are part of the circulation system will not be affected by the replacement, as the overall lighting system will remain intact and individual replacement poles are of compatible materials and design to existing ones. Most importantly, the illuminated nature of the circulation system will be maintained.

No changes are proposed to the location or pattern of the circulation system within the park. The replacement of individual poles will not affect the contributing architectural resources. No changes are proposed to alter other aspects of the landscape, such as the terrain or vegetation.

The overall spatial pattern of the light poles illuminating the circulation pattern will be retained. Only minor refinements to pole locations are anticipated. Two poles near Reservoir 5 may conflict with water lines, as shown in the disturbance area site plans (Exhibit C.31-36), however, no changes are proposed that would affect the contributing resources within the Mt. Tabor Park Reservoir Historic District.

Based on the above, the planned pole replacements will be compatible with the circulation system, the landscape as a whole, other contributing resources, and both of the historic districts at the site.

This criterion is met.

## **DEVELOPMENT STANDARDS AND ADDITIONAL PROCESS**

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

Of the 88 existing light poles to be replaced, 4 are located in the SE Taylor Street right of way (ROW), Poles in the ROW will be addressed through the Portland Bureau of Transportation (PBOT) permit process for existing utility structures (encroachment permit review).

## CONCLUSIONS

The purpose of the Historic Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance.

This project will replace 88 light poles and fixtures adjacent to the park's circulation system. Approximately 60 of the poles may date from the park district's historic period of significance, and none of the fixtures do. Options to retain, rehabilitate, and reuse the existing light poles were explored. However, there was not an acceptable way for them to be anchored in a manner that would meet current building codes while also retaining enough of the pole's historic and design integrity.

The materials and design of replacement poles closely resembles existing ones and will preserve the historic character of the lighting system. Efforts have been made to preserve the spatial pattern of the illumination system. Replacement of the poles and the fixtures will ensure the system of illuminated pathways, staircases, and historic drives continues to provide comfort and safety as community members explore the historic landscape and cherished scenic views of Mt. Tabor Park. By replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

This proposal meets the applicable Historic Resource Review criteria and Demolition Review criteria and therefore warrants approval.

## LANDMARKS COMMISSION DECISION

It is the decision of the Landmarks Commission to approve Historic Design Review for Historic Resource Review and Demolition Review for the replacement of 88 light poles and light fixtures in Mt Tabor Park. Of the 88 existing poles to be replaced:

- 84 are located within Mt. Tabor Park.
- 4 are located in the SE Taylor St. right-of-way (ROW).

The new concrete light poles will be hexagonal to match existing, and the new light fixtures will be acrylic/metal light fixtures with decorative metal strapping. The proposed replacement poles and fixtures will be installed in approximately the same location as the current poles.

Approvals per Exhibits C.1-C-36, signed, stamped, and dated January 25, 2024, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B C) must be noted on each of the 4 required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE- Case File LU 23-088549 HR DM. All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- **B.** At the time of building permit submittal, a signed Certificate of Compliance form (<u>Certificate</u> <u>of Compliance for Design and Historic Resource Review Approvals</u> | <u>Portland.gov</u>) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- **C.** No field changes allowed.

Bv:

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Historic Landmarks Commission Chair Andrew Smith

Application Filed: September 28, 2023. Decision Filed: January 23, 2024. Decision Rendered: January 22, 2024 Decision Mailed: January 29, 2024

This land use decision is **not a permit** for development. Permits may be required prior to any work.

#### **PROCEDURAL INFORMATION**

The application for this land use review was submitted on September 28, 2023, and was determined to be complete on December 7, 2023.

Zoning Code Section 33.700.080 states that land use review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore, this application was reviewed against the Zoning Code in effect on September 28, 2023.

ORS 227.178 states the City must issue a final decision on land use review applications within 120 days of the application being deemed complete. The 120-day review period may be extended at the request of the applicant. In this case, the applicant waived the 120-day review period, as stated with Exhibit A.5. Unless further extended by the applicant, **the 120 days will expire on: December 6, 2024.** 

**Some of the information contained in this report was provided by the applicant.** As required by Zoning Code Section 33.800.060, the burden of proof is on the applicant to show that the approval criteria are met. This report is the final decision of the Landmarks Commission with input from other City and public agencies.

If you are interested in viewing the file, please contact the planner listed on the front of this notice. The planner can provide information over the phone or via email. Only digital copies of the material in the file are available for viewing.

**Conditions of Approval.** This approval may be subject to specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

**Appeal of this decision.** This decision is final unless appealed to City Council, who will hold a public hearing. <u>Appeals must be filed by 4:30 pm on February 12, 2024.</u> If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of City Council is the final local decision; any further appeal is to the Oregon Land Use Board of Appeals (LUBA).

Upon submission of their application, the applicant for this land use review chose to waive the 120-day time frame in which the City must render a decision. This additional time allows for any appeal of this proposal to be held as an evidentiary hearing, one in which new evidence can be submitted to City Council.

**Who can appeal:** You may appeal the decision only if you submit written comments which were received before the close of the record at the hearing or if you testified at the hearing, or if you are the property owner or applicant. Appeals must be filed within 14 days of the decision. The appeal application form can be accessed at

https://www.portland.gov/sites/default/files/2020/lu\_type3\_appeal\_form\_073119.pdf.

The completed appeal application form must be emailed to

LandUseIntake@portlandoregon.gov and to the planner listed on the first page of this decision. If you do not have access to email, please telephone the planner listed on the front page of this notice about submitting the appeal application. **An appeal fee of \$5,000.00 will be charged.** The appeal fee will be refunded if the appellant prevails. There is no fee for Office of Community and Civic Life recognized organizations for the appeal of Type III decisions on property within the organization's boundaries. The vote to appeal must be in accordance with the organization's bylaws. Please contact the planner listed on the front page of this decision for assistance in filing the appeal and information on fee waivers. Please see the appeal form for additional information.

#### Recording the final decision.

If this land use review is approved the final decision will be recorded with the County Recorder. *Unless appealed*, the final decision will be recorded **on or after February 12, 2024**, by the Bureau of Development Services.

**Expiration of this approval.** Generally, land use approvals (except Comprehensive Plan and Zoning Map Amendments) expire three years from the date of the final decision unless one of the actions below has occurred (see Zoning Code Section 33.730.130 for specific expiration rules):

- A City permit has been issued for the approved development,
- The approved activity has begun (for situations not requiring a permit), or
- In situations involving only the creation of lots, the final plat has been submitted.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

**Applying for permits.** A building permit, occupancy permit, or development permit must be obtained before carrying out this project. See <u>https://www.portland.gov/bds/permit-review-process/apply-or-pay-permits</u>. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed here.
- All applicable development standards, unless specifically exempted as part of this land use review.
- All requirements of the building code.
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions, and regulations of the City.

Grace Jeffreys 1-25-2024

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).

## **EXHIBITS** (not attached unless indicated)

- A. Applicant's Submittals
  - 1. Narrative, 9-28-2023
  - 2. Appendix, 9-28-2023.
  - 3. Plans, 9-28-2023

Final Findings and Decision for Replacement of Mt Tabor Light Poles and Fixtures Page 17 Case Number LU 23-088549 HR DM

- 4. Pre App Summary, 9-28-2023
- 5. 120-day waiver, 10-12-2023
- 6. Incomplete Response, 12-7-2023
- 7. Revised narrative, 12-7-2023
- 8. New Site Plans, 12-7-2023
- 9. New Construction Plans, 12-7-2023
- 10. Revised Appendix, 12-7-2023
- 11. Revised Plans, 12-7-2023
- 12. Response to F2
- 13. Response to F1
- B. Zoning Map (attached)
- C. Plan & Drawings
  - 1. Contents
  - 2. Vicinity Plan
  - 3. Historic District plan
  - 4. Site Plan (attached)
  - 5. Light Fitting drawings (attached)
  - 6. Light pole drawings
  - 7. Light pole drawings (attached)
  - 8. Light pole details
  - 9. 20. Illumination studies
  - 21. 24. Permitted Landscape Plans
  - 25. 30. Tree plans
  - 31. 36. Disturbance Area Plans
- D. Notification information:
  - 1. Request for response
  - 2. Posting letter sent to applicant.
  - 3. Notice to be posted.
  - 4. Applicant's statement certifying posting.
  - 5. Mailed notice.
  - 6. Mailing list
- E. Agency Responses:
  - 1. Bureau of Transportation Engineering and Development Review
  - 2. Bureau of Parks, Forestry Division
  - 3. Life Safety Review Section of BDS
- F. Letters
  - 1. Jesse Powell, 1-2-2024, wrote in opposition of removing historic lighting posts.
  - 2. David Kaplan, 1-4-2024, wrote in support of the replacement design because it closely resembles the original posts and lanterns.
  - 3. Linda Raveaux, 1-10-24, wrote in support of low light that is aimed downward to maintain the award winning "quiet" aspect of the park. Also supported maintaining existing historic appearance of the posts and fixtures.
- G. Other
  - 1. Original LUR Application
  - 2. Incomplete letter 10-19-23
    - a. RFR response Bureau of Environmental Services
    - b. RFR response Bureau of Transportation Engineering and Development
  - 3. Summary from Briefing on Lighting in Historic Parks 3-13-23
- H. Hearing
  - 1. Staff Report
  - 2. Staff Memo
  - 3. Matrix
  - 4. Staff Presentation
  - 5. Applicant Presentation
  - 6. Testifiers sign in sheet



For Zoning Code in Effect Post October 1, 2022



MOUNT TABOR PARK HISTORIC DIST

Site Also Owned Parcels Historic District Historic Landmark

<u>LU 23 - 088549 HR DM</u>
3136-37,3236-37
1 inch =800 feet
1S2E05 100
B Sep 28, 2023



Light pole locations with Conservation and Scenic Overlays



LU 23-088549 HR DM, Exhibit C.4

Light poles and fixture schematics





LU 23-088549 HR DM, Exhibit C.5



LU 23-088549 HR DM, Exhibit C.7

#### 088549\_23\_LU\_3FFDEC

	А	В	C	D	E	F
1	ENDORSEMENT	INF01	INF02	NAME	ADDRESS/IO ADDRESS	CITYSTATEZIP/ADDRESSEE
2	RETURN SERVICE REQUESTED	OWNER	1S2E05 100	PORTLAND CITY OF	1900 SW 4TH AVE #7007	PORTLAND OR 97201-5380
3	RETURN SERVICE REQUESTED	APPLICANT/OWNERS AGENT	PORTLAND PARKS & RECREATION	HORNER BRETT	1210 SW 5TH AVE #800	PORTLAND OR 97204
4	RETURN SERVICE REQUESTED		LAND USE CONTACT C/O SEUL	MT TABOR NEIGHBORHOOD ASSOCIATION	3534 SE MAIN ST	PORTLAND OR 97214
5	RETURN SERVICE REQUESTED		PORTLAND SCHOOL DISTRICT	LAND USE NOTICE CONTACT	501 N DIXON	PORTLAND OR 97227
6	RETURN SERVICE REQUESTED		SOUTH TABOR NEIGHBORHOOD ASSOC	CARR JOHN	2918 SE 67TH AVE	PORTLAND OR 97206
7	RETURN SERVICE REQUESTED		LAND USE CONTACT	SE UPLIFT NEIGHBORHOOD PROGRAM	3534 SE MAIN ST	PORTLAND OR 97214
8	RETURN SERVICE REQUESTED		BELMONT AREA BUSINESS ASSOCIATION	COOK NICHOLAS	PO BOX 14472	PORTLAND OR 97293
9	RETURN SERVICE REQUESTED		HAWTHORNE BLVD BUSINESS ASSOCIATION	LEVESQUE WILLIAM	PO BOX 15271	PORTLAND OR 97293
10	RETURN SERVICE REQUESTED			KARLA MOORE-LOVE (CITY HALL)	1221 SW 4TH AVE #130	PORTLAND OR 97204
11	RETURN SERVICE REQUESTED		RISK & LAND DEPARTMENT	NW NATURAL	250 SW TAYLOR ST	PORTLAND OR 97204-3038
12	RETURN SERVICE REQUESTED		LAND USE CONTACT	PACIFIC POWER & LIGHT	7544 NE 33RD DR	PORTLAND OR 97211
13	RETURN SERVICE REQUESTED		PORTLAND METRO REGIONAL SOLUTIONS	C/O DLCD REGIONAL REPRESENTATIVE	1600 SW FOURTH AVE #109	PORTLAND OR 97201
14	RETURN SERVICE REQUESTED		LAND USE CONTACT	PORT OF PORTLAND PLANNING	PO BOX 3529	PORTLAND OR 97208
15	RETURN SERVICE REQUESTED		LAND USE CONTACT	TRANSIT DEVELOPMENT	1800 SW FIRST AVE #300	PORTLAND OR 97201
16	RETURN SERVICE REQUESTED		LAND USE CONTACT	STATE HISTORIC PRESERVATION OFFICE	725 SUMMER NE #C	SALEM OR 97301
17	RETURN SERVICE REQUESTED			JUDY PETERS	6916 NE 40TH ST	VANCOUVER WA 98661
18				PORTLAND PARK TRAIL	TATE WHITE	B106/R1302
19				LAND USE CONTACT	PROSPER PORTLAND	129/PROSPER





# Light Pole Safety Project: Mt. Tabor Park

Type III Historic Resources Review for Accessory Utility Upgrades

LU 23-088549 HR DM, Exhibit A.1

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**General Information** 

Project:	PP&R Light Pole Safety Project
Applicant:	Portland Parks and Recreation (PP&R) 1120 SW Fifth Ave, Suite 858 Portland, OR 97201 Contact: Brett Horner, Parks and Trails Planning Manager 971-409-3518   Brett.Horner@portlandoregon.gov
Property Owner:	City of Portland 1900 SW Fourth Ave, Suite 7007 Portland, OR 97201
Land Use Planner:	PP&R, 1120 SW Fifth Ave, Suite 858 Contact: Carine Arendes, AICP 503-679-0826   Carine.Arendes@portlandoregon.gov
Engineer:	PP&R, 1120 SW Fifth Ave, Suite 858 Contact: George Tkebuchava, P.E. 503-250-0355   George.Tkebuchava@portlandoregon.go
Site:	Mt. Tabor Park (6325 SE Division Street) Pre-application conference June 27, 2023 (23-047200 PC)
Improvement Value:	88 new concrete light poles with acrylic/metal fixtures and decorative metal strapping (value \$8000 each, total \$704,000)

# Section 1.1 Proposal

This application narrative is provided to request land use approval to replace light poles at Mt. Tabor Park. The replacement work at Mt. Tabor Park is part of the City of Portland's Light Pole Safety project to replace light poles in 12 city parks. The current phase of the Light Pole Safety project was approved by City Council through the adoption of Ordinance No. 191222 on April 5, 2023. The replacement project is part of a larger effort to reduce the Parks and Recreation Bureau's environmental footprint and address a growing capital maintenance backlog.

Usually, the removal or installation of light poles does not require a building, site, or zoning permit. Mt. Tabor Park was nominated as a historic resource in 2004 and listed as a historic district. Historic resource review is required in this case because the lighting system is a noted attribute along with the circulation system and other elements within the park's landscape. The park's landscape (or 'park land' as it is referred to in the nomination) is a contributing feature in the listing of Mt. Tabor Park in the National Register of Historic Places. Therefore, a historic resources review is required.

Mt. Tabor Park was designed in the early 1900s by Emanuel Mische, a landscape architect who started his career with the well-known Olmsted Brothers landscape consulting firm. In addition to its notable designer, the park's landscaping elements, along with historic architecture and statuary contribute to the park's value as a historic resource. As discussed further in Section 3.3, the historic nomination does not list individual poles as important structures, rather it is the overall illumination provided to the circulation system as it meanders through the landscape of the park that is valued as an important feature within the park site.

Individual light poles to be replaced are located within the park and along SE Taylor St. 84 light poles are located within Mt. Tabor Park and four additional poles are located in the SE Taylor St. right-of-way (ROW). Poles in the ROW will be addressed through the Portland Bureau of Transportation (PBOT) permit process for existing utility structures (encroachment permit review).

Documentation for individual poles varies, some were replaced at least once before with installation dates ranging from the 1950 through the 1980s. About 60 of the poles are thought to have been installed during the 1920s and 1930s. Currently 81 poles are installed at Mt. Tabor Park along the circulation system. The light system will be restored to 88 light poles to match the number of poles identified in the historic nomination. All of the new replacement poles will match the existing ones in design and material (see Exhibit C).

# SECTION 1 - PROPOSAL AND PROJECT NEED

Current fixtures to be replaced are not original - though they are consistent in design to existing lantern-style metal framed fixtures within Mt. Tabor Park and those found in other city parks (Irvington, Lair Hill Parks, Laurelhurst, Washington, etc.). Archival records indicate the now iconic lantern-style fixtures were first installed at Mt. Tabor Park in the 1950s. The replacement fixtures will match the existing fixtures in both materials and design (see APP Exhibit).

Existing poles are showing their age and the impacts of Portland's wet environment and the freeze-thaw cycle. Conditions include cracking and flaking in the concrete surface, as well as efflorescence (white discoloration from moisture loss), pitting, and even external evidence of corrosion of internal metal components, or 'spalling' (see photographs included in the APP Exhibit). Additionally, poles were installed using an anchoring system that does not meet current building code. The project team and engineering consultants explored options to retain, rehabilitate, and reuse the existing light poles in Mt. Tabor Park. However, this is not practicable as there is not an acceptable way for them to be anchored in a manner that would meet current building code for anchoring, while also retaining enough of the pole's historic and design integrity. Therefore, all of the poles are being removed and replaced.

Park landscape features identified in the listing are the circulation system – which consists of multiple scenic drives along with formal entrances, historic staircases, and the formal trail system; the lighting system for the circulation system; scenic viewpoints; spaces of refuge created by screening vegetation; two tennis courts and three play areas (69th Avenue playground and group picnic area, Harrison playground, and main playground). At the time of nomination, Mt. Tabor Park also contained seven contributing buildings and five additional contributing structures, along with 10 non-contributing buildings and six non-contributing structures.

The historic reservoirs and associated elements were detailed in a separate resource designation and constitute a separate historic district within the park. None of the <u>Reservoir</u> Historic District resources will be affected by this project (the boundaries of the two separate districts are shown in the APP Exhibit). Additional information on the <u>Park</u> Historic District is in Section 3.3 of this application and copy of the nomination (NRIS Reference No. 04001065) is included in the APP Exhibit.

Mt. Tabor Park is located in inner East Portland, generally bounded by SE Yamhill St.to the north, SE 71<sup>st</sup> Ave. to the east, SE Division St. to the south, and SE 60<sup>th</sup> Ave. to the west (see vicinity map in Exhibit C). Used first in 1894 as a site for the city's public water reservoir, records indicate Mt. Tabor was established as a public park and nursery for Portland's city parks in either 1908 or 1909. Built on a volcanic butte, the site's topography is highly variable, with shallow inclines to the west, steeper slopes in the

# SECTION 1 - PROPOSAL AND PROJECT NEED

east, a forested ravine in the northwest corner and multiple peaks, the tallest of which is the namesake volcanic cider cone rising to more than 640' in height.

The interior of the park is a mixture of grassy and forested areas that provide users with options for a wide variety of activities, including two scenic views identified in the city's Scenic Resources Protection Plan. The southern portion of the site, south of SE Lincoln/Harrison St. contains the historic nursery and maintenance yard (approved for updates via 2017 land use approval), a small play area, and a dog-off leash area.

The replacement light poles will be installed along the historic drives and portions of the park's soft surface trail system. The location and age of poles planned for replacement is shown in a modified version of the 1987 lighting plan in Exhibit C. Replacement poles will be installed in the same location as the current poles to maintain the spatial pattern in existence at the time of the historic listing wherever possible. A one-for-one replacement will also minimize tree impacts and ensure large shade trees are retained onsite.

Poles will consist of a concrete post and a metal framed lantern-style light fixture consistent with existing poles. Pole design details and fixture design details are provided in Exhibit C. As shown in the comparison of a current pole in Mt. Tabor Park and a replacement pole (already installed in Laurelhurst Park), the replacement poles match the character of the existing poles from materials used, design of pole and fixture, as well as height and form (APP Exhibit).

The replacement light poles include the following features:

- Tapered gray concrete octagonal poles with flared base similar in shape and style to the posts in existing light poles.
- Pole material is concrete consistent with period poles. Unlike the period poles, however, the replacement ones are precast for a durable and structurally stable life cycle. They have an exposed aggregate finish and anti-graffiti coating.
- Poles will be embedded 5' underground. Once buried in place, the overall 17'2' pole will have above ground height of 12' 2" similar in height to existing park poles.
- Poles will be placed directly into an augered hole, a technique referred to as direct burial, to minimize installation damage and loss. Direct burial provides a clean and uncluttered appearance eliminating anchor footings, or the need to cover unsightly base plates, studs, or nuts. This technique saves time, money and is more visually appealing.

- Decorative metal strapping will be affixed to the top of the pole below the fixture, consistent with existing fixtures in this and other historic parks in the city.
- Fixtures affixed to the tops of the poles are framed metal lantern-style to match existing lantern-style metal framed fixtures within Mt. Tabor Park and those found in other Portland Parks, historic (Irvington, Lair Hill) and otherwise (Laurelhurst, Washington, etc.).
- Fixtures (or luminaires) are made of cast aluminum with acrylic panels. The new fixtures are shielded to archive "dark skies" compliance. The new fixtures will also direct more focused illumination onto the circulation system.
- The existing 150W HPS lamp delivers 9000 luminaire lumens, while the new 60W light emitting diode (LED) lamp is more efficient and will deliver 6000 luminaire lumens (a reduction of 33%).

# Section 1.2 Project Need

Over 1,000 light poles in city parks were inspected as part of a system-wide review of the structural safety of light poles in city parks. Through this effort, PP&R identified more than 240 light poles in 12 City Parks that may pose a life and safety hazard to the public due to structural issues. Initially the Bureau was removing hazard light poles while planning to replace light poles as funding became available. The Bureau has since developed a funding plan to replace all poles with structural issues. Poles will be replaced as new poles are delivered and are available to install. The Mt. Tabor Park replacement poles are currently scheduled for installation in April and May 2024.

The Bureau engaged the services of the engineering firm of KPFF to provide expert analysis on certain light poles used in City of Portland parks. The engineers were tasked with identifying structural issues and recommending solutions that prioritize public safety. Due to an inadequate anchoring system that relied on a tie wire technique and the condition of the concrete at the base of the poles, it is not practicable to reuse the poles. Concrete poles are required to have reinforcing steel capable of withstanding specific seismic and tensile loads to meet current code standards and it was the project team's determination that the existing poles could not meet these standards. Adding structural reinforcement while also keeping the concrete poles intact was determined to be not practicable.

Based on the age and condition of the poles and fixtures, and other information and recommendations from the engineers and City Attorneys on the project team, the Bureau determined full replacement was warranted. This determination is in line with City Policy FIN 2.19, which requires that, *"Bureaus shall employ a conservative approach"*
to public and employee safety, erring on the side of caution." It is crucial the public feels safe when using our parks and natural areas. When public safety is at stake, the Bureau acts out of an abundance of caution to preserve the health and safety of Portlanders and others who use our facilities. PP&R has a long history of prioritizing life and safety in decision-making as evidenced by the recent difficult decision to close Columbia Pool, a community-cherished asset.

The decision to replace the period light poles in Mt. Tabor Park and those in 11 other city parks was carefully considered. A thorough review of more than 1,000 light poles throughout the park system was conducted, input from park friend groups and recommendations from legal and engineering experts was considered before making a final decision. Although replacement was not an easy decision, there are a number of benefits that will result from the decision to replace these light poles.

This project is an investment in adequate illumination of the park's circulation system for the long term. Benefits to replacement of the light poles includes improving public safety and energy benefits. Replacement of outdated and inefficient lighting systems is expected to result in reducing operating costs in the future. The light safety replacement project is estimated to reduce utility costs by \$79,000 every year.

Replacement fixtures will provide more focused and direct lighting toward walkways, reducing the amount of light exposure in natural areas and on adjoining properties and enhancing safe use of our facilities. This project also advances the City's Renewable Energy Goal by improving the energy efficiency of our infrastructure to avoid the future consumption of over 362,313 kWh of electricity per year and over 10,092 therms of natural gas (as noted in Ordinance No. 191222 in the APP Exhibit).

Using new poles and fixtures will extend the life of the lighting in the park, far beyond the expected lifespan of the existing poles and fixtures. Investing in these improvements now helps ensures safe, efficient, and welcoming parks in the future, consist with the Bureau's mission to provide equitable access to welcoming places, programs, and services that improve community health and our environment.

## Section 2.1 Existing Site

Mt. Tabor is located in a residential area of southeast Portland, approximately 3 miles east of the Willamette River, directly east of the central city core. The city purchased land on Mt. Tabor in 1888 to be part of the new system bringing water to town from the Bull Run. In 1894, the Water Bureau constructed Reservoir 1. Reservoirs 5 and 6 were completed in 1911. (Reservoirs 3 and 4 are located within Washington Park.)

# SECTION 2 - EXISTING SITE AND VICINITY

The area was identified for park purposes in the 1903 Olmstead Portland Parks System Plan due to its importance as the most significant landscape feature in the area, the notable scenic view available from various points of the mountain's slopes, the existing mix of both cleared areas and lush tree groves, as well as its use by the public for "Sunday and holiday outings" at the time and the growing population projected in the vicinity of the site. From its volcanic peaks and "picturesque ravines," the Olmsteds were convinced that Mt. Tabor would provide a variety of "attractive features in a public pleasure ground." Portland leaders agreed and designated Mt. Tabor a public park. The site was expanded when additional land was purchased in 1909 to establish park uses on the site according to the historic nomination. Additional land purchases for park purposes also occurred in 1929, according to the park's 2000 Master Plan.

Access to the park is taken from SE Salmon St., SE 69<sup>th</sup> Ave., SE Harrison St., and SE Lincoln St. The adjacent maintenance yard can be accessed from SE 64<sup>th</sup> Ave. and SE Division St. While the park and the maintenance yard are located on the same tax lot, the Bureau classifies the park and maintenance yard as two separate assets based on their function. The portion of the site used as a public park totals 176.04 acres and is located on R332679, R149581, R149582, and R332503. Within R332503, the park site includes the Mt. Tabor Community Garden – but not the area immediately to the west of the community garden within the "long block" or the maintenance yard. The maintenance yard consists of approximately 6.83 acres and is located on the southern portion of R332503 and the entirety of R239658. Historical remnants of unvacated rightof-way still exists in the NE corner of the park, including where the tennis courts are located, and are not usually included in the Bureau's calculation of the park's size.

The site generally slopes from east to west and north to south. The park's elevation to the west (approximately 300') and south (ranging from 215' to 235') is generally consistent with the surrounding urban fabric. The eastern portion of the site contains slopes ranging in elevation from 400-250', with the steepest slopes in the northern portion, which also contains the namesake volcanic cone. The 69<sup>th</sup> Ave historic staircase in the northeast corner of the site contains a staggering 18 flights to span an elevation gain of 180 feet before intersecting with Harvey Scott Circle at the center of the park near the summit of Mt. Tabor.

Within the interior of the park, a series of flat terraced areas host a variety of amenities. Paved drives, soft surface paths, and staircases provide connections between active areas and more contemplative passive uses. Amenities include view areas, play areas, restrooms, picnic areas (some with shelters in addition to tables), a variety of sports courts (tennis, basketball, volleyball), a horseshoe pit, hard surface plaza areas, and a dog off-leash area. In active areas, lawns and soft surfaces are surrounded by towering Douglas Firs while ravines and steep slopes are vegetated with native understory plants

# SECTION 2 - EXISTING SITE AND VICINITY

and contain a mix of conifers and deciduous trees. Landscaping adjacent to some developed areas also includes non-native ornamental plantings.

Exposed volcanic rock is apparent in a small section of the northwest corner of the park due to historical excavation on the site. The USDA Natural Resources Conservation Service identifies two dominant soils, Multnomah Silt Loam and Urban Land Latourell Complex, in disturbed areas. These soil types are well-drained, moderately permeable, and prone to erosion, particularly on steeper slopes.

The forest and woodlands on Mount Tabor are organized into natural communities based on slope and aspect. The native tree canopy is well-developed in most of the natural areas; however, the shrub layer is dominated by non-native, invasive species and some areas lack native understory. Plantings of horticultural shrubs and trees occur throughout the park alongside trails and roadways, and in meadows. The Bureau of Environmental Services identified the park as an "anchor site" in its 2006 Terrestrial Ecology Enhancement Strategy and the park's vegetation is managed in accordance with the Portland Watershed Management Plan, PP&R's Natural Areas Restoration Plan, and Urban Forestry regulations in Title 11 of the city's code.

#### Section 2.2 Vicinity

The park is situated on a volcanic butte, Mt. Tabor, contained within the Boring Lava Fields that underlie East Portland. At the landscape scale, Mount Tabor is part of the East Buttes. These buttes are composed of complex sediments, share a common geological history, and are part of the same uplifted area.

The surrounding development was established during the city's streetcar era in rectangular blocks and is primarily residential in nature. The park boundaries contain the steepest slopes associated with Mt. Tabor, however much of the immediate area around the park is also noticeably sloped. The adjacent rectangular street grid gives way to curvilinear streets in steeper areas.

Nearby development is finely grained, residential homes on small lots are oriented to the street. Larger lots to the west or south also contain courtyard style multifamily development, commercial enterprises, or campus use. Western Seminary is located west of the park, and Warner Pacific College is located to the southeast.

Although planned for vehicular access, the highly connected street pattern facilitates access to the park on foot or by bike. Belmont St. to the north, Division St to the south, and SE 60 Ave to the east, are intensely developed collectors supporting bus service and provide easy transit access to the park. Although located within 1.5 miles of Interstates 84 and 205, vehicular access to the park is via local streets.

# SECTION 3 - LAND USE CONTEXT

## Section 3.1 Zoning

## Zoning

- Base: Open Space base zone
- Overlay(s): Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
- Pattern Area: Inner
- Pedestrian District: N/A
- Transit: Some of the site is considered "close to transit"
- Corridors: Division Street is considered a Civic or Neighborhood Corridor
- Historic Designation: Mount Tabor Parks Historic District, Mount Tabor Park
   Reservoirs Historic District

Mt. Tabor Park is entirely zoned Open Space (OS). Portions of the park are also within two Environmental Overlays, the Conservation (c) and Scenic (s) overlay zones, as shown in Exhibit C. Per the City zoning code, the OS zone is intended to preserve and enhance public and private open, natural, and improved park and recreation areas. The environmental overlays conserve identified resources while also providing for development. Due to its listing as a Historic District in the National Register of Historic Places, Mt. Tabor Park is also within the Historic Resource overlay zone, which ensures development impacts on historic resources – although allowed – are limited.

## Section 3.2 Land Use History and Previous Approvals

Mt. Tabor Park was originally zoned Singe Family Zone I in 1924 despite already established as a city park, according to the BPS study *The Historical Context of Racist Planning: A History of How Planning Segregated Portland* (see APP Exhibit). According to the historic nomination, seven buildings and five structures were established within the park prior to 1937. One of these, the historic Administrative Building, was modified to add attached garages between 1938 and 1941, followed by a second-story addition in 1958.

Additional buildings and structures were added to the site in the 1950s and 1960s. City land use records for the site show Conditional Use (CU) approvals issued as early as 1961 for a storage building on-site. Additional CU approvals followed in the 1960s and 1970s for maintenance and nursery ('plant potting') buildings, along with a new parking lot, pumping station, and park shelter. The main parking lot dates from 1970.

The City's first state-acknowledged Comprehensive Plan, effective in 1981, identified the site as Open Space (see APP Exhibit). In the 1980s and 1990s a parking lot expansion,

# SECTION 3 - LAND USE CONTEXT

the establishment of a motor vehicle service building, and trail improvements were approved. After a historic reservoir was decommissioned in the portion of the site managed by the Water Bureau, a flat portion of the park was partitioned from the parent parcel and sold for residential development.

The master plan for the park was updated in 2000. The primary focus of the plan is to preserve and enhance the natural qualities of Mt. Tabor. The plan envisioned updates to the circulation system, recreational uses, and facilities in manner that maintained the balance between developed areas and the environmental qualities of the natural areas in park. In 2009, a master plan to improve and update the Mt. Tabor Central Maintenance Yard & Nursery was completed.

The Historic Designation occurred in 2004. Since then, projects to provide deferred maintenance, an ADA-accessible pathway, reservoir disconnection, rehabilitation of the summit restroom, replacement and addition of railings along existing stairways, and replacement of non-historic light poles in the reservoir areas have been approved via historic resource or design review.

Most recently, updates including the addition of new structures, art and fencing; relocation of existing structures; removal of non-contributing structures; a new horticultural area; and the preservation of north elevation of one of the historic buildings were approved. These improvements occurred primarily, but not exclusively, in the vicinity of the Maintenance Yard. The Conditional Use review included a review of the site's nonconforming elements and approval of the existing parking lot and perimeter landscaping through the adjustments process.

No prior conditions of approval appear to conflict with the proposed site improvements and all conditions of approval are currently in compliance. Outstanding conditions for LU 17-245440 will be completed prior to final approval after construction is completed. A list of land use decisions for the site is included in the APP Exhibit.

#### Section 3.3 Historic Designation

The park was nominated for the National Register of Historic Places and listed in 2004. In addition to the 'park land', seven buildings, five structures and a statute of Henry Scott (one-time editor of the Oregonian) are listed as contributing to the site's value as a historic resource. An additional ten buildings, five structures, and multiple greenhouses that do not contribute to the site's value as a historic resource were also inventoried in the nomination.

The period of significance for the park's historical listing is a 50-year period spanning from 1889 to 1939. The park's development was influenced by the City Beautiful

# SECTION 3 – LAND USE CONTEXT

movement's emphasis on establishing parks in urban areas according to the listing. The recognized architectural vernacular is both Late Victorian and Late 19<sup>th</sup> and 20<sup>th</sup> Century Revival. The park is also recognized for its utilization of the Depression era Works Progress Administration (WPA) program. In particular, the park is associated with the 1903 Olmsted Brothers report to the Portland Parks Board, the first year of significance noted in the listing, and was designed by Olmsted protégé Emmanuel Mische.

Mische was hired as Portland's Park Superintendent in 1908, the other year noted as significant in the listing. He submitted a plan of development for Mt. Tabor to the Parks Board in 1911 that identified scenic viewpoints and a circulation system of paved drives and pathways to traverse the heavily vegetated site (see 1911 site plan in the historic listing). Most of the improvements that occurred during the period of significance were actually implemented by another former Olmsted employee, Parks Superintendent Charles P. Keyser. The resulting park is a mix of formal and natural elements where no one feature is preeminent and a variety of activities and experiences can occur, and – according to the listing – "illustrates the design principles advanced by the Olmsted firm."

The listing details a long period of land acquisition and subsequent development within the park, noting that:

"The active acquisition of the land that makes up the park and the park design occurred with local funding during the Progressive Era and included the influence of the City Beautiful movement at the turn of the nineteenth to the twentieth century. Work on Mount Tabor Park's amenities continued through the next decades with the ebb and flow of local funding. With the Great Depression came federal aid through the New Deal programs of the 1930s."

As Portland Parks Superintendent, Mische had significant interest in providing a wide variety of plants and trees for the whole park system, including native plants. Archival records indicate that the on-site Nursey was established in 1908 or 1909 and it is a significant contributing feature to the site's value as a historical resource. The earliest contributing historic building, the Horticultural Services Building, was located adjacent to the Nursery and was established sometime between the completion of Mische's 1911 plan for the park and 1918. The adjoining maintenance yard contains multiple contributing swith varying dates of construction according to the listing.

The contributing historic buildings within the park utilize revivalist designs. These consist of two Tudor-style restrooms dating from the mid-1920s and the Caretaker's House, a 1920s Colonial. A notable contributing structure in the park is the Crater Amphitheater. The completion date is not known, but records demonstrate construction was underway

# SECTION 3 - LAND USE CONTEXT

by 1934 (as documented in historic photographs in the listing). The historical listing describes both contributing and non-contributing architectural elements in both park and the maintenance yard in detail.

The listing identifies the 'park land' as a contributing resource and details physical elements within the landscape of the park. According to the listing, the park's design does not focus on or feature any one element, rather it provides for a variety of pastoral and scenic experiences. The listing identifies the circulation and lighting systems, the formal entrances, and three playground areas as notable elements withing the landscape of the park. Other site attributes within the park's landscape include the west and east tennis courts with records of constructing dating from 1923 and 1928.

While construction of the first scenic drives was funded in 1912 and 1913, later construction to finish the planned drives was funded by the WPA (as documented in historic photos of WPA funded work dated 1934 in the nomination). The circulation system is a key element to the experience of the landscape at Mt. Tabor Park. The meandering drives enhance the sense of moving between separate spaces and various experiences within the park. Having lights alongside the circulation system increased the comfort and safety of those using the circulation system at a time when private vehicles and illuminated roadways were a relatively new phenomenon.

The circulation's lighting system consisted of 88 poles at the time of nomination. <u>No</u> <u>attempt is made in the nomination to date individual poles or ascertain the number of</u> <u>poles dating from the period of significant compared to more recent installations.</u> Similar poles at historic parks such as Laurelhurst and Irvington were not considered contributing resources, in part due to the lack of information to confirm installation dates and because fixtures for such poles were not original to the period of significance. In the Mt. Tabor Park nomination, lighting for individual buildings is not considered a contributing resource since those objects are separate from the park's circulation system and are of varying age.

According to the historic listing, archival records show a request to install an electric lighting system in 1911 alongside the planned drives, although the listing notes installation didn't occur until 1924 and 1925. The lighting system was an important enhancement to the growing circulation system as it improved access to the park's various pleasant experiences, especially the forested areas. In addition to the historic paved drives, a bridle path system dating from 1929 is also included in the park's circulation system in Superintendent Mische's design and was provided with electric illumination at an unknown point in time. It is also likely that as the system of paved drives expanded during the 1930s - additional lighting followed.

# SECTION 3 - LAND USE CONTEXT

A review of as-built plans from different eras indicates park staff replaced and relocated individual poles as needed to support park needs in and around the circulation system (see APP Exhibit). A 1958 Lighting Plan shows the illumination for the circulation system consisted of 85 poles. Later plans from the 1980s show a total 87 poles, 24 of which were replacement poles. A 1999 plan shows the installation of new pole near a restroom, which is likely the 88<sup>th</sup> pole noted in the historical nomination.

Based on archival records and field examinations, park staff have concluded that <u>at</u> <u>most</u>, 61 of the poles currently illuminating the park's circulation system are original installations. As noted above, records indicate 24 poles were replaced in the 1980s. Installation dates for 3 poles is uncertain and may have occurred in tandem with the change to the fixtures associated with the 1958 mapping of the light system.

Based on a review of the historical listing and the identified contributing resources (which does not specifically identify the lighting system), the nomination's description of the strong association between the circulation system and its lighting system, and the archival records relating to the installation and replacement of individual light poles over time, park staff conclude the <u>historic value lies with the system of illuminated</u> <u>pathways and historic drives as a whole</u> – not individual light poles – and the resulting social and cultural value experienced by community members who used the circulation system to observe and interact with the park's natural and scenic landscapes at time when private vehicles were providing increased access to natural areas in park systems throughout the nation.

#### Section 4 Title 11

Title 11 of the city code regulates tree preservation and removal. A tree permit for the removal of light poles citywide was obtained March 3, 2023 and modified on March 28, 2023 (Permit # 23-007867-000-00-UF). A separate review will be completed for the installation of the replacement poles within Mt. Tabor Park.

Since the review authority has determined that a development permit is required on this site, the criteria in Chapter 11.50 apply to this application in accordance with 11.10.020. Applicable code standards are provided below in italics, followed by the response.

#### 11.20.060 Heritage Trees

*F.* Heritage Tree removal. Heritage Trees may be removed only with the consent of the UFC, except as provided in Subsection I., below. The UFC shall hold a

# SECTION 4 – TITLE 11

public hearing on a request to remove a Heritage Tree. Consent to remove the tree shall be supported by at least six members of the UFC.

<u>Response.</u> No Heritage Trees will be affected by this project. There are two heritage trees in the park, located near Reservoir 6; neither of which are close to the proposed area of work. The northern tree is a giant sequoia located on the east side of Reservoir 6, is not directly adjacent to the circulation system, and is more than 250' from the SE Reservoir Loop Drive (where the closest light pole to be replaced is located). The southern tree is a bigleaf linden located on the SE corner of the same reservoir and while located near pathways that provide access to and from various points within the historic reservoir district, it is more than 350' feet to a light pole that will be replaced in this project.

#### Chapter 11.50 Trees in Development Situations

## 11.50.020 When a Tree Plan is Required.

A tree plan is required in conjunction with all development permits, unless there are no Private Trees 12 inches or more in diameter, no City Trees 6 inches or more in diameter, and/or no Street Trees 3 inches or more in diameter, and the site or activity is exempt from Section 11.50.050 On-Site Tree Density Standards; and Section 11.50.060 Street Tree Planting Standards. If multiple development permits are required for a development proposal, including demolitions and subsequent construction, the same Tree Plan shall be included with each permit. For tree removal when no development permit is required, following completion of the development permit, or when tree preservation does not apply per Subsection 11.50.040 A.1., see Chapter 11.40.

<u>Response.</u> A tree plan is provided in Exhibit C that shows the location of trees 6" and greater in diameter in the developed areas of the park. A scaled plan showing the areas of temporary disturbance is also provided in Exhibit C.

#### 11.50.030 Development Impact Area Option For Large Sites and Streets.

Where development is proposed on a site larger than one acre or where work is occurring in the street and is not associated with an adjacent development site, the applicant may choose to establish a development impact area. For sites using the development impact area option, tree preservation requirements shall be based on the trees within the development impact area and tree density will be based on meeting Option A as applied only to the area within the development impact area. Trees may be planted to meet tree density requirement elsewhere on the site.

## SECTION 4 – TITLE 11

<u>Response.</u> The maximum area of disturbance as shown on the tree plan in Exhibit C constitutes the development impact area. The development impact area totals 2200 square feet.

#### 11.50.040 Tree Preservation Standards.

- C. Tree Preservation Requirement. Any trees preserved shall be protected in accordance with the specifications in Section 11.60.030. The regulations for Private Trees in Subsection 11.50.040 C.1. sunset after December 31, 2024. After December 31, 2024 the regulations in effect will be those in effect on January 1, 2015.
  - 1. Private Trees...
  - 2. City and Street Trees.
    - a. General Tree Preservation
      - (1) Retention. The City Forester will identify potential impacts and opportunities to preserve and protect existing trees, as well as any measures required to protect trees on site, on adjacent sites, or in the street. Any work on any Street Tree or City Tree must be approved by the City Forester.
      - (2) Mitigation. Any required mitigation specified below shall occur on the site, in the street planter strip, elsewhere on City property or in the street, or as a payment into the Tree Planting and Preservation Fund. The City Forester may reduce or waive the following mitigation requirements.
        - (a) Approved Street Tree removal in conjunction with improvements to partially or fully unimproved streets. Each tree at least 12 inches in diameter that is allowed to be removed shall be replaced with at least one tree. Trees planted to meet Street Tree Planting Standards will be credited toward meeting this requirement.
        - (b) Any other Street Tree or City Tree allowed to be removed that is 6 or more inches in diameter shall be replaced with at least one tree in addition to trees required to meet required tree density or Street Tree planting standards.

(3) Removal. Any trees approved to be removed by the City Forester may be removed. Any trees removed shall be removed in accordance with the specifications in Section 11.60.050.

<u>Response.</u> No trees are requested for removal in this request.

11.50.050 On-Site Tree Density Standards.

- A. Where these Regulations Apply. This Section applies to sites within the City of Portland and the County Urban Pocket Areas. Unless exempted in Subsection 11.50.050 B., the following are subject to the On-Site Tree Density Standards:
  - 1. New Development;
  - 2. Exterior alterations to existing development with a project valuation that is more than the threshold stated in Subsection 33.258.070 D.2.a.

Response. Project value exceed the threshold in Subsection 33.258.070 D.2.a.

- C. New development shall meet City specifications and standards in Chapter 11.60 and the on-site tree density requirements in Subsection D., below. Exterior alterations shall meet City specifications and standards in Chapter 11.60 and the on-site tree density requirements in Subsection D., below, but are only required to spend 10 percent of project value on the requirements in Subsection D. and the nonconforming upgrades required by Chapter 33.258, Nonconforming Situations.
- D. On-Site Tree Density Requirements.
  - 1. Required Tree Area. The required tree area is based on the size of the site and the type and size of proposed and existing development as shown in Table 50-2. Applicants may choose Option A or Option B for calculating required tree area except only Option A may be used to apply standards to a "Development Impact Area".

Table 50-2 Determining Required Tree Area						
Development Type	Option A	Option B				
Other	25 percent of site or development impact area	Site area minus building coverage of existing and proposed development				

SECTION 4 – TITLE 11

<u>Response.</u> The park is 176 acres, therefore the required tree area (or 25% of the site) is 44 acres or 1,916,640 square feet (sf). Tree canopy covers approximately 62% of the site as shown in Exhibit C. Therefore, the minimum tree area is met.

The Bureau has inventoried 1,131 trees in the developed portions of the park, as shown in Exhibit C. 74 trees have diameters more than 1.5" and less than 6" inches. 1,041 have diameters of 6" or greater. As shown in the tree inventory, 921 of the inventoried trees have large mature canopies, 59 have medium mature canopies, and 142 have small canopies at maturity. Additional trees in various stages of growth are located within the natural areas of the park.

## 11.60.030 Tree Protection Specifications.

- C. Protection methods. The Tree Plan shall show that trees retained are adequately protected during construction using one of the methods described below:
  - 1. Prescriptive Path.
    - a. A root protection zone is established as follows:
      - (1) For trees on the development site a minimum of 1 foot radius (measured horizontally away from the face of the tree trunk) for each inch of tree diameter (see Subsection 11.80.020 C., Measurements):
    - b. Protection fencing
      - (1) Protection fencing consisting of a minimum 6-foot high metal chain link construction fence, secured with 8-foot metal posts shall be established at the edge of the root protection zone and permissible encroachment area on the development site. Existing structures and/or existing secured fencing at least 3.5 feet tall can serve as the required protective fencing.
    - c. Signage designating the protection zone and penalties for violations shall be secured in a prominent location on each protection fence;
    - d. Installation of landscaping required by Title 33 is allowed within the root protection zone and is not an encroachment. Any in-ground irrigation systems are considered encroachments.

- e. The following is prohibited within the root protection zone of each tree or outside the limits of the development impact area: ground disturbance or construction activity including vehicle or equipment access (but excluding access on existing streets or driveways), storage of equipment or materials including soil, temporary or permanent stockpiling, proposed buildings, impervious surfaces, underground utilities, excavation or fill, trenching or other work activities; and
- *f.* The fence shall be installed before any ground disturbing activities including clearing and grading, or construction starts; and shall remain in place until final inspection.

<u>Response.</u> Trees onsite will be protected in accordance with the above standards, unless the Bureau's contractor determines it is not practicable, in which case an arborist will be retained to provide site-specific recommendations and prepare a protection plan approved by the City Forester in accordance with 11.60.030 C. 2.

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Using the terms defined in Chapter 33.920 (shown in italics), the proposed light pole replacement project is characterized as follows:

- the project will replace *utility structures* in the *Basic Utility Use Category* that provide an *accessory use* to the *primary use* (the public park).
- this action will constitute an *alteration to exterior development*.
- soils will need to be disturbed to install the poles in the ground, which will result in a *temporary disturbance area*.

The proposed use is identified in Chapter 33.100 Open Space Zone and is subject to the following overlay zones:

- 33.430 Environmental Zone.
- 33.480 Scenic Resource Zone.
- 33.445 Historic Resource Overlay Zone.

The replacement poles serve an accessory function to the primary park use and are subject to additional development standards related to off-site impacts as well as those that apply through the historic resources review.

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Section 5.1 The Base Zone: Open Space Zone

The Open Space criteria are in Chapter 33.100 and allowed uses are identified in Table 100-1 *Open Space Zone Primary Uses*.

Table 100-1 Open Space Zone Primary Uses					
Use Categories	OS Zone				
Institutional Categories					
Basic Utilities	L/CU [5]				
Y = Yes, Allowed L = Allowed, But Special Limitations CU = Conditional Use Review Required N = No, Prohibited					
<ul> <li>Notes:</li> <li>The use categories are described in Chapter 33.920.</li> <li>Regulations that correspond to the bracketed numbers [] are stated in 33.100.100.B.</li> <li>Specific uses and developments may also be subject to regulations in the 200s series of chapters.</li> </ul>					

As shown in the excerpt from Table 100-1, basic utility uses are allowed, either as a Limited Use or a Conditional use as determined by note [5] in 33.100.100 B (addressed below). The use is not identified in the 200s series of standards. Applicable code standards are provided in italics below, followed by the response.

#### Use Regulations 33.100.100 Primary Uses

- B. Limited uses. Uses allowed that are subject to limitations are listed in Table 100-1 with an "L". These uses are allowed if they comply with the limitations listed below and the development standards and other regulations of this Title...
  - 5. Basic Utilities. This regulation applies to all parts of Table 100-1 that have note [5].
    - a. Basic Utilities that serve a development site are accessory uses to the primary use being served.

<u>Response.</u> Lighting systems are utilities that serve a development site and are accessory to the primary park use. The subject lighting system is classified in this section as a Basic Utility pursuant to 5.a. (hereafter referred to as a *Basic Utility, type 5.a.*) and meets the

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standards for a Limited Use. As such the use is subject to the standards for accessory uses in this Chapter.

#### 33.100.110 Accessory Uses

Uses that are accessory to a primary use are allowed if they comply with specific regulations for the accessory uses and all applicable development standards.

<u>Response.</u> The proposed use is subject to the development standards in 33.100.120 shown below.

## 33.100.120 Nuisance-Related Impacts

A. Off-site impacts. All nonresidential primary and accessory uses must comply with the standards of Chapter 33.262, Off-Site Impacts.

<u>Response.</u> The proposed use is a nonresidential accessory use and is therefore subject to the development standards in 33.262. The additional development standards in the 200s series are addressed in Section 4.2.

## 33.100.200 Development Standards

- A. Allowed or limited uses. Allowed or limited uses are subject to the development standards stated below.
  - 1. Building setbacks. Except as specified in paragraph A.3., buildings must be set back from all property lines a minimum of 1 foot for each foot of building height.
  - 2. Outdoor activity facility setbacks. Except as specified in paragraph A.3. below, outdoor activity facilities, such as swimming pools, basketball courts, tennis courts, or baseball diamonds must be set back 50 feet from abutting R-zoned properties. Playground facilities must be set back 25 feet from abutting R-zoned properties if not illuminated, and 50 feet if illuminated. Where the outdoor activity facility abuts R-zoned properties in School uses, the required setback is reduced to zero.
  - 3. Recreational fields for organized sports. Recreational fields used for organized sports are subject to Chapter 33.279, Recreational Fields for Organized Sports

<u>Response.</u> None of the above criteria apply to accessory utilities, in this case, the lighting system.

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The lighting system meets the standards for allowed Limited Uses and meets all the development standards that apply to a *Basic Utility, type 5.a.* in the Base Zone.

## Section 5.2 Additional Use and Development Regulations

No additional use regulations are identified in the 200s series for utilities accessory to primary park uses. Additional development standards are identified and addressed below.

Chapter 33.258 Nonconforming Situations

## 33.258.030 Types of Nonconforming Situations

A specific site may be nonconforming because it contains either a nonconforming use, an allowed residential use that exceeds the allowed density, a nonconforming development, or a combination of these. Nonconforming uses, nonconforming residential densities, and nonconforming development are defined in Chapter 33.910, Definitions.

<u>Response.</u> Chapter 33.910, Definitions provides the following term and definition:

Nonconforming Development. An element of a development, such as a setback, height, or parking area, that was created in conformance with development regulations but which subsequently, due to a change in the zone or zoning regulations, is no longer in conformance with the current applicable development standards.

<u>Response.</u> Both the primary use on site, the park, and the accessory utility use proposed for modification in this application, are currently allowed uses that conform with current zoning regulations. However, the development of the primary use, the park and the accessory utility use occurred prior to the adoption of the first zoning regulation and development regulations for accessory utility uses have since been adopted.

The primary use onsite – the park – does not conform to all the current regulations that apply to the development of new parks today. In particular, the review authority determined in LU 17-245440 that the park's perimeter and parking lot landscaping do not meet current standards. Three adjustments to those standards were approved in that decision therefore, no additional nonconforming upgrades to the site's landscaping are required. However, since that time, standards related to bicycle parking in Chapter 266 have been updated.

#### 33.258.070 Nonconforming Development

A. Purpose. This section is primarily aimed at upgrading nonconforming development elements that affect the appearance and impacts of a site. It

*is not intended to require extensive changes that would be extremely impractical such as moving or lowering buildings.* 

- B. Continued operation. Nonconforming developments may continue unless specifically limited by Subsection D. below or other regulations in this Title.
- C. Changes. Changes may be made to the site that are in conformance with the development standards of the base zone, overlay zone, plan district or other development standards that apply to the site. Changes that bring the site closer to conformance are allowed. Proposed changes that are not in conformance or do not move closer to conformance, are subject to the adjustment process unless prohibited.

<u>Response.</u> The change proposed in this application, light pole replacement, will conform to the requirements of this code.

- D. Development that must be brought into conformance. The regulations of this subsection are divided into two types of situations, depending upon whether the use is also nonconforming or not. These regulations apply except where superseded by more specific regulations in the code.
  - 1. Nonconforming development with a new nonconforming use or new non-conforming residential density...
  - 2. Nonconforming development with an existing nonconforming use, allowed use, limited use, or conditional use. Nonconforming development associated with an existing nonconforming use, an allowed use, a limited use, or a conditional use, must meet the requirements stated below.

When alterations are made that are over the threshold of Subparagraph D.2.a., the site must be brought into conformance with the development standards listed in Subparagraph D.2.b. The value of the alterations is based on the entire project, not individual building permits.

a. Thresholds triggering compliance. The standards of Subparagraph D.2.b., below, must be met when the value of the proposed alterations on the site, as determined by BDS, is more than \$347,000. The following alterations and improvements do not count toward the threshold:

- (1) Replace a manufactured dwelling in a manufactured dwelling park;
- (2) Alterations required by approved fire/life safety agreements;
- (3) Alterations related to the removal of existing architectural barriers, as required by the Americans with Disabilities Act, or as specified in Section 1113 of the Oregon Structural Specialty Code;
- (4) Alterations required by Chapter 24.85, Interim Seismic Design Requirements for Existing Buildings;
- (5) Improvements to on-site stormwater management facilities in conformance with Chapter 17.38, Drainage and Water Quality, and the Stormwater Management Manual; and
- (6) Improvements made to sites in order to comply with Chapter 21.35, Wellfield Protection Program, requirements.
- (7) Energy efficiency or renewable energy improvements that meet the Public Purpose Administrator incentive criteria whether or not the project applies for and receives the incentive;
- (8) Landscaping required by 33.475.220;
- (9) Removal or remediation of hazardous substances conducted under ORS 465.200-545 & 900; and
- (10) The installation of electric bike and electric vehicle chargers and accessory equipment.

<u>Response.</u> Nonconforming development exists on the site and the value of the proposed improvements is approximately \$704,000, which exceeds the threshold to trigger compliance with the standards of this section. However, these improvements are intended to meet life safety standards and so may be exempt pursuant to Subsection 33.258.070 D. 2.a(2) above.

- b. Standards which must be met. Development not complying with the development standards listed below must be brought into conformance or receive an adjustment.
  - (1) Landscaping and trees required for the following areas:

- Exterior display, storage, and work activity areas;
- Setbacks for surface parking and exterior development areas;
- Interior parking lot landscaping;
- Existing building setbacks;
- Minimum landscaped areas (where land is not used for structures,
- parking, or exterior improvements); and
- On-site tree density standards of Subsection 11.50.050.C.

<u>Response.</u> The parking lot landscaping was approved via the adjustment procedure in LU 17-245440 which approved the updates to the Tabor Yard. The implementation of the approved improvements to the Tabor Yard are currently in construction. Conditions related to the landscaping will be completed by the Bureau's contractor for the Yard project prior to final approval in accordance with that decision. (See permitted landscaping for LU 17-245440 in Exhibit C.)

# (2) Pedestrian circulation systems, as set out in the pedestrian standards that apply to the site;

<u>Response.</u> Pedestrian circulation system standards are identified in the base zone. The OS zone does not contain pedestrian circulation standards; therefore, this criterion does not apply.

- (3) Bicycle parking by upgrading existing racks and providing additional spaces in order to comply with 33.266.200, Bicycle Parking as follows:
  - Major remodeling projects must meet the standards for all bicycle parking;
  - Sites with accessory surface parking must meet the standards for all bicycle parking;
  - In all other situations, the amounts and standards for shortterm bicycle parking must be met.

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<u>Response.</u> Mt. Tabor Park does have accessory surface parking; therefore, the bicycle parking standards apply.

The minimum number of bicycle parking spaces is calculated based on current and future bicycle use, as shown in Map 266-1 and pursuant to Table 266-1. Based on these requirements, Standard A applies to Mt. Tabor Park. Based on the site's primary use as a park, and in accordance with Table 266-6, no long-term bicycle parking is required. Short-term parking for public parks is determined through a conditional use review.

The most recent conditional review for the park occurred via LU 17-245440 did not determine a need to add more short-term bicycle parking. Currently, bike racks are located near the main parking lot and the western SE 64<sup>th</sup>/SE Lincoln St. entrance. Section 33.266 addresses bicycle parking. Sites that could considered for additional bicycle parking include the paved parking area by the playground in the middle of the park, as well as additional flat paved areas near other amenities such as the tennis courts, the south play area, and the summit.

## (4) Screening; and

<u>Response.</u> The existing nonconforming perimeter screening landscaping was approved via the adjustment procedure in LU 17-245440.

(5) Required paving of surface parking and exterior storage and display areas.

<u>Response.</u> The existing surface parking areas are paved.

- c. Area of required improvements.
  - (1) Generally. Except as provided in D.2.c(2), below, required improvements must be made for the entire site.
  - (2) Exception for sites with ground leases. Required improvements may be limited to a smaller area if there is a ground lease for the portion of the site where the alterations are proposed.

<u>Response.</u> No portion of the site is leased and therefore this subsection does not apply.

- *d. Timing and cost of required improvements. The applicant may choose one of the following options for making the required improvements:* 
  - (1) Option 1.

Under Option 1, required improvements must be made as part of the alteration that triggers the required improvements. However, the cost of required improvements is limited to 10 percent of the value of the proposed alterations. It is the responsibility of the applicant to document the value of the required improvements. When all required improvements are not being made, the applicant may choose which of the improvements listed in Subparagraph D.2.b to make. If improvements to nonconforming development are also required by regulations in a plan district or overlay zone, those improvements must be made before those listed in Subparagraph D.2.b.

<u>Response.</u> Required improvements will be completed as part of the light pole replacement work. The combined value of the proposed improvements is \$704,000. Therefore, the maximum cost of the required upgrades cannot exceed \$70,400.

## 33.262 Off-Site Impacts

#### 33.262.010 Purpose

The regulations of this chapter are designed to protect all uses in the R, C, CI, IR, and OS zones from certain objectionable off-site impacts associated with nonresidential uses. These impacts include noise, vibration, odors, and glare...

## 33.262.020 Applying These Regulations

Nonresidential uses in all zones which cause off-site impacts on uses in the R, C, CI, IR, and OS zones are required to meet the standards of this chapter. Exempted equipment and facilities are stated in 33.262.030 below.

<u>Response.</u> Accessory utilities are for nonresidential use, and this project is in the OS zone, therefore the standards of this section apply.

#### 33.262.050 Noise

The City noise standards are stated in Title 18, Noise Control. In addition, the Department of Environmental Quality has regulations which apply to firms adjacent to or near noise sensitive uses such as dwellings, religious institutions, schools, and hospitals.

<u>Response.</u> Replacing light poles within the existing lighting system will not result in any permanent noise generation. Temporary construction impacts will comply with the

standards in 18.10.060 for Construction Activities and Equipment, and the Oregon Administrative rules for DEQ in Chapter 340 Division 35.

#### 33.262.060 Vibration

## 33.262.070 Odor

<u>Response.</u> Replacing light poles within the existing lighting system will not generate any vibrations or odors.

## 33.262.080 Glare

- A. Glare standard. Glare is illumination caused by all types of lighting and from high temperature processes such as welding or metallurgical refining. Glare may not directly, or indirectly from reflection, cause illumination on other properties in excess of a measurement of 0.5 foot candles of light.
- B. Strobe lights. Strobe lights visible from another property are not allowed.

<u>Response.</u> Most of the light poles in the historic illumination system are located within the park at significant distance from nearby residences and will not result in any light spill on residential properties as shown in the photometric study in Exhibit C. No strobe lights are proposed.

There are light poles located within the SE Taylor ROW outside of the park and the historic district boundary shown in the historic listing. These poles are not subject to Title 33 due to their location outside of the historic district and within the ROW. However, additional information is provided about these poles below since they are located closer to residential property lines than others in the lighting system.

The homes on SE Taylor are orientated to the north and take access via the SE Yamhill frontage. The homes are located east of the heavily vegetated area encircling the northern parking lot within the park and there is significant vegetation within the SE Taylor right-of-way providing significant buffering and screening between the roadway and the residences. PBOT will review the proposed lighting on SE Taylor through the encroachment permit review process.

PBOT typically mounts pedestrian scale lighting at 14 feet compared to overhead "cobra-head" lighting that is mounted at 30-40 feet. At 12.5 feet in height, the proposed replacement light poles located in the SE Taylor St ROW are consistent with pedestrian scale lighting. SE 69th which intersects with SE Taylor contains typical overhead lighting which casts significantly more illumination compared to the pedestrian scale lighting provided on SE Taylor.

The illuminance value for street lighting is guided by street functional classification and minimum lighting levels rise on streets that provide higher levels of service. The brightest lighting is expected on Major Traffic or Transit streets, while Local Service roadways have the lowest lighting levels. SE Taylor is classified as a local street in the Transportation System Plan and provides City Bikeway services. Therefore, according to PBOT's 2019 Recommended Light Levels and Guidelines for Roadway Lighting, the recommended <u>minimum</u> level of lighting is 0.2 candle lights along the corridor and 0.3 candle lights at the intersection of SE Taylor and SE 69<sup>th</sup> Ave.

Photometrics for SE Taylor show the poles will meet the minimum levels of lighting required in this location (see Exhibit C). The proposed new replacement lights will greatly reduce the amount of illumination cast on adjacent properties over the current ones due to improved light fixtures that focus light more effectively, thereby reducing the overall area illuminated by each light fixture.

The proposed replacement of light poles in Mt. Tabor Park for the light pole safety project will meet the additional development standards that apply to accessory utilities.

## Section 5.3 Environmental Overlay

The criteria for environmental review are addressed in Chapter 33.430. Applicable code standards are identified in italics below, followed by the response.

## 33.430.080 Items Exempt From These Regulations

The following items, unless prohibited by Section 33.430.090, below, are exempt from the regulations of this chapter. Other City regulations such as Title 10, Erosion Control, and Title 11, Trees, must still be met.

- D. Existing development, operations, and improvements, including the following activities:
  - 1. Maintenance, repair, and replacement of existing structures, exterior improvements, roads, public trails, public rest points, public viewing areas, public interpretative facilities, and utilities....
  - 8. Pruning trees in accordance with Title 11 permit requirements;

<u>Response.</u> The request is to replace existing utility structures and is exempt from the regulations in Chapter 33.430. Estimated average temporary ground disturbance is 2.5' around each light pole and maximum temporary ground disturbance is 5' x 5' per light poles, for a maximum 2200 sq ft of temporary ground disturbance. For the majority of the poles, bare ground is present in the immediate vicinity, and although poles may be located under tree canopy, no trees are proposed to be removed to install replacement

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poles. Any pruning required to site equipment will occur in a limited fashion consistent with Title 11 requirements.

The proposed project to replace light poles in Mt. Tabor Park is a limited activity to maintain an existing accessory utility system and will comply with Titles 10 and 11. Any required permits will be obtained prior to any ground disturbance.

#### Section 5.4 Scenic Overlay

The standards for development within the scenic overlay are addressed in Chapter 33.480.

There are two small areas of scenic overlay located in the interior of the park that allow for tree removal under certain conditions to preserve views. There are no view corridors or scenic corridors that regulate building height on the site. As shown in Exhibit C, there are two panoramic viewpoints identified in the 1999 Scenic Resource Protection Plan. The western viewpoint is located above Reservoir 6 and the other is located at the summit.

The following standards apply to viewpoints:

#### 33.480.050 Tree Removal Review

- A. Tree removal without development...
- B. Tree removal in development situations. When tree removal is proposed as part of development, the standards of Subparagraph 33.480.040.B.2.h apply in addition to the tree preservation standards of Title 11, Trees.
- C. Trees that do not qualify for removal under Subparagraph 33.480.040.B.2.h may be removed if approved through tree review as provided in Chapter 33.853, Tree Review. However, where the tree removal would require environmental review, only environmental review is required.

<u>Response.</u> None of the light pole replacements are proposed in the vicinity of either viewpoint. Furthermore, any pruning required to install the new poles will occur in accordance with Title 11, the associated Tree Permit protection plan, and to proper arboricultural practices, thereby avoiding impacts to the health or structural integrity of any trees.

The proposed project meets the standards in Chapter 33.480 for the Scenic Overlay.

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Section 5.5 Historic Resource Overlay Zone

Chapter 33.445 contains the standards for the Historic Resource Overlay Zone. The applicable standards are identified in 33.445.030.

## 33.445.030 Where These Regulations Apply

- A. Sections 33.445.010 through .060 and .400 through .500 apply to all historic resources.
- B. Sections 33.445.100 through .340 apply as shown in Table 445-1.

Table 445-1 Where These Regulations Apply							
	In Historic District	In Conservation District	In National Register District	Not in a district			
Not a Landmark or Significant Resource	33.445.200	33.445.210	33.445.220	N/A			

<u>Response.</u> Mt. Tabor Park was listed on the National Register of Historic Places as a Historic District prior to 2017 and is designated a Historic District by the city (and, consequently, is not a Landmark or Significant Resource). As shown in excerpt of Table 445-1 above, this request is subject to Section 33.445.200.

#### 33.445.200 Historic District

- A. Designation of a Historic District
  - 1. National Register listing. Districts listed by the federal Keeper of the National Register of Historic Places or before January 27, 2017 are automatically identified as Historic Districts on the Official Zoning Maps. For Historic Districts that were listed by the federal Keeper of the National Register of Historic Places on or before January 27, 2017 but have not been independently designated by the City as the result of a legislative or quasijudicial procedure, any expansion of the boundary by the federal Keeper of the National Register of Historic Places is also automatically identified on the Official Zoning Maps. See Section 33.855.075, Automatic Map Amendments for Historic Resources.

<u>Response.</u> The listing of Mt. Tabor Park on the National Register of Historic Places occurred in 2004. The Mt. Tabor Park Historic District was therefore identified on the official zoning maps (in APP Exhibit).

B. Removal of a Historic District designation.

<u>Response.</u> This criterion does not apply, as no change to the designation is proposed.

*C. Relocation of a contributing resource in a Historic District.* 

<u>Response</u>. This criterion does not apply, as no relocation is proposed.

- D. Development in a Historic District. Certain development within a Historic District requires historic resource review to ensure the resource's historic value is considered prior to or during the development process.
  - 1. When historic resource review is required. Unless exempted by Paragraph D.2, the following proposals in a Historic District are subject to historic resource review...
  - 2. Exempt from historic resource review.
    - a. Alterations that do not require a building, site, zoning, or sign permit from the City, and will not alter the exterior features of a resource having such features specifically listed in the Historic District documentation or National Register nomination as attributes that contribute to the resource's historic significance;

<u>Response.</u> The replacement of light poles does not require a building, site, zoning, or sign permit. However, the lighting for the circulation system was specifically identified in the documentation for the historic listing as an important feature of the park's landscape, which is a contributing resource. Therefore, review staff have determined that historic resource review is required. The standards for historic resource review are in Chapter 33.846 and are addressed in the next section.

E. Demolition of resources in a Historic District. Conservation Landmarks in a Historic District that are not identified as contributing to the historic significance of the Historic District are subject to the regulations of Section 33.445.110.E. National Register Landmarks in a Historic District that are not identified as contributing to the historic significance of the Historic District are subject to the regulations of Section 33.445.120.E. Significant Resources in a Historic District that are not identified as contributing to the historic *significance of the Historic District are subject to the regulations of Section 33.445.330.* 

Demolition of contributing resources within a Historic District requires demolition review to ensure their historic value is considered and that there is an opportunity for the owner and community to consider alternatives to demolition.

- 1. When demolition review is required. Unless exempted by Paragraph E.2., demolition of a contributing resource in a Historic District is subject to demolition review. For the purposes of this Chapter, demolition is defined as:
  - a. Total demolition;
  - b. An alteration that requires a demolition permit except for a demolition permit to relocate a structure;
  - c. An alteration that results in the removal of 50 percent or more of any streetfacing wall of a structure;
  - d. An alteration that results in:
    - (1) The removal of 50 percent or more of the total exterior wall area of a structure; and
    - (2) The removal of 50 percent or more of the total roof area of a structure; or
  - e. For structures that are not buildings, an alteration that results in the removal of 50 percent or more of the structure;
- 2. Exempt from demolition review. The following are exempt from demolition review:
  - a. Demolition of noncontributing resources;

<u>Response.</u> The park landscape is a contributing resource, and the lighting system is a component of the landscape. While the lighting system itself is proposed to be retained, because more than 50 percent of the light poles that constitute the lighting system will be replaced in the light safety project, BDS has determined that the replacement is subject to demolition review.

- *b.* Demolition of contributing resources in Historic Districts when demolition is required because:
  - (1) The Bureau of Development Services requires demolition due to an immediate danger to the health, safety, or welfare of the occupants, the owner, or that of the general public, as stated in Section 29.40.030 of Title 29, Property Maintenance Regulations; or
  - (2) The Hearings Officer requires demolition, as provided for in Section 29.60.080 of Title 29, Property Maintenance Regulations;

<u>Response.</u> Park staff has proposed to replace light poles in 12 city parks to ensure public safety. However, neither BDS nor a Hearings Officer has required replacement, or demolition, in accordance with the requirements in Title 29.

c. Demolition of covered detached accessory structures in C and R zones that are identified as a contributing resource and are 800 square feet or less in total floor area; and

<u>Response.</u> Since this project will occur in the OS zone, the above criterion does not apply.

- d. Alterations to a contributing resource that meet the definition of demolition in Paragraph E.1.b.-e. when the following are met:
  - (1) The alterations are approved through historic resource review; and
  - (2) The historic resource review decision is final, and all appeals have been resolved.

<u>Response.</u> This request fulfills the requirement to obtain a historic resource review. Pole removal may occur once the decision for this request is final (including the resolution of any appeals).

## Section 5.6 Historic Resource Review

The standards for Historic Resource Reviews are located in Chapter 33.846. Review procedures for proposals within Historic Districts are located in Table 846-3.

Table 846-3           Review procedures for proposals within Historic Districts					
Proposal	Zone	Threshold	Procedure		
Any other non-exempt	All	Project value > \$547,400	Type III		
proposal		Project value ≤ \$547,400	Type II		

<u>Response.</u> This request is not specifically listed and so falls into the final category, "*Any other non-exempt proposal*." Since the estimated project value is estimated at \$704,00 it must be reviewed through the Type III procedure.

## 33.846.060 Historic Resource Review

- E. Approval criteria for outside the Central City plan district. ...
  - 1. Historic Districts. When historic resource review is required for any resource in a Historic District, including Historic Landmarks and Conservation Landmarks, the approval criteria are:
  - a. Historic Districts with district-specific guidelines....
  - b. Historic Districts without district-specific guidelines. Where there are no guidelines that are specific to the Historic District, the approval criteria are:
    - (1) The criteria in Subsection G;
    - (2) If the resource is a Conservation Landmark, the criteria in Subsection *H*; and
    - (3) If the proposal includes relocating a landmark or contributing resource, the criteria of Subsection I;

<u>Response.</u> There are no district specific guidelines for the Mt Tabor Park Historical District, therefore the project is subject to the criteria in Subsection G.

The resource is not a Conservation Landmark; therefore, Subsection H does not apply. The proposal does not include relocating any resources; therefore, Subsection I does not apply.

- G. Other historic approval criteria. When required by Paragraphs E. or F., the following approval criteria must be met:
  - 1. Historic character. The historic character of the landmark or contributing resource will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the historic significance of the landmark or contributing resource will be avoided;

<u>Response.</u> The historic listing identifies multiple parcels totaling 196-acres for the Mt. Tabor Park historical district, including both the park and maintenance yard. As mentioned previously, the district contains multiple contributing resources in addition to the park's landscape. The lighting system is a small component of the overall park site.

The replacement project will have little to no impact on the existing natural areas and decorative landscaping, as the areas around the poles are typically kept clear of vegetation. Minor refinements to pole locations to avoid impacts to landscaping and tree could occur if needed to preserve the character of the landscaping and ensure trees are protected. The vast majority of the landscape, the historic vehicle entrances and meandering drives, and all of the contributing buildings and structures will remain untouched by the light pole replacement project.

The lighting system itself will remain, even if components are replaced. Many of the original system components were replaced prior to the historical nomination, including all the light fixtures and 27 of the poles currently in use. The alternative to removing current poles would be to rehabilitate the existing poles despite their age and condition.

Bureau staff has verified with the consulting engineers at KPFF that the work necessary to mount poles to current code (installing rebar or other structural supports within the pole) is not considered practicable or cost-effective. For reuse, poles and footings would need to be removed and poles structurally altered to increase their structural capacity and then anchored to a new footing to meet current code standards. External alterations to enhance structural capacity would have a detrimental effect on the look and character of the pole, while internal alterations to replace or add reinforcing steel would significantly impact the structural integrity of the concrete. Internal alterations to 99-year-old concrete that was not originally built to meet current building code standards would significantly compromise the integrity of the poles.

By preserving the spatial pattern of poles (adjacent to the circulation system and distributed across the landscape), and installing poles of similar materials and design, the illuminated pathways will retain their historical character. The compelling nature of the park's landscape as a place of urban refuge offering a variety of forested, pastoral,

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and scenic experiences will be preserved through this project. Therefore, the contributing resource, the park's landscape will not be negatively affected by this project.

2. Record of its time. The landmark or contributing resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided;

<u>Response.</u> The illuminated circulation system provided vehicular access at the dawning of the automobile age to one of the city's most prominent natural features and ensured even nighttime visits would be safe and enjoyable. Pole replacement will result in a restoration of the illumination system at the time of the historic nomination, thus preserving the warmly illuminated meandering drives that provide access throughout the park, even in the darkest of forested areas.

# *3. Historic changes. Most resources change over time. Those changes that have acquired historic significance will be preserved;*

<u>Response.</u> The project proposes to provide light pole replacements consistent in number to the historical listing. Locations will match that documented in 1988 and 1989 to the extent possible. Although not part of the period of significance, the current lantern-style fixtures and the metal strapping at the top of certain light poles, have acquired significance and are considered representative of Mt. Tabor Park in particular. The proposed new light poles will be topped with lantern-style fixtures along with metal strapping of similar in design and style, as shown in the APP Exhibit, to maintain the iconic significance these features have acquired over time.

> 4. Historic features. Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the historic feature in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence;

<u>Response.</u> The lighting system that illuminates the circulation system is identified as contributing to the park's historic landscape. The replacement of 88 poles is needed to maintain structural safety of the lighting system due to severe deterioration, as certified by the city's consulting engineers. Installing modern fixtures at the same time poles are replaced will ensure the illumination system meets current electrical code, will reduce the need for future spot replacements, and will generate significant saving by reducing

energy consumption. The new poles will match the historic ones in material, texture, color, and design (as shown in the comparison photographs in the APP Exhibit).

Written and graphic evidence regarding the existing system is provided in the APP Exhibit, which documents at least 27 pole replacements over time and the installation of the now iconic lantern-style fixtures. While the first elements of the lighting system were installed in 1924 and 1925, development of the park's physical elements occurred over time and it is likely some individual poles were added later, for example when the bridle path was established in 1929 and Mt. Tabor Drive was constructed (circa 1934). The earliest record of the number and location of light poles dates from the 1950s (outside the period of significance). Over time, individual poles have been replaced as needed – however the overall system of illuminated drives and paths providing circulation through the landscape has been maintained. Documentation of the lighting system is also located in the historic listing. The existing light poles and fixtures are compared in photographs in the APP Exhibit and details of the proposed replacements are shown in the specification sheets in Exhibit C.

5. Historic materials. Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used;

<u>Response.</u> Poles will be ground-mounted, and the installation will not affect historic materials. Under normal circumstances, a direct buried concrete pole can be set directly into an augered hole that minimizes the amount of ground disturbance or impacts to surrounding soils or any historic concrete. Depending on the strength of the soil, backfilling can be accomplished with aggregate, concrete, or the original soil. This technique does not require the use of sandblasting or chemicals and meets modern building code requirements for structural safety.

6. Archaeological resources. Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken;

<u>Response.</u> There are no known archaeological resources on site. Development, including significant ground disturbance and excavation on the site has been documented since 1894. Given the project will install replacement light poles in previously developed locations using modern techniques that limit ground disturbance, it is very unlikely any materials of archaeological interest will be encountered. Regardless, should any archaeological discoveries occur, work will be stopped in the affected area and the Bureau will notify the State Historic Preservation Office (SHPO). Prior to submitting this application, the Bureau contacted the SHPO but has not heard back from them regarding any state requirements, concerns, or suggestions about this project.

- 7. Differentiate new from old. New additions, exterior alterations, or new construction will not destroy historic materials that characterize a landmark or contributing resource. New work may be differentiated from the old if the differentiation does not diminish the character, features, materials, form, or integrity of the landmark or contributing resource and, if in a Historic District, the district as a whole;
- 8. Architectural compatibility. New additions, exterior alterations, or new construction will be compatible with the massing, size, scale, and architectural features of the landmark or contributing resource and, if in a district, the district as a whole. When retrofitting to improve accessibility for persons with disabilities or accommodate seismic improvements, design solutions will not compromise the architectural integrity of the landmark or contributing resource;

<u>Response.</u> The integrity of the park's landscape (the contributing resource) will not be affected by the replacement poles, as they will maintain the existing spatial pattern of the lighting system adjacent to the circulation system. As previously noted, poles will match those in existence today and at the time of the historical listing. Any new conduit needed will be concealed.

Many of the current components of the light system are almost a hundred years old. By replacing the poles now, the structural integrity of the lighting system is assured for a hundred more years. No other changes to the landscape or to any of the contributing architectural structures or buildings are proposed.

9. Preserve the form and integrity of historic resources. New additions, exterior alterations, or new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the landmark or contributing resource and, if in a district, the district as a whole would be unimpaired; and

<u>Response.</u> The lighted circulation system is an integral component of the landscape in the Mt. Tabor Park Historic District, as the illumination provided alongside the historic drives and formal pathways enhances access to the park's various experiences. However, individual pole replacement has occurred repeatedly over time without affecting the integrity of the overall system of lighting or circulation. Therefore, it is reasonable to conclude that if an individual pole needs to be removed in the future, as long as it was replaced in the same vicinity and with similar materials and design, neither the system of illumination or circulation would be affected, and the character of the landscape would remain unimpaired. 10. Hierarchy of compatibility. New additions, exterior alterations, or new construction will be designed to be compatible primarily with the landmark or contributing resource and, if located within a district, secondarily with contributing resources located within 200 feet and, finally, with the rest of the district. Where practical, compatibility in districts will be pursued on all three levels.

<u>Response.</u> The lighting system will maintain its function and role of illuminating the park's circulation system. Replacement poles will maintain the look and design of the current poles within the illumination system. There is a compelling relationship between the lighting system and the circulation system. Areas in the vicinity of the existing lighting system that are part of the circulation system will not be affected by the replacement, as the overall lighting system will remain intact and individual replacement poles are of compatible materials and design to existing ones. Most importantly, the illuminated nature of the circulation system will be maintained.

No changes are proposed to the location or pattern of the circulation system within the park. The replacement of individual poles will not affect the contributing architectural resources. No changes are proposed to alter other aspects of the landscape, such as the terrain or vegetation.

The overall spatial pattern of the light poles illuminating the circulation pattern will be retained. Only minor refinements to pole locations are anticipated. Two poles near Reservoir 5 may conflict with water lines, as shown in the disturbance area site plans (Sheet 4), however, no changes are proposed that would affect the contributing resources within the Mt. Tabor Park Reservoir Historic District.

Based on the above, the planned pole replacements will be compatible with the circulation system, the landscape as a whole, other contributing resources, and both of the historic districts at the site.

## 33.846.080 Demolition Review

A. Purpose. Demolition review protects landmarks and contributing resources in districts. Demolition review recognizes that historic resources are irreplaceable assets significant to the region's architectural, cultural, and historical identity and their preservation promotes economic and community vitality, resilience, and memory. In the event that demolition of a historic resource is approved, demolition review also addresses the potential for mitigation of the loss.

<u>Response.</u> The lighting system for the Park's circulation system was identified as an attribute within the Park's landscape, which is a contributing resource to the Park

Historic District. The lighting system is composed of light poles installed alongside the circulation system that was designed in 1911 and constructed between 1912 and 1934. Light poles within the system have been replaced over time and feature fixtures installed outside the period of significance identified in the historic listing.

As noted previously in this application, the value of the lighting system is the illumination provided to the historic circulation system which is a core component of the 1911 park design. The circulation system is composed of paved drives, soft surface formal trails, and staircases that convey park users from one experience to another within the park. Individual portions of the circulation system have been replaced, rebuilt and refurbished over time, just as the individual poles that constitute the illumination system have been replaced over time.

- B. Review procedure. Demolition reviews are processed as follows:
  - 1. Proposals to demolish an accessory structure are processed through a Type II procedure;
  - 2. Proposals to demolish a Conservation Landmark, National Register Landmark, contributing resource in a Conservation District, or contributing resource in a National Register District are processed through a Type III procedure;
  - 3. All other proposals to demolish a historic resource are processed through a Type IV procedure.

<u>Response.</u> This request is being processed through the Type III procedure consistent with B.2. above.

- *C. Approval criteria. Proposals to demolish a historic resource will be approved if the review body finds that one of the following approval criteria is met:* 
  - 1. Demolition of the resource has been evaluated against and, on balance, demolition has been found to be equally or more supportive of relevant goals and policies of the Comprehensive Plan, and any relevant area plans, than preservation, rehabilitation, or reuse of the resource. The evaluation must consider:
    - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
    - b. The economic consequences for the owner and the community;

- c. The merits of demolition;
- d. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
- *e.* The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
- f. Any proposed mitigation for the demolition.
- 2. The proposal is to demolish a contributing resource in a Conservation District or National Register District and demolition of the resource will be mitigated to enhance, preserve, or restore the archaeological, architectural, cultural, or historic significance or integrity of the district. The mitigation must be responsive to the significance and integrity of the resource proposed for demolition. The evaluation must consider:
  - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
  - b. The economic consequences for the owner and the community;
  - c. Relevant goals and policies of the Comprehensive Plan.
- 3. The proposal is to demolish a contributing resource in a single-dwelling zone in a National Register District, and demolition of the resource will facilitate the creation of more deeply affordable dwelling units...
- 4. The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

<u>Response.</u> The lighting system is a Basic Utility and as such is classified as an accessory use in the OS base zone. Therefore, the proposal to remove and replace light poles within Mt. Tabor Park may be reviewed subject to the requirements in C. 4 above. As noted previously in this application, replacement of the proposed light poles will not have any effect on the architectural contributing structures or buildings in either the Mt. Tabor Park Historic District or the Mt. Tabor Park Reservoir Historic District.

In terms of the historical listing, the primary cultural or historic significance of Mt. Tabor Park as articulated in the historic listing, is the Park's association with the Olmsted
## SECTION 5 – TITLE 33

Brothers through the 1903 Olmsted Plan which identified Mt. Tabor as a desirable site for a public park, and its design which embodies the principles of landscape architecture espoused by the Olmsteds.

As such, the lighting is a feature within the contributing resource of the park landscape as a whole and provides historic and functional value by illuminating the park's circulation system. Some care was taken to determine when the various drives and formal pathways were constructed for the historical nomination, however, no such attempt was made regarding the lighting system. Further, no attempt was made to distinguish individual poles or their location, date individual poles to the period of significance, or assign historical value to individual poles in the nomination.

Updating the light poles within the existing landscape will do nothing to erode the cultural importance of Mt. Tabor Park as a significant park within the Portland Park System, nor will it impact the integrity of the landscape itself. In fact, by replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

While the light poles clearly met the criteria for accessory structures, given input received at the Historic Landmarks Commission briefing on March 13, 2023, it seems prudent to consider the additional demolition criteria that applies to contributing resources in Historic Districts under C.1. and National Register Districts in C.2. as well.

Relevant goals and policies of the 2035 Comprehensive Plan relate to encouraging development that promotes human health and safety, historical resource preservation and development that is energy and resource efficient. Goals and polices to implement these admirable intentions are located in Chapter 4 Design and Development and include the following:

• Goal 4.B: Historic and cultural resources

*Historic and cultural resources are identified, protected, and rehabilitated as integral parts of an urban environment that continues to evolve.* 

<u>Response.</u> The historic resource is Mt. Tabor Park. The park is integral to the Mt. Tabor Neighborhood and an important part of the Portland Park System. Ensuring the park is a place of safety is a key component of its value as an "urban refuge." It is critical that park visitors feel safe and welcome in Mt. Tabor Park. As the city's park system's components age, maintaining park safety through replacement of outdated components will be become a more common aspect of the evolving urban environment. This request proposes to maintain the historical integrity of the lighting system and its role of illuminating the circulation system in park while also ensuring all the light pole structures are of the most modern construction and installed to current health and safety codes. The historic value and character of the system of illuminated pathways and historic drives within the park is derived from systems as a whole (rather than individual light poles), and the resulting social and cultural value experienced by community member's when partaking in the park's natural and scenic landscapes.

By replacing the light poles within the park's landscape with light poles that maintain the historic design and materials of the existing light poles, the light safety project will ensure that the overall park site remains available and open to public in a manner that honors the historic and cultural value the Park provides to the community.

• Policy 4.1 Pattern areas. Encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Portland's five pattern areas described in Chapter 3: Urban Form.

<u>Response.</u> The site design of Mt. Tabor Park is one that respects the natural topography of the site and the inner neighborhood pattern area. The site's curvilinear drives and mix of trails and staircases respects the site's sloped nature. The site's design also provides for a variety of edge treatments to integrate the park into the residential fabric of development that surrounds it. Utilizing long approaches and screening vegetation creates buffers between park users and residential users. The updated light fixtures proposed in this project will improve the lighting system for the park's circulation system by reducing the amount of illumination reaching nearby residential uses and improve the park's integration into the neighborhood. The proposed update will only enhance the value Mt. Tabor Park brings to the highly connected, densely populated inner neighborhood it is located within.

• Policy 4.46 Historic and cultural resource protection. Within statutory requirements for owner consent, identify, protect, and encourage the use and rehabilitation of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

<u>Response.</u> The Bureau supports sensible neighborhood nominations of historic parks to protect the historic and cultural relevancy of our revered park assets. Previous improvements at Mt. Tabor Park have included restoration of historic buildings, including the Gate House (Head House) and the Summit Restrooms. Interpretive elements onsite identify historic resources in the vicinity of the Cinder Cone, the Crater Amphitheater, and the Historic Reservoir District. Historic significant architectural

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resources within the park have been protected and preserved including the Crater Amphitheater, the Summit and Volcano restrooms, and the Caretaker's House.

• Policy 4.50 Demolition. Protect historic resources from demolition. When demolition is necessary or appropriate, provide opportunities for public comment and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

<u>Response.</u> The illuminated circulation system will be maintained through this project, even though individual light poles will be removed. Prior to submitting this application, Bureau staff attended the following public meetings to discuss the light safety project:

- Historic Landmarks Commission, March 13, 2023.
- Portland City Council, April 5, 2023.
- Light Pole Safety Project neighborhood meetings, May 11 &12, 2023.
- Light Pole Safety Project community-wide meeting, May 17, 2023.

Community input at meetings focused on safety, with strong preferences for maintaining lights until replacement poles and lights are funded. There was no opposition expressed regarding the appearance of the proposed poles, fixtures, and strapping, all of which have been used in other City parks (Laurelhurst and Duniway for example). Given the conditions of the existing poles, there was strong interest in replacing poles – however there was also community interest in salvaging old poles and fixtures where possible.

Bureau staff agreed to offer poles for salvage to mitigate for the loss of original Mt. Tabor Park light poles. Bureau staff contacted a variety of organizations and offered to donate the poles for this purpose. The following organizations have been offered original light poles, including fixtures from a variety of parks:

- Oregon Historical Society.
- Oregon Architectural Heritage Center.
- Habitat for Humanity ReStore.

The above organizations have accepted donations of fixtures (2, 4, and 35 fixtures respectively) for preservation, and in some case rehabilitation and resale. Despite offers, no organizations have chosen to preserve any of the concrete light poles due to pole size (12' and taller), weight (about 1200 pounds), and condition. It is expected that future removals will be managed by the city's contractor and materials will be recycled when practicable.

• Policy 4.51 City-owned historic resources. Maintain City-owned historic resources with necessary upkeep and repair.

<u>Response.</u> The Bureau maintains a wide range of assets within the Park System using funds from the General Funds as authorized by City Council and the 2020 Parks Local Option Levy as authorized by the city's voters. The Bureau operates and maintains 154 neighborhood parks, 11 indoor and outdoor pools, 14 community and art centers, six golf courses, 160 miles of regional trails, and a motor raceway. The revised budget for maintenance in FY 22-23 was \$21.8 million and the Bureau expects to spend between \$22.5 and \$23.9 million on maintenance in this fiscal year (FY 23-24).

Resources are allocated in accordance with the Healthy Parks, Healthy Portland framework and adopted Level of Service plans. Within the parks system, resources are prioritized based on number of factors, including how many park users are served by an asset and equity considerations to address historic underinvestment within the park system. Parks with historic resources are not prioritized over other park assets under the current policy framework, however they are not assigned a lower priority either.

All developed parks, community center, and natural areas with public access receive basic daily maintenance. And although the Bureau prioritizes maintenance for health and safety, the system as a whole has a backlog of \$560 million in deferred maintenance expenses. Additional resources to fund maintenance and operation expenses for the city's aging park system are currently under consideration through the Bureau's Sustainable Futures program.

The citywide light safety project will help reduce future maintenance expenses through a combination of reducing future operating expenses, leveraging external funding, and securing materials and labor at current costs, while also ensuring public safety. Investing in new light poles now for Mt. Tabor's historic light system will ensure that the illuminated circulation system remains in good repair well into the future.

• Policy 4.60 Rehabilitation and adaptive reuse. Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.

<u>Response.</u> The park's existing contributing buildings and structures will not be affected by the proposed replacement of the light poles. Replacement of the proposed light poles will ensure that contributing architectural resources are not impacted should aging or structural deficient poles fail. • Policy 4.62 Seismic and energy retrofits. Promote seismic and energy-efficiency retrofits of historic buildings and other existing structures to reduce carbon emissions, save money, and improve public safety.

<u>Response.</u> Replacement light poles will meet current code standards and seismic requirements. The replacement light fixtures to be installed through the light pole safety project feature improvements in energy efficiency and will result in monetary saving over time. Most importantly, the replacement poles will improve public safety.

• Policy 4.63 Life cycle efficiency. Encourage use of technologies, techniques, and materials in building design, construction, and removal that result in the least environmental impact over the life cycle of the structure.

<u>Response.</u> The current manufacturing process for precast light poles proposed in this project will ensure a lengthy life cycle. The concrete is precast and prestressed to improve longevity. In addition, high tensile steel is incorporated into the pole during manufacturing which reduces freeze-thaw impacts and yields a stronger pole able to bear higher loads (APP Exhibit).

The existing concrete poles are experiencing a variety of impacts due to their age. Replacement of the reinforcing components inside the pole would compromise the pole's integrity, likely damage the external concrete casing, and destroying the desired appearance of the 1924 poles. While it is hypothetically possible to break down the concrete and melt down the existing rebar to reuse materials, doing so would be inefficient in terms of resource and energy use, as well as extend the amount time needed to complete this project. Thus, the project team concluded that replacement poles will result in the less environmental impact than attempts to rehabilitate the existing poles.

• Policy 4.64 Deconstruction. Encourage salvage and reuse of building elements when demolition is necessary or appropriate.

<u>Response.</u> Although the poles removed as part of the citywide light safety project so far have not been salvaged due to the lack of interest by area reuse experts, they have been recycled. It is expected that light poles removed during the Mt. Tabor Park portion of the project will also be recycled by the contractor as part of their overall construction debris handling.

Based on the above responses, the proposed project does comply with relevant 2035 Comprehensive Plan policies.

The criteria for Historic Districts under *C.1.a.* and National Register Districts in *C.2.a.* relates to the <u>value of the historic resource</u>, considering the resource's <u>age, condition, significance, rarity, value to the community, and association with historically</u> <u>marginalized populations or communities</u>. The historic resource in this case is the lighting system that provides illumination to the park's circulation system of historic drives, formal pathways, and period staircases. Park staff was unable to locate any evidence that the Mt. Tabor lighting system holds significance for any historically marginalized communities in Portland.

The lighting of Mt. Tabor's circulation system in the 1920s (and likely the 1930s in association with WPA circa drive construction) was not unique, nor was it the earliest achievement in the Portland Park system. The city's first known illuminated circulation system that welcomed automobile users to travel within forested areas and experience previously inaccessible scenic views was the Terwilliger Boulevard Parkway. The lighting system for the parkway may have been installed as early as 1913.

Laurelhurst Park, another historic park in the city's park system, also has an illuminated circulation system. According to that park's historical nomination, its lighting system was installed in 1915 – although the nomination also recognized that the age of individual poles varied and therefore, the system itself wasn't a contributing resource. The lighting system at Mt. Tabor Park is neither the oldest example of such a resource nor is it rare. The proposed replacement, however, will maintain the system's integrity and ability to function far into the future.

As for the design of the light poles themselves, the octagonal design is almost the standard for Portland parks developed within the inner neighborhood pattern area and examples of such poles can be found throughout the inner eastside. The fixtures that currently exist do have value for the community and the proposed replacement fixtures preserve the lantern-style design. Approximately 40 lighting fixtures of this style have already been donated. As noted previously though, the existing poles, especially those that date from the period of significance are not in good condition, lack the structural integrity necessary for restoration, and any rehabilitation or reuse would be far more resource intensive from an environmental standpoint than replacement.

The criteria for Historic Districts under C.1.b. and National Register Districts in C.2.b. focuses in on the <u>economic consequences</u> of demolition <u>compared to preservation</u>, <u>rehabilitation</u>, <u>or reuse of the resource for the owner of the resource and the</u> <u>community as a whole</u>. The lighting system is being preserved in this case, at issue is whether certain elements within the system should be or could be preserved, reused or rehabilitated.

Many elements of the lighting system, such as electronic wiring and fixtures, and some of the poles, have already been replaced in order to maintain the lighting system in proper functioning order. The main structural components of the lighting system, the poles and fixtures, are not unique within the Portland parks system. Through the Bureau's citywide Light Safety project, light fixtures of various ages have been successfully donated for reuse or preservation.

When it comes to individual light poles from the period of significance, there is a preponderance of evidence that rehabilitation to current code standards is not possible. Preservation would entail costs to remove poles from their current location where they pose a potential safety hazard to another location. Specialty equipment and trained staff is needed to transport objects of this size. In addition, materials and labor would be required to install a light pole or poles in another location and secure the pole(s) in a manner that mitigates the structural risk. These costs are all currently unfunded. Reuse by other parties does not appear feasible or cost effective as local experts have declined to take ownership of any the poles removed through the light safety project to date.

The Bureau's funding plan to replace the light poles in twelve city parks, which leveraged grant funding from Metro, was authorized by City Council earlier this year. The Bureau currently faces significant capital maintenance expenses that lack funding. While the community supported the preservation of existing services through the passage of the 2020 Parks Operation Levy and capital maintenance through the passage of the 2017 Capital Bond, expending scarce public dollars to preserve structurally deficient components does not meet current policy priorities nor would such expenditures be consistent with City and Bureau goals to provide an equitable level of service in our community.

Based on the above analysis, which considers feasibility as well as expenses, park staff have concluded that demolition and replacement of the light poles fixtures is a more cost-effective solution than reuse, rehabilitation, or preservation for both the Bureau <u>and</u> the community. However, it should be noted that cost is *not* the primary reason for proceeding with replacement was chosen; public safety, the impracticality of retrofitting the existing poles, and renewing the park's lighting system to last another century were more significant drivers in the decision to replace light poles in Mt. Tabor Park.

The subsequent criteria diverge at this point. Historic Districts require an examination of benefits for alternative scenarios, while in Conservation Districts the remaining criterion is focused on policies in the Comprehensive Plan. These policies were addressed above. Regarding the final Historic District criteria, since no redevelopment is proposed in this case, the <u>alternative scenarios to be considered are demolition and preservation</u> - taking into consideration the purposes described in Subsection A.

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The benefits associated with demolition, or more specifically in this case, the benefits associated with the replacement of structural components in the historic light system and subsequent recycling and reuse of the light poles and fixtures, include the following:

- The integrity and character of the historic lighting system as a whole is maintained and available for use now and many years into the future.
- Park users will be able to continue to comfortably navigate the park in the evenings and access even the most densely forested portions of the circulation system regardless of the natural lighting conditions.
- Park users can have confidence in the city's park system as a safe place in which to recreate, exercise, and enjoy scenic vistas, with all members of their family, friends, and fellow community members.
- Future cost savings from increased energy efficient operation of the lighting system.
- Improved lighting conditions due to improvements in the lighting technology, including increased directional focus for light emitting diode (LED) lamps and improved shielding in fixtures that will result in dark skies compliance and less impact to off-site properties.
- Use of durable, proven, aesthetically pleasing and historic-honoring light pole and fixture products, with decades of performance in other City parks, including historic Terwilliger Boulevard, Duniway Park, Laurelhurst Park, and other Portland parks.

The merits of preservation that must be considered in Subsection A are *economic and community vitality, resilience, and memory.* Preservation of light poles in their current condition would require relocation away from the actual lighting system to a location where their structural deficiencies would not cause a risk to park users and likely would defeat the purposes of preservation related to promoting community vitality and memory. Preservation is currently unfunded and additional funding would need to be identified, which would have a negative impact on economic vitality. Preservation is unlikely to increase community resiliency to potential natural or other hazards.

Based on the above considerations, the Bureau concludes that replacing the light poles and fixtures of the historic lighting system while maintaining the spatial distribution noted in the historic nomination is the most feasible, cost-effective, and reasonable method for preserving the historic illuminated circulation system within Mt. Tabor Park.

The proposed replacement of light poles in Mt. Tabor Park's historic lighting system will comply with the standards in the Historic Resource Overlay Zone and for Historic Resource Review.

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## Conclusion

The Light Pole Safety project will replace 88 light poles adjacent to the park's circulation system, approximately 60 of which may date from the park district's historic period of significance. Economic and climate resiliency benefits will be realized by updating the aging lighting system, consistent with city policies. Replacement will ensure the system of illuminated pathways, staircases, and historic drives continues to provide comfort and safety as community members explore the historic landscape and cherished scenic views of Mt. Tabor Park.

Poles will be replaced in their existing location and replacement work will avoid existing trees. No trees are proposed for removal in the Light Pole Safety project. Any pruning or root cutting required to install the new poles will occur in accordance with Title 11 and the Tree Permit protection plan, consistent with proper arboricultural practices, and will not adversely impact the health or structural integrity of the tree.

The Bureau proposes to take significant efforts to preserve the spatial pattern of the illumination system. Materials and design of replacement poles closely resembles existing ones and will preserve the historic character of the lighting system. The reasoning provided in this narrative, along with the supporting evidence provided in the attached exhibits demonstrates project compliance with the applicable requirements of Title 33. Therefore, Bureau of Development Services staff should recommend, and the Historic Landmarks Commission should approve, the light pole safety project replacement of light poles within Mt. Tabor Park.

## APP Exhibit List

- Exhibit A Portland City Council Ordinance #19122
- Exhibit B Official Zoning Maps # 3136, 3137, 3236, 3237
- Exhibit C Mt. Tabor Historic Districts
- Exhibit D Historic Zoning Maps
- Exhibit E Past Land Use reviews
- Exhibit F Historic records for illumination system (1958 Lighting Plan, 1984 Lighting + Electric As-Built Plan, 1987 Lighting Plan + Details, 1999 Restroom Electrical Plan) and Replacement Summary (notations on 1987 Lighting Plan)
- Exhibit G Comparison between existing and proposed
- Exhibit H Staff photographs showing existing pole conditions
- Exhibit J Tabor Park Historic District National Register listing
- (\*note no capital I Exhibit to avoid confusion with lowercase I)



Home / Council Documents

# 191222

Emergency Ordinance

# \*Amend contract with McKinstry Essention, LLC for energy savings performance contracting services not to exceed \$18,500,000 (amend Contract 30007025)

Passed

The City of Portland ordains:

Section 1. The Council finds:

- 1. In partnership with the Office of Management and Finance (OMF) Procurement and the Bureau of Planning and Sustainability, Portland Parks & Recreation (PP&R) is committed to reducing our environmental footprint while improving the resiliency of our infrastructure. Our lighting, cooling, heating, and plumbing systems consume over \$6 million per year in gas, electricity, and water and many of these systems are well beyond expected service life and contribute to our \$600 million and growing capital maintenance backlog.
- 2. On April 5, 2017, City Council authorized a competitive solicitation per City Code 5.34.880 for an Energy Savings Performance Contract (ESPC) (Ordinance No. 188310). To complete the work most efficiently, PP&R determined that it would implement multiple design-build stages from one initial technical energy audit. On September 4, 2019, City Council accepted the Guaranteed Maximum Price for Stage 1 (GMP1) implementation of the ESPC. On November 20, 2019, the City entered into contract agreement with McKinstry Essention, LLC (Contract No. 30007025).
- 3. On December 28, 2022, the Commissioner-in-Charge signed an emergency declaration for lighting removal and replacement work to take place under this contract since many of the impacted parks and pathway lighting impacted by a structural deficiency were already within scope of the ESPC work.

## Introduced by

Mayor Ted Wheeler

## Bureau

Management and Finance; Revenue and Financial Services

## Contact

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Construction, Supervisor II

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Requested Agenda Type Regular

## Date and Time Information

Requested Council Date April 5, 2023 Time Requested 15 minutes

- 4. Both this Stage 2 amendment (GMP2) and GMP1 derive from the same feasibility, analysis, technical energy audit, technical specifications and know-how for the performance guarantee provided by McKinstry Essention, LLC. Performance has been satisfactory for Stage 1, including: 40% DMWESB firm utilization; direct annual cost savings of over \$79,000 per year; a 15% reduction of utility consumption at the Stage 1 sites; improved lighting coverage on pathways at seven parks; and DarkSky-compliant fixtures for improved conditions for wildlife.
- 5. In a continuation of that work, PP&R intends to award a GMP2 contract amendment that will include improvements to pathway lighting at an additional 12 parks; add more efficient heating and cooling to replace an obsolete heating-only system at Peninsula Park Community Center; and modernize the heating, ventilation, and air-conditioning system at Charles Jordan Community Center and East Portland Community Center so that they are better able to function in poor outdoor air quality environments. These investments support the Climate Emergency Declaration and Workplan and avoid 327 Metric Tonnes of CO2 per year the equivalent of 1,222,000 miles not driven in an internal combustion engine car.
- 6. The current contract amount is \$1,071,124.24 incorporating changeorders 1 and 2, and the GMP 2 amendment's cost is anticipated to be \$14,500,000, including the emergency approved change orders 3 and 4 for pole and base removals. An additional amount of \$2,928,875.76 is being requested as a contingency in case other issues arise during construction and change orders are required, for a new contract not to exceed value of \$18,500,000.
- 7. Sufficient funds are expected to be available in the Parks Capital Improvement Program Fund, No. P00924.

NOW, THEREFORE, the Council directs:

- A. The Chief Procurement Officer is authorized to execute amendment(s) that are approved as to form by the City Attorney's office and/or change orders to Contract 30007025 if the contract not-to-exceed amount is \$18,500,000 or less.
- B. The Mayor and City Auditor, or their designee(s), are hereby authorized to draw and deliver checks when demand is presented and approved by the property authority.

Section 2. The Council declares an emergency exists due to the need for climate action and to replace removed pathway lighting for public safety; therefore, this Ordinance shall be in full force and effect from and after its passage by the Council.

## **Official Record (Efiles)**

Ordinance and testimony (https://efiles.portlandoregon.gov/record/16069363)

An ordinance when passed by the Council shall be signed by the Auditor. It shall be carefully filed and preserved in the custody of the Auditor (City Charter Chapter 2 Article 1 Section 2-122)

Passed by Council April 5, 2023

Auditor of the City of Portland Simone Rede

## Impact Statement

## Purpose of Proposed Legislation and Background Information

Authorize the Chief Procurement Officer to execute amendment(s) that are approved as to form by the City Attorney's office and/or change orders to Contract 30007025 if the contract not-to-exceed amount is \$18,500,000 or less.

This is the second stage of a Guaranteed Maximum Price Energy Savings Performance Contract (ESPC) which was originally competitively bid in 2017. ESPCs follow City Code 5.34.880 where an expert firm performs technical analysis and feasibility of efficiency work and then performs and guarantees the utility savings of selected and funded designs. Stage 1 covered nine locations and this second stage covers an additional fifteen.

This Stage 2 amendment will improve pathway lighting at an additional 12 parks; add more efficient heating and cooling to replace an obsolete heating-only system at Peninsula Park Community Center; and modernize the heating, ventilation, and air-conditioning system at Charles Jordan Community Center and East Portland Community Center to ones that are better able to function in poor outdoor air quality and in pandemic operating environments.

## **Financial and Budgetary Impacts**

Based on the proposed Guaranteed Maximum Price and also including contingency, Parks anticipates the contract cost to be up to \$18,500,000.00. The additional amount in the amendment authorization ordinance includes the original award plus additional contract contingency should the scope change between now and the end of 2024.

The current contract amount is \$1,071,124.24 incorporating change-orders 1 and 2, and the GMP 2 amendment's cost is anticipated to be \$14,500,000,

including the emergency approved change orders 3 and 4 for pole and base removals. An additional amount of \$2,928,875.76 is being requested as a contingency in case other issues arise during construction and change orders are required, for a new contract not to exceed value of \$18,500,000.

Funds are expected available from the following sources:

- Capital Set Aside: \$2,083,852
- System Development Charges: \$900,000
- Metro Bond Local Share: \$2,000,000
- PP&R Major Maintenance: \$8,916,148
- Department of Energy Block Grant: \$600,000
- Total anticipated funds available: \$14,500,000.00
- Previous contract amount: \$1,071,124.24
- Additional authorization for contingency: \$2,928,875.76
- Sum of authorization: \$18,500,000.00

No positions will be created, eliminated or re-classified as a result of this legislation. This project will reduce (or avoid the increase of) ongoing operating costs at the sites where these investments will be made.

## **Community Impacts and Community Involvement**

The investment supports the Climate Emergency Declaration and Workplan and avoid 327 Metric Tonnes of CO2 per year – the equivalent of 1,222,000 miles not driven in an internal combustion engine car. In addition to progress on our major maintenance backlog, informal community feedback from the lighting conversion completed in the earlier pilot was positive and responds to extensive community involvement which shows extensive interest and concern about safety in-general and park lighting in-particular. The improved lighting is not only more energy efficient but also provides better coverage, appears brighter, and is more reliable. Based on preliminary consultation with the PP&R Community Engagement Team, implementation of the work will take an *inform* approach, where interested and impacted parties will be kept up to date on construction impacts through the project website, signage, and other appropriate site-specific strategies.

## 100% Renewable Goal

This projects advances the City's Renewable Energy Goal by improving the energy efficiency of our infrastructure to avoid the future consumption of over 362,313 kWh of electricity per year and over 10,092 therms of natural gas.

## **Budget Office Financial Impact Analysis**

Based on the proposed Guaranteed Maximum Price and included contingency, the anticipated amended contract cost is expected to be up to \$18.5 million. That amount includes the original award plus additional contact contingency should the scope change. Funding for this project is expected to be available from the following sources: Capital Set Aside: \$2,083,852; System Development Charges: \$900,000; Metro Bond Local Share: \$2,000,000; PP&R Major Maintenance: \$8,416,148; Department of Energy Block Grant: \$600,000. Ongoing operating costs at the sites of these investments will be reduced or stay the same.

Breakdown of the total amount: The current unamended contract is \$1,050,624.24. Including all change-orders and GMP2, the amendment's cost is anticipated to be \$14.5 million. The contingency is \$2,949,375.76. The amendment's cost and the contingency total are for the new contact that is not to exceed \$18.5 million.

## **Agenda Items**

264 Regular Agenda in <u>April 5, 2023 Council Agenda</u> (https://www.portland.gov/council/agenda/2023/4/5)

Passed

Commissioner Dan Ryan Yea

Commissioner Rene Gonzalez Yea

**Commissioner Mingus Mapps Yea** 

Commissioner Carmen Rubio Yea

Mayor Ted Wheeler Yea













# HISTORICAL CONTEXT OF RACIST PLANNING

A HISTORY OF HOW PLANNING SEGREGATED PORTLAND



LU 23-088549 HR DM, Exhibit A.2

trateristic fi da y es cher ca a bear



Figure 1. City of Portland map of Zone I single-family residential areas, 1927



Figure 2. Current City of Portland map boundaries with 1927 Zone I single-family residential areas, 2019

Legend

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IOM THE PLANNING COMMISSION	LAND USE AND PUBLIC MACILITIES	SECTION V. ECONOMIC DEVELOPMENT	SECTION IX: CITIZEN INVOLVEMENT	SOLID WASTE
Pentania Olizzone	GOALS AND POLICIES	A review draft of the proposed City Economic Development Policy has been impared and a process established for public review, discussion and public	9 Maintain carrier involvement in the on-going land use decision-making process and provide opportunities for cligan participation in the injustrum process and provide opportunities for doal and comparticipation in the injustrum 1945.	11D Provide for adaptatic polici wartle deponent POLICIES:
Invested, instrume Commission is responsible for neonimerclary a Com- ensive Paris to the City Council. This Proposed Comprehensive Plan te- the adaption process for meeting this responsibility. For the find as months	SECTION I: METROPOLITAN COORDINATION	heatings. The following goals are included in the proposed Petry.     SA PUBLIC/PRIVATE DEVELOPMENT PARTNERS/III     Evelop a relation strategies development partnership responsive to the exist.	POLICIES:	11.28 CISPOSAL Reduce relearce on landfilling for disposed of solid waster innough lappon of the Microsofter Service Dearch's Solid Waste Management Plan
in year, a Discussion pranticulinar read-was namelings were hard tor citizen individuals and organizations. Over 100 meetings were hard tor citizen we and comments on the Data. This Proposed Plan is the result of those com- tended and the second operating the second secon	1 The Comprehensive Plan shall be coordinated with Federal and State law and subpart regional guile, objectives and plana adopted by the Columbia Beneric Assessment of Concentration and its survessment. The Mitmanian	nome, media of Portland businesses and mekkints 18 JOBS AND INCOMES	9.1 OTTIZEN INVOLVEMENT COOPDINATION Encourage altern involvement in and law planning projects by activity coordinating the planning process with relevant community ingenerations.	11.29 EXEND RECOVERY Dupped the development and utilization of label waste energy recovery
and the part and core, received during the pocket of even plants, which grade the and a have alayed the same, there have been changes to various parts of the t	Service District (MSD), to promote a regional planning hammich.	Support the development of the fortune exclusion at media and increase the dependent of the development. Sec Bullane SS AND INDUSTINY	through the reasonable drasbying of parenting reports to the reporter to businesses, and motion of thicking public hearings to neightborrhood associa- tions, business groups, attacted individuals and the parental public.	11.30 COLLECTION Continue to support the collection of valid waste by private operations
Planning Commission will begin public featings on the Proposed Com- lensive Plan at September which will lead to a formal received aut incom- Dry Council by the first of 1980. After the City Council receives our incom-	1.1 URBAN GROWTH BOUNDARY Support the concept of an urban growth boundary for the Portland metro-	Retain existing in-city time, keep Portland competitive for new boomers and industry.	9.3 COMPREHENSIVE FLAN REVIEW implement a process for complete review of the Comprehensive Plan on a live year basis, which provides opportunities for active involvement by the	WATER SERVICE
Mation, they will hold additional public hearings and adopt Portland's Com- tension Plan. Designed and a distance will address they worked with the Statt and the Com-	1.2 URBAN PLANNING AREA SOUNDARY Wester and an under clammer area foundar by current	50 Nectification to be an annual and apporting transmission and industrial apportunities promote retail, sonice, employment and avaestment responsive to approximate retail, and the destination.	UNY's residents, tournesses and organizations 8.3 COMPREMENSIVE PLAN AMENDMENT COMPREMENSIVE PLAN AMENDMENT of the selected Comprehen-	BOAL: INF instant that reliables unit ordersuate and at supply and delivery systems and
sion thus far to help make this Plan a solid, workable guideline for the growth development of our lutare, thank you! To those of your interested in the fature and the left we necessarily the programment for the first first. I will your additional and the left we necessarily the second size of the left first.	city timits. The City will conclude agreements with abuting jurieds from satabiliting a process for monitoring activity willive this boundary.	SE EQUALIZATION OF ECONOMIC OPPORTUNITY Equalize the opportunities for employment and careet advancement, basis	ave Plan which assures official involvement opportunities for the city's residents, businesses and organications	available to provide sufficient quantities of high runnity water at addigoate perdame to meet the sufficient duty overhild number of the contenuality, on an exclusion, which and well-sufficient backs.
) and commonly as we move foward the linal stages of adopting a Plan. Your immedia and participation now will continue to help us in our devicerations. No or can meet the appriations, house and expectations of exercise and every thin Contributions.	1.3 Create spread about a urban service boundary within the urban planning sins boundary.	result development, and expansion for their segments in the population facing the gradiest insidulational barrient to economic success.	9.4 INTERCOVERMMENTAL COOPERATION Promote citizen involvement is tend use decisions indiated by other gra- emmental agencies:	POLICIES
Vegure compromise from all of us, it is a serious and difficult task, and the inning Commission will need your guidance and help	<ol> <li>INTERGOVERSMENTAL COORDINATION Insure continuous participation in intergonerimental attains with public agencies to permote council allocimetropolitan land use planning and mas-</li> </ol>	Ensure that accounts development and other publicly spoosared ar funded activities are mutually supportive.	SECTION X: PLAN REVIEW AND ADMINISTRATION	TEAL SOURCE Mantain and sufequent the Bull Rim Watershed as the primary widor supply source for the community, with water cuality preservation taking
1 11 1 all	mare the efficient use of public hands 1.5 FUTURE MSD PLANNING EFFORTS Exhibition by underly access that means Publicating Commun.	POLICIES-INDUSTRIAL: 5.1 Promote jobs for only residents by sargeting economic development re-	GOAL: 10 Portand a Comprehensive Plan will undergo periodic rowers to assure that	11.32 QUALITY Mantain the quality of the water supply at its surrent level, which encodes
foan the Joneth	harrisive Plan for amendments that consider compliance with posts, objec- wes and plans adopted by MSD subsequent to acknowledgement of the Concentrative Plan.	sources and inducting in the second of the second s	It remains an up-to-date and workable transwork for land use derivative ment. The Plan will be implemented in secondance with State twe and the Geals, Polyces and Comprehensive Plan Map contained in the adopted	all State and Frederal water guality standards and satisfies the reads in both domistic and edustrial buildomers. 11 31 ALTERNATE SOURCE
an H. Senilly, President Intend City Planning Commission	SECTION II: URBAN DEVELOPMENT	transportation scotts, increased tand supply and food convol factores.     S.3 Encourage the contributed use of designability districts for manufactores instructions.	Completienerve Plan POLICIES	traurie a residule supply of eater to the community indough the development and manifestance of an alternate source (phumdwater) for use during emergencies or periods of eaternate high demand
TROPUCTION	GOAL.	5.4 Provide industrial lates in the city through redevelopment of existing industrial districts and annexation of new sand, to provide jobs for city residents	10.1 MAJOR PLAN REVIEW implement a process for complete review of the Comprehensive Plan on a flow wat heads. This precess will include land use and demographic data	11.34 MAINTENANCE Maintain storage and distribution facilities to order to protect water quality.
In Comprehensive Plan establishes goals and policies to guide luture public	<ul> <li>Cultural center through public policies that encourage, expanded oppo- locally for reaucing and lobs, while international the challacter of established</li> </ul>	5.5 Improve movement of goods and workers in the designated industrial districts.	collection and analysis, a Comprehensive Plan progress report, and a ofigue involvement process to evaluate the Plan's effectiveness and pro- posals for amendments is appropriate.	INCOMENTATION AND AND AND AND AND AND AND AND AND AN
A part of Land Use and Public Facilities Godis and Pescars to guide the develop- mend and reduced other to the city.	POLICIES:	POLICIES-COMMERCIAL	10.2 ANNUAL REPORT The Barreau of Planning will provide an annual status report on the imple- mentation of the Completeneous Plan.	Maintain City storage capacity of all each type interesting the second stary cap of city same. Additional storage capacity contracted by sufficient city water users will store be maintained.
A Companianew Pran Map to guide follow zoning patients in the city. A guide for the major public investments required to imperment the Plan. A variable for review and attendment of the Plan. and	2.1 POPULATION GROWTH Allow for probabiliting growth within the existing city boundary by providing land use opportunities that will accommodate the protected increase in city.	at the city, and reinforces neighborhood livability 5.7 Mandam the central business district as the principal commercial center in	10.3 INTERIM PLAN REVIEW AND AMENDMENT Amendments to the goals, policies, map and implementing ordinations of	11.36 FIRE PROTECTION Install and maintain public fire hydrants with adequate flow to serve the fire protection heads of all City residents and businesses.
Recommendations for revising the Zoning Code to carry out the Policies and angument the Comprehensive Plan Map. Seals and Policies solutions what the City should do, while the Comprehensive	22 URIAN DIVERSITY Portole a tange of living environments and employment opportunities for	Support the vitality of commercial centers throughout this city is asses for trade and service.	the Contentional with the second of the content which cate in worker while Cay Council as dearmed recovery consistent with cate in worker ment procedures and State law.	11.37 DESIGN AND COMMUNITY IMPACT Design water facilities is be campable with the area in which they are invested.
Non Map and Zoning Code provide the guidance and the tools for where and new to accomptant these codes and Polices and the finale and British checks a written transaction for Alice program.	Pertiand readents in order to attract and retain a stable and divergenced population	5.9 Mastan transit related commercial centers along designated major transit compose	10.4 COMPREMENSIVE PEAN WAR AMENDMENTS Individual requests for modification of the Compenhensive Plan Map design rational field are determined to be consistent with the Compenhensive Plan.	11.38 OUTSIDE USER CONTRACTS Secure long-term contracts with outside only water purveyors in order to
and hundring declarants by the Pranning Commission and City Council. Public Facilities Goals and Policies guide how we spend money leach year to	Prease the aniversation program of the City within the urban service boundary in allow to smooth transition in service provinces, more logical of boundaries and coordinated capital improvements (programming,	5.10 Fieldan example angebactive of contractice accepter wave group or taking of residential endo and encourage clustered along of mes reighborhood sommercial development.	and State land userplanning goals were proceed under regulations, resources som requirements and hearing procedurus used for zone transport requirements. Recording may be carried area done when developments	Inspose sogreen were suppresented. 11.39 OUTSIDE LISER BENGFOT Regular water users outside the city that benefit hom a new improvement.
marging and carebract the facilities that are neclessary to happen the Compet- lempter Plan. These policies were developed in concentions with the Designithment of Public Works, the Bussias of Water, Plana, Fire and Police, and Potiand	2.8 URBAN LANDS The Day shall encourage as received stick that when and urbanicable	SECTION VI: TRANSPORTATION	10 the Competitioner has been been been been been been been bee	to finance that portion of the improvement constructed for their byness. 11.40 OUTSIDE USER STORAGE Review endo is expressed with whom the Dity has a contract, to provide
School Dates of 1 The Comprehensive Plan Map determines the type, location and density of and development and redevelopment permitted in the future. Although develop-	2.5 OPEN SPACE Provide opportunities for recreation and vocal relief by preserving Pon- Provide opportunities for recreation and vocal relief by preserving Pon-	COAL: 8 Promote an efficient and balanced untan introportation system, consistent,	work and guide to the development and redeviatioment of the city     10.8 POBLIC FACILITIES     Advertise Profe Facilities Goals and Paldoes as the long range guide to	storage of at least three times the average daily use of their community or to compensate the City for the additional cost of maintaining such storage within the City Sector.
ment is this only may not exactly insich the map in two, two or event twenty years, the map shows where otherent kinds of activities are spenopiate. It identifies potential development apportunities for meeting the city's housing and unoxy-	lands sparks, got courses, train, parkways and currentine. Exception a loop trait that excertises the city and permitte the recreational use of the city a results, creaters, takes, and sloughts.	with the Arbertal Streets Classification Policy. Is evidentially arrive conservation, reduce air poliulair, leasen the impact of vitability artific on registeritial reightechoods and improve access to major employment and	the invostment of public funds through coordination with the City a Capital Improvements Program and the budgeting process of rolated public agen- cies	11-41 EQUITABL/TY Establish water rates basis on the cost of providing water service in an
need pueds. This Compenhensive Plan Map designates land uses and demnines the maximum zoning classification allowable for each partial of land. The Zoning Code is the major "soc" for importanting the Compenhense Plan.	2.6 WILLAMETTE RIVER GREENWAY PLAN Implement the Williamette River Greenway Plan which preserves a strong waiting river while promoting reduction, commercial and residential we- residential we-	POLICIES:	10.7 COMPREHENSIVE PLAN MAP Adapt the Comprehensive Plan Map is the official long range planning Adapt the comprehensive of the city to these density and beaton	11.42 WATER PRESSURE Provide water at standard pressures (40 to 110 bb, per bg, with its all users
Therefore, recommendations for modifying the Code to respond to the Plan must be considered at the same time. Zoning must by lies be "considered with the emotion of the completenesive Plan. The does not mean that all land with be emotioned with the same completenesive Plan.	Sector development along the Willamette south of the Broadway Bridge 2.7 FORESTLANDS 1. and there are an in commercial together lands	6.1 INTERGOVERNMENTAL COOPERATION Encourage efficient management of the temportation resources located in the sity and metropolitar, area through cooperation and long range plan-	The Competenziale Plan Map will determine the maximum zoring classi- leaten that may be applied to a specific site.	HIAD EXERCIT CONSERVATION     Pursue todam improvements, efficiencies in operation, and maintennatule
zerial. Where "downzoning" (incorring to a line internet use) is pecelearly to be reasolated with the Companiemovie Plan Map, the law inquires that the Sawe whan the Plan is adopted, However, "upporting," incorting to a more relative	2.8 RESIDENTIAL NEIGHBORHOODS Indexte and protect the city's residential residentical while allowing for	REGIONAL AND CITY TRAFFIC PATTERNS     Create and mandain regional and only table patterns that project the le-	10.8. ZONNO UPON PLAN ADOPTION Resons those stress favoring oracling zoning classific asing more permissive than allowed by the Comprehensive Plan Map to control to the Plan av that adoeted by the Comprehensive Plan Map to control to the Plan av	of facilities to restuce and conserve energy
sales relief not take places until an appropriate development proponal is suborthod Upporing is lecommended to setter on a case by case base, using established to long procedures, including notification and public hearings. Approval for up-	Tes within residential areas under certain conditions. 2.9 DOWNTOWN PORTLAND	ability of Partiand s established residential regificenceds erive improving access and includy within commercial and inclusional small.	required by tax. Areas were source or an and a source of the source of t	PARKS AND RECREATION
zaming will depend on each factors as stability or change in the evid, as balanter of public utilities or services, and adopacy or transportation systems. By not automatically changing the zoning to the maximum level permitted by the Com-	<ul> <li>Reinforce the downloan's position as the principal community, service, outland and high density housing center in the sty and the region. Maintain the downloan as the only is principal retail canter.</li> </ul>	6.3 Antichols bitmetra and project development will be guided by the traffic ways classifications, objectives and policies contained in the adapted Adapted Streats Classification Policy	10-9 REVISED ZONING CODE Codduct a traverse and revision of the city is Zoning Code with the objective	11F Maximum the quality, safety and usability of parktends and facilities through the efficient manipriance and spiration of park improvements, prestoria- tion of needs and search parks, and equilable advicement advice and parameters.
prohemisive Plan Map, existing states onough his be premissively teriode out of an area. With all of bases elements wonking bigether (the Land Lise and Public Facilities	2.10 HISTORIC COMMERCIAL CENTERS Expand the role of mayor historic ourmerical seniors which are well served to trend Counciliant Interac controls with retail, office, service and labor-	84 FUBLIC TRANSPORTATION     Encourage a sale, inflorent metropolitain public transportation system deard	of updating and implifying to privide a shorter more accurate, under- standates and entersates document. Work toward development of a system uperformance standards in industrial zones, replacing the satisfing	POLICES
Boals and Policies, the Complementative Plan May and the Zoning Code, Portains and move who the Tubure, responding to changing heads while preserving the quartees the make Period a tensionable place to three, end play.	interview webstwal activities. Locate medium and high density apartment zoning adjacent to these conders	Ing Portland as an attemative to the existence by providing more inter- crease-lown services to resoluting insights/receipt which contract commen- cial aveas to other centers of activity and employment throughout the phy-	use like system 10, 10 DESIGN REVIEW Develop recemmendations for additional arrive where design neview would	11.44 MASTER DEVELOPMENT PLANS Maintain master development plans for city parks that address user proop
Additional information on stach of the Goals and Polician Sections, the Pair Map and the Processed Zoning Code Revisions is available in individual support docu-	2.11 TRANSIT COPRECISE Provide a motione of activities along major transit routes to decisate de- pendence on the automobile. Encourage development of commercial pendence on the automobile. Encourage development of commercial pendence on the automobile.	4.5 TRANSIT-ORIENTED DENSITY     Beindows the link between public transportation and land usin by increasing	be appropriate and prepare design review standards for both existing and proposed areas.	pain opportunities, financing strategies and origin myolvement. 11.45 MAINTENANCE
mems. Copies of these documents may be steamed at the BUREAU OF PLAN. NING, 424 5 W MAIN PORTLAND, CREGON 97204 (Telephone 248-4360).	schvittas. Encourage attached rundentas and garden apartment develop- ment new transit insites topecally where vacant tand affords an uppor- base for a fiel development.	La TRANSIT-DEPENDENT POPULATION	Develop mechanisms for bitter entorgenent, of conditions required of individual projects in zone changes, conditional use and vacance cases.	Provide programmed proventive maintenance is as only park and network tonal facilities in a mather which induces upgrammed nexitive maintenance and emphasizes the use of echectuled service delivery.
	2.12 AUTO-DRIENTED COMMETICIAL Allow sub-oriented commercial activities to boots along major traffic Allow sub-oriented commercial activities to boots of the Allonate Tabletter	Encourage a public transit system that addresses the special needs of the bonst-dependent population:	The Bureau of Planning and the Park Bureau shall develop a long ramps parks plan for the stry which will provide standards for landson of plank and periods bureau.	11.46 CARISTAL PROGRAMMING Maintain a lang-range park capital improvement program that balances announces, development and expensions, provides a process and criteria.
LOOKING AHEAD	Policy: Also allow the location of lenal, tabor-intensive menufacturing firms and other amali industrial lems which do not edvertely impact adjacent contential anality.	Coordinate the planning and development of matios related land use and avators facilities with the Port of Portland as well as other attented agon- ries, devices and individuals.	hood, distinct and city-wide recrisitional parks and programs.	for capital anonyement project selection, and emphasizes creative and baside invocens strategies
Portant is more than a group splice area - if a sway of the Many characteristics	2.13 INDUSTRIAL SANCTUARES Provide industrial sanctuaries. Encourage the growth of industrial activities	6.8 TANK REGITS CF-WAY Encourage the preservation of excerning rail rights-of way for use in Imaght	SECTION XI: PUBLIC FACILITIES POLICIES	Base the precision for expresentation of development of parkands on decomprobed reside and the following prever law angiver membranching mate location at decision areas. Provid community segurit, location and
break and revers accorded by store-capped peaks on the hondon, a dynamic orban aeting enhanced by the intense, yet human, churacter of the Denembers, an active sector a human diverse to be been dynamic and active been and the store of the Denembers of the store of	2.34 LIVING CLOSEN TO WORK	6.9 ALTERMATIVE URBAN TRAVEL Provide support for administry forms of urban travel, such as boycling and	11A Provide a timely, orderly and efficient arrangement of public facilities and services that support existing and planned land use pathore and deciding.	<ul> <li>Incont to schonia and other public facilities, expect of neighborhood stabilities and community development projects and policies, and constaining with policies maked development planes.</li> </ul>
valing diversified amployment, and a variety of orighborhoots, each unique in character, allowing for a break range of liketyles.	Locale gravities engle-tanky resources consistent million edge inclusion of proyment conterts 2.15 STRIP DEVELOPMENT	mercial areas by proveling boycle patts and walk ways	GENERAL POLICIES.	11.48 NEW PARKLAND Increase the supply of parkland, giving provide to wreat where sensitive increased and supply of parkland, giving provide the sensitive increased and sensitive increased and sensitive increased and sensitive increased and sensitive increased and sensitive increased and sensitive increased and sensitiv
by at twenty or a functively years ago, it offers from the city of yesterday. The future seems to be arriving at an even increasing place, and in whys that could demonst the character and installing of the urban area. Finance to an urban area	<ul> <li>Discourage the development of new stro commercial areas and focal fature activity in such areas to create a more clustered pattern of commer cial development</li> </ul>	SECTION VII: ENERGY A newsr graft of the proposed City Energy Policy has been propertid and a	11 Service Reprovementation of the Cap of Perstand will provide public tacitizer and services at levels appropriate for all cand use types and will participate in descent address of other tacitizer before can which between the called approximate.	I sary tai complete the "Fony Mile Loop" system, acquisition of transit system prate for park development which trave been declared surplus to park public agencies, and acquisition of environmentally unspise areas, and
a fact that cannot change. The task faces is to return the receipt important chan- rectenistics of our oilly in the task of changes we cannot control wind by memorying as well as possible. These brokes we can control. We must accept from changes.	2.16 TRANSIT STATIONS Where new regeneil transit lacilities and stations are to be alled, increase opportunities for commercial activities, the development of medium and opportunities for commercial activities. The development of medium and	process established for public review, discussion and public hearings. The following goal and policies are included in the proposed Policy.	11.2 CROERLY LAND DEVELOPMENT Urban development should occur only where urban tublic facilities and	1 11.49 BELT SUSTAINING SPE CIAL FACILITIES 11.49 BELT SUSTAINING SPE CIAL FACILITIES
or we can the task of kalling all the trungs that make Portaind "one of Anionca is most trunder care." The mainteenties that make Portaind an Inable continue to draw more to severelide to	<ul> <li>nigh density apartments, and excessed single-family density</li> <li>2.17 UTE (ZATION OF VACANT LAND AND HOUSING STOCK</li> <li>Excesse table advantation of leaser single-family items and existing</li> </ul>	GOAL 7 To increase the energy efficiency of existing structures and the transporte- tion wedem of the only through policies and programs enclourage	11.3 DRIDERLY SERVICE EXTENDED The angular service and expansion of one under public leadily or service	and whore there are class to a cl
the only Energy resources, perfectually periodeum products are becoming the more expensions and more solaria. Land and reliating posts (methods) with increasing and as do the cases for perioding inverted policy facilities and services, meaning for	2.18 WKLD USE Distance that will allow for the continuator and enhancement	conservation of renewable resources and the application of renewable resources while mandating the attractiveness of the city as a place to the and do business.	should not streadule development that begins any treader of services a solidy to provide all other necessary urban public facilities and services a uniform levels.	<ul> <li>Develop and concern special representation makes measurum late, and can be financially self-substanting.</li> </ul>
Des future must respond to these factors when prevening the city's account health and finability. Product has deviated nucleocidly may a used use pattern that is, and can con-	<ul> <li>Provide a finised use character where such arises act as buffers and when opportunities week for creation of rivides or preters of meset commission interview and approximately experiment.</li> </ul>	POLICIES: 7.1 THE CITY'S ACLE IN ENERGY CONSERVATION	11.4 CAPITAL EFFICIENCY Maximum use of existing public facilities and services should be supported through encouraging new development to occur at the maximum densities	11.51 AQUATICS FACILITIES     Provide oparies in conjunction with School Dated #1     11 At Second Anone Photospanis     11 At Second Anone Photospanis
Brue to be, basically assure. The early other of 6 and Portand, 51 Johns, Alama Selenced and Director row from a series of commenced, industrial and residential canders within Portand. The balay loss that screed three others in download	SECTION IIL: NEIGHBORHOODS	The role of the City is to insure the accompliant of the close, while the energy policies are in being tables of the City and depend on City action. The City anall implement conservation actions detectly within City government.	allowed by the compensation was and strategy in a considerate viscant land within presently developed streats. 11.5 COST EQUITABILITY	Provide instreadon programs and envicos including colume inducemental historical, relativistic and physical fitness, and sports (competitive and non- competitive) as resurred to measure a balanced program which includes the
Perfaved and to such autoban communities as Multicinari. Lend, violationaria Kenson and Survivalde, backere image transportation comdens stall used today Downlown Portland developed as the maker activity center of the transportation Downlown.	GOAL: 	and encourage conservation activity are private and mandatory adaptive accomplished through education interentives, and mandatory adaptive. The City's enforts shall include promoting conservation informing all sectors of methods between end operations for functioners devices francescal in the sector of the sector of th	To the maximum eaders' possible, the casts of improvement, extension and constructions of active technics should be brinne by foote whose land being openent and redevelopment actions made such improvement, extension	<ul> <li>needs of the specially handscapped and the elderly within eacing its a secondly.</li> <li>A second to the speciality hands if it</li> </ul>
region, providing a Intercala, reale, receiption and a statistical cose in industria add alare and sweeppic, and must ramain as. Well established, cose in industria and destribution areas provide deverse employment opportunities clove to a brow	I moots while providing for increased density in other to all act and retain the strong-term residence and businesses and ensure the city's residence/ quest and economic visitiv.	n anthreas, advocating the support of the City efforts at the state, regional, and federal investic and regulating conservation actions where appropriate the City effort exclusions of an every consumption to assure the	11.6 FACILITIES SYSTEM PLAN Develop and mantain a coordinated Facilities System Plan that provide	Support private development and operation of single use recreation face fees which meet an identified public need and the City's remeasurant of activities.
The Proposed Comprehensive Plan calls for maintaining this basic develop morpatient whee providing direction for responding to the future s demands. Th	POLICIES:	effectiveness, comprehensiveness and fairness of private vector actions 7.2 RETROFIT OF EXISTING BUILDINGS AND EQUIPMENT	a) harrowsch toj the provision of unitari public facilities and arrows which Postandie Unitari Semicir Boundary. This plan will be consultative with the descriptated tand using and density of the applicable companientaries plan.	PUBLIC SAFETY
proposed land use passes small the public basis. The commercial content scon which residues the socializity to public basis. The commercial content scon transit conducts are designed for new land uses which are not highly dependent the social conducts are designed to new land uses which are not highly dependent.	<ul> <li>Provide and coordinate programs to prevent the deterioration of existin structures and public facilities</li> </ul>	possible as determined by costs of conservation actions and price of en- ergy. The referit of exating buildings for the purpose of energy conserva- tion shall be accessible and provide vehicles with man- ticity.	11.7 CAPITAL MPROVEMENT PROGRAM The Capital Improvement Program will be the ensues parening processe to major improvements to estating public facilities and the construction of two	FIRE
entited - antached readential, or rowhousing. This housing from allows some normaals in density reduces and and acreduction costs per unit, and yet rates the enables of the traditional socials family enables that now woult.	<ul> <li>B 22 Bocure comparison programs to promote neighborhood interest, co Provide and coordinate programs to promote neighborhood interest, co sem and security and to minimize the social arguints of land use decretory </li></ul>	<ul> <li>datory requestments imposed two years after the adoption of the policy.</li> <li>Reindli programs and the requirements must be cost-effective, compar- henauxe, and have the most equilation impust possible and all aschort of the</li> </ul>	tacktes. Planning will be in accordance with the manwwork provides o This Facilities Dystem Plan.	<ul> <li>GOAL.</li> <li>HIG Develop and essentian facilities that adequately respond to the fire protection.</li> </ul>
Provisions are installed which allow more efficient use of larger homes and vacat hand, unknowage apparent developments to be more compatible with color	<ol> <li>BEGHEOFHOOD DIVERSITY Promote neighborhood drivenity and security by encouraging a balance age, income, race and while background within the only a heighborhood age. Income. race and while background within the only a heighborhood</li> </ol>	n community 7.3 LAND USE The Day shall develop land use polyces which take advantage of density	PUBLIC RIGHTS-OF-WAY	POLICES
readounce uses preferred energy conservation quality in the city and stability available preserve and enhance between energian quality in the city and stability exching respirate the two starts and the start of the start of the start of the start when its even sensitive and change above the to be start of the start	34 HISTORIC FRESERVATION     Preserve and initial historic diructures and aveas throughout the city     Preserve and misian historic VEMENT	and tocation to reduce the need to travel, increase access to travel, and permit building configurations which increase the efficiency of space heat ing in residences.	110 Preserve the quality of Portland's land transportation system, protect th City's elaptial investment in public rights of way through continuing his	<ul> <li>Provide a uniform sever of two protection twoughout the city through procession and suppression activities</li> </ul>
Is designed to keep this charge responded in these wars, more effortable housing opportunities and more employment opportunities san tar made a variable to encourage and provide for the needs at a diverse population. More effective	<ul> <li>Provide for the active evolvement of resphonhood residents and buy headers in therapiers affecting their tegetoxinoid through the promotion meghterized and hashers associations and bein activities</li> </ul>	7.4 RENEWABLE RESOURCES AND SUPPLEMENTAL ENERGY SYSTEM The scenaroption of non-immediate viscources for residential and bishness use shall be reduced by enclusive the speciation of immediate and provide the second by enclusive the speciation of immediate and second by enclusive the second by enclusive the speciation of immediate and the second by enclusive the speciation of immediate and the second by enclusive the speciation of immediate and the second by enclusive the second by the second by the second term of the second by enclusive the second by the	equative manufacture and information programs, and cally on a set inspectiments in accessing the needs of neighborhoods, commerce and industry	<ul> <li>As alreas are annexed was the oby, evaluate the level of the protection an take action to many that these new areas receive the same level of the protection provided to the max of the city.</li> </ul>
case of public faunties is possible, more parents in collect to existing implo- ment and shapping sentities, costly unline sprawt can be reduced, and publi- tionant can be near publicationale to more parents.	SECTION IV: HOUSING	administrative energy structure. 7.5 TRANSPORTATION Transmound for the second structure and the second structure of the seco	POLICIES	11.56 MUTUAL RESPONSE Coolerus to participate in mutual response agrouments arround the district
In the year 2000, the Doentown skyline will be different, with new development reacting upwald, as well as unique, sider arrest being preserved. Both of the characteristics must work together to save the only offers also. Readered and	GOAL:	Hough assans which increase the officiency of the transportation system operating within the city. These actions will encourage individuals to choose the method of travel which in the most the efficient house the outputs	<ul> <li>Preside the processing of the series of the s</li></ul>	all benefits and antiproces the ability of the City is provide uniform levels of the protection investigned the city.
will retain their individual character, but with liams increase in demoty to reduce urban sprawl, represed energy efficiency and provide more attoration hourse options, heightertructures will generally remain single tanky shorted with oers	<ul> <li>Provide for any interview of the adopting City Housing Policy in order to provide adequate supply of sate, samitary housing at price and next levels appressive in the varies foregard and address.</li> </ul>	of the trg, promote the strangy-afficient movement of goods, and provide movembers for the use of two afficient voltacles.     The concentrates that	<ul> <li>TRANSIT CONTROLOGIES High priority will be given to improvements which promote more effective sublectmantportation for those steets functioning as transit condons.</li> </ul>	PE CONTRACTS Contracts for City tree protection services to subside city busineesing, ter bences, the departments and districts should be installed only if megatility
ochaged house, both detached and attached, alrungteeing neighborhood bi DNM, Opportunities for rendal units wit studies dround carefoldors and carefolders while news good access to public transit to and from employment centers and shoppon	POLICIES	City burelease shall induce energy consumption by investing in lineargy con any values sportunities and changing operational procedures to the most energy, and road-inductive and changing operational procedures to the most energy, and road-inductive and possible	11 10 STREET IMPROVEMENTS All improvements to public rights of way will be consistent with the right	to body for announcement or includin tesponies representation with the successful Conference where including the control the control well with the announcement policy of the City and should provide on incentive for announcement
Conversional and industrial activities and remain activities and openative as estable figma continues to grow and new times choose to Portunia as their mone- Portunity as the basicity and character have anovided a second transitiation for the co-	<ul> <li>An Opport UNITY PLAN</li> <li>Cooperate with the Matropolitak Service District and the Housing Author of Benard in converse call the MDD Answeld Housing Cooperate Plan</li> </ul>	SECTION VIII: ENVIRONMENT	<ul> <li>b) way classifications in the Arteriel Streets Classification Policy</li> <li>11 LOCAL SCRVICE IMPROVEMENTS</li> <li>Constant local service streats as accordance with examine and planner</li> </ul>	11 dia EMERGENCY ACCESS. Provide and maintain storets of high structure guality to insure access amergency and service equipment.
Sinued development of the LBy. The only main build on that foundation as we me the challenges of the future, and respond in a manner which installes that uniq- ifordiand challender.	In The bulkweing policies were adupted by the Portland City Council Or barrow 145472, on March 29, 1978 as the Housting Policy for the City	GOAL:     A Mantain and improve the parate of Portland's six, water and open topic	registerhood land use patients and accepted engineering standards 11.12 TRANSIT AVPROVEMENTS Constraint based atmost an third transit vehicle movement is and areaared	POLICE

PEANNING COMMISSION PUBLIC HEARINGS: Grant High School Austorium Encoln High School Austorium Milson High School Austoriu Roosevelt High School Austorium Roosevelt High School Austorium Cleveland High School Austor Portland Planning Rureau, Rm. Sept. 11 Sept. 13 Sept. 20 Sept. 20 Oct. 4 Oct. 9 Oct. 11 ALL HEARINGS BEGIN AT 7:00 PH.

USING PRODUCTION

reportions, both sample- and multi-tamity. This relativerance will be not label through a vigurality housing maintenance code programs in the arkening, inspection and francisal assignments, similar primality at sale installow, structural integrity and amongs conservation.

Response Left appointe of a searchard restrict of the second and the Response the management of a second restrict of the Greenway Plan. Restrict of the second fixed fixed restricts and the Bennetiators of a Air range of footplane messagement (in the Bennetiators of a Air range of footplane messagement) in Bennetiators of a Air range of footplane messagement Bennetiators of a Air range of footplane messagement. Bennetiators of a Air range of footplane messagement Bennetiators of a Air range of footplane messagement. Bennetiators of a Air range of footplane messagement Bennetiators of a Air range of Bennetiators of a seared of Air range of Ai

POLICIES--NOISE: 6.13 Refues and prevent instalative node and vibration in attac deviced through construction requirements 8.14 Reduce and prevent excessive noise levels from one use which may impact another use through no-poing rese monitoring and enforcement procedures.

Mantain and improve the quality of Portland's siz, water and open status measures and potent receptorhoots and susiness content from detri-mental road potents.

Commute to cooperate with public significance concerned with the imported ment of all quality, and imponent State and imponent prime are compared to allow could have a supervised to the second state of the second data and the second state of the second state of the second datasets of the second state of the second state of the second center moleculate by 1987 and the second state of 1987.

This revised Downlown Parking and Circulation Plan will got it four-City efforts on atlaneng an quality electance in the period business detroits and alline for expanded employment and housing open-turbus downlown

and allow for expanded employment and incursing opportunities downlows 8.3 Develop strategies that will allow for economic growth and are quality in provinements in an equility particular issues developed outside of Downlown 8.4 Promote use of ride sharing and public transit throughout the metropolities

8.7 Maintain doordination of hand use planning and capital improvements to to visual the most efficient use of the City's sandary and atomicater run-off facilities.

Protoct Portland parks, cameteries and got courses from have develop-ment fresign an Open Space designation on the Compositemice Plan Map

Map 8.9 Restrict development within Portland's milural dramaginerys through de-velopment and application of a desinagewey overlay zone

8.5 Continue comportation with Federal. Blate and regional agencies with the management and quality of Portland's water resolutions. 8.8 Operate plan and regulate wastewater systems as designated in MSD's Waste Treatment Management Component

POLICIES-AIR QUALITY

POLICIES-WATER QUALITY

POLICIES-LAND RESOURCES

1.60 NEW SERVICE PEDESTRIAN IMPROVEMENTS Provide for safe pedestrian movement along at new or reco SCHOOLS

POLICE GOAL. 11H Develop and cubic salety

NUCIES:

OLICIES

uconing requests for street vacations, give consularisation lo as for tacycle ways, preleatmen ways, parkland or other ou

stream especially on those shoets designed and the stream of the stream

### SANITARY AND STORMWATER FACILITIES

Insure an efficient adopuate and self-supporting with training and disposal system which will move a POLICIES

20 IMPROVEMENT Improve the existing sever system in those are

major changes from the exists Limited Commercial (CS) zone (C3) zone. The C3 is designed ded by transit to encourage de ra cally when collars for Assepting the actival oper and all affects to inflam the structure for piddle last

Planned Unit Development

APARTMENT ZONES

At 5 Medium Density Aparts

24 High comments of the backford statements. Descriptions would risingly on persistent Up to 20% of the backford schuld be used the obligation of the backford of the obligation of the parking schuld be used the obligation of the south of the backford of th

COMMERCIAL ZONES

ZONING CODE REVISION

OPEN SPACE DESIGNATION the only land use designation that such fication. Open Space designations are a well courses, schools with Park Bure

SINGLE-FAMILY RESIDENTIAL

lignificant changes are proposed for the ones. A new zoning classification has been tential construction (R2.5). This zone provision of the provision of the

R5 High Denaity Single-Family Residential:

AND IN TINCI E. FAMILY RESIDENTIAL ZONES: riger Homes to Add a Rental Unit if the Islowing requirements are mel-ouse must have all least 2 000 eq. it. of gross floor area, exclusive of

For the answers uncompared to the following regulations are mell may have more than one common wall. In must be parent on a lot than when so all the requirements of the width, depth and total area. In must have one side yard as tead 15 feet wide in the sub-one side yard as tead 15 feet wide.

2. Each unit must been on a abocand parts within and mer mere rear and part in jamment of the unitarity is a backard parts. The mere equated is the unitarity may be approximate the period of the second address. A site is unitariately is permitted that number a strategist address in a site is unitarity in permitted that number a strategist address A site is unitariately a permitted that number a strategist address and address of a second parts built and a strategist address and make mere address of a second parts built address must be extended reading and address of a second parts built address and address of address and address of a second parts built address of address of address and address of a second parts built address of address of address and address of address

where the procession of the second se

Development Developments (PUD) are a memod of land development which all land plane this online development, including stream, utilities, which are plane her this online development, including stream, utilities, all developments a rise of focusing types, but development is bit

Authorit langue family research advantages and the standard stan Standard stan

to to this housing unit in the

MIXED USE ZONE This is a new zone which provides for the continuation of areas of mixed use character where they form buffers and where opportunities exist for creation of mixed use crefters.

MU Mixed Use: igh density apartmining are parentided as a con-trait users are allowed, as are other light indi-initiosent basising. No packing maximums are i initioguiraments for each use allowed in this are are as for 20 or more cars must be divided into achied with bears. Parking regularitistic for the king and storage areas must be lighted A 5-ft lander, residential zone

### MANUFACTURING ZONES

INTERPORTATIONAL CARTES Under the careful caring, law intense care an automatically particle in the most intense zone, intension intense careful careful careful careful most intense careful careful careful careful careful careful careful careful for consistence and the strategies note induced and astrong a counter the intervention of the strategies note induced and astrong a counter the automatical careful careful careful careful careful careful careful careful above of the careful above of the careful ca

### MX Downtown Manufacturing:

Overlag downs are specifies the indetrying score. A parcel of land may be and the specifies of the score score score score score score constraint of the score score score score score score constraint commercial (C2) may be superimposed with the underlaying constraint commercial (C2) may be superimposed with an end of the score score score score score score score score score constraints and the score score score score score scores, scored score constraints and public bearings. The current Zoning Code has size to parter. This side scores the score score score score threes new overlag zones. The additionals the Particip reverged more threes new overlag zones. The additionals the Particip vertice and the scor
--

This zone requires a L Aircraft Landing:

in the workly of the airp teched by arport route

This overlay zone provides additional restriction outside of the Urban Growth Boundary. The Na onestion of new lots of less than 20 acres

This zone restricts the construction of signs along turdge approaches and ways to prevent a confusing proliferation of signs that could to a stattle a hear of the second secon

### Z Downtown

This searchey is designed too inhits, imposes design reven

	Year 1977 Figures	Year 2000 Potential Figures			
	-	Pressent Zoning Pattern Continued	Dissization Draft Land Gas Patient	Properted Lang	
Population	A60.000**	1004 (ADD-1	#17,5021	41A.000	
Haveling Single-Fanity Matt-Fanity Tyre Tyre Engleyment Commencial	Units Acres 102.400 is 800 00.000 1.800 182.600 is 600 Jake Acres 10.000 2.800	Lindia Apres 113,000 17,000 79,000 7,000 101,000 10,000 Jana Apres 121,000 2,000	Unite Acres (20.004 17.800 (10.000 5.000 (10.000 10.800 Acres (14.000 2.000	Unite Auren 116,700 17 50 81,610 0,30 201,665 18,60 date Auren 151,600 5,60	
Copri Holush'ali Masary Kolush'ali Institutional' * Total	17 700 8.105 21.405 8.300 41.700 18.500 2846.400 21.706	81.882 3.489 37.900 3.800 73.900 4.8.605 932.880 85.900	76.600 2.000 80.759 18.600 202.400 38.108	27 MIN 1.40 MI.400 H0.90 MIL.600 71.40	
Sensity Paratra per Anne Crip Welle Units per Anne	F.26.	1.88*1	ALL	4.00	
Available Strater	4.67	8.47	8.27	8.55	
Average Multi-	28.79.	94.88	34.41	36.25	
Acres of Vectors	13.471	5,485	ART	1581	

Fightening, Characterist, Yopoptake, government functional, parket, etc. "Knowledge parket, strength, waterwaysh and cancel regress of water."

Nate. The principle she



### **Proposed Comprehensive Plan** Portland, Oregon September, 197



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LU 23-088549 HR DM, Exhibit A 2

Tour Parts

## Past Land Use Reviews

File Name	Year	Category
LU 21 - 053526 HR	2021	LU
LU 18-103566 HR	2018	LU
LU 17-245440 CU AD	2017	LU
LU 17-206893 HR	2017	LU
LU 17-163203 CU	2017	LU
LU 17-158467 HRM	2017	LU
LU 16-148005 HR	2016	LU
LU 14-218444 HR EN	2014	LU
LU 13-236792 EN HR	2013	LU
LU 07-139442	2007	LU
LU 06-178213	2006	LU
LUR 99-00809	1999	LUR
MP1 107-89	1989	MP
HL 74-89	1989	HL
HL 75-89	1989	HL
CU 49-77	1977	CU
CU 059-74	1974	CU
CU 007-74	1974	CU
CU 93-67	1967	CU
CU 056-65	1965	CU
CU 067-64	1964	CU
CU 029-61	1961	CU













and the second s

# GENERAL NOTE

CONTRACTOR SHALL INSTALL NEW UNDERGROUND CONDUITS ALONG SIDEWALK PATHS AND EXCAVATIONS FOR OTHER PORTIONS OF THIS PROJECT. COORDINATE EXACT ROUTING WITH OWNER'S REPRESENTATIVE AND OTHER TRADES.

# SHEET NOTES

- (1) PROVIDE AND INSTALL WP, GFI RECEPTACLE AT +24" ABOVE FINISHED INSTALLATION.
- 2 PROVIDE COMPLETE COMPLIMENT OF CIRCUIT BREAKERS FOR REST ROOM FINISH PROJECT. COORDINATE WITH OTHER CONTRACT
- OR HIS REPRESENTATIVE.
- EXACT LOCATION WITH OWNER'S REPRESENTATIVE.

(5) PROVIDE AND INSTALL NEW 120V, IP, 20A CIRCUIT BREAKER IN EXISTING MAINTENANCE BUILDING PANEL BOARD AND NEW 3/4"C, 2#12, 1#12G AS REQUIRED TO POWER NEW IRRIGATION CONTROLLER IRRIGATION CONTROLLER SHALL BE PROVIDED BY LANDSCAPE CONTRACTOR WITH FINAL POWER CONNECTION BY ELECTRICAL CONTRACTOR.

A NEW SITE LIGHTING FIXTURE, POLE AND BASE SHALL BE PROVIDED BY PORTLAND PARKS AND RECREATION AND INSTALLED BY THE ELECTRICAL CONTRACTOR. THE ELECTRICAL CONTRACTOR SHALL PROVIDE AND INSTALL ALL OTHER ITEMS AS REQUIRED, INCLUDING, BUT NOT LIMITED TO A NEW 120V, ENERGY SAVING BALLAST, CONDUIT, WIRING AND HAND HOLE. HOMERUN SHALL BE VIA A TORK 7200EL TIMER, PROVIDED AND INSTALLED BY THIS ELECTRICAL CONTRACTOR. REFER TO SHEET EI OF THE VOLCANO RESTROOM DRAWING PACKAGE FOR EXACT LOCATION.

GRADE. SAW CUT SHELTER SLAB AS REQUIRED. VERIFY EXACT LOCATION AND MOUNTING HEIGHT WITH OWNER OR HIS REPRESENTATIVE PRIOR TO

3 ROUTE CONDUIT CONCEALED IN ATTIC SPACE. COORDINATE WITH OWNER

(4) PROVIDE AND INSTALL NEW PULL BOXES AS REQUIRED. COORDINATE







# Comparison

# Existing



# Proposed



# Comparison

# Existing

# Proposed





## Staff photographs of light poles at Mt. Tabor Park



## Light poles in the landscape

Adjacent to paved drives

Adjacent to soft surface trail

Note areas around poles are clear of vegetation and, while poles installed on flat grade, they are often near slopes which may be prone to erosion and/or soil instability. The overall site is steeply sloped, and soil erosion is common in many areas of the park. Replacement poles will utilize direct burial techniques that will increase structural stability regardless of nearby slopes.

# Light poles in the landscape

In high traffic areas, signage reminds the public that it is prohibited to attach anything to light poles and provides the code reference for the prohibition.






White deposits, or efflorescence, is caused by chemical changes within the concrete due to moisture impacts.

Cracking in concrete often occurs due to thermal stresses and weathering. May also be caused by corrosion of steel reinforcement.



Flaking, or delamination, is a common type of concrete distress. Surficial delamination occurs when air or water is trapped between surface and may also be a sign of internal corrosion.



Despite install on flat grade, all three of these poles show clear signs of soil erosion at the base that could lead to structural instability.





Cracking can lead to materials loss, as has occurred on here. Loss may affect just the pole, as shown on the left, or both the pole and the base, as shown center and on the right. Replacement poles will be direct buried, thus eliminating the need for a separate base element.



(Left) Pole installed straddling mixed surface mediums (soil and concrete). This unfortunate installation is not as sound as installation on a single surface. This is an example where pole locations may be slightly refined for greater stability and safety.



Erosion around base is present, as is cracking.

Pitting, as shown in the center and right photo, is a sign of material instability and is caused when water freezes within concrete pores. As the concrete becomes weaker, more of the craters will appear. Smaller pits will often converge into larger ones, as shown here.



Pole with cracking and pitting. Vertical nature of pitting may indicate spalling.



Pole with cracking, pitting and efflorescence.



Spalling occurs when the concrete starts to break away from the reinforcing steel bars, reducing the stability of the structure.



Spalling is sometimes referred to as 'concrete cancer' since the problem is not initially obvious and can result in structural failure.

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES **CONTINUATION SHEET**

Section Page

SUPPLEMENTARY LISTING RECORD

NRIS Reference Number: 04001065

Date Listed: 9/22/2004

Mount Tabor Park Property Name

Multnomah OR County State

N/A

Multiple Name

This property is listed in the National Register of Historic Places in accordance with the attached nomination documentation subject to the following exceptions, exclusions, or amendments, notwithstanding the National Park Service certification included in the nomination documentation.

∕o£′ the Keeper

Date of Action

\_\_\_\_\_\_ Amended Items in Nomination:

#### Location:

Signature

The street location should read: Roughly bounded by S.E. Division Street, S.E. 60th Avenue, S.E. Yamhill Street, and S.E. Mountain View Drive.

#### **Classification:**

The Category of Property is: District.

The Number of Contributing Resources previously listed in the National Register should read: 12 [Reservoir #1, Reservoir #5, Reservoir #6, Gatehouse #1, Gatehouse #5, Inlet Gatehouse #6, Outlet Gatehouse #6, Weir Building #1, Weir Building #5, Covered Storage Tank Building, Covered Storage Tank, and Reservoir #1 Fountain.]

#### Significance:

Entertainment/Recreation is added as an area of significance.

These clarifications were confirmed with the OR SHPO office.

#### **DISTRIBUTION:**

National Register property file Nominating Authority (without nomination attachment) LU 23-088549 HR DM, Exhibit A.2 NPS Form 10-900 (Oct.1990)

United States Department of the Interior **National Park Service** 

# **National Register of Historic Places Registration Form**

1		OMB No.	OMB No. 10024-0018	
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NST RA		·		

This form is for use in nominating or requesting determinations for individual properties and districts. See instruction in How to Complete the National Register of Historic Places Registration Form (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classifications, materials and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property	
historic name Mount Tabor Park	·····
other names/site number	
2. Location	· · · · · · · · · · · · · · · · · · ·
street & number 6325 S.E. Division Street	not for publication
city or town <u>Portland</u>	vicinity
state <u>Oregon</u> code <u>OR</u> county <u>Multnomah</u> code <u>051</u> zip	code <u>97215</u>
3. State/Federal Agency Certification	
As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this request for determination of eligibility meets the documentation standards for registering properties in the Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the p not meet the National Register criteria. I recommend that this property be considered significant national	Xnomination National Register of Historic property Xmeetsdoes ystatewide _X_locally.
4. National Park Service Certification    I hereby certify that the property is:	Date of Action 9/22/04
determined eligible for the National Register	
other (explain):	

### 5. Classification

Ownership of Property (check as many as apply) private public - local public - state public - Federal	Category of Property (check only one box) building(s) district Xsite structure object	Number of Resources within Property    (Do not include previously listed resources in the count)    Contributing  Noncontributing    7  10  buildings    1  sites    5  6  structures    1  objects    14  16  Total	S	
Name of related multiple property listing (enter "N/A" if property is not part of a multiple property listing) N/A		Number of contributing resources previously listed in the National Register <u>1 (Mount Tabor Reservoirs Historic District)</u>		
6. Function or Use				
Historic Functions (enter categories from instructions)		Current Functions (Enter categories from instructions)		
Recreation and Culture: outdoor recreation Landscape: park Agriculture/Subsistence: horticultural facility Industry/Processing/Extraction: waterworks		Recreation and Culture: outdoor recreation Landscape: park Agriculture/Subsistence: horticultural facility Industry/Processing/Extraction: waterworks		
7. Description				
Architectural Classification (Enter categories from instructions)		Materials (Enter categories from instructions)		
Late Victorian Late 19 <sup>th</sup> and 20 <sup>th</sup> Century Revi	vals	foundation: <u>CONCRETE</u> walls: <u>STUCCO; WOOD: plywood</u> <u>weatherboard; CERAMIC T</u> <u>CONCRETE</u> roof: <u>CONCRETE; WOOD: shing</u> <u>ASPHALT</u> Other: <u>EARTH; BRICK; STONE:</u> <u>basalt; METAL: bronze, alu</u> <u>iron, steel</u>	d, ILE; gle; granite, minum,	

Narrative Description

(Describe the historic and current condition of the property on one or more continuation sheets)

See continuation sheets.

#### 8. Statement of Significance

**Applicable National Register Criteria** (Mark "x" in one or more boxes for the criteria qualifying the property

for National Register listing).

- X A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B Property is associated with the lives of persons significant in our past.
- X C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
  - D Property has yielded, or is likely to yield, information important in prehistory or history.

### Criteria Considerations

(Mark "x" in all the boxes that apply)

#### Property is:

- A owned by a religious institution or used for religious purposes
- B removed from its original location
- C a birthplace or grave
- D a cemetery
- \_\_\_\_ E a reconstructed building, object, or structure
- F a commemorative property
  - G less than 50 years of age or achieved significance Within the past 50 years

Narrative Statement of Significance

(Explain the significance of the property on one or more continuation sheets)

#### 9. Major Bibliographical References

Bibliography (Cite books, articles, and other sources used in preparing the form on one or more continuation sheets) See continuation sheets

Previous documentation on file (NPS):

- \_\_\_\_ preliminary determination of individual listing (36CFR67) has been requested
- \_\_\_\_ previously listed in the National Register
- \_\_\_\_ previously determined eligible by the National Register
- \_\_\_\_ designated a National Historic Landmark
- \_\_\_\_ recorded by Historic American Buildings Survey
- \_\_\_\_ recorded by Historic American Engineering Record

Primary location of additional data:

- State Historic Preservation Office
- \_\_\_\_ Other State agency
- \_\_\_\_ Federal agency
- \_\_\_ Local government
- \_\_\_\_ University
- \_ Other

#### Name of repository:

LU 23-088549 HR DM, Exhibit A.2

Areas of Significance (Enter categories from instructions)

Landscape Architecture **Community Planning and Development** 

Period of Significance

1888-1939

1908

Significant Dates 1903

Significant Person (Complete if Criterion B is marked above)

Cultural Affiliation

Architect/Builder

Mische, Emanuel Tillman Keyser, Charles P.

#### 10. Geographical Data Acreage of Property \_\_\_\_\_ 196 acres **UTM References** (Place additional UTM references on a continuation sheet) 532115 5038988 1 10 5040065 3 10 531517 Zone Zone Easting Northing Easting Northing 531181 532076 5039181 5039637 2 10 10 Zone Easting Zone Easting Northing Northing X See continuation sheet Verbal Boundary Description (Describe the boundaries of the property on a continuation sheet) **Boundary Justification** (Explain why the boundaries were selected on a continuation sheet) **11. Form Prepared By** name/title Cascade Anderson Geller organization <u>Mount Tabor Neighborhood Association</u> date November 2003 street & number <u>1934 S.E. 56<sup>th</sup> Avenue</u> telephone <u>503-232-0473</u> state Oregon zip code 97215 city or town \_\_\_\_\_ Portland Additional Documentation Submit the following items with the completed form: **Continuation sheets** Maps: A USGS map (7.5 or 15 minute series) indicating the property's location. A sketch map for historic districts and properties having large acreage or numerous resources. Photographs: Representative black and white photographs of the property. Additional items (check with the SHPO or FPO for any additional items)

Property Owner				
name	City of Portland			
street & number	1221 S.W. 4 <sup>th</sup> Avenue	telephone	503-823-4000	
city or town	Portland	state <u>OR</u>	_ zip code _97024	

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, PO Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.

OMB No. 1024-0018

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NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET Section \_7\_\_\_Page \_1\_\_\_ Mount Tabor Park Multnomah County, Oregon

## DESCRIPTION

Mount Tabor Park is a 196-acre city park located in a residential area of southeast Portland, about three miles east of the Willamette River. The park encompasses most of a volcanic butte, with four peaks. The tallest summit rises to an elevation of 643 feet, making it a prime landmark visible from points all around the city. The terrain of the park varies from a limited number of level areas, especially around the reservoirs, to gentle hillsides and steeper slopes. The towering Douglas fir forest is punctuated with big deciduous trees and some glades. Large areas of the forest floor are kept mowed while steeper areas tend to have a predominance of native understory plants. Ornamental non-native shrubs and trees are found throughout the park, especially at buildings, entrances or other features. Non-native invasive species are also present.

Portland Parks and Recreation Bureau has authority over all but approximately 146 acres of Mount Tabor Park. The remaining 50 acres is under the jurisdiction of the Water Bureau. Mount Tabor Park is the site of three open reservoirs and a small concrete water tank. Mount Tabor Park, like Washington Park on the west side of the Willamette River, became a distribution site for Portland's gravity fed, mountain source drinking water in 1894 with the construction of the first reservoirs, two at Mount Tabor and two at Washington Park. Two additional Mount Tabor reservoirs, on the western slope, were constructed in 1911 soon after the time Mount Tabor Park became officially designated. All of these open reservoirs represent some of the finest examples of intact, stillin-use City Beautiful public works remaining in the nation. Because of their high integrity and historic significance to the city's water supply and development of Portland, and because they are outstanding examples of intact historic architecture and engineering, the reservoirs were listed in the National Register of Historic Places in 2004 as the Mount Tabor Reservoirs Historic District and the Washington Park Reservoirs Historic District. A majority of the reservoirs' features have been kept intact and contribute greatly to the integrity of Mt. Tabor Park. The surface of the water held in the reservoir basins represents approximately twenty acres, about one tenth of the entire park acreage. The deep, open water provides a chiaroscuro effect to the landscape and is an integral part of the experience of Mount Tabor Park. The lighted walkways around the perimeter of each parapet wall and wrought iron fence, the cleared, grassy areas associated with the reservoir basins and the outstanding views provide important park amenities.

Mount Tabor Park is a scenic reservation. The height of the various peaks allow for grand vistas in all directions from viewpoints attainable by auto, foot or bicycle. Two views on Mount Tabor have been rated by the City of Portland's Scenic Resource Inventory as among the top seven in the city and have been incorporated into the Scenic Resources Protection Plan.

The design principle of subordination is a key element of Mount Tabor Park. The historic drive and pathway system respects the topography, allowing accessibility without overwhelming the picturesque and pastoral landscape. The more than three miles of drives are popular destinations for local and out-of-town visitors to take in the views of the park, reservoirs, city skyline and surrounding mountains. Autos can still encircle the butte on the historic drives, arriving at one entrance and leaving at another. Since vehicular access has been restricted to certain areas in the park's interior since the 1970s, some of the paved drives provide popular routes for bicycles, skateboards, roller blades and baby carriages. Walking, jogging and bicycling are the primary activities noted in

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<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

the park. Many visitors arrive from the surrounding neighborhoods on foot or bicycle. These drives are conducive to the park being a popular site for various types of races including foot, bicycle and adult soap box derby tournaments. The wide, well-graded unpaved paths were in the original design and, like the drives, were added over a period of years when funds became available. The path system travels over the entire park. In recent years, more unofficial paths have been made by mountain bikes and hikers.

Adding distinctive charm and illumination is the period lighting system comprised of eighty-eight single concrete standard lampposts that follow the drives and some of the main interior pathways throughout the park. These lampposts give off a soft, friendly light, reminiscent of gaslights, especially in the interior forested areas where they serve as a reminder of the original design of accessibility. The lighting encourages pedestrian exploration of the hills and dells throughout the park even in the short days of the colder months. Originally topped with a single, white, glass globe, polygonal lantern-style shades have replaced the globes. In 1911, Superintendent Mische requested of the Park Board, lampposts with glass globes to be serviced by an alternating current feed. He also requested underground conduits. The lampposts are serviced via underground conduits. The lighting system dates from 1924 and 1925.

A variety of amenities have been added to the park over the years. These include picnic areas, playgrounds, an amphitheater, tennis courts, a soapbox derby track, and comfort stations (only one in service.) Most of these amenities can be accounted for during the period of significance and are described in the descriptions of the quadrants of the park. The varied topography and forest cover of the park has allowed the amenities to be tucked in here and there so that they do not dominate the general feel of the park as a forest retreat. As was the Olmsted counsel, the park's styles allow respite from urban life and a connection to the rural roots and historic and natural resources of the area.

As much as Mount Tabor Park is a forest refuge in an urban environment, it is also a pivotal "work-horse" park, not only for the Water Bureau, but also for Portland's Parks and Recreation Bureau. Superintendent Emanuel T. Mische was, above all, a horticulturist, and he established a nursery to supply trees and other plants to city properties, including tens of thousands of street trees, at the south end of the site soon after the property was acquired in 1909. The nursery and greenhouse complexes still provide stock for all the city's properties, including all of the parks.

Though Mount Tabor Park's grandeur is striking, closer observation reveals modern projects and alterations, fortunately few and small, which have not adhered to the graciousness of the historic understated features. No attempt has been made to utilize period light fixtures attached to buildings and around the reservoirs. Recent Park Bureau signs are at odds with the historic feel. The maintenance yard's hodge-podge of buildings displays the largest array of unaesthetic alterations, however, this area is separated from the recreation area and so does not pose a problem of aesthetics for the park at large.

The entire park is being nominated. The general outline of the park is a rough rectangle with irregular protrusions such as Mount Tabor Nursery and maintenance yard due south, the finger of nursery on the west boundary, and two narrow irregularities to the north and the east owned by the Oregon Department of LU 23-088549 HR DM. Exhibit A.2

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Mount Tabor Park Multnomah County, Oregon

Transportation. It is roughly bounded by S.E. Division Street to the south, S.E. 60<sup>th</sup> Avenue to the west, S.E. Yamhill Street to the north, and S.E. Mountain View Drive to the east. The attached boundary map illustrates the current property lines.

### **Resource Count**

Mount Tabor Park contains one contributing site, seven contributing buildings, five contributing structures, and one contributing object. In addition, Mount Tabor Park contains ten non-contributing buildings and six non-contributing structures. A sketch map and key delineate these features. The park land was counted as one contributing site; infrastructure such as driveways, paths, maintenance yard, and the lighting system, as well as those areas with loose physical definition such as play and picnic grounds, and the nursery, are included as part of the site. Substantial or distinctive buildings, structures, and objects were counted as contributing or non-contributing as follows:

### **Summary of Contributing Features**

Site:

Mount Tabor Park site, including the circulation system: Drives (original names): Reservoir Loop Drive (Cascade Drive & Interlink Drive), East Tabor Drive (Woodland Drive), North Tabor Drive (East Overlook Drive), Tabor Summit Drive (Overlook Concourse), Lincoln Street Entrance (Linden Entrance), Salmon Street Entrance, and 69<sup>th</sup> Avenue Entrance; the historic lighting system; the Mount Tabor Nursery and maintenance yard, parking lot, and three play areas: 69<sup>th</sup> Avenue playground and group picnic area, Harrison playground and main playground.

Buildings:

Office-Horticultural Services Building Administrative Building & Additions Mechanical Offices Building (Community Gardens Building) Caretaker House-Mount Tabor House Volcano Comfort Station Summit Comfort Station Northeast Entrance Comfort Station

#### Structures:

Crater Amphitheater West Tennis Court East Tennis Court 69<sup>th</sup> Avenue Stairs Southside Stairs

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### Object:

Harvey W. Scott Statue & Terrace

### **Summary of Non-Contributing Features**

### Buildings:

Garages/Shops-West Side Row Garages/Shops-Eastside Row Lathe House Equipment Building Pole Barn building Duplex Screen House 50" Meter House 56" Meter House S6" Meter House Maintenance Building and Park Office

### Structures

Summit Radio Tower Additional Greenhouses Picnic Shelter Greenhouse Complex Basketball Court Soap Box Derby Track

### **Regions and Features of Mount Tabor Park**

Mount Tabor Park has four public vehicular entrances located roughly in the four corners of the rectangular property at S.E. Salmon Street (Salmon Street Entrance), S.E. 69<sup>th</sup> Avenue (69<sup>th</sup> Avenue Entrance), S.E. Harrison Street (Harrison Street Entrance) and S.E. Lincoln Street (Lincoln Street Entrance). Numerous pedestrian or bicycle entrances exist from footpaths on all sides of the park. Neighborhood streets dead end at park boundaries, especially at the north, west and south sides. The east side is steep and rugged and adjoined by a newer housing development with private properties abutting the parkland along Mountain View Drive. The southeast corner of the park property adjoins a small private college, Warner Pacific College. The far southwest corner now abuts the private apartment and nursing care facility, Courtyard Plaza, a five-acre parcel formerly occupied by one Mount Tabor Park's first two reservoirs. The reservoir gatehouse, now privately owned and listed in the National Register, remains at the corner of S.E. 60<sup>th</sup> Avenue and Division Street.

Many maps exist for Mount Tabor Park and over the years, vicinities, drives and features have been delegated various names. This has contributed to some difficulty in creating clear descriptive statements and guidelines for the photographers and other volunteers involved with the preparation of this nomination. The predominant

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park boundary has a roughly rectangular shape. For the sake of clarity, this nomination has the park divided into quadrants based off the four park entrances described above. The site, buildings, structures, and objects in each quadrant are described as follows:

### **Lincoln Street Entrance**

The earliest development of the land now designated as Mount Tabor Park happened in this area of the park. The city acquired land in this quadrant to build the first two reservoirs, then known as Mount Tabor High and Low Service Reservoirs respectively, in 1888.

In between Reservoir 1 and 5 is one of the four peaks, which Mische called the Hilltop Grove. At the summit of this small peak is a grove of large big-leaf maples and Douglas firs. On the south slope of the Hilltop Grove, just above the Reservoir Loop Drive, is a small grove of digger and ponderosa pines. The north slope of the hill is popular on the rare snowy day as it is used for sledding and other snow play. A 1954 map shows a ski tow at this location. A well-graded path encircles this rise as Mische had planned. Another path leads up and over the summit from north to south.

Where Harrison Drive meets Lincoln Drive at the south base of the dam face of Reservoir 1, the Southside Stairs climbs north from the roadway up to the reservoir basin. Lincoln drive continues west winding down the southwest slope of Mount Tabor past the Water Bureau entrance to the park south of Reservoir 6. At this junction, laurels and a cornelian cherry grow to the north and a weigela and several large lilacs to the west. flanked to the southeast with a row of mature fuchsia-colored double flowering cherries that create a dramatic display in mid-spring. The west side is a mixture of tall well-established shrubs and trees, some deciduous such as lilacs and hawthorns and others evergreen conifers and laurels. Continuing south, the drive intersects the nursery sites at the S.E. Lincoln Street Entrance and the north service entrance into the maintenance yard.

It was approximately here that Emanuel Mische designed his formal entrance scheme: the Maple Entrance arriving from the south from S.E. Division Street and the Linden Entrance from S.E. 60<sup>th</sup> Avenue coming from the west into a circle. A photograph circa 1920 depicts S.E. Lincoln Street lined with trees, as it is today on the north, nursery side. A traffic circle of sorts, does exist approximately where Mische's circle was to be but it is much more informal and less aesthetic. It is a widened area that serves as an intersection for a service road leading south into the maintenance yard, a small gravel service road going east into Mount Tabor Nursery, the Lincoln Street Entrance drive running straight west to S.E. 60<sup>th</sup> Avenue, and the drive into the park climbing north and then east. Today a touch of Mische's more formal scheme remains with some interesting, primarily non-native plantings. A large fragrant viburnum, Thunberg's barberry, a large strawberry madrone and other ornamental shrubs grow on the east side of the intersection and plantings of red osier dogwood, oriental maple, cotoneaster, and other shrubs are planted across the drive on the northwest corner of this intersection. S.E. Lincoln Street, as it runs west, has private homes constructed in the 1980s and 1990s on the south side of the street. The north is bounded by the nursery property fully planted with a variety of trees. This north side of the Lincoln Street Entrance is flanked by ornamental pear trees that replaced the double flowering cherries in the 1990s.

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The Mount Tabor Nursery includes a large tree and shrub planting area and a maintenance yard historically associated with the nursery, which is currently used to store and maintain park vehicles and equipment. The nursery and maintenance grounds together comprise 14 acres. While not indicated specifically on Mische's 1911 plan for Mount Tabor Park, park archival records state that the Mount Tabor Nursery dates from 1908-1909, and both the nursery and maintenance yard are located within the historic boundaries of the park. Located on the sunny, well-drained lower southwestern slope of the butte, the nursery also covers a long finger of land extending east and west between S.E. Lincoln Street and S.E. Harrison Street due south of what Mische had called the Linden Entrance (Lincoln Street Entrance). On the north side, the nursery is flanked with climbing roses on trellises and on the south, along the Lincoln Street Entrance drive, a row of ornamental pear trees. At the east end of this finger of nursery, two other nursery plots exist. These rise up further on the slope of the butte, in a wide, south-facing sloped area. These plots are also planted with tree and shrub species and are divided by an east-west service road that ends at a concrete patio area used for storage of soil amenities below Harrison Drive. The nursery has supplied street trees and other plants for the City of Portland continuously since the earliest years of Mount Tabor Park, propagating native species as well as those from around the world. Presently, the over 70 species of trees growing in the nursery provide visual interest, especially seasonally, and encourage various species of birds.

Inside the maintenance compound are a variety of buildings dating from various periods and serving a variety of functions to park maintenance for the Park Bureau. Park vehicles and machines, such as mowers and other tools are stored and maintained at this site. Offices and greenhouses are also located here. From the back of the compound, a maintenance vehicle exit ties into the Lincoln Street Entrance drive and the tree and shrub nursery areas. The main entrance to the maintenance vard is marked by a lawn with a row of large Atlantic blue cedars, shrubs and a bed of seasonal flowering annuals. Upon entering the maintenance grounds, the asphalt roadway is flanked by two rows of buildings. To the east is the Administration Building along with garages and shops. To the west is a long row of attached garages and shops. The Administration Building is the most formally designed building on the site. All other structures are of a functional nature and house offices, greenhouses, machine shops, paint shops, garages, and storage. Dates of construction range from pre-1918 through 1989. The back entrance of the yard leads out to the north, through the nursery stock onto S.E. Lincoln Street. A chain link fence encloses the entire maintenance grounds. The vard layout appears to be unplanned with buildings constructed when needed wherever space was available. Verbal interviews with park employees indicate that horses were kept at the compound for mowing and other work. Some of the buildings are reportedly converted stables. The grounds are primarily asphalt-covered with the exception of some landscaping around the Administration building and various trees near the Community Garden building. The eastern border of the yard is lined with a dense cedar hedge.

### **Contributing Features**

### Horticultural Services Building

This small office building appears to be the oldest remaining building, dated "pre-1918" on various Parks' sketches. It is located in roughly the center of the maintenance yard, facing south. The Horticultural Services Building is a small rectangular one-story building with a hip roof. The siding is horizontal shiplap. The corners

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are finished with a narrow board. A gabled dormer defines the front entrance. Wood shingles and a lunette window fill the gable end. No porch overhang exists currently. Windows are multi-over-one, double-hung wood sash of varying sizes. The foundation is concrete. There is a large brick chimney rising from the rear of the building venting the underground gas boiler. The boiler that heats the greenhouses was originally coal-burning. It continues to function as the boiler for the greenhouses. The chimney towers over the other structures in the yard, and has been extended to nearly twice its original height according to historical photographs. There is a greenhouse attached to the building.

### Administrative Building and Additions

The most visible building on entering the maintenance grounds, and one of the most aesthetic, is the Administrative Building. Built in 1938, the Art Deco-styled, single-story, flat-roofed concrete building has a long rectangular plan with attached garages. In 1958, a two-story addition was added to the east facade. Both the 1938 building and the 1958 addition include a basement. The 1938 building was originally a combination of offices and garages. The front entrance is on the west elevation. It is defined by a slightly projecting bay decorated with telescoping vertical lines above the entrance. A flat concrete porch roof covers the entrance. Above this porch roof is a three-light, steel-sash window. To the south of the entrance is an unusual projecting triangular steel sash window; apparently a dispatcher's window overseeing the vehicle entrance. To the north is a series of garage entrances. Between the garage bays, at the top of the building, are a series of six-light, steelsash windows. A decorative cornice is done in the Art Deco style. The garage bay immediately north of the front entrance has been in-filled and a new aluminum slider window replaces the original overhead garage door. Four garage bays remain intact. Beyond the garage bays, the building facade becomes slightly recessed, but the Art Deco corrice continues to the end of the concrete portion of the structure. Extending north, the structure changes to wood frame with metal siding and the roof becomes a gable roof covered with standing-seam metal. A series of metal-covered, wood, side-opening garage doors open into areas now used for storage and shops. According to verbal interviews with long-time parks' employees, this area once served as stables for the city's horses. According to park records, these attached garages were constructed over a three-year period from 1938 -1941. The 1958 two-story addition was designed to match the original building, including the Art Deco cornice. The windows are a different type of steel sash. Typical of 1950s industrial buildings they are eight-light steelsash with a center hopper window.

## Mechanical Offices - Community Gardens Building

Located north of the Administration Building, this building is labeled mechanical offices on Parks Department sketches. It now functions as the "Community Gardens" office. According to park records, it was built before1938. This is a one-story structure with a concrete foundation and a gable roof. It is sided with wood horizontal lap siding. The corners are finished with vertical boards and the roof is composition shingle. Many of the windows have been replaced by vinyl sliders. The remaining original windows are small four-light wood sash. A shed-roof addition was added to the east facade at an unknown date. Wide wood lap siding covers the extension.

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### Southside Stairs

On Mische's preliminary plan, a long flight of stairs was designed to climb from the south park boundary up to the Reservoir 1 terrace garden to tie into the pathway network of the park. Construction of 500 tread of stairs, location not given, were under construction in 1913. The lower flight of stairs between the Lincoln Street Entrance drive and the south boundary of the park no longer exists. There is a rough path there and there are metal pipes in the ground that could be remnants of earlier construction. There have been apparent excavations, perhaps on water pipes from Reservoir 1 directly above, following the line of the mapped stairs. The section of the Southside Stairs that is intact starts at the Lincoln Street Entrance drive and climbs up to Reservoir 1. The top of the stairs yields an impressive front-on view to the north of the 1894 Reservoir 1 and its associated gatehouse and weir building. To the south, the view is of southeast Portland, distant hills and the grounds of Warner Pacific College.

### **Noncontributing Features**

### Garages and Shops-West Side Row

Also built in 1938 and located across from the Administration Building is a row of attached shops and garages. They are covered with a gable composition shingle roof. The garage doors and siding are covered in standingseam metal. Some original windows remain and are eight-light wood sash. Some windows have been replaced by aluminum or vinyl sliders. Uses for this structure have varied over time; currently the spaces are identified as "Turf Maintenance, Building Maintenance, Ballfield Maintenance, Irrigation." Although falling within the historic period, it is considered a noncontributing building due to numerous alterations.

#### Garages and Shops-East Side Row

Roughly forming an L-shape, this group of buildings is located at the eastern border of the maintenance grounds. Built between 1950 and 1961, they are comprised of a series of attached buildings, all with gable roofs and concrete foundations. All roofs are covered with standing-seam metal. Siding is either wood board and batten (1961) or wide horizontal lap siding (1950s). Gable ends are filled with horizontal lap boards. Windows are identical to those in the 1958 addition to the Administration Building: twelve-light metal sash with center hoppers. This grouping has had numerous functions: paint shop, electric shop, storage, etc. The construction dates of these buildings fall outside of the historic period so they are considered noncontributing.

#### Other Buildings and Structures

An Equipment Building is located at the far north end of the maintenance yard. Built in 1971, it is a 1-1/2 story "tilt-up" building with metal siding and roof. Gas pumps are located in front. The Pole Barn building dating from 1987 is located at the south end of the yard adjacent to S.E. Division Street. Near the Horticultural Services Building to the west is the Lathe House. Built in 1963, it is a shed-roof building with horizontal lap siding. Directly behind the Horticultural Services Building is a Greenhouse Complex. According to sketches from the Parks Bureau, these were constructed in 1981, 1988 and 1989. Additional greenhouses dating from 1973 are located at the northwest corner of the maintenance yard. All of these buildings and structures are noncontributing because they fall outside the period of significance.

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### Water Bureau Buildings and Structures

Below and to the south of Reservoir 1 are four small buildings associated with the Water Bureau and piping from the reservoirs. The Duplex Screen House is a three-sided building with a shed roof. The small concrete building is situated into the slope. A metal door bears the building name. Dating from 1967, it is void of ornamentation. Southwest and below the Duplex Screen House is the 50" Meter House, a small shed- roofed concrete utilitarian building. The only slight embellishment is the projecting concrete door and window lintels and sills. The construction date is 1967. At the foot of the concrete steps up to Reservoir 1 is the 44" Meter House. The south elevation of this building abuts Harrison Drive. The metal door faces east and is accessed by concrete steps. The shed-roofed concrete building is the largest of the meter houses with screened windows on all four sides. To the west of these buildings along a wooded path, is the 56" Meter House. This small shed roofed concrete utilitarian structure has a slight embellishment in the projecting concrete door and window lintels and sills. It matches the design and feel of the other 1967 building. All of these buildings and structures are considered noncontributing because they fall outside the period of significance.

### **Salmon Street Entrance**

The main vehicular entrance to the park is the S.E. Salmon Street Entrance. Accessed from S.E. 60<sup>th</sup> Avenue, this entrance was another of Mische's formal entries into the park. Presently it is marked with a basalt retaining wall on the steep north side and a park sign on the south side. A basalt wall acts as the gatepost for the metal swinging gate that can close off the driveway. The historic Caretakers House - Mount Tabor House (presently a rental property), is situated on slope to the immediate south of the Salmon Street Entrance overlooking the west side tennis courts and Reservoir 6 further to the south. To the north of the entrance is the steep forested slope of Foothill Overlook rising up to the S.E. Yamhill Street service entrance.

Here the park entices visitors into the interior as the driveway curves and gently climbs through one of the groomed forest areas of the park. At the line of sight where the driveway curves is a lovely ravine, called Sweet Briar Vale by Mische. John C. Olmsted called this area out in his Report to the Park Board in 1903 saying,

"West of the summit ridge, it may be impracticable to take any considerable areas except in the ravines, which apparently have little value for residential purposes, and yet are very picturesque and would make attractive features in a public pleasure ground."

An important and picturesque trail network converges at Sweet Briar Vale, part of the inviting enticement of this region. Three paths climb up the ravine at this point. The one on the north side ascends the volcano through a large grove of tall rhododendrons beneath the overstory of Douglas firs. In the late winter or early spring the ground is covered with sweet violets. Passing historic lampposts standing in the forest, this path climbs occasional railroad tie steps (Mische had designed concrete steps) and arrives at the newly refinished basketball court at the south end of the Crater Amphitheater. An unofficial trail continues up the cinder cone, known as Foothill Overlook on the original map. Here also, the path intersects with a graveled east-west service drive that accesses the trash dumpsters to the west and continues out of the park onto S.E. Yamhill Street. Just to the east,

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this drive intersects with the main Reservoir Loop Drive at this pivotal access point with the main parking area, Maintenance Building-Park Office, Volcano Comfort Station, Picnic Shelter, and main playground.

The newest path follows the cleavage of Sweet Briar Vale where recent work was done to attempt to channel seasonal water down through a naturalized ditch of rock and earth to a small wetland area at the base of the ravine. On the higher ground near this area, old plantings of large heather family shrubs such as kalmia, rhododendron, and andromeda dominate. There is also the only sourwood tree, native to the southeast United States located here. This touch of formality continues as the path crosses the Salmon Street Entrance road with large mature azaleas and other shrubs marking the path that leads down the railroad tie steps to the west tennis courts passing to the south of the Caretakers House-Mount Tabor House, both constructs from the 1920s. This trail once led to the comfort station alongside the main entrance drive. All that remains now is a concrete foundation accessed with steps to a picnic table. The building was demolished when a tree fell on it in the 1990s.

One of the most popular trails in the park follows the south side of Sweet Briar Vale through native forest with an intact understory. This trail was on Mische's original plan and was apparently also included in the bridle path system established in 1929. Along the path grow a variety of tree species including numerous bitter cherries, a California buckeye and one of the largest alder trees in the park. It arrives at an eastern junction of several trails and the Reservoir Loop Drive.

Crossing the paved Reservoir Loop Drive, the path continues to the south, up railroad tie stairs, (stairs were originally designed here by Mische) passing by two immature ginkgo trees and a row of young, recently planted alders. Picnic Grove is at the top of the stairs. A modern drinking fountain and barbeque structure were recently removed from this area. Two picnic tables remain. To the south, this area overlooks the starting point for the Soap Box Derby Track. The groomed forest spot also provides a view of Reservoir 5 and the southwestern cityscape through the Douglas fir boughs. Picnic Grove, with its southwestern aspect is one of the nicest places in the park. It has hosted weddings and other gatherings in modern times.

The eastern path from Picnic Grove intersects with Reservoir Loop Drive below the Mountain Crest Summit. An unofficial trail climbs straight up the summit arriving to the north of the backside of the Summit Comfort Station. Two other trails descend down from Picnic Grove to Reservoir Loop Drive. One to the north follows the contour of the hill wrapping around from the north to the south. The other drops down directly from the summit. Both reconnect, arriving at the more formalized region with plantings of star magnolias, hawthorn, flowering crabapple and young sequoias just to the northwest of Reservoir 5.

This point intersects with the boundary of the Mount Tabor Park Reservoirs Historic District. Here another well-used pathway intersects at the northwest corner of Reservoir 5 and travels west on the grassy grade completely encircling the basin of the reservoir. This path parallels the lighted sidewalk around Reservoir 5 and defines part of the boundary of the Mount Tabor Reservoirs Historic District. The path comes to a junction with three other pathways and the paved Reservoir Loop Drive and the Soapbox Derby Track below the summit of Hilltop Grove. From this point, the Reservoir 1 basin and its northern glade is visible further to the southeast.

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This area is part of the narrowed, linear boundary defined by the underground tunnel that connects the waters of Reservoir 1 and Reservoir 5 of the Mount Tabor Reservoirs Historic District. This junction is a popular meeting ground and the lawn shows signs of wear and tear primarily because it has become a dog play area. Its popularity is understandable since the views of Reservoir 5 and the western cityscape are outstanding. In recent years, a bench has been placed northeast of this junction to take advantage of the fine vistas. The areas close to Reservoir 5, like those around Reservoir 1, are graced with the water sounds generated from the small cascades that feed into the reservoirs.

A west bound path continues along the southern boundary of the reservoir historic district south of Reservoir 5 to arrive at the top of the dam. Here Mische requested that the dam be widened so that visitors could have access the area and the views. This design created one of the most popular gathering places in the park and in the city to watch sunsets, fireworks over the Willamette River and to simply enjoy a sweeping, inspirational view of Portland. The view is enhanced by the twelve acres of the deep water reflecting from Reservoir 6 below. This is one of the protected views noted in the City of Portland's Scenic Resource Protection Plan and is within the boundaries of the Mount Tabor Reservoirs Historic District.

The Soapbox Derby Track runs north and south due east of Reservoir 5. Though seemingly not currently used by soap box derby afficionados, the south end of the track is located in a particularly scenic airy site overlooking Reservoir 5 with sweeping vistas of the cityscape. This site attracts many park visitors, both human and canine.

From the gate at Reservoir 5, going northeast on the Reservoir Loop Drive is a lovely curvilinear perfectly graded drive into the heart of the park. The forest dominates and every other distraction falls away, illustrating a chief Olmsted design principle. Passing by the top of Sweet Briar Vale at the base of two summits the road curves up to Mische's Foothill Overlook and the area to the west that is now called the "volcano" area or "crater." It is denoted with a tablet embedded in a stand of basalt rock that was erected in 1952 by the Oregon Society of the Geological Country of Oregon giving a brief summary of the volcanic activity.

This location, with its private feeling, lends itself to a natural amphitheater and has become the site of some of the amenities that the Mountain Crest Summit area hosted in the past. On the east side of the small peak, excavations unearthed a cinder cone in 1913. The east face of the cinder cone now comprises the west wall of the amphitheater. Excavations of rock for various city and private enterprises, created a quarried area that was eventually utilized as an outdoor amphitheater, the Crater Amphitheater. This is a defining and attractive feature of Mount Tabor Park.

Due south of the Crater Amphitheater and still within the volcanic crater is a regulation-sized basketball court, recently resurfaced with an orange substance made from recycled tennis shoes.

A path, from the original park design, surrounds the cinder cone, called Foothill Overlook on original maps. It is well graded and travels through an upland forest terrain that is mowed occasionally. The mid spring brings a carpet of yellow wood violets along the western slope interlaced with the earlier sweet purple violets. True

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dandelions are abundant here. This part of the park adjoins a donation land claim of a botanic physician trained at the Baltimore Botanic Institute, Perry Prettyman, who reputedly introduced dandelions to use as medicine.

Directly above and to the east of the Crater Amphitheater is the main parking lot for the park. This modest-sized parking lot, the largest in the park, was designed in 1971. At the north end of the parking area is the non-historic Maintenance Building and Park Office. To the east of the maintenance building is the Volcano Comfort Station, the only current serviceable restroom in the park. This pleasingly designed comfort station appears to date from 1928. Due south of the parking lot, across Reservoir Loop Drive, is the non-historic thirty-four square feet Picnic Shelter open on four sides. The Picnic Shelter appears to have been constructed in approximately 1974. The main playground with a few remaining older metal structures and an elaborate modern plastic structure is adjacent to the Volcano Comfort Station, parking area and Picnic Shelter. Benches overlooking the play area have been provided at the top of the slight rise accessible by a brick ramp. The bricks are stamped with the names of benefactors who purchased a brick for \$50 to help pay for the remodel in 1999. The ramp area is landscaped with miniature azaleas and other common ornamental shrubs. A row of young native red alders are planted to the south behind the benches. Paths lead up to the Mountain Crest Summit to the south and in every direction at this point.

### **Contributing Features**

#### Caretaker House - Mount Tabor House

The house is situated at the base of Mount Tabor at the Salmon Street Entrance with a southern view overlooking the west tennis court and Reservoir 6. The house is accessed from an unpaved driveway, S.E. 63<sup>rd</sup> Avenue, off of S.E. Salmon Street. Facing west on a slight rise, it is of an unassuming design and does not dominant the landscape. It is surrounded by a wide expanse of shady lawn under towering Douglas fir trees with perimeter plantings. Originally it served as housing for the park caretaker but it is now rented out to a private individual. The house is designed in the Colonial style and is listed in park documents and assessor records as dating from 1920. It is a one-and-a-half story, side-gabled, rectangular house with a concrete foundation. The house is sided with cedar shingles and the roof has composition shingles. The gable ends have no eaves, but the front and rear elevations have wide boxed eaves. An eyebrow dormer penetrates the roof directly over the front porch. The front central entrance porch is recessed under the main roof. Sidelights flank the wood front door. On either side of the front porch are two built-in wood benches. Windows are either eight-over-eight, double-hung wood sash or three-over-three, double-hung wood sash. To the south of the entrance porch is a bay window. Wood shutters with diamond cut-outs decorate every window. An exterior stucco-covered chimney is located at the south facade. The rear facade has an off-set recessed back porch. City records indicate that construction costs of the dwelling were \$3,000 in 1920.

### West Tennis Court

The construction dates of the two tennis courts in the park are given in park records as 1923 and 1928. It is unclear which one was constructed when, however, both dates fall within the period of significance. This tennis court is located just north of Reservoir 6; the tennis court on the east side of the park is located at the 69<sup>th</sup> Avenue playground. Fence and other repairs to the courts are recorded in 1926 and 1932.

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### Volcano Comfort Station

Built in 1928 in the English Tudor style, this comfort station is in excellent condition. Park records show the cost for construction to be \$3,843.19. The plan for this building is roughly L-shaped with a combination crossgable and conical roof uniting three separate functions into one structure; restrooms, storage, and seating. This one-story roughcast stucco-covered building is comprised of two restrooms side by side and a storage area, a covered shelter with bench, and a small turreted storage room at the east end. The building has a concrete slab foundation and wood frame walls and roof. The roofing is composition shingles. Alterations were made to this building in the 1990s. At this time both men's and women's entrances were shifted to the south facade. Originally, the men's entrance was located on the west facade and was sheltered by a small Tudor-style covered porch. The women's entrance was located on the east facade under the attached covered shelter. An original window was removed from the south facade when the men's new entrance was installed. Both original entrance locations were replaced with windows. The porch on the west facade was removed. The gable end on the south facade (the current men's entrance) is filled with a decorative half-timber design. Small arched openings provide ventilation in the smaller gable end east of the men's entrance. A storage room is located to the north of the restrooms on the rear facade. Two entrances are located on the rear facade and retain their original vertical board doors. The attached gabled shelter is supported by a single square post with curved brackets in the Tudor style. The bracketing, exposed beams and cross bracing add to the English flavor. A wood built-in bench rests under the shelter. Seating is located on both sides of the bench. An attached round storage room at the far eastern end is topped with a conical roof that appears more French than English. Atop the roof is an iron weathervane depicting animals at play. It has an original vertical board round arched door cut into a round arch opening. The door has large iron strap hinges. A single step leading into this storage room is comprised of three massive cut stones. The charming nostalgic design is unique in the Portland parks system. Like the other two remaining Mount Tabor comfort stations, this one is set on a slight downhill slope to keep it from dominating the landscape. The approaching path from the south is through a touch of formal landscaping with common shrubs including Oregon grape and azaleas.

### Crater Amphitheater

Making the most of the quarry established after the cinder cone was discovered in 1913, construction of the concrete stage and basalt rock retaining walls were apparently underway in 1934 according to archive photographs. A geological plaque on a basalt rock base, installed in 1952, remarks on the volcanic nature of this area. The concrete and basalt rock stage is located at the north end of a grassy "pavilion," with a large cindered area at the base of the stage. In the cindered area, wooden and metal benches are stored in stacks and set up for stage events. The grass pavilion was recently replanted with grass and three low angular curved basalt risers were installed to provide informal seating and enhanced viewing of the stage area. The stage area is wired for electricity. The Crater Amphitheater is accessible via remodeled concrete stairs or a long concrete ramp reconstructed to American Disabilities Act standards. The ramp parallels the high volcanic rock retaining wall all along the east side of the amphitheater that descends gradually to wrap around the back side of the stage. The stage area is accessed to the northeast by a small trail through old cedar plantings that connects with the trail that encircles the cinder cone. Though reconstruction has occurred at the Crater Amphitheater, it was done in a thoughtful manner and most of the historical features, including the stage, rock retaining walls, benches and

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railings are either original or in keeping with the original design of the area. Other amenities here include a modern drinking fountain.

### **Non-contributing Features**

### Maintenance Building and Park Office

Situated to the northwest of the comfort station, this building faces out onto the main parking lot. The rear elevation, that drops down from the south façade, is surrounded by fir trees and a footpath. The original construction may be dated to approximately 1965, although a photograph dating from 1953 does show a building close to the current location. This south-facing building is one story with an exposed basement level on the north side. It is covered with T-111 siding on all but the front facade, which is covered with wood lap siding. The gable roof faces south and has imitation half-timbering in the gable end. The front facade is dominated by two garage doors. The entrance is recessed on the east end. All windows are aluminum sliders. This building is considered non-contributing because it is outside the period of significance.

### **Picnic Shelter**

Located midway up Mount Tabor along Salmon Way is a large thirty-four-square-foot picnic shelter. Plans for the structure were drawn by R. George in 1974. The shelter is situated in an open grassy area across from the Parks office building and parking lot. This is the only picnic shelter in the park. It is a square structure with a cross-gable roof supported by four log posts, wood beams and trusses. The roof structure is exposed. The flooring is concrete slab. This shelter serves as a gathering place for large group events with seating for eighty to one hundred visitors. This structure is considered non-contributing because it is outside the period of significance.

### Soap Box Derby Track

The Mount Tabor Soap Box Derby Track is a long ribbon of pavement with six faded painted lines forming lanes. It appears as a roadway set in a bowl. The starting trench is on the north end and this trench is covered with a long narrow piece of heavy steel. Just south of the starting trench, on the east side of the track, are large piles of soil amendments used for park maintenance. These piles use the cement retaining wall along the north east edge of the track. The track follows the contours of a bowl-like depression. Historical information is sketchy regarding its origins, however, the first official track in the U.S.A. was constructed as a Works Progress Administration project in 1936 in an Akron, Ohio city park. Oral reports from derby afficianados indicate that the track at Mount Tabor Park was originally designed to official specifications and was very active in the 1940s through the 1960s. Most sources doubt that the track would have been built in the period of significance for this nomination since few communities had official tracks prior to the 1940s. According to City Archives records, the Mount Tabor Park Soap Box Derby Track was apparently refurbished in 1957. During that time, there was a discussion between City Council and the park superintendent regarding complaints of not completing the tract to specifications and of problems with silt deposition onto the apron of Reservoir 5 below it. In 1961, there was more City Council correspondence regarding a design for the track. The Soap Box Derby Track is considered a non-contributing structure because it is outside the period of significance.

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### Basketball Court

The basketball court is open air and is bounded on the west by the crater, and to the northeast by the steps servicing the amphitheater. The date of construction is unknown but it has a modern feel and is subsequently considered a non-contributing structure.

## 69<sup>th</sup> Avenue Entrance

The northeast area of the park maintains much of its historic feel. Located in an historic and stable neighborhood, the 69<sup>th</sup> Avenue Entrance invites pedestrians to climb the long concrete stairs up the steep slope of Mount Tabor Butte. Historic drives travel to the southeast and due west. To the southeast, East Tabor Drive climbs gently in a curvilinear fashion past the 69<sup>th</sup> Avenue playground and group picnic site, eventually encircling the butte. To the west, the drive enters the park paralleling private residences to the north and arrives at the main playground, main parking lot, Crater Amphitheater, Picnic Shelter and Volcano Comfort Station.

To the southeast of the Northeast Entrance is the 69<sup>th</sup> Avenue playground. This historic playground and picnic area was built to take advantage of this relatively level spot on the steep east side of the butte. It is accessed by the 69<sup>th</sup> Avenue Stairs dropping down from East Tabor Drive. To the west, the butte rises dramatically upward. A comfort station, the Northeast Entrance Comfort Station, designed in 1916 and constructed in the 1920s, is also located in this area. This site includes an old style swing set, small ball diamond, volleyball court, two horseshoe pits and a group picnic area and drinking fountain. The open-air picnic site, like the entire area, is set amidst the lofty Douglas fir trees. The long tables are situated in close proximity to the recreational amenities. This area with its old-style recreational past-times and near-by historic comfort station, gives the visitor a sense of traveling back in time. Though the construction of every feature at this location cannot be dated precisely, there is a cohesiveness and sense of period that is intact. Also, early records report a high degree of neighborhood interest in recreation services at this entrance.

Mische designed a junction where park drives Interlink, West and East Overlook, Cascade, and Woodland met at the northern base of the park's highest point, Mountain Crest Summit. From this point pathways encircled the highest point and connected with a trail system to points all over the park. At the approximate location of Miche's junction there is now a primary intersection of the main driveways in the park and a small parking lot. A west locked gate at Reservoir Loop Drive (Cascade Drive) and an east locked gate at Tabor Summit Drive (East Overlook Drive) have been closed to public vehicular traffic since the 1970s when "partying youth" were prevalent and many nuisance reports were recorded. These driveways make excellent thoroughfares for bicycles, runners and baby strollers. Northwest of this junction is the main playground. Through the east locked gate, Tabor Summit Drive (East Overlook Drive) climbs the eastern slope to arrive at the summit area. This driveway has been referred to by numerous names on various maps such as Harvey Scott Circle, Mount Tabor Summit Drive, Tabor Summit Circle or simply Summit Drive. At the south end of the summit area there is a divider that directs traffic to the east side of the summit, circling around to the west side, and back down the east slope of the butte on the same driveway. Because this driveway has been closed to vehicular traffic for several decades the summit maintains a protected and peaceful feeling. Pedestrians, bicyclists, skateboarders

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and roller bladders frequent it as do those seeking solitude at the few picnic tables in the groomed forest area or at the overlook benches.

The Mountain Crest Summit is the highest point on the butte. The long flat summit area stretches approximately one-eighth of a mile north and south, sloping gently to the south. The summit is composed of mowed shady lawn with lofty Douglas firs and other deciduous trees. Views to the east and west from the summit have been incorporated into the Scenic Resources Protection Plan adopted by the city in 1991. Although Emanuel Mische preferred to leave the forest intact, he had planned for the views from the Mountain Crest Summit to be kept open. Since the tall trees in the key vista points have not been kept pruned, the views of east Portland, Mount Hood and the eastern foothills and mountain range have now become more or less obstructed from the highest points on the summit's east side. (Dropping down to the East Tabor Drive, however, affords several good views of Mount Hood, Larch Mountain and other peaks and the cityscape.) From the northeast vicinity of the summit, a glimpse of Mount St. Helens can be obtained on clear days. The northwest section of the summit provides a grand vista of downtown Portland and the west hills. With the sparkling waters and picturesque oval gatehouse of Reservoir 5 below, it is one of the finest views available in the city. This is a favorite site for sunset watching and a modern bench has been installed here. Where Mische had planned a modest, airy bandstand at the north end of the summit, two grand big-leaf maples grow. This site is utilized as a meeting ground for many people and impromptu nighttime concerts occur here in mild weather. Benches face east and north, and sunrises and moonrises can be witnessed there. Young beech trees have been set out to the north of the big maples. A brass geological marker reading City of Portland Benchmark number 1876 is embedded in the ground to the north of the large maples. To the west, is the historic 1920s Summit Comfort Station (probably constructed in 1926 according to city records). This comfort station replaced the original one that was remodeled in 1913 from the large J.H. Smith residence that presided over the summit area until it was demolished. To the northeast of the few stairs that access the comfort station, a 135-foot Summit Radio Tower was built. This tower is apparently used as a relaying system for the water system. The date of construction appears to be about 1968. The tower is unobtrusive due to the screening of the tall fir trees. At the south end of the summit is a large bronze statue of newsman Harvey W. Scott, by Gutzon Borglum of Mount Rushmore fame. Mounted in 1933 on a granite base, the statue sits atop a cut basalt rock terrace with steps and two benches.

Besides the asphalted Tabor Summit Drive, the summit area is accessed at the north and south by several pathways. As Mische envisioned, a long flight of concrete steps, the 69<sup>th</sup> Avenue Stairs, curves down the northeast slope of the butte to the 69<sup>th</sup> Avenue Entrance. These stairs, like the other long flight between Reservoir 5 and 6 on the west slope, get frequent use for athletic training by school groups and individuals. A short distance down the stairs, another wide trail forks to the north and drops down to the Reservoir Loop Drive above the main playground. At this junction, a small building built into the side of the north slope faces low round cement structures. This small round concrete covered water storage tank is a discontiguous feature of the Mount Tabor Reservoirs Historic District. From the Summit Comfort Station, another smaller paved path descends further to the northwest down to this same point. On the south end of the Mountain Crest Summit, Mische planned for another long flight of stairs to descend down to the Old Reservoir 1, site. A short flight of concrete steps descends directly south of the Harvey W. Scott statue across Tabor Summit Drive. From here several trails traverse the steep south side of the butte through some of the most natural forest in the

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park. Native understory, plants including fairy lanterns, trilliums, Solomon's plumes, snowberry, thimbleberry and hazel shrubs grow beneath the predominating conifer forest. One trail takes the steep route down to the north end of the Reservoir 1 site. The main path follows gentler contours of the hillside and is wide and well graded. Where it turns due west at a forest junction lamppost, it offers scenic glimpses of the waters and buildings of Reservoir 1. From this junction of several trails, the main trail turns northeast past another forest lamppost and accesses the eastern side of the summit area continuing either around to the 69<sup>th</sup> Avenue Entrance Stairs or tying into North Tabor Drive. This area of the park and the steep slope east of there has the most natural feel due to the forest undergrowth being intact.

Beginning at East Tabor Drive (Mische's Woodland Drive) was constructed with great difficulty across the rocky, steep slope of the east side of the butte. The east side of the roadbed has an attractive stacked basalt rock retaining wall. East Tabor Drive climbs and encircles the butte and arrives either at the Harrison Street Entrance, not in the original plan, or the Lincoln Street Entrance as Mische had essentially planned. Mische's 1911 preliminary park plan called for extending the boundary of the park so that the Woodland Drive (now East Tabor Drive) could be built at a more reasonable level farther down the slope. The property and drive he envisioned are analogous to what is now private homes along S.E. Mountain View Drive. East Tabor Drive, however, does provide the wide and inspirational views that Mische wanted to secure for the public. Mount Hood, the Cascade Range and all of east Multnomah County are visible as are the peaks in Washington State across the Columbia River to the north.

### **Contributing Features**

### Summit Comfort Station

The Summit Comfort Station is a Tudor-style building located to the northwest of the summit of Mount Tabor Park. It was built either in 1920 or 1926. In keeping with the other comfort station designs, it is located at a slightly lower elevation so as not to compete with the landscape. Several concrete steps and a low retaining-wall terrace landscaped with low ornamental shrubs lead down to the building from the Summit Drive. The one-story red-brick building faces east and is comprised of two restrooms with a storage/concessions area in between. The foundation is concrete and the roof is composition shingle. The plan is comprised of a main rectangular form with a projecting wing at either end. The center volume and wings are side gabled. Original round-arched wood doors to storage/concession are on the front (east) facade and a large central window opening has been boarded up. The gable ends of each of the wings (front facade) are filled with original timber and stucco. The original window openings in the gable ends have been filled in with brick. Restroom entrances are on the north and south facades in the wings. Wood vented window openings flank the entrances. The restroom entrances are sheltered by a small shed roof supported by Tudor-style brackets. Doors are original round-arched vertical board. The women's entrance retains an original curved iron railing. The rear elevation drops steeply down into the forest. The concrete foundation is more exposed on this side. Small boarded up windows are irregularly placed on this facade. The gable ends of the wings contain the same timber and stucco decoration as the front facade. Plans in 1953 were for a slight remodel for the women's side to accommodate a water bureau radio station. Though no longer in use, the building is in good condition and according to park records, can be made available for special occasions.

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### Harvey W. Scott Statue and Terrace

At the southern end of the top of the butte, amidst the Douglas fir boughs, stands a full-body bronze statue of Harvey W. Scott, long-time editor of the daily newspaper, the *Oregonian*. Mounted on a granite pedestal approximately thirteen feet tall in total, it faces southeast, looking toward Mount Scott, another of the Boring Buttes that bears the influential man's name and where he once owned sizeable acreage. The statue's right hand points westward toward downtown Portland. An inscription on the base reads: Harvey W. Scott 1838 – 1910; Pioneer, Editor, Publisher, Molder of Opinion. It is among the last works by the sculptor Gutzon Borglum (1867 – 1941), who completed it around 1930 while he was working on the Mount Rushmore Memorial. The name of the artist is inscribed into the metal base on the east side. The statue and its pedestal stand in a small formalized terrace of a cut basalt rock patio with two concrete benches on the east and west sides of the statue. Cut basalt rock stairs and walkways approach the statue from the east and west. A cut basalt rock retaining wall faces south and follows the curve of the Summit Drive between the east and west stairs. The terrace landscape includes hardy shrubs for this south facing aspect. Oregon grape, rhododendrons, red osier dogwood and heather are among them. The statue was a gift from Scott's family and was dedicated at a ceremony at the site in 1933. The family established a maintenance fund, the "Scott Statue Memorial Fund," with \$5,000 in an interest bearing account in the city of Portland's name, in the 1940s.

### Northeast Entrance Comfort Station

Plans for this building date from 1916 and were drawn by the architectural firm C. H. Kable & Company according to City Archives documents. The actual construction date is 1926 and the building's construction cost was \$5,049.60 according to inventory records for Mount Tabor Park. Situated in the northeast corner of the park, it services the 69<sup>th</sup> Avenue Playground area. The front facade of the comfort station faces north. A sidewalk winds around the building and continues up a short flight of stairs to the road. This one-story Tudorstyle building is clay tile construction with a concrete slab foundation. The building is situated on sloped ground so that the elevation drops down from north to south and west to east. Thus the foundation is higher on the southeast side. The top of the foundation is capped with a wide curved concrete water table. The exterior is roughcast stucco. Rectangular in plan, the hipped roof is intersected by a large gable-roofed front porch. The roof is composition shingle. The interior plan is comprised of two restrooms side by side and storage areas at the rear. Access to the women's restroom is from the front porch as is access to an ADA restroom. Access to the men's restroom is from a side porch on the north facade. The front facade is dominated by a large front porch. The porch gable end is filled with wood lap siding. Exposed rafters are curved as is the bargeboard. Squared brackets decorate the gable end. Identical rafters also decorate the eaves of the main hip roof. The porch is supported by square posts and is enclosed by a low stucco wall with an arched opening and inset tile and brick decoration. The porch ceiling is beaded board. A small built-in bench is integrated into the wood railing along the south end of the porch. The wood railing is decorated with bell shaped cut-outs. Window openings are located high up on the each of the facades and are filled in with wood vents. Under the hip roof on the rear facade is a recessed area containing a built-in bench. Original vertical board doors provide access to small storage areas here. This restroom is no longer open to the public, but the building is in good condition.

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### East Tennis Court

The construction dates of the two tennis courts in the park are given in park records as 1923 and 1928. It is unclear which one was constructed when, however, both dates fall within the period of significance. This tennis court is located at the 69<sup>th</sup> Avenue playground; the tennis court on the west side of the park is located at the Salmon Street Entrance near Reservoir 6. Fence and other repairs to the courts are recorded in 1926 and 1932.

# 69<sup>th</sup> Avenue Stairs

Long flights of stairs are one of the hallmarks of Mount Tabor Park. This concrete flight winds its way with steep grace up the entire northeast slope of the butte arriving at the summit. It begins at the 69<sup>th</sup> Avenue Entrance west of the playground. It was completed in 1915. Just past the junction with Tabor Summit Drive, concrete restoration work was completed recently on a section of the stairs.

### Non-contributing features

### Summit Radio Tower

The summit radio tower is a metal structure, 135 feet tall, located on the northwest portion of the Mountain Crest Summit. It reportedly serves the Water Bureau with communications to their various sites. Some of the power components are apparently housed within the Summit Comfort Station that was refitted to accommodate them. The date of construction could not be firmly determined, but through Archives and oral reports, it appears to be about 1968. The Summit Radio Tower is a non-contributing structure because it is outside the period of significance.

### **Harrison Street Entrance**

Mische's preliminary park plan of 1911 had the northern reaches of this region traversed by Woodland Drive and pathways. His plan called for extending the park land to include the steep lower reaches of the butte that are now developed for residences along S.E. Mountain View Drive. The Woodland Drive of Mische's plan was developed higher up the butte in the 1930s and is called East Tabor Drive today. Photographs depict construction on this drive in 1937 by a WPA crew (Project # 869C). This is one of the most scenic drives in the park. It is open to vehicle traffic six days a week and provides some of the grandest views to the east of Mount Hood, Larch Mountain, and the Washington State mountains north of the Columbia Gorge. Pedestrians have a sidewalk up the east side for most of the drive. Heading north, East Tabor Drive intersects North Tabor Drive that travels northwest below the Mountain Crest Summit arriving at a small parking lot bounded by a railroad tie terrace to the south. This terrace is landscaped with a variety of native and non-native plants but of particular interest are the flowering currants that attract hummingbirds. Here, also, is the primary junction of the locked gates to Tabor Summit Drive and the east portion of Reservoir Loop Drive. The main playground and Crater Amphitheater areas are to the northwest.

The Harrison Street Entrance was the last formal entrance developed in the park and not part of Mische's original scheme. The entrance appears to have been an extension of S.E. Mountain View Drive, the residential street paralleling the eastern boundary of the park. This entrance was apparently begun as W.P.A. Project #

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869C, 1/11/37 - 5/4/37 and labeled:  $72^{nd}$  and Harrison St. Approach to Mt. Tabor Park – Removing 1500 cu. Yard." The estimated cost was \$4,746 and actual cost was \$5,162.56. The drive associated with this entrance is called Harrison Drive because it is an extension of S.E. Harrison Street. It ties into the Lincoln Drive arriving from the west and the East Tabor Drive that curves down the eastern slope of the park. The junction of these drives is below and to the south of Reservoir 1, just east of the Southside Stairs. Harrison Drive is a good example of the difference noted between the newer road construction and the original. Harrison Drive is potholed and not of the same quality of that of the older drives.

The Harrison Street Entrance is flanked by ornamental tree plantings, predominantly flowering plums, on the north slope and the Harrison Playground, distinguished by the variety of lovely non-native shade trees, on the south side slope. The history of the planting of the mature grove of predominating black walnut, black oaks, linden, and other deciduous trees is unknown. They are well suited for this south-facing aspect and well-drained environment. The Mount Tabor Nursery is just to the west of this area, and along the paths in that direction, several other non-native or uncommon tree species are growing and so the area may have received the extra attention of nursery workers. The predominance of large, non-native nut-bearing trees makes this a distinguished site in the park and a favorite hunting ground for the plentiful fox squirrels and various birds. The deciduous trees make the area pleasantly shaded in the summer but well lit after the trees drop their leaves in the winter. The Harrison playground is old-style with several metal structures. The play structures are positioned with great distances between them in the sloped grove. The well-spaced great shade trees lend an airy, playful feel to this pastoral area, even without the play structures. The recent widening of the path that accesses this area from the east and west adds an unaesthetic element. The exact date of the construction of the playground is unknown.

A pathway leaves the playground going west through the primarily Douglas fir, partially groomed forest. It soon divides into a lower path and an upper path. These paths bisect what used to be the lower section of the Southside Stairs, from the southern boundary of the park up to the planned terrace garden of Reservoir 1. This portion of the stairs has been replaced by a rough trail that climbs steeply up to cross Lincoln Drive accessing the remaining upper section of the Southside Stairs. The lower path, bordering Warner Pacific College grounds, passes by two large native madrone trees, uncommon in the park and the neighborhood. The upper path traverses the south face of the slope and crosses a main, but undeveloped path climbing up to the Reservoir 1 area. The upper path passes by a tiny spring, one of the few visible springs in the park, emerging from beneath a big-leaf maple on the north side of the path. The pathway continues into a mature non-native spruce forest. Both of these trails converge into the nursery area where there is a small grove of sizable non-native Coulter or big-cone pines and other notable non-native species such as strawberry madrone. The upper trail arrives into a flat cedar grove that is used as a soil amendment storage area for the nursery . A low cement retaining wall along the north side is crowned with well-established plantings of uva ursi and a prostrate juniper.

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### Summary

True to the prediction of John Charles Olmsted, Mount Tabor Park is one of the most important and largest parklands in the city of Portland, and a defining landscape feature of the city's east side. Mount Tabor Park's design retains its historic integrity and the principles of Olmstedian design.

Mische recognized the wisdom of letting the land speak for itself by primarily aiding accessibility with aesthetic drives and pathways. Though a city park in an urban neighborhood, Mount Tabor maintains elements of a forest preserve. The masterful network of drives and pathways fit the needs of the community. The interior of the park remains a sanctuary due to the limited access of vehicles, yet the drives and paths provide recreational opportunities and numerous places to enjoy the powerfully beautiful park landscape and outstanding views of the surrounding city and countryside. The oldest driveways are also testimony to timeless construction techniques. After extensive analysis of the roadways in the park, the City of Portland's Mount Tabor Master Plan of 2000 stated that the historic roads have held up very well for over 50 years unlike the newer constructs. The rock work from local basalt accents drives and other mammade features. Amenities are subordinate to the landscape. All of the comfort stations have maintained a high degree of integrity, though only one is open to the public at this time. As the park master plan points out, the open water reservoirs are, "integral historic and aesthetic elements directly tied to the public's identification with Mount Tabor Park." Ninety-five years after the city purchased the nearly 200 acres that make up the park today, little has been done that alters the experience of Mount Tabor Park.

### A PARTIAL LIST OF **Plants Growing in Mount Tabor Park** (alphabetized by most familiar common name)

Alder, red Alnus rubra Betulaceae Andromeda Pieris sp Ericaceae Barberry Berberis sp Berberidaceae Bittercress Cardamine sp Cruciferae Blackberry Rubus laciniatus, R. discolor Rosaceae Buddleia (Butterfly bush) Buddleia sp Buddlejacaceae Butdercup Ranunculus sp. Ranunculaceae Burdock Arctium lappa Asteraceae Brooklime, American Veronica americana Scrophulariaceae Bracken fern Pteridium aqulinum Polypodiaceae Camellia Camellia japonica Theaceae Cedar Thuja occidentalis, Chamaecyparis lawsoniana, C. nootkatensis, Calocedrus decurrens Cupressaceae Centaury Centaurium umbellatum Gentianaceae Cherry, wild Prunus emarginata, P. subcordata, P. virginiana Rosaceae Chestnut, horse Aesculus hippocastanum Aesculaceae

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Chickweed Stellaria media Caryophyllaceae Chicory Chicorium intybus Asteraceae Clematis Clematis sp Ranunculaceae Clivers Galium aperine, G. oregano Rubiaceae Clover, red Trifolium pratense Fabaceae Clover, white Trifolium repens Fabaceae Cotoneaster Cotoneaster sp Rosaceae Cottonwood Populus trichocarpa Saliaceae Cranesbill Geranium sp Geraniaceae Currant, red-flowering Ribes sanguineum Grossulariaceae Daisy, English Bellis perennis Asteraceae Daisy, ox-eye Chrysanthemum leucanthemum Asteraceae Dandelion Taraxacum officinale Asteraceae Dandelion, false Hypochoeris radicata Asteraceae Dock, yellow Rumex crispus, R., obtusifolius Polygonaceae Dogbane, spreading Apocynum androsaemifolium Apocynaceae Dogwood, Pacific Cornus nuttalli Cornaceae (in demise) Dogwood, creek (red osier) Cornus stolonifera Cornaceae Fairy lanterns (Fairy bells) Disporum hookeri, D. smithii Lilaceae Fir, Douglas Pseudotsuga menziesii Pinaceae Groundsel, common Senecio vulgaris Asteraceae Hawthorn Crataegus monogyna Rosaceae Hawkbit Leontodon sp Asteraceae Hazelnut Corvlus cornuta Betulaceae Hemlock, Poison Conium maculatum Apiaceae Hemlock (tree) Tsuga sp Pinaceae Hydrangea Hydrangea sp. Saxifragaceae Holly Ilex aquifolium Ilexaceae Horsetail Equisetum hymenale, E. arvense Equisetaceae Ivy, English Hedera helix Araliaceae Juniper Juniperis sp Cupressaceae Kalmia Kalmia sp Ericaceae Knotweed Polygonum sp Polygonaceae Lambsquarters Chenopodium album Chenopodiaceae Lettuce, wild Lactuca sp Asteraceae Madrone, Pacific Arbutus menziesii Ericaceae Madrone, Strawberry Arbutus uneda Ericaceae Mallow Malva neglecta Malvaceae Maple, big leaf Acer macrophyllum Aceraceae Maple, vine Acer circinatum Aceraceae Mock orange Philadelphus sp Saxifragaceae

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Mountain ash Sorbus sitchensis Rosaceae Nipplewort Lapsana communis Asteraceae Oak Quercus sp Fagaceae Oceanspray Holodiscus discolor Rosaceae Oregon grape Mahonia aquifolium, Mahonia nervosa Berberidaceae Osoberry / Indian plum Osmaronia cerasiformis Rosaceae Pearly everlasting Anaphalis margaritaceae Asteraceae Periwinkle Vinca major, V. minor Apocynaceae Pineapple weed Maticaria matricarioides Asteraceae Pine Pinus sp Pinaceae Pittosporum Pittosporum sp Pittosporaceae Plantain Plantago major, P. lanceolata Plantaginaceae Poison oak Rhus diversiloba Anacardiaceae Oueen Anne's lace Daucus carota Apiaceae Raspberry Rubus strigosus Rosaceae Rhododendron Rhododendron sp Ericaceae Rose, wild Rosa gymnocarpa, R. nutkana Rosaceae Rush Juncus sp Juncaceae Salsify/Oyster plant Tragopogon sp Asteraceae Scots broom Cytisus scoparius Fabaceae Sedge Carex sp Cyperaceae Self-heal Prunella vulgaris Laminaceae Sheep sorrel Rumex acetosella Polygonaceae Shepherd's purse Capsella bursa-pastoris Cruciferae Snowberry Symphoricarpos mollis Lonicerae Solomon's seal, branched/false, star-flowered Smilicina racemosa, S. stellata Liliaceae St Johnswort Hypericum perforatum Hypericaceae Strawberry Fragaria vesca Rosaceae Sword fern Polystichum munitum Polypodiaceae Tansy ragwort Senecio jacobaea Asteraceae Thimbleberry Rubus parviflorus Rosaceae Thistle Cirsium sp Asteraceae Trillium Trillium sp Liliaceae Uva ursi Arctostaphylos uva ursi Ericaceae Vetch Vicia sp Fabaceae Viburnum Viburnum sp Caprifoliaceae Violets Viola sp Violaceae Weigela Weigela (Dievilla) sp Caprifoliaceae Witch hazel Hamamelis sp Hamamelidaceae Willow Salix sp Salicaceae Yarrow Achillea millefolium Asteraceae

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Youth-on-age/Piggyback plant *Tolmiea menziesii* Saxifragaceae Yellow dock *Rumex crispus* Polygonaceae Yew *Taxus sp* Taxaceae

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## STATEMENT OF SIGNIFICANCE

Mount Tabor Park is a 196-acre city park located in southeast Portland, Multnomah County, Oregon. It is eligible for the National Register of Historic Places under Criterion A because of its association with early park planning achievements in Portland. The birth of this park characterizes the style by which many of Portland's parks, and the nation's parks, were obtained and developed through active citizen involvement in cooperation with the city government. Mount Tabor Park's story also illustrates how park design shifted with national trends, from a formalized European mode to a more naturalistic style, with later accommodations for the recreation/playground movement. The chronicle of Mount Tabor Park falls into the larger context of periods of park creation and development in the history of the United States. The earlier portion of the park's history, in the waning nineteenth century and emerging twentieth century, coincides with the City Beautiful movement's influence regarding the importance of parks and landscape on society. The ideas of these times held sway through the several decades of the Progressive Era. Also important in the park's development were the New Deal work programs of the 1930s, established during the years of the Great Depression.

Mount Tabor Park is also eligible as an example of Landscape Architecture under Criterion C because of its association with John Charles Olmsted, who identified it as a prime park location in 1903. Mount Tabor Park's design clearly exhibits elements that are associated with design principles followed by the Olmsted landscaping firm. John Charles Olmsted was the stepson and nephew of the famous landscape planner Frederick Law Olmsted, Sr. Frederick Law Olmsted is credited as being one of the prime instigators of the City Beautiful movement. Commissioned to aid in the planning of Portland's Lewis and Clark Exposition of 1905, his firm was also retained to review the city of Portland's existing and potential parklands. After John C. Olmsted's 21-day visit to Portland in April 1903, he produced his report to the Portland Park Board in December of 1903. Thirty-seven park projects were identified in Olmsted's 1903 Report to the Park Board, Mount Tabor Park among them. Olmsted's document has continued to shape the city's park planning to this day. In 1907, the Olmsted firm completed another review of Portland's parks, building on the earlier 1903 recommendations.

Mount Tabor Park's original design was created by Emanuel Tillman Mische, an outstanding horticulturist who had trained and worked at the Olmsted firm for eight years before being referred by them for the position of Portland's park superintendent. Mische was hired by the City of Portland in 1908. Emanuel Mische had a continuing relationship with the Olmsted family beyond that of an employee. On John Olmsted's subsequent visits they collaborated on various aspects of Portland's park planning and implementation. Mische's 1911 park design for Mount Tabor Park stayed true to the recommendations as discussed by Olmsted's report to the Park Board of 1903. Mount Tabor Park has maintained the look and feel of a park designed using the principles touted by the Olmsted firm in part due to the continuity afforded by Mische's assistant, Charles P. Keyser. Hired in 1909, the year of Mount Tabor's official park status, Keyser was made the superintendent of Portland's parks in 1917 where he remained until 1949.

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Criterion A: Mount Tabor Park Development Influenced by the Progressive Era, City Beautiful Movement, and the New Deal

Mount Tabor Park meets the guidelines for Criterion A as an example of the city of Portland's early park planning. This story is not unlike so many other parks across the country. Civic leaders in Portland sought outside council, specifically the Olmsted landscape firm, to plan not only the site for the 1905 Lewis and Clark Exposition, but to review lands suitable for parks. Mount Tabor Park was one among many identified by John Charles Olmsted's 1903 Report to the Park Board. The active acquisition of the land that makes up the park and the park design occurred with local funding during the Progressive Era and included the influence of the City Beautiful movement at the turn of the nineteenth to the twentieth century. Work on Mount Tabor Park's amenities continued through the next decades with the ebb and flow of local funding. With the Great Depression came federal aid through the New Deal programs of the 1930s. Money was channeled to all levels of government to produce public works projects that would employ millions of jobless people. Mount Tabor Park, like so many other recreation sites around the country, benefited by work crews who created well-crafted infrastructure and amenities. In the case of Mount Tabor Park, Works Progress Administration crews completed the drive system as it was originally designed in the 1911 plan prepared by Emanuel Tillman Mische. Other W.P.A. projects related to the construction of park maintenance buildings, drainage and clearing understory plants were undertaken at Mount Tabor Park.

## Progressive Era and City Beautiful Movement Stimulate Park and Urban Planning

The sweeping social and political changes that occurred during the ending years of the 1800s and the early years of the 1900s mark what is called the Progressive Era. Reform movements grew and created policies and institutions still powerful today. Progressive individuals and groups believed that it was possible to improve human nature by bettering living and working conditions. Women, from local civic clubs to scientists like Ellen Swallow Richards from M.I.T., were instrumental in providing leadership for the municipal housekeeping movement that spawned environmental consciousness and general improvements throughout the nation.

The Progressive Era emerged as the United States faced the end of the frontier. Settlement stretched from coast to coast. The population of the country burgeoned, tripling in size from thirty million in the 1860s to ninety million by 1910. Cities rapidly expanded with immigration, and migration from farms to urban jobs. Land became much more valuable as it became scarcer. Progressives grappled with the side effects of an unmitigated free enterprise system. Urban life brought the classes in close contact with each other, though the upper class could retreat to their estates. A compelling sense of responsibility to contribute to the community in positive ways grew, extending from the traditional philanthropy of the upper class to include the growing middle class. Whereas the upper class did not need to rely on public land for their recreation, the growing middle class and the lower classes needed access to land for recreation. Labor unions were edging industry toward providing shorter work hours for laborers thus city dwellers tended to have more time for recreational interests. The subjugation of nature by automobiles and urban development contributed to a growing sense of nostalgia for the lost rural roots of America. Reform movements emerged as the public faced the Industrial Revolution head-on. Among the movements was the so-called City Beautiful movement.
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The City Beautiful movement grew out of this time of reform to address not only architecture but city planning at a time when urban areas were expanding exponentially with little concern for aesthetics or other planning criteria. Advocates of the City Beautiful movement promulgated that beautification would not only provide a more pleasing environment, but that individuals and thus society as a whole, would exhibit greater moral and civic virtues.

The City Beautiful movement's precepts strove to encourage city governments to set aside bountiful land for present and future enjoyment and to build beauty into every development. The movement preached that the incentives for doing so included a better, more affluent society of engaged citizens. There was an agreement that pleasant neighborhoods that included gardens, squares, tree-lined boulevards and parkways or other park-like land, as well as properties overlooking grand vistas and waterscapes, increased real estate value and increased the tax base.

Land use planning had not emerged as a strong feature in the forge-ahead economic development of United States cities in the middle of the nineteenth century. Yet well-established and crowded eastern urban areas had prominent people influenced by the grand beauty of European designed cities, parks and gardens, who demanded and helped to fund, lovely public spaces. Places like New York City, Boston and Washington, D.C. became famous for their parks and landscapes, and the designers of these landscapes found themselves in high demand. There was a sense of competitiveness between cities as they vied for attracting business and residents. This competitive sprit was exemplified by the international events known as the World Expositions.

Designed to promote the latest achievements in industry and technology, as well as to showcase the products and virtues of a region, the expos were meant to inspire the possibilities of creating an aesthetic and healthful city environment. The first were conceived and executed in Europe – London 1851, Paris 1889, London again, and Vienna. Chicago's World's Columbian Exposition of 1893, though not the first expo for the country, was a pivotal event for the United States. Four hundred years after Columbus, the nation was eager to demonstrate its glamour and abilities in comparison with the acknowledged distinction of Europe's far more historic cities. Known as the "White City" due to the extensive use of white paint applied to cover the plaster architectural features, Chicago's expo was a testament to classical Greek and Roman architecture and relied extensively on the elaborate Beaux Arts style, popularized by French schools of architecture. Design guidelines were utilized to create harmonious architectural scale. The highly designed landscape featured the local waterway as an aesthetic component whereas urban rivers and lakes were primarily monopolized by industry and suffered grave environmental consequences. The World's Columbian Exposition put the City Beautiful movement soundly on the map and influenced cities of all sizes across the land to develop beautification programs of their own.

Chicago's Columbian Exposition advanced the field of professional landscape design just as the Progressive Era, in the zeal to outsmart political cronyism, had hatched the trend to hire an outside professional consultant. The City Beautiful married the two and the landscape design field took off. Cities and prominent citizens were anxious to hire experts, like the Olmsteds, to help with urban and estate landscapes. If the city wanted to host an expo, there was even a greater incentive for creating an image of desirability. Such was the case for Portland in

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1903, when John C. Olmsted was commissioned to help the city prepare for the Lewis and Clark Exposition of 1905.

The City Beautiful movement pushed for park planning as part of a national trend toward political and social reform that had grown with the burgeoning of American business, and the swelling population. The influence of this movement went right to the top level of public policy makers. Concern for the conservation of public lands was advanced by President Theodore Roosevelt. While his interests included art (he was an early member of the elite National Arts Club) and general political and commercial accountability, he is credited with championing the conservation of land for public parks. During his time as president, approximately 230 million acres were placed in public protection. His terms in office, between 1901 and 1909, first completing the assassinated William McKinley's three years followed by his own successful four year term, were very instrumental in forming the National Parks and National Monument systems, the U.S. Forest Service, and game and bird refuges. A clear policy of conservation coming from Washington, D.C. helped to foster the state and local park systems we know today. The push to acquire the land for Mount Tabor Park closely corresponds to Teddy Roosevelt's term, and a majority of the land parcels purchased by the city of Portland for Mount Tabor Park and other parks occurred in 1909.

The women's suffrage movement, an important component of the Progressive Era, had a profound effect on park planning. Even without the right to vote, women worked at the local and state levels to promote a common agenda of moral obligations to women and children. Kindergarten and other school programs, awareness of child labor practices and the playground movement came out of these efforts. New Jersey passed the first comprehensive state legislation in 1907 establishing a playground commission. Whereas the City Beautiful movement had emphasized the need for aesthetically, naturalistically designed land separated by space or landscape from the urban environment, a growing number of urban families demanded open space for active recreation.

# **Post World War I: Recreation Movement Continues**

The time between the two Roosevelt presidents, from 1909 to 1933, was pivotal for the nation's evaluation of outdoor recreation. Many parks were established by the first decade of the twentieth century. The population clamored for more park amenities, as well as more parks, but lack of funding, the restrictive atmosphere imposed by World War I and the world wide influenza pandemic, had hampered the development of services on parklands. Nationally, as labor unions and public opinion swayed the labor force toward shorter work hours, people had more leisure time. The predominating urban environments, as opposed to the rural lifestyle, increased the demand by the public for recreational land and facilities. In general, people had more time and more mobility, especially with the private automobile, which also contributed to a declining rate of physical activity.

In 1924 the Federal Government held the National Conference on Outdoor Recreation in Washington, D.C. at the request of President Calvin Coolidge. Three-hundred delegates from one-hundred-twenty-eight national organizations attended. The conference was designed to assist in the formulation of a national policy "to

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coordinate the activities of federal, state, county, municipal and unofficial agencies in the field of outdoor recreation and to promote the development of the recreational resources of the country and stimulate their use." The conference was also to encourage the promotion of conservation and wise administration of the nation's natural resources. This conference was followed two years later with the passage of the Recreation and Public Purposes Act, through Congress, that authorized the Secretary of the Interior to exchange, sell (at low cost) or lease unreserved non-mineral public lands to states, counties and municipalities for the purpose of recreation.

This time of park acquisition was followed by a time of development during the next decade. While the country suffered economic collapse in 1929 and private development languished, public lands benefited. John Olmsted, in his 1903 Report to the Park Board, had noted that economic hard times could be used for good advantage both in the acquisition and development of parks. The stock-market crash of October 1929 was a major turning point for American life on nearly every front. Desperation was a driving force of individuals as well as all levels of government.

# The New Deal: Development of Park Amenities

President Franklin Delano Roosevelt (FDR), who served from 1933 until 1945, during the trying times of the Great Depression and World War II, established the work relief programs of the New Deal. In the face of the desperate depression times of the 1930s, FDR's administration worked to shore-up the economy of the nation by providing jobs for unemployed Americans. By providing funding for public works projects through the Public Works Administration and direct employment through the Works Progress Administration and the Civilian Conservation Corps, the federal government was able to assist states and local governments proceed with developing public amenities. Many parks, including more than 800 state parks, were developed through the direct employment agencies of the New Deal.

The Works Progress Administration, later called the Work Projects Administration, employed 8.5 million people on 1.4 million public projects to improve America's infrastructure, arts, history and culture. The Civilian Conservation Corps, under the Emergency Conservation Work program, put men to work developing recreational facilities in forests and parks, preventing soil erosion, and planting trees. Parks around the country were upgraded and Portland's parks were no exception. Work crews from this era left their mark on Mount Tabor Park, executing Mische's earlier design intentions from the mid-1930s until 1939.

Out of this period emerged principles regarding parks and natural resources and federal laws, such as Public Law 770 1/2 of 1936 that provided for a comprehensive study of parks, parkways, and recreation programs in the United States. Another federal study entitled, "Municipal and County Parks in the United States 1935" included data on every state including 1,216 cities in seventy-seven counties that was to be compared to the 1925-1926 study on recreation facilities. In 1941, a federal document outlining guidelines for the nation's recreation entitled, "A Study of the Park and Recreation Problem in the United States," made strong recommendations that the majority of recreational needs should be the responsibility of state and local governments.

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World War II interrupted the momentum for park planning that had been gained during the 1920s and 1930s. It was not until the mid- to late -1950s that federal efforts pushed forward with the Mission 66 program, spurring once again park planning and development on all government levels. The boom times of the post-war nation encouraged housing developments and a new suburban expansion. Once again, there was much pressure for park land developments as housing and business continued to edge out the rural landscape.

# Early Park Development: The Process in Portland, Oregon

The story of the creation of Mount Tabor Park, which was the largest park in Portland until the 1940s, is an illustration of the way many public parks were conceived. Its establishment took the will and the cooperation of civic-minded and influential individuals including members of the mayor-appointed Park Board, politicians and ultimately voters to give the mandate on funding. Very important in this mix were the outside influences of experts in the field, members of the Olmsted firm, including their former horticulturist, Emanuel Tillman Mische, whose vision and expertise helped manifest the beginnings of John C. Olmsted's park plan for Portland. Mount Tabor Park and Portland's entire park system benefited from the continuity of management style carried on by Mische's assistant, Charles Paul Keyser who was park superintendent until 1949.

A clear policy on publicly owned parkland had not developed nationally but it was in process by the turn of the century. There was a sense of rivalry between cities as policy makers tried to determine how much land was appropriate for parks. Hiring the Olmsted firm and hosting a world's fair helped Portland gain a reputation as a city that invested in planning and parkland. Portland began to get inquiries from city governments around the nation, some wanting to "borrow" the Olmsted report. In May of 1907 a letter from H. A. Shatuck addressed to Portland's Park Commissioners said, "We are in the throes of park agitation here in Boulder."<sup>1</sup> Walter D. Moody, the managing director of the Chicago Plan Commission in 1912, requested the total present park area and the total proposed park area (if any) for a national report on park acreage of leading American cities. Philadelphia, Boulder and Chehalis, Washington made similar inquiries to Portland.<sup>2</sup> Park planning eventually progressed to city planning. In the year 1909, the same year that Mount Tabor Park was pieced together, land use planning emerged as a budding profession. That year the first national conference on city planning was held, Harvard University's first course on city planning was offered, and Wisconsin passed legislation authorizing cities to create planning commissions.

The City Beautiful movement propelled the nation toward park development fueled by expositions like Chicago's in 1893. But expos not only generated models of planning, they also fostered growth in the hosting city as they were extensively advertised and attended by millions of people. Portland's Lewis and Clark Exposition, open from June until October 1905, expanded the city's population and boundaries sizably. Even with design expertise from consultants like Olmsted and planner Edward Bennett, the burgeoning growth made it a challenge to carry the City Beautiful tenets from the fantasy world of the expo to the filthy, crowded streets and waterways of the real urban world. The "White City" and Portland's own exposition of 1905 were artificially produced, short-term fantasies, produced to create wealth for the promoters, as well as for the region and concerns that were featured. The designs and recommendations of the designing consultants seemed farfetched to some government and business leaders. Land use decisions were complicated by the special interests

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of developers and industrialists who held powerful sway over elected politicians. The amounts of park land, the amenities to develop, the numbers of street trees, while looking good in theory, did not always seem attainable or sustainable. Park acquisition and development were closely tied with fickle economic trends as well as voter attitude. Elections, such as the discouraging ones in Portland in 1912 and 1913, proved that citizens were not entirely sold on the City Beautiful's concepts or if they were, they did not want to put their money where their beliefs were.

# **Civic Visionaries Guide Park Development Process**

The city of Portland's effort at deliberate park planning, like other cities, was the culmination of a process. It involved civic conversation and action between city and state government and principal families of influence or people who were closely allied to them, plus hired professionals such as John C. Olmsted, Emanuel T. Mische and later Edward H. Bennett who submitted the "Greater Portland Plan" in 1912. A precedent had been set for municipal ownership when the Water Committee developed the city-owned Bull Run system in 1894. A number of the same civic elite members served as early Park Commissioners and on the Exposition Committee and they were instrumental in helping to initiate and guide the process toward a public park system. A major win for proponents of parks was the amendment of Portland's City Charter by the state legislature in 1899 and the referendum in 1900 to authorize the Portland Park Association and Board of Park Commissioners.

Portland's far-sighted citizens were able to harness the money and vitality of the city and look beyond its borders for talent, true to the trend of their day. Portland Park Commissioner, the Reverend Thomas Lamb Eliot, of the First Unitarian Church, utilized his connection to the influential east coast park movement and he was integral to the foundation of the parks system that Portland enjoys today. Reverend T.L. Eliot paid a visit to the Olmsted offices and set the deal for John Charles Olmsted, also a member of the Unitarian Church, to visit both Portland and Seattle. The Reverend Eliot's relative was Charles Eliot (1859 -1897) whose father, Charles William Eliot, was the president of Harvard College. The junior Eliot was a member of the Olmsted, Olmsted and Elliot landscape architecture firm in Brookline, Massachusetts. Charles Eliot is credited with helping to craft Massachusetts state legislation for the protection of public lands. This eventually led to the legislation that created the Boston Metropolitan Parks System in a large part due to his 1890 piece entitled "Waverly Oaks," a landmark article defending a stand of virgin trees in Belmont, Massachusetts. Charles Eliot greatly influenced the younger John Charles Olmsted, his business partner. In his plan for Portland parks, Olmsted repeatedly reminds Portland of the value of its forestland: "Many of the older cities would now pay very high prices for land covered with the primeval forest which the early inhabitants destroyed and which might once have been obtained for a few dollars an acre," he wrote. Of Mount Tabor, Olmsted said, "It has been sufficiently cleared to open up all the important views from one point or another of it, yet there still survive considerable groves of the original growth of fir trees, including many tall ones, as well as other trees and shrubs."<sup>3</sup> Presently, Mount Tabor Park represents the only sizable, naturalistic forest left in the heart of east side Portland.

While Eliot did the east coast leg-work for orchestrating Olmsted's visit, another member of the Park Commission, Lester Leander Hawkins, bank and electric utility president, escorted Olmsted and his assistant around Portland, including Mount Tabor, in the spring of 1903. Hawkins dreamed of a trail and driveway

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network along the summit and valleys of the west hills from Macleay Park to south Portland. His vision, strengthened by the Olmsted report, has carried through the century. It laid the groundwork for conservationists and preservationists to develop Portland's largest network of trail systems. Nearly half a century later, with the help of a new set of citizens, Hawkins' vision became manifest with an elaborate trail system throughout the west hills. The crowning glory of this system, Forest Park, made official in the 1940s, is a forest reserve of over five-thousand acres that allowed Portland to boast of having one of the largest urban parks in the world. The view of this long, green ridge of parkland running north of the cityscape of Portland's downtown, provides one of the prized sights visible from the west side vista points of Mount Tabor Park.

# Funding and Acquisition: Emanuel Mische Takes the Helm

Early correspondence, coupled with officially produced park reports, helps tell the tale of Portland's difficulties in developing a clear and consistent policy on parks. The Olmsted report of 1903 and follow-up report in 1907 chronicle the indecision that existed in Portland. There was a clear hesitation to commit lands to parks by some interests and politicians. There was an unhesitating group of citizens, and some politicians, that were dedicated to the park effort. In between were the vast number of average voting and tax-paying citizens subject to the pendulum of influences, especially economic concerns. To some, parks posed what was seen as multiple problems including the tying up of potentially more profitable land bases, development and maintenance costs, policing and administration costs, as well as liability risks. Those who did not support parks generally saw these same challenges even with donated park land. To others, parks were absolutely necessary for the health and well-being of a community on all levels, including economic.

Portland's records show that, overall, the city needed strong encouragement from civic sources, in addition to public funding, to acquire and develop parks. A major aid to increasing park acreage in Portland came from the Water Bureau's land holdings, some of which, like Mount Tabor Park, served two roles. These jointly owned and managed properties presented challenges to funding and management. The Olmsted and Mische park reports consistently addressed complicated issues in order to help the politicians and the community sort out priorities and options for acquiring, funding and managing parks.

Though John C. Olmsted had given Portland a thorough evaluation of park priorities in his report of 1903, the city had taken little action on his recommendations. Prior to 1909, Portland's parks were limited in size (approximately 165 acres of parkland in 1900) and most were gifted properties on the west side of the Willamette River (approximately 128 acres west, 37 acres east.) Parks were not dictated by a city-led plan. The Park Commissions Report of 1901 rallied a call for action by the citizens and the city to move forward on park development that led to the visit of John Charles Olmsted in 1903. The City Beautiful movement inspired a civic organization, The Initiative One Hundred, that promoted an integrated park system. Together with Portland's Park Board there was motivation to implement Olmsted's plan for parks.

When in 1906, Mayor Harry Lane took the helm of the Portland Park Board, coupled with support from a December 8, 1906 *Oregonian* piece expounding on the benefits of carefully implementing park design in collaboration with a competent engineer, the tide truly did turn toward creating momentum for park

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development. Mayor Lane asked the Olmsted firm for their advice on securing a park superintendent. John Olmsted recommended Emanuel Mische, but Mische had just started a new job as Madison, Wisconsin's park superintendent. The Park Board hired Arthur D. Monteith instead.

Under Monteith's leadership, the Portland Park Association planned a bond issue in 1907 for \$1,000,000 to carry out the Olmsted plan of 1903. It narrowly passed in June of that year. A challenge to the validity of the bond held up the funds, but \$5,000 was allocated to retain the Olmsted firm again, with the anticipation of the eventual availability of the bond funds. Olmsted's colleague and member of the firm, James Frederick Dawson preceded Olmsted's arrival by three weeks in November 1907. It was Dawson who did much of the foot and paperwork in the complicated process of land value assessment. Olmsted's two-and-a-half weeks were spent on private enterprise with some of Portland's most elite families. For the city of Portland, Olmsted focused on defining boundary descriptions for nine parks and parkways. The Olmsted report, delivered by Dawson, was well received by the Park Board in December of 1907 and provided a roadmap to moving ahead with park acquisitions, though elevated property values limited the buying power of the available funds to approximately one-half of the proposed parklands.

By the time the first installment of the \$1,000,000 bond issue became available for use, Emanuel Mische had replaced Arthur Monteith as Portland's park superintendent. Mische brought to Portland a remarkable range of experience and skill. Born in Syracuse, New York in 1870, his training in horticulture included stints at Arnold Arboretum at Harvard as well as the Royal Botanic Gardens at Kew. He was hired by the Olmsted firm when John Charles and Frederick Law, Jr. began their official partnership in 1898, and stayed on for eight years, becoming a friend and a colleague of the Olmsted family. It was Mische who penned the tribute to John Charles Olmsted in the April 1920 journal, Parks and Recreation. He became editor of a department of this magazine the next year. Mische eventually left the Olmsted firm to become park superintendent of Madison, Wisconsin at the recommendation of John C. Olmsted. On a second Olmsted recommendation, Mische landed the Portland superintendent position in the spring of 1908. Emanuel Mische had worked for a limited salary in Madison and regretted the small salary offered by Portland. The perks of a more suitable climate, a rent-free abode in City Park (negotiated by Olmsted) and the hope for private design work encouraged Mische, acclaimed by the Olmsted's as one of the country's most esteemed horticulturists, to move with his family to Portland. The story of his interactions with Portland's Park Board, City Hall, and the voters illustrate the challenges that were presented to park development, even with a highly capable professional such as Mische. He came to Portland with prior knowledge, gained through the previous visits of John Olmsted, of the concern that the city had for expenditures related to park acquisition and development.

The purchasing and condemning process that resulted in Mount Tabor Park, as well as other east side parks and the west side Terwilliger Boulevard in 1909, stirred up plenty of heated dialog as developing neighborhoods jockeyed for parkland. While many thought that it should be a priority to develop parks, others, like Mayor Joseph Simon, elected in 1909, seemed to believe the opposite. He was against tying up private land for public parks since he felt that Portland was, by its nature, a natural park. This attitude, along with the limitation of accessible funding from the previous bond and the threat of a decreased payroll for the Park Department,

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created difficulties for the new Superintendent Mische. Nonetheless, he went ahead with his design of six parks, including Mount Tabor Park, and a boulevard, as well as attending to his regular duties of supervision.

# East and West Side Dynamics: Portland's Citizen Groups Encourage Park Development

As the west coast of the United States' population burgeoned, Portland's was no exception. Portland's west side, backed up to the west hills, hosted the old establishment of affluent families and their gifted park properties. The broad, relatively flat plain of the east side of the Willamette River, however, was the fastest growing section of the city. By 1915 sixty percent of Portland's population lived on the east side of the river. Old money land speculation deals were building subdivisions on the eastside, such as Ladd's Addition, Laurelhurst and Irvington. Between the developers' interests, the sheer numbers of residents and the citizen clubs, the east side was developing a strong voice for parks and other public services.

This civic movement manifested itself in the style of "push clubs" that were especially active east of the Willamette River. Letters, petitions, and visits to the Park Board from these groups were continuous. The year 1905, the same year of the Lewis and Clark Exposition, push club activity was escalated with petitions and sizable attendance at Park Board meetings. It was in this year that the first mayor, Harry Lane, was elected from east Portland. The mayor was the official chairman of the Park Board. In November 1905, Park Commissioner Lang tried to assure the east side push clubs that though the present park acreage was three- hundred-seventy-five, the Park Board was planning not only east side parks, but a parkway and boulevard system to connect them. He included in his list Sellwood, Rose City, North Albina, Columbia River and also Mount Tabor parks for a total of one-thousand acres. Lang added that the goal was for three-thousand acres of parks and boulevards and of that, five-sixths should be east of the Willamette River. He suggested that the pending \$1,000,000 bond was but a drop in the \$10,000,000 bucket of monies to be found for parks.

Despite these encouraging words and continued agitation, years passed without action by the city to create new parklands. Land prices and population following the 1905 Lewis and Clark Exposition rose exponentially. Just as some people were feeling an urgency to put aside national lands, there was a growing concern that the rural-like qualities of large areas of Portland were rapidly being subdivided and urbanized. Emanuel Mische built a case to the Park Board that it was absolutely essential to acquire certain tracts to be included in the park system, "...some are so essential, both as strong local characteristics, distinctively native and excellent landscape features that to exclude them would be to very seriously impair the quality and value of the system. Such an element in the proposed system is the dual knoll eminence known as Mt. Tabor," he said.

An Oregonian article ran in November 1908 headlining: "Want Park at Mt. Tabor: East siders think ground should be bought now. Committee to appear before park commission today, setting forth wishes of United Push Clubs" The committee wanted action, "...for it has seemed to many citizens that little or no progress is being made toward securing a park at Mount Tabor, or anywhere else."<sup>4</sup> The article alluded to the fact that the City was contemplating two new reservoirs in the park. The east side push clubs had had a design in hand for several years amounting to a minimum of 169 acres.

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Agitation finally yielded results as this March 1909 *Oregonian* piece illustrated, "Parks to be Bought: Mount Tabor Property Recommended by Boards. Value is over \$300,000. System of reservoirs to be built to be used with new pipeline that will be constructed – Price agreed on is reasonable."<sup>5</sup> It is not surprising that Mount Tabor landowner and owner of the *Oregonian*, Henry Pittock, would deem the price reasonable He and his wife had been paid one of the highest amounts by the city in the scramble to acquire Mount Tabor properties. Having the Water Board responsible for about one quarter of the costs of the land may have helped spur on acquiring additional acres.

The slow acquisition of land dedicated for parks was a source of disappointment for public park supporters and Olmsted, who returned to Portland a number of times between 1903 and 1911. Pressure from citizen groups and the Park Board, coupled with public relations, was pivotal in helping to spur action and get the \$1,000,000 bond measure passed in 1907 that allowed land purchases to commence. Citizen groups were also strong advocators for development money. When finally Mount Tabor Park was beginning to officially materialize, the Mount Tabor Improvement Association passed a resolution claiming that the \$15,000 made available for development of the, "new Williams Park at Mount Tabor... was totally inadequate to do justice to the improvements contemplated on this centrally located and natural park site..."<sup>6</sup> The resolution recommended \$25,000.

Amidst the planning of the park, a controversy was emerging regarding the naming of the park. Mount Tabor was the traditional name of a large portion of the east Portland area, more than twice the size of the present Mount Tabor neighborhood. The Mount Tabor of Palestine (now Israel) is the namesake of the Mount Tabor in Portland, probably bestowed by an early settler in the 1850s. Many churches, businesses and developments referred to Mount Tabor in their names and by the early 1900s the name Mount Tabor was rooted in the city. In April of 1910, an ordinance provided that the, "public park on Mt. Tabor shall be designated as Willams Park in honor of the late George Henry Williams (1823 - 1910.)"<sup>7</sup> Williams had served in national and local politics for half a century including being a U.S. Senator from Oregon, U.S. Attorney General, and the mayor of Portland from 1902 – 1905. Influential citizen input kept the name Williams Park from ever gaining a toe-hold, and the name reverted back to Mount Tabor Park.

# Mount Tabor Park: Acquisition and Development

Prior to the large-scale acquisitions of land to create Mount Tabor Park in 1909, the surrounding community had unofficially used the land as "park" and for hunting and gathering for decades. Deer and bear were hunted according to accounts of early settlers such as the Kelly and the Prettyman families who had large land claims at the base of the butte prior to 1850. A deed dated July 21, 1888 states that Buell and Helen Lamberson dedicated a tract of land to the city as designated "park." This land may have corresponded to the Water Committee and the early reservoirs completed in 1894. John C. Olmsted used the title of Mount Tabor Park in his "Report to the Park Board" of 1903 and he pointed out that the butte was already being used for recreation. This was one of the facts he promulgated to build a case for the city to acquire the land for a park.<sup>8</sup> By the time the city moved ahead with land acquisitions for the park several years later, property prices had soared. A sizable chunk of the money garnered through the bond measure was spent on Mount Tabor Park in 1909. From 1908 through 1910, 141.02.088540 HB DM Exhibit A 2

LU 23-088549 HR DM, Exhibit A.2

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lots of varying sizes were purchased, with a flurry of activity throughout 1909. Property prices paid by the city ranged from \$1 paid to the Commercial Trust Company, to \$37,500 paid to land speculator Henry L. Pittock, owner of the daily newspaper, the *Oregonian*. Some people sold their deeds for \$10, stipulating that the property was only to be used as a public park. A number of cases went to court in condemnation proceedings. The average price paid per deed, if the two extremely high deals are excluded, was approximately \$6,500. Charles Paul Keyser, in his reflections on forty years in the service of Portland's parks, first as Mische's engineer and later as superintendent, said, "In 1909 most of the high ground was still in more or less neglected ownership following a real estate bust of the nineties."<sup>9</sup> By December 1909, the Park Board reported, "When the court proceedings are completed, all the top and side slopes of that high eminence rising out of the east side plain will be public property. The views in the four directions on the compass will ever more be under public control. Nothing short of skyscrapers on contiguous property will ever destroy these views."<sup>10</sup> In a personal report in 1961, Keyser said of Mische's involvement with attaining Mount Tabor Park, "In my estimation making Mt. Tabor a most outstanding feature of our park system was his greatest single achievement, even if he was disappointed in failing to acquire the property fronting on S.E. 60<sup>th</sup> Avenue between Reservoirs #6 and #2, and a more ample margin on the eastern slope."<sup>11</sup>

# Shifting Trends: Active Recreation, Funding Woes, Park Board Abolished

In 1908, Mische began his new job in Portland just in time to face two important changes in park design, the automobile and playgrounds. The automobile was integral to Mische's design of Mount Tabor Park, but it was also the automobile and its potential to do harm to children playing in the streets that helped to prompt the playground movement. Begun in New York City, playgrounds addressed tenement dwelling families with limited access to safe outdoor spaces. In addition, changes in land use and labor laws left children and adults alike with more leisure time. Portland followed the national shift from parks for beauty and passive recreation to an emphasis on active recreation. It was the women of the United States who vociferously lobbied for playgrounds; in Portland, the Play Ground Committee of the People's Institute included the wives of some of the most influential men in the city. Their report to the Park Board in 1907, regarding the new Park Blocks playground, provides valuable insight into Portland's early playground development. A female supervisor, hired by the institute, was responsible for the three months that the facility was open. There were separate girls' and boys' blocks. The average attendance was 40 children of mixed ethnic backgrounds between the ages of 7 and 9 years. Much of the remaining report recites the myriad of park rules per a city ordinance. In May of 1907, the Park Board received a letter from President Theodore Roosevelt as the honorary president of the Playground Association of America, requesting the attendance of the Playground Committee at the first annual meeting of the association in Chicago. Dues ranged from \$1 to \$1000 and members received the magazine, "The Playground." In 1911, the same year that California women gained voting rights (Oregon was the following year), a representative from the Women's Congress addressed the Parks Board regarding creating an exhibit of playground "apparatus" at an exposition to be held at the Armory. Mische was given the authority to act on this recommendation. Mische reported to Mrs. Stella W. Durham in March of 1914, that Portland had twelve playgrounds and he told her, "We spent for playgrounds in 1913, approximately \$25,000."<sup>12</sup>

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The year 1913 saw big changes in Portland's city government as the Parks Board, along with most of the other boards, was abolished. The City Charter was adopted that allowed for a council form of government. This change in July 1913, meant that Superintendent Mische reported to the elected official, Commissioner of Public Works, instead of the appointed Park Board. The Bureau of Parks was created under the authority of the commissioner. It appears that this was an awkward time of transition. In the words of Charles P. Keyser, "He (Mische, ed.) failed to click with the new regime, struggled along bravely for a couple of years longer, and in 1915 stepped down…" Mische was replaced by J.C. Convill, appointed by Commissioner Brewster. Keyser went on to say, "He (Convill, ed.) had been a notable college athlete. His extensive background in sports and savvy of publicity made him especially useful to Brewster who was rather inclined to promoting recreational activities with such appropriations as he could wrangle, until the time would be right to plug for more bond or other capital expenditure."<sup>13</sup>

By this time, the Olmstedian-City Beautiful influence on park planning had begun to shift. Mische and others outside of the political arena hoped to see some of the beautification projects, such as parkways and boulevards outlined in Edward H. Bennett's 1912 "Greater Portland Plan" plan, come to fruition. Though commissioned with money from the "city beautiful fund" established by Mayor Joseph Simon in 1909 during the frenzy of park acquisitions, the Bennett plan's arrival was ill-timed. The new Bureau of Parks pulled away from parks and boulevards for beauty and inspiration and more toward active recreation whose cost and liability could be shared by the developing school system. The national conversation regarding the social benefits of parks had turned its attention more to the value of keeping youth, especially boys, out of trouble with supervised organized sports. The trend centered on recreation centers, and generally smaller parks, featuring sports fields rather than providing inspiration and relaxation within the confines of an aesthetically pleasing, larger park. The new city commissioner echoed this new trend. Visionary superintendents, skilled in horticulture and park design, were not deemed as necessary as maintenance and recreation supervisory personnel. Complicating the parks issues even more was the reluctance of tax-paying citizens to pass the parks' bond measure asking for \$2 million that was brought to the voters and failed in 1912 and 1913.

After the first bond defeat in November of 1912, Mische recommended that a full-scale report be presented to the public as an educational tool and an encouragement to support Portland's parks. Five years of reports were published as the Annual Reports of the Park Board 1908-1912, issued in March 1913. It was an unabashed appeal for funding. The report contained many photographs of Portland's parks and graphs and mapping to illustrate Portland's park deficit in comparison to other cities such as Chicago, Kansas City, Detroit, Cincinnati, San Francisco, Spokane and others. Portland's park acreage, per person, ranked lower than all of those cities. The report emphasized how politically clean the process would be for acquiring parkland. The closing remarks were emphatically pointed along the lines of the precepts of the City Beautiful movement: "Final adinonition is given that our rate of progress has not been commensurate with our material or population growth nor has it been adequate to keep us abreast of a financially or economically wise or proper social betterment requirement. The Board would urge that the citizens take such action on the park project as to prove our readiness and our foresight in rising to our opportunities and by demonstrating our public spirit, enterprise and civic courage assist in taking enviable rank among the most favored cities of the nation."

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Mount Tabor Park was to receive a sizeable portion, \$69,800, of the anticipated bond money to get it in "first class condition." In anticipation of the election, an extensive article appeared in the Oregonian in the late summer entitled, "Mt. Tabor Park Plans Elaborate. Sylvan paths designed. Slow progress." Complaints of the inaccessibility of the park, especially during the wettest months of the year, led Mische to remark, "With a few improvements such as construction of walks, drives, proper drainage and lighting, the park can be converted into a recreation center second to none in Portland." His preliminary drawn plans, not realized, included a large swimming pool, four separate gymnasiums for men, women, boys and girls, playfields, a wading pool for the smallest children and a pergola for climbing plants and other formal landscaping touches to be located at the site of the original modest playground at the only large flat expanse of the park at the south end near the nursery and Reservoir 2. Mische pushed for acquiring all of the flat land at the base of the butte near adjoining roads and close to the residential areas as it was easily accessible to the children and parents of the community. The site also fit with the principle of separation being within the area he had wanted to make more formal and a good distance away from the more forested region of the butte. The original playground is no longer at the southeast site, but one of the three present playgrounds is due east at the southeast corner of the park and two other playgrounds have been constructed over the years. Portland's records, including mapping, are generally sketchy on details regarding playgrounds.

#### The End of an Era: Mische Moves On

Mount Tabor never did get the recreation center that Mische designed. (A very similar plan, however, was drawn up when Reservoir 2 was taken off line about sixty years later and the Park Bureau had its own high hopes of finally realizing this long-term recreational goal for the park. Instead the level property was sold to a private developer.) And despite the comprehensive report, the \$2 million was not approved in the June 1913 election.

The defeat of the 1913 bond measure took much of the wind out of the sails of Portland park development and sent a message of dissatisfaction from citizens to the newly formed government. Another byproduct of this bond measure defeat was the gradual loss of Mische. His employment was soon to switch from park superintendent to landscape architect for the parks and finally out of the parks system to follow in the Olmsted's path to private practice with his own landscape architecture firm. Mische did some consulting work with the Park Bureau after the end of his official employment. His influence did live on with Charles P. Keyser, who served as Mische's assistant from 1909 and went on to become Park Superintendent from 1917 until 1949. Keyser deserves much credit for steering the Portland parks down the course set by Olmsted and Mische. Mount Tabor's essential plan of naturalistic forest landscape with the curvilinear road and pathway network was completed and remains in a large part due to these three people's vision.

Although highly dedicated to the city and his work, and extremely qualified, Emanuel T. Mische resigned as superintendent of Portland's park system after only six years. Details of his resignation remain obscure, but it is clear from the records that tensions existed between him and city officials, especially by 1913 when the city abolished the appointed Park Board and established the Park Bureau with the new commission form of government. His outspoken ideas on land acquisition and management, street trees and other civic

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improvements were similar to those of his mentors, the Olmsteds, and though the ideas were influential, they seemed to be at odds with some elected city officials. Like Frederick Law Olmsted, Sr., who established his own private enterprise after soured experiences with city politics, Mische became a consultant in 1914, and worked outside of the park bureau on not only landscape, but larger civic issues concerning conservation.

World War I and the influenza pandemic of 1918-1919 slowed progress on projects as well as record keeping. It wasn't until the early 1920s, under Charles P. Keyser's reign as park superintendent, that substantial progress on Mount Tabor's amenities seemed to take off again with the construction of tennis courts and other active recreational facilities, lighting and comfort stations. Ever continuing was the progression of the drive and path system. Under the supervision of Charles P. Keyser, the 1920s also saw the construction of four comfort stations, two situated near the main entrances, one at the crater and another at the summit, along with a caretaker's house and the erection of eighty-eight concrete single pole lampposts with white glass globes, seemingly the same as those promoted by Mische to the Park Board in 1911. Greenhouses were built in the nursery's maintenance yard. Efforts continued during the 1930s to complete the drives called for in Mische's original plan.

#### Criterion C: Mount Tabor Park and the Olmsted Influence

Mount Tabor Park meets the guidelines for Criterion C as a park landscape that retains many elements of Olmsted design principles. Identified as a prime park location on John Charles Olmsted's first visit to Portland in 1903, Olmsted continued to work with the city on land acquisitions, park boundaries and as an advisor to his ex-employee and colleague, Emanuel Tillman Mische, between the years of 1906 through 1911. Mische was hired as Portland's park superintendent, on Olmsted's recommendation, in 1908 and remained in that position until 1914. He then continued a relationship with the city as an independent landscape designer. Mount Tabor Park reflects its original design, crafted by Emanuel Mische in 1911, and illustrates the design principles advanced by the Olmsted firm.

#### **Olmsted Landscape Firm: Park Development in the Nation**

With the Progressive Era's emphasis on hiring outside professionals as consultants, the emerging field of landscape design captured the attention of prominent citizens and city governments who wanted to hire well-known landscape designers to help beautify their cities and make them as desirable as possible. Frederick Law Olmsted, Sr.'s participation in the design of New York City's Central Park in the mid-1800s and his, and his namesake son's, affiliation with the 1893 World's Columbian Exposition in Chicago, set his Boston landscape firm at the forefront of landscape design. The Olmsted's, and other known designers, found themselves in high demand by cities, other agencies and elite land owners all over the country entranced with the precepts of the City Beautiful movement. The Olmsted firm included his nephew and step-son, John Charles Olmsted, son, Frederick Law Olmsted, Jr., and Charles Eliot, all extremely influential individuals who touched hundreds of public parks, and public and private institutions and developments across the nation. An "Olmsted Park" became a hallmark of civil society in the United States. John Charles Olmsted was hired as a consultant to Portland and Seattle in 1903 and these cities, like so many other places, have him to thank for some of their

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most beautiful parks. Because of the influence of the Olmsted firm, and the receptivity of the nation to the ideals they espoused, the profession of landscape architecture was conceived at Harvard University (Charles Eliot's father, Charles William Eliot, was president of the university) and this profession in turn sparked the beginnings of urban planning.

The senior Olmsted was a man of the land, trained by experience and the family's appreciation of beautiful, natural places. Frederick Law Olmsted brought to his work as a landscape architect (he helped coin the term) years of experience and world travel. He, like his colleagues and mentors Andrew Jackson Downing and Calvert Vaux, blended social consciousness with land management. Born of American soil, influenced by the magnitude of the American west's landscape, Olmsted helped foster the idea that landscape could play a healing role on a personal as well as a social level. Rebelling against the tight confines of the Old World's formal landscapes that reflected a sense of opulence, his designs spoke more to the democratic society where large beautiful landscapes were available to all citizens regardless of social standing or race. These concepts became imbedded in the City Beautiful movement's message to civic individuals, policy makers and bureaucrats.

Already having been a reporter, covering Civil War issues in the South, Olmsted was able to sway public opinion. His inspirational appeal, written while serving as chairman of the state's commission for Yosemite, called for legislation to keep Yosemite in the public domain. It was entitled, "Yosemite and the Mariposa Grove: A Preliminary Report, 1865." The suppression of this document for over a century, along with the political hassles he encountered with his work on Central Park, could possibly have been the reason why he and his sons chose to work as consultants outside of the bureaucracies and why their commentaries to the bureaus and policy makers warned of the dangers of politicizing irreplaceable landscape resources.

The Olmsteds have had such a profound effect on American landscape design that the adjective "Olmstedian" has been coined to describe open spaces exhibiting their touch. Subject to interpretation, there are some generally agreed upon components of features that the Olmsted firm strove for and that are illustrated by enduring examples of the landscapes that they designed. The National Association for Olmsted Parks has provided a concise overview using what they describe as the "Seven S's " of Olmstedian design principles: scenery, suitability, style, subordination, separation, sanitation, and service. The scenery, even in small or active spaces, provides passages of scenery and indefinite boundaries. Avoidance of specimen planting and hard edges and the utilization of shadow and light help to enhance the sense of space. The suitability of the design is dependent on respecting and making use of the naturally occurring elements of the topography of the space itself. The style of the design is specific to a desired effect. A soothing pastoral effect is achieved with an open expanse of greensward dotted with small bodies of water, groves of trees or scattered individual trees. The abundant sense of the picturesque style is achieved with mass plantings of trees, shrubs, and groundcovers especially on steep slopes where the play of light can impart a sense of mystery. Subordination of every element to the desired effect of the overall design is a hallmark of the Olmsted principles. A thorough separation of differently designed or incompatible areas insures an intact sense of space. Engineering the design to insure sanitation by planning adequate drainage and other considerations into the features so that the space can be easily managed to provide the user with health of body and mind. And lastly, the designed landscape should be of service with utility that meets fundamental social and psychological needs crafted into the design.

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# John Charles Olmsted: Portland Consults

In 1894, Portland had already taken the investment plunge into an efficient public water system that brought pure mountain water down to collect in four grand open reservoirs, two on the east side, on what was to become Mount Tabor Park, and two in one of the earliest gifted park lands, City Park (now Washington Park.) The reservoirs were designed with the harmony of utility and beauty as advocated by the City Beautiful movement. In its continuing quest to get an edge over other developing west coast cities, Portland was busy planning the 1905 Lewis and Clark Exposition. In this time of zeal, park planning and the City Beautiful movement ideals got a substantial push in Portland. As the east coast park and city designers had looked to Europe for inspiration, newly developing western cities depended on the eastern cities not only for inspiration, but expertise.

The Portland Park Association engaged the Olmsted firm to help with the design of the expo grounds and other parklands for the growing city. Though preferring the name association of Frederick Law Olmsted, Jr., it was John C. Olmsted who made the trip to Portland in 1903, the same year that Frederick Law Olmsted, Sr. died. Having lived and worked in the far western regions of the U.S., John Charles was a good, albeit second, choice for Portland and Seattle, who jointly enlisted him in the spring of 1903. Reverend T.L. Eliot made the connection for him in Seattle so that his travel expenses could be shared between the cities and it would be better worth Olmsted's time to have another account.

Portland Park Commissioner Lester Leander Hawkins escorted Olmsted and his assistant from his firm, Percy Jones, to many potential and existing park sites around the region. John Olmsted presented a thorough document to the Park Board commenting on the sites and giving specific recommendations. The team visited Mount Tabor on the afternoon of April 19, 1903.<sup>14</sup> They took photographs and in his report to the Park Board, Olmsted made these remarks regarding the butte known as Mount Tabor:

"There seems to be every reason why a portion, at least, of Mount Tabor should be taken as a public park. It is the only important landscape feature for miles around, and the population in its vicinity is destined to be fairly dense. It is already a good deal resorted to by people for their Sunday and holiday outings, and it will be better known to and more visited by the citizens as time goes on. It has been sufficiently cleared to open up all the important views from one point or another of it, yet there still survive considerable groves of the original growth of fir trees, including many tall ones, as well as other trees and shrubs. There can be but little doubt that public sentiment will cordially support the city government in acquiring considerable land on this prominent and beautiful hill. John C. Olmsted, Report to the Park Board, 1903.

On his subsequent return to Portland, John Olmsted and his colleague Frederick Dawson, developed park acquisition plans and drew up boundaries for some of the parks that had been identified in the 1903 report. Olmsted continued his relationship with Mische over the years that Mische was park superintendent in Portland.

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## Emanuel Tillman Mische: Continuing the Legacy of Olmsted Design in Portland

Portland's park system benefited from John C. Olmsted's visits at the turn of the century and his "Report to the Park Board of 1903" provided valuable guidance to Portland, still relevant today. Crucial also to the integrity of Mount Tabor Park and other historic parks in the system, was the actual planning and planting of the parks by former Olmsted employee, Emanuel Tillman Mische, hired as Portland's parks superintendent in 1908. His credentials were strong, and five years after his resignation from the Portland position in 1914, the Olmsted firm attempted to entice him back. But Mische stayed on in Portland, working on private and public contracts and serving as a civic leader in city and park planning, and as a leader in the budding field of landscape architecture.

The hiring of Emanuel Mische as Portland's park superintendent was controversial, as was his leaving due to uncomfortable political developments. During his six years at the helm of Portland's parks, however, he left an enduring mark with his insightful correspondence to the City of Portland that continues to contribute valuable information and insight regarding long and short range planning of green space. Few individuals could have brought such a prestigious array of training to fill a position. His design and drafting skills obtained from the years at the Olmsted firm, coupled with his strong expertise in horticulture gained from some of the most esteemed horticultural institutions in the world made him one of the prime foundations of Portland's park system.

The Olmsted heritage continued with Charles P. Keyser who had trained under Mische and stayed on as Portland's park supervisor until 1949. Though not much has been recorded regarding Keyser's life, he credited Emanuel Mische with teaching him what he needed to know about parks and park planning. Much of the integrity exhibited in Portland's historic parks is testament to the continuity of management he gave with an eye for the distinctive style originally laid down by Olmsted and Mische.

#### **Mount Tabor Park: Design and Implementation**

After Emanuel Mische was hired as park superintendent and most of the land that was to make up the park had been acquired, his plan and map were unveiled to the public on May 21, 1911 in the Sunday *Oregonian*. True to his tenure with the Olmsted firm, his design relied on key Olmsted design principles. The most formal, elaborate and costly part of his plan addressed the principle of service. With the two large new reservoirs being built on the west side of the park, facing downtown and the majority of Portland's population, Mische wanted to couple water storage with aesthetics by incorporating a large well-lit, waterfall and spray jet scheme utilizing the fall of water between the upper and lower reservoirs. "To contrast this feature satisfactorily will give this park a most interesting possession and the city a uniqueness not met with in any other park in the country," he said. Not naively, he added, "but its cost will be so great and the needs of the parks now are so urgent that we would specifically urge against any attempt to provide for it in the near future." This design feature was never realized, even two years later when once again, the *Oregonian* presented another spread that touted the continuing design process of the park. Mische still sounded hopeful for the cascade scheme and T.W. Tanner, park keeper, helped support the cause by adding, "It is my judgment that power enough could and should be developed by the falling water between the upper and lower reservoirs sufficient to illuminate Mount Tabor and

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its driveways and Mountain Crest. There is a fall of 85 feet, which is sufficient to develop electric illumination of the entire park, which in my judgment would produce a most magnificent effect." Seven decades later, a hydroelectric generating system was installed utilizing the fall of water between Reservoir 5 and 6. A small hydro-generating unit is housed in the inlet Gatehouse of Reservoir 6.

The highly defined nature of the concrete reservoir basins surrounded by wrought iron fences with their distinctive gatehouses, leant a formality to the west side of Mount Tabor Park. Mische attempted to address the idea of separation of the incongruous features of this design with the sylvan feel of the rest of the park. "It is contemplated to provide two approaches at the southwest corner formally as a contrast to the native treatment of the remainder of the park," he said. <sup>15</sup> In keeping with the principle of suitability, his emphasis was on making an already beautiful place, complete with native aesthetic vegetation, simply more accessible to the public. His drive and pathway system, one of the hallmarks of the park, is an excellent example of subordination of features that yield to the overall design, as well as meeting the criteria of suitability. The Oregonian quotes him as saying, "The drives are located with a view to requiring the least possible scarring of the surfaces consistent with agreeable alignment and grade, where the distant views are to be enjoyed from the best vantage points or where the local vegetation or surface configuration pointedly suggest a traverse route. In passing over the drives on the ascent to the crest the vegetation is to be developed for its local offerings, with vistas opened only at prominent points. It is both impractical and ruinous to expect to have continuous or even large and abundant sweeps of distant outlooks without unduly injuring the forest. Such views are reserved for the summit concourse...The drives encircle the park on all sides, the east and west and wind their way to the top, where is located Mountain Crest, at present occupied by the old dwelling built there many years ago," the article went on to sav.<sup>16</sup>

# Mount Tabor Park Design: Shaped by Modes of Accessibility

Two predominating features of Mount Tabor Park bear the mark of Emanuel Mische and the Olmsted influence. One is the peaceful grandeur of the forest and the other is the drive and footpath system. Though the park does have several miles of paved drives and even more in the trail system, they are laid out with a master landscaper's touch and with a sensitivity to the natural terrain. The curvilinear design is easy on the eye and inviting to traverse. Though the drives are unnatural, they fit into the scenery, providing alluring passages. In many places, especially along Woodland Drive on the steep east slope, cut basalt rock blocks, probably quarried on-site, reinforce the east side of the drive and add to the rustic beauty of the scenery. In most places there is a forest buffer between the footpaths and the auto drives, adding to the sense of separation. In the name of serviceability, the pathways allow a myriad of routes to be taken so that regular visitors can walk for twenty minutes or one hundred and twenty minutes and not traverse the same path. Mische, and later his assistant, Keyser, did an excellent job of making the park accessible to an urban population while yet maintaining the rural feel. The drives and paths pass through the landscapes of the park exhibiting pastoral or picturesque qualities in a suitable and subordinate way. The historic drives and original pathways were very well constructed and conform to the design principle of sanitation in their quality engineering. When the drive and path system was complete, Mount Tabor butte could be scaled in a private vehicle, by foot or bicycle for stupendous views of the surrounding countryside; the high, snowy peaks to the east and the north, the

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surrounding developing neighborhoods and the downtown city skyline backed by the green line of hills three miles to the west. This is one of the features of Mount Tabor Park that keeps visitors returning time and time again.

Mount Tabor Park's design paid homage to a new era of the automobile. In 1912 there were 902,000 registered autos in the United States. By 1913 Portland had approximately 6,000 automobiles in use. Automobiles were considered a source of entertainment. In 1907 the Park Blocks children's festival featured automobile rides as a featured entertainment. City planning, spurred on by the City Beautiful movement, called for creating leisure drives. Mische had a grand plan for a parkway running north from Sellwood along the high banks of the Willamette River. This river parkway was to tie into a tree-lined boulevard that would head east, through the Ladd's Addition neighborhood toward Mount Tabor Park where it would continue north to the meadows of the Columbia River Slough. This boulevard had been the vision of Olmsted when he visited Mount Tabor," John C. Olmsted remarked.<sup>17</sup> Though the grand boulevard and parkway system was never realized, much money and effort were expended on the drive system within Mount Tabor Park. Grading and paving were completed in sections over many years and were prime expenditures for the park. The geography of the butte, with a primary summit of 643 feet and three smaller rises, stretched from north and south for over a mile. From east and west it measured almost a mile. The winding lanes, each distinctively named, would encircle the butte carrying visitors to a variety of viewpoints over the three-and-a-half miles of paved drive with a five-percent grade.

Emanuel Mische designed the system of drives for a winding but pleasant auto tour. They were to be graded in such a way as to be enjoyable to drive on, macadamized and illuminated. The width would be wide enough for motorcars or wagons but narrow enough to do minor damage to hillsides and forests. The drives would pass by interesting features and views. Visitors could escape from the sights and sounds of the surrounding city but they could also admire it from a high distance. The route could carry visitors in one entrance and out another.

Mische kept at the driveway projects with any funds he could get. A good portion of the drive projects were constructed at times of economic downturns, following Olmsted's advice in his report of 1903: "...it is far more advantageous to employ common labor for park improvement during hard times either to prevent or to diminish the sufferings of the poor and to get the work done at minimum wages."<sup>18</sup> Mische, in his report to the Park Board in 1912 said, "During the winter of 1911 – 1912 the Council appropriated \$10,000 to give employment to idle men. The funds were set aside for charity purposes but good use, though by reason of the very nature of the method of employment and the class secured it was thoroughly efficient, nevertheless over 8,000 feet of 32-feet wide drive were cleared and partly graded...The drive connects the hilltop with the East Salmon Street Entrance."<sup>19</sup> Other such appropriations followed and included Works Progress Administration contracts from 1935 – 1939 when work progressed on East Tabor Drive (Woodland Drive), to Mische's design specifications, at a cost of \$5,163.

"A system of walks supplement the drives and lead to many charming features it is not desirable to approach by a drive," described Mische of his 1911 plan for Mount Tabor Park. The trail system that he envisioned remains as one of Mount Tabor's park's most cherished attributes. Throughout the park pathways traversed areas

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between the drives. Curvilinear pathways paralleled the curvilinear drives. He even provided access to some of the steepest areas with long flights of concrete stairs, some with more than a hundred steps, such as those that ascended the Mountain Crest. There was a type of path for all visitors from adventurers out for real exertion with a steep climb to those wanting a pleasant walk. The reservoirs themselves would, and still do, provide lighted walkways encircling them for easy strolling. Mische asked that the walkways surrounding the reservoirs be wide enough for pleasurable walking.

# Summit design: Subordination of Elements

At 643 feet, the summit of Mount Tabor provided a grand panorama of the Portland area and the surrounding countryside both far and near when Olmsted and Mische were working with Mount Tabor Park. On Olmsted's visit to Mount Tabor, he suggested, that at a minimum, the twenty or so acres of the summit should be taken to command the views. Debate carried on for years regarding the grand residence at the top of the butte, commonly referred to as the J.H. Smith Residence. Information on this homestead is sketchy and although there are apparently no photographs of it in city records, a sketch does exist from an early real estate brochure.<sup>20</sup> Mische's plan followed the suggestion made in Olmsted's 1903 report, calling for its removal and replacement with a combination shelter, refectory, comfort station and detached bandstand that in his words were, "...all ...to be generally low and rambling and conspicuously modest and subdued in style, materials and color. Other than this the plan intends no masonry construction, such as an overlook tower, large building or other object attractive in itself mayhap, but disturbing in its effect on the beholder as seen amid surroundings of native rural wildness."<sup>21</sup> These designs followed the Olmsted principle of subordination. The residence was apparently converted to a visitor station in 1913, "Upon the crest, the large old residence has been remodeled and fitted for public use by opening rest rooms, nursery, refectory and comfort features. . . an automatic electric control pumping plant for delivering water from the submerged hill top reservoir to the attic tank in the park house is now being installed," Mische reported to the Park Board in 1913.<sup>22</sup>

Two years later the Smith residence was still sitting at the top of the hill and the plans for its removal and replacement with other services still were being contemplated. In 1917, correspondence to the, "…caretaker living on top of the hill in the big house,"<sup>23</sup> thanking them for the opportunity to make baskets, was addressed to the city and forwarded on by Mayor H.R. Albee. Actual demolition of the Smith Residence did finally occur, though the exact date is unknown. A Tudor-style comfort station was built to the west of the summit in the 1920s. True to Mische's vision, Keyser made sure that the comfort station sits down below the summit, in a position of subordination, so that at present the summit and the views are the commanding presence.

Concerts, especially with the municipal band, were an important activity for the parks to host, though not particularly lucrative. Popular outdoor concerts were held in Mount Tabor and other parks during the summer months. In 1913 one concert per month was held during July and August. Possibly these concerts, with attendance of one-thousand or more people, were held at the Mountain Crest Summit where the first public comfort station and refectory were remodeled into the Smith residence. According to the 1915 park report, the long flight of stairs was completed giving "large numbers of visitors" access to the hilltop. By 1917, concert attendance at Mount Tabor Park had more than doubled. Concerts have continued in Mount Tabor Park near

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the area that Mische recommended in the 1913 Report of the Bureau of Parks in what he referred to as "the concert grove on the ridge adjoining Belmont Street." Present concerts are held in the month of July in the crater amphitheater in this vicinity.

# Plantings: A Balance of Native and Non-native Species

Mische was appreciative of the flora in his new Pacific Northwest home. He had also been trained at the hand of people with a deep appreciation of forest preserves. His desire was to keep the natural forest feel of the butte, even reforesting the more gradual western slope,"...where it is now open and the openness severely defined by old property lines. It is both impractical and ruinous to expect to have continuous or even large and abundant sweeps of distant outlooks without unduly injuring the forest. Such views are reserved for the summit concourse," he reported to the Park Board of his plan in 1911.

Emphasis was put on the over-story of tall Douglas-firs as well as the under-story of natural shrubs and wildflowers. Mowing was to be kept to a minimum. Primary maintenance of the landscape of the park was to keep the grandest vistas cleared of trees. In the first *Oregonian* article of 1911 announcing the big, new east side park, Mische was quoted with this description of his vision for the Mount Tabor Park: "Except at the two formal entrances, at the terrace garden and the cascades, only native material is to be used or suffered to remain. Moreover, the undergrowth is at no time to be entirely removed from throughout the park, as has been suggested by private individuals." He continued, "This tract offers an excellent opportunity of displaying the exceptional beauty of our native flora. It requires merely the elimination of some sorts, the addition of others or as a whole controlling nature to the extent of determining how her materials shall be massed and arranged."<sup>24</sup>

His attention to practicality and foresight was evident when he commented, "In addition, native vegetation is always adapted to this region, can be depended upon to be safe, enduring, easily repaired should damage occur, and above all can be maintained more cheaply than exotic or foreign vegetation."<sup>35</sup> A good deal of the continuing attraction of Mount Tabor Park, to both human and animal visitors, is due to the amount of native plants that have been retained in some sections of the park, but non-natives are a historic feature of the park. Over the years, perhaps due to the wide variety of trees and shrubs propagated at the on-site nursery, areas of the park have had non-natives integrated into the landscape. These vicinities are predominantly in sections of the park that have been disturbed for entrances, drives or other types of construction. Mische was sensitive to quickly replanting any areas on the side of drives that were disturbed during grading operations. Likewise, he preferred to move slowly in removing vegetation as the drives were being laid out. "It is better, by far, not to remove anything," he said. Many of the non-native trees and shrubs, including many kinds of pines and hawthorns, are mature and add to the historic significance of Mount Tabor Park.

# Mount Tabor Nursery: Plant Propagation for the Entire City

In the mid-1800s, orchards predominated in the Mount Tabor vicinity. Apples, pears and other fruits were shipped out by steamer and supplied the California boom towns in a lucrative market. Mount Tabor's south side had a gentle slope with a perfect aspect for plant propagation, providing adequate sunlight and drainage. The

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butte rising to the north behind the area, provided a weather buffering element. The elevation was modest, serving the purpose of frost pocket protection. These features appealed to Mische as a fine place to site the nursery that he had called for in his first park report of 1908, a nursery that would serve all the parks and other planting needs of the city.

Though Mische appreciated the native plants of his newly adopted western home, he nevertheless continued his interest in non-native species. Large orders with invoices of over \$2,000 were made to east coast nurseries. Invoices to Mische from the United States Department of Agriculture dating from spring of 1909 list plants that were being sent: two *Syringa amurensis*, five *Clematis recta* and three *Clematis species*. Other records indicate his interest in buying shrubs from local growers and wild diggers, especially rhododendrons. Interestingly, a potato crop was recorded as having been grown in 1916 at the Mount Tabor nursery. <sup>26</sup> Propagation stock was also brought from the nurseries supplying the Vanderbilt's Biltmore Estate in the Appalachian Mountains near Asheville, North Carolina.

There are references to a "fruitectium" being establishing at Mount Tabor for the cultivation of plants from seeds or cuttings for nursery stock.<sup>27</sup> In 1913, Harvard's Arnold Arboretum, Mische's, *alma mater*, sent a gift of five hundred Chinese species to him, probably attributable to Ernest Henry Wilson's two collecting trips to China, most recently in 1910. Among the species sent were rhododendrons, hollies, barberries and rhododendrons. This propagation stock went first to the greenhouse at Columbia Park and then was set out in the nursery at Mount Tabor Park. Mische wanted to use the species to begin an arboretum, an Olmsted ideal for every region in the country. Portland's Hoyt Arboretum, in Washington Park, is a result of Mische's plan and Charles Keyser's management.

The nursery at Mount Tabor Park was an important resource for the planned beautification of the city of Portland. An entry from Park Board records of December 1912 recites, "There are trees now growing in the Mount Tabor Nursery to supply a quantity sufficient to extend planting by about 30-40 miles in the fall of 1913."<sup>28</sup> City residents were petitioning for street trees. Mische had a grand plan for the street trees of Portland, an area that the city had been slow to act on, and this may have been one of the thrusts to create a large nursery at Mount Tabor Park. In his Report to the Park Board of 1911, he opened with strong words, "The condition of the street trees are deplorable."<sup>29</sup> Street trees represented at least a stab at the grand boulevards and parkways he wanted to see established from the Olmsted plan. It was a daunting task to keep up with road building plantings and Portland had not developed a clear policy on who was responsible for street trees. Power lines created problems and although the Park Board was apparently responsible for street trees, they had no jurisdiction over them. Mische gave specific recommendations to the Park Board regarding the size of the median strip and even designed a different theme of trees from around the world for the various quadrants of the city. Responses to infestations of elm beetles and gypsy moths eventually helped to clarify the importance of municipally controlled street trees. Besides street trees, the nursery at Mount Tabor Park also provided trees for other parks. The Oregonian of August 1913 stated that there were 32,000 tree seedlings set out in the nursery at Mount Tabor for supplying all of the parks. Mische continued his advocacy for Portland to become a city of stately trees. He authored an article published in the August 22, 1917, The Evening Telegram about shade trees.

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Giant sequoia conifer trees, like those that grow on the western slope of the Sierra Nevada range in California, were brought to Oregon by pioneers such as A. H. Johnson and W. S. Ladd. The Mount Tabor neighborhood has numerous large sequoia *Sequoiadendron giganteum* trees that probably date back to Mische's time. He ordered twenty "sequoia gigantea" in 20"x 20" boxes. Each sampling was reportedly five to six feet tall and cost \$6 each. They were to be shipped by rail for  $51 \notin$  per 100 pounds from the California Nursery Company in Niles, California, in 1910.<sup>30</sup> It is probable that one of these trees is the giant sequoia, a City Heritage Tree, that towers over the east side of Reservoir 6 today.

Probable references to construction of structures in the nursery area appear in reports from various years, such as advertising for a storehouse and shelter to be built in 1915. Evidently greenhouses were in progress at the nursery site in the summer of 1918 when the city council granted a one-month extension to the builder of the greenhouses. Ten years later, Superintendent Keyser introduced plans for a violet house at the "Municipal Nursery."

The nursery area is comprised of planted grounds and a maintenance yard. Buildings are of mixed time periods with suggested dates of construction ranging from pre-1918 with the greenhouse complex that has had various additions, through the years to the 1987 pole barn. Oral reports of the parks bureau personnel recount the current utilization of refurbished old stable buildings where once the horses that pulled the mowers were kept. Records corroborate that there was a stable at Mount Tabor. Records show that a greenhouse was dismantled in between 1916 and 1917. Columbia Park was the site of the first greenhouses and Mische mentions it in his 1913 report in reference to propagation of the newly acquired stock from Arnold Arboretum. Complaints regarding odors emanating from the manure and compost piles in the smaller Columbia Park may have contributed to moving propagation endeavors to the south side of Mount Tabor.

# **Reservoirs: Balancing Naturalistic with Formal Design**

Included in the boundaries of the Mount Tabor Park nomination is the Mount Tabor Park Reservoirs Historic District, which includes the two 1911 reservoirs, Reservoirs 5 and 6, and the one remaining 1894 reservoir, Reservoir 1.<sup>31</sup> Portland's reservoirs in Mount Tabor Park and those in Washington Park, also listed in the National Register, are some of the nations most intact, functioning examples of public works projects from the City Beautiful movement. The reservoirs are defining features of Mount Tabor Park. Besides the period architecture, they provide outstanding panoramas of the surrounding countryside as well as a link to the historical significance of the butte to the development of the city of Portland.

Emanuel T. Mische planned to incorporate the two new 1911 reservoirs into his design for Mount Tabor Park as a formal feature. Frederick Law Olmsted, Jr. had written an article for *American Park and Outdoor Art Association* entitled, "The Relation of Reservoirs to Parks" in 1899, while Mische was working in the Olmsted firm. Olmsted stated that, "In itself, regardless of its outline or setting, a body of water is beautiful and refreshing, and its value to the public is so well recognized that provision is very often made for giving the public access to the enclosure about a reservoir, whence its surface may be seen." <sup>32</sup> The main discussion focused on what he saw as the wasted potential between different municipal organizations in regards to

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Mount Tabor Park Multnomah County, Oregon

reservoir design. In essence he felt that a reservoir in a public park should be designed with cooperation between engineers and landscape designers in order to achieve aesthetics and good value for the taxpayers' investment. In the case of distribution reservoirs, such as the ones at Mount Tabor Park, artificially created with embankments, he suggested keeping to a formal design. The two 1894 reservoirs at Mount Tabor Park followed this precept.

The 1911 reservoirs, constructed when Mische was park superintendent, were also designed to follow a formal theme. Mische attempted to coordinate planning with the Water Board and some of his recommendations were apparently heeded. He paid special attention to the dam face of the Upper Reservoir (Reservoir 5) as this area would be highly visible, illuminated with an open western exposure and a very steep slope. His design called for highlighting the stored water with, as he described it, a "rushing cascade" and "a series of pools…" taking advantage of the drop between them. Gravity pressure could supply several spray jets, adding greatly to the ornamental feature. "To be creditably executed requires considerable massiveness and architectural ornamentation in detail. The lighting must be abundant and some extension work, such as widening the dam and adding balustrades and the like are essential," Mische explained when the *Oregonian* showcased the design in the spring of 1911. To implement this scheme, Mische wanted the Water Board to lay the piping necessary for the cascades when the construction of the reservoirs was undertaken. The cascades scheme was never constructed, probably in a large part due to the lack of funding. According to park reports, as Olmsted had noted in his article, an apparent lack of cooperation did exist between the Water Board and the park superintendent regarding the design of the reservoirs and other park areas.

Mische successfully influenced the design surrounding the reservoirs, such as widening the dam at Reservoir 5 to accommodate the drive across the top that bestows one of the grandest views in the city. Today this view, as well as others on Mount Tabor, are part of the Scenic Resources Protection Plan. The greensward surrounding Reservoir 5 has touches of formality achieved with tree and shrub plantings. He suggested widening the walkway around Reservoir 6, that at present, is one of the most popular exercise and strolling walks in southeast Portland. An unsigned report to the Park Board in 1910 stated, "I have to report that several conferences were had with officials of the Water Board to the end that in constructing the reservoirs at Mt. Tabor there would be a partial carrying out of what would be park plans." As usual, money was a primary concern as, "It has not been contemplated that water funds should be devoted to park construction, but rather that such changes should be made in the purely structural work at this time as would harmonize it with park development whenever the latter is undertaken." In attempting to achieve the design principles of service and sanitation, mention is made of, "a profile and sketch grading plan for the slope between the two new reservoirs." A formal and an informal design for Reservoir 6 were suggested and, "Both propose an ornamental parapet balustrade on the street side of the west walk; Both propose an entrance of some pretension and dignity, with an entrance way rising above the parapet in order to relieve the long, bold sky-line of the parapet."<sup>33</sup> A steep concrete staircase of more than 100 steps climbs up the dam face between Reservoir 6 and Reservoir 5 on the west side of the park instead of Mische's waterfall scheme. A bit of a formal garden is retained with mature shrubs, tree plantings and a lawn area on the top of the dam adjoining the Gatehouse and parapet of Reservoir 1. Concrete steps rise up the south side of the dam face giving access to this area.

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Mische's planning attempted to strike a balance between naturalistic features in a majority of the park with formality at the entrances and in the approximately 20 acres that harbored the reservoirs. The elaborate waterfall, fountains and walkway system that Mische envisioned up the western side of the butte were not realized nor were either of his entrance schemes, in their entirety, advanced for the west side of Reservoir 6. However, his ideas have held influence over the years, if modified. The creation of electricity generated by the drop between Reservoir 5 and 6 did come to pass seven decades later when the Portland Water Bureau developed a generating system between Reservoirs 5 and 6, which apparently met engineering guidelines but did not contribute a feature of beauty to the park as Mische desired. Although not part of the cascading scheme down the dam face, Reservoir 2 and 6 eventually did get the spray jets (fountains) that would spout high into the sky from the middle of their basins, providing a grand amenity and some water purification. Allegedly, the aeration would help to counteract the rectangular shape of the reservoirs that could contribute to water stagnation in the corners.

Mische wanted to utilize the flat land at the southwest base of the butte near the lower 1894 reservoir, for a major recreation center and for, "picnicking and other pastimes amid sylvan and retired surroundings." Picnicking is integrated into Mount Tabor Park but the formal flat area did not get constructed. His Picnic Grove now Picnic Hill, is one of the great areas he designed and is still maintained as a small picnic area with beautiful interior views of Reservoir 5, and glimpses of exterior views.

# **Archeological Summary**

Though there has been involvement of the Federal Energy Regulatory Commission at the Mount Tabor site since the mid-1980s due to the hydro-electric generating plant, there is no official state record of cultural resource surveys conducted at Mount Tabor. Further research has revealed a site yielding artifacts dating from the Late Archaic period, 2,000 years ago to historic contact in the late 1700s, on the flanks of the butte, outside of the present park boundaries. These findings included: a moccasin last, arrowheads and the "Mt. Tabor Bowl." <sup>34</sup> The bowl got its name from its bowl-like form. It was 21 centimeters long and 14 centimeters wide with distinct depressions on the upper and lower surfaces. The outer edge showed evidence of decoration. Speculation was that it had been used as a grinding bowl or metate.<sup>35</sup> Other unconfirmed reports suggest that there are obsidian flakes within the park boundaries. <sup>36</sup>

#### Conclusion

Mount Tabor Park is an exemplary representation of a city park developed within the context of the Progressive era and the City Beautiful movement and enhanced with New Deal amenities. The Mount Tabor experience, as called for by Olmsted and Mische, includes the majesty and beauty of mature forest and plantings that yield a sense of stability and mystery. These natural features prevail over subordinated modifications and amenities. The varied terrain and the views yielded, the crater area, and the subtle integration of the buildings and other structures all contribute to make Mount Tabor Park one of the historic treasures of Portland, Oregon.

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<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

Mount Tabor Park is an excellent example of a city park that combines the principal elements that developed during the various movements that shaped American parklands. The recreation movement is represented with tennis courts, jogging and bicycling paths, and horseshoe pits. The playground movement is identified by the three open-air playgrounds. The three remaining reservoirs, with their dignified features and beautiful deep, open water views, provide an outstanding historic resource, a living record of the City Beautiful movement at its finest with their marriage of beauty, utility and the democratic principle of the first municipal service, drinking water. Another element of service, the Mount Tabor Nursery, is important not only to the historic integrity of Mount Tabor Park, but to the entire Portland parks system and, in fact, all city properties, as the continual provider of trees and other plants since it was established early in the park's history.

As defined by the National Association for Olmsted Parks, Mount Tabor Park's design embodies the "Seven S's" of Olmsted design principles: scenery, suitability, style, subordination, separation, sanitation, and service. The park's picturesque scenery provides a sense of passages and indefinite boundaries. The sheer size, nearly 200 acres, as well as the natural softly rugged terrain leave the visitor with a sense of wonder. The temperate rainforest climate nurtures remarkable plant growth, and the towering trees and lush greenery of the understory and grass make at once a soothing and exciting impression. The steep wilder areas are still endowed with seasonal wildflower shows, a rare thing in the midst of the city. The suitable design respected these natural elements and encouraged a "hands-off" policy in much of the park, acknowledging the serviceability of native vegetation for long-term maintenance. Mische's designs, like the Olmsted's, speak to long-term service, and his main aim in Mount Tabor Park was to achieve accessibility. He did so with the path and drive system, so well crafted that they have demanded little maintenance over the years and achieve the goal of not only service but sanitation, as their drainage is well engineered. Mische's thorough respect for the process of constructing without mass destruction set the tone that was followed by Keyser in the years it took to complete the drive and path system. The drives and paths subordinate themselves to the landscape in their position and their grade. Subordination has been used in most of the amenity design, especially of the built features, with the exception of the reservoirs. Their design is one of more formality, and the land around them follows a loosely pastoral theme with the reservoirs and their grassy setting acting as the bodies of water and the greensward. The three reservoirs embody the blending of beauty and utility, and the deep, sparkling water and the romantic period architecture add drama and charm to the park experience. Active recreation is represented at Mount Tabor Park, and although playgrounds, horseshoe pits, tennis courts, basketball and volleyball courts, even a small ball diamond, exist, they do not dominate. These amenities are tucked in here and there, so although the park has experienced, as most open space has, construction of modern features, the landscape allows separation and subordination.

In 1911, Emanuel Mische, Park Superintendent, summed up Mount Tabor Park well when he said to the Park Board, "One of the most pleasing accents of the general landscape of the city is this property, rising with majestic eminence from the broad East Side plain."

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<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

# Notes

<sup>1</sup>City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>2</sup>Ibid.

<sup>3</sup>City of Portland, Annual Report of the Park Board, 1903.

<sup>4</sup><u>The Oregonian</u> November 5, 1908, p. 14.

<sup>5</sup><u>The Oregonian</u> March 30, 1909, p. 16.

<sup>6</sup>City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>7</sup>Ibid.

<sup>8</sup>City of Portland, Annual Report of the Park Board, 1903.

<sup>9</sup>Keyser, Charles Paul. Correspondence to Emily Moltzner, Oregon Geological Society, August, 31, 1961.

<sup>10</sup>City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

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<sup>14</sup> Guzowski, Kenneth James, "Portland's Olmsted Vision (1897-1915): A Study of the Public Landscapes Designed by Emanuel T. Mische in Portland, Oregon." Thesis, University of Oregon, June, 1990.

<sup>15</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>16</sup> <u>The Oregonian</u> May 21, 1911, p. 10.

<sup>17</sup> City of Portland, Annual Report of the Park Board, 1903.

<sup>18</sup> Ibid.

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<sup>20</sup> J.H. Smith Residence, Summit of Mt. Tabor. The Hart Land Co., Brochure of Mount Tabor Views. (ca. 1890's, ed.)

<sup>21</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>22</sup> City of Portland, Annual Report of the Bureau of Parks, 1913.

<sup>23</sup> City of Portland, Stanley Parr Archives and Record Center. *Council Documents.* 

<sup>24</sup> <u>The Oregonian</u> May 21, 1911, p. 10.

<sup>25</sup> Ibid.

<sup>26</sup> City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>27</sup> Ibid.

<sup>28</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>29</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>30</sup> City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>31</sup> Anderson Geller, Cascade, "Mount Tabor Reservoirs Historic District, National Register of Historic Places." 2003.

<sup>32</sup> Olmsted, Frederick Law, Jr., "The Relation of Reservoirs to Parks." American Park and Outdoor Art Association, Paper 32. Boston: Rockwell and Churchill Press, 1899.

<sup>33</sup> City of Portland, Stanley Parr Archives and Record Center. Report for Board Meeting, Park Department, January 7, 1910.

<sup>34</sup> City of Portland. "East Buttes, Terraces and Wetlands Conservation Plan," Ordinance number 166572, 1993.

<sup>35</sup> Beals, Herb (ed.), "Screenings," The Oregon Archaeological Society. Vol. 22 No. 7; July, 1973.

<sup>36</sup> City of Portland. "East Buttes, Terraces and Wetlands Conservation Plan," Ordinance number 166572, 1993.

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<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

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Mount Tabor Park Multnomah County, Oregon

#### **UTM REFERENCES**

5 <u>10</u> <u>531495</u> <u>5040207</u> Zone Easting Northing

#### VERBAL BOUNDARY DESCRIPTION

The nominated property is bounded beginning at S.E. 60<sup>th</sup> Ave. on the west at S.E. Lincoln St. north to S.E. Harrison St. east to the approximate location of S.E. 64<sup>th</sup> Ave. north to S.E. Stephens St. west to S.E. 60<sup>th</sup> Ave. north to approximately S.E. Madison St. east to approximately S.E. 62<sup>th</sup> Ave. north to S.E. Yamhill St. east along the south boundary of S.E. Yamhill St. to approximately S.E. 65<sup>th</sup> Ave. south to S.E. Taylor St. east along the south boundary of S.E. Taylor St. to S.E. 71<sup>st</sup> Ave. south roughly along S.E. 71<sup>st</sup> Ave. to Mountain View Dr. south following the east property boundaries of the west side private residences to approximately S.E. 65<sup>th</sup> Ave south to S.E. Oburt of S.E. Division St west to approximately S.E. 64<sup>th</sup> Ave. north along roughly S.E. 64<sup>th</sup> Ave. to S.E. Lincoln St. west along the north boundary of the street to S.E. 60<sup>th</sup> Ave.

The boundary has some irregularities as shown by the heavy black line on the accompanying map entitled, Mount Tabor Park Boundary Map.

#### **BOUNDARY JUSTIFICATION**

The boundary represents the present boundary of Mount Tabor Park. It is roughly the same boundary as the original park plan of 1911\*presented to the Portland Park Board and corresponds to the original park properties purchased between the years of 1888 and 1922, with the exception of the southwest corner of the property bounded roughly by S.E. 64<sup>th</sup> Ave. at S.E. Division St. north to roughly S.E. Caruthers west to S.E. 60<sup>th</sup> Ave. south to S.E. Division St. east to roughly S.E. 64<sup>th</sup> Ave. that was occupied by Reservoir 2 and was sold to a private individual in the 1990's.

\*(Excluding the proposed eastern boundary section. See the Original Plan by Mische 1911)









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MOUNT TABOR PARK CITY OF PORTLAND LU 23-08 MOLTNOM ALCOUNTY OR 2GON ORIGINAL PLAN BY MISCHE 1911



Figure 8 - Illustrative Master Plan






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SANBORN MAP 1950

## NPS Form 10-900a (8-86)

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### Section

#### Photo List for Mount Tabor Park

The following information applies to all photographs:

Resource: Mount Tabor Park Location: Multnomah County, Oregon Photo date: November, 2003 Negative location: 1934 SE 56<sup>th</sup> Portland, Oregon 97215

View: Mount Tabor Butte looking east from Washington Park Photographer: Cascade Anderson Geller Photo Number: 1

View: Mount Tabor Butte looking east from S.E. Hawthorne Blvd. Photographer: Cascade Anderson Geller Photo Number: 2

View: S.E. Salmon Street Entrance looking east

Photographer: Jeff Lee Photo Number: 3

View: Caretakers House looking southeast north and west elevations Photographer: Kimberly Lakin Photo Number: 4

View: Sweet Briar Vale path at S.E. Salmon St. looking east Photographer: Jeff Lee Photo Number: 5

View: S.E. Salmon St. drive with Sweet Briar Vale crossing looking northwest Photographer: Jeff Lee Photo Number: 6

View: Reservoir Loop Drive switchback north of Reservoir 5 looking north Photographer: Jeff Lee Photo Number: 7

View: Upper path around Reservoir 5 looking west Photographer: Jeff Lee Photo Number: 8

View: Looking southwest from Reservoir 5 viewpoint at Reservoir 6, hawthorn grove & sequoia tree Photographer: Jeff Lee Photo Number: 9 View: Top of Sweet Briar Vale path & steps to Picnic Hill Photographer: Jeff Lee Photo Number: 10 View: Picnic Grove Summit looking southwest toward Reservoir 5 Photographer: Jeff Lee Photo Number: 11

View: Volcanic crater core & throat from amphitheater looking west Photographer: Jeff Lee Photo Number: 12

View: Crater Amphitheater & Stage looking north Photographer: Jeff Lee Photo Number: 13

View: Crater Amphitheater Stage rear entrance looking east (Maintenance Building & Office in background) Photographer: Jeff Lee Photo Number: 14

View: Crater Comfort Station looking north at south elevation Photographer: Kimberly Lakin Photo Number: 15

View: N.E. 69<sup>th</sup> Ave. Entrance stairs looking southwest Photographer: Cascade Anderson Geller Photo Number: 16

View: N.E. Entrance Comfort Station looking southwest east & north elevations Photographer: Cascade Anderson Geller Photo Number: 17

View: Summit Comfort Station looking west east elevation Photographer: Kimberly Lakin Photo Number: 18

View: Mountain Crest Summit north end big leaf maple grove looking northeast Photographer: Cascade Anderson Geller Photo Number: 19

View: Mountain Crest Summit south end east stairs to Harvey W. Scott statue Photographer: Cascade Anderson Geller Photo Number: 20

View: Harvey W. Scott statue looking west Photographer: Cascade Anderson Geller Photo Number: 21

View: East Tabor Drive viewpoint Mt. Hood, Boring Lava Buttes, east Portland looking east Photographer: Cascade Anderson Geller Photo Number: 22

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View: East Tabor Drive basalt rock retaining wall looking northwest Photographer: Cascade Anderson Geller Photo Number: 23

View: S.E. Harrison St. Entrance Drive looking west Photographer: Cascade Anderson Geller Photo Number: 24

View: From north path above Reservoir 1 looking south Photographer: Jeff Lee Photo Number: 25

View: S.E. Harrison Drive switchback at Water Bureau Entrance looking southeast Photographer: Jeff Lee Photo Number: 26

View: Water Bureau Service Drive approach to Reservoir 6 southeast side looking northwest Photographer: Jeff Lee Photo Number: 27

View: Tennis Courts northeast side Reservoir 6 looking south Photographer: Jeff Lee Photo Number: 28

View: S.E. Lincoln St. Entrance at Nursery looking northeast Photographer: Jeff lee Photo Number: 29

View: Mount Tabor Yard from Nursery looking south Photographer: Cascade Anderson Geller Photo Number: 30

View: Mount Tabor Yard looking northeast Photographer: Kimberly Lakin Photo Number: 31

View: Office (Horticultural Services Building) looking northeast south & west elevations Photographer: Kimberly Lakin Photo Number: 32

View: Administrative Building & Additions looking east west elevation Photographer: Kimberly Lakin Photo Number: 33

View: Mechanical Offices (Community Gardens) looking northeast south and west elevations Photographer: Kimberly Lakin Photo Number: 34

View: Nursery finger looking northeast Photographer: Cascade Anderson Geller Photo Number: 35























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## C Exhibit List (Plan Set)

- Exhibit 1 Vicinity Map
- Exhibit 2 Site Boundaries
- Exhibit 3 Light pole locations with Conservation and Scenic Overlays
- Exhibit 4 New Pole and Fixture Schematics
- Exhibit 5 Illumination Info (photometrics, distribution comparison, etc.)
- Exhibit 6 Scaled Plan Set
- Exhibit 7 Permitted landscaping per LU 17-245440 Condition L.
- Exhibit 8 Tree Plan (includes Inventory)



## Site Boundaries









HEIGHT: WIDTH: MATERIAL:

PANELS: FINISH: LAMPING: VOLTAGE: COLOR TEN

OPTICS: TYPE TYPE

SURGE:

CATALOG N TYPE I

· TYPE

#### LUMINAIRE SPECIFICATIONS:

	WILLIAM AND MARY
	26 1/8"
	16 5/8"
	CAST ALUMINUM ALLOY A.N.S.I.
	356, PER A.S.T.M. B26-95
	PEBBLED ACRYLIC
	POWDER COAT - RIVER TEXTURE GLOSS BLACK
	60 WATT LED SYSTEM
	ELECTRONICALLY WIRED FOR 120-277 VOLTS
MP.:	2700K (WARM WHITE)
10:	TYPE III (ASYMMETRIC DISTRIBUTION)
V:	TYPE V (SYMMETRIC DISTRIBUTION)
	10kV
0.0	
III:	ALMWMS-LE060-EVX-2G2-27-CR3-YPBP-TR7P-CU
V:	ALMWMS-LE060-EVX-2G2-27-CN5-YPBP-TR7P-CU





		ΒY	APPF						
SCREW WAS STANDARD. REMOVED GFI									
EMBEDDED FLUTED POLE									
POLE HEIGHT ABOVE GRADE	EMBEDDED DEPTH	OVI P LEI	ERALL OLE NGTH	RALL ULE GTH BUTT DIA ULTIMATE GROUND LINE MOMENT (ft-lbs)		E POLE WEIGHT (lbs)		т	
12'-2"	5'-0"	1	7'-2"	18"		22,500		1,050	
E CONF	IG CODES		"P"	LEVEL	PO	E CONFIG	i C	ODES	;
ENTRY	INFO		OPTI	ON CLAS	SS	ENTRY		INFO	
I				MIX		11E	E	VT MAT	СН
66538E			F	FINISH		3			
TMP			COLLAR		COLLAR 65850EPA			ROUNE	)
MODFE	NOTE 7		POLE TOP CONFIG. MOD			MOD95			
		-	STR	UCT. MC	D	MODDCI		NOTE	3

#### SHIPPING ASSEMBLY 2304-010 **BILL OF MATERIAL**

40195EM3PAA - MODIFIED FABRICATED ALUMINUM TENON ASSEMBLY, 2-7/8" O.D. x 3"

1. MIX (11E3I): GRAY NATURAL (EVT MATCH), EXPOSED AGGREGATE FINISH WITH AMERSHIELD ANTI-GRAFFITI COATING.

ASTM C-595 TYPE 1L GRAY CEMENT

PROTECTIVE COAT EXPOSED P.C. WIRES AT POLE ENDS.

7. MODFE: POLE BOTTOM PREPARATION FOR FREEZING OR CORROSIVE COASTAL ENVIRONMENT; SEE DOCUMENTATION.

8. MODDCI: CORROSION INHIBITOR MIX MODIFICATION.

9. POLE FULLY PRESTRESSED WITH (8) 7mm ASTM A421 STEEL WIRES.
10. THE POLE (& IMPLIED TENON TOP ASSEMBLY) DEPICTED ON THIS DRAWING IS

DESIGNED TO WITHSTAND THE LOADS IMPARTED BY A SINGLE POST TOP

LUMINAIRE (NOT TO EXCEED 1.5 SQ FT EPA & 47 LBS) AS DESIGNED PER THE 2013 AASHTO LTS-6 USING A 90 MPH WIND ZONE (3-SECOND GUSTS) CRITERIA FOR STREET LIGHT POLES. NO TORSIONAL (ARM OR TWIST) LUMINAIRE LOADS ANALYZED. PLEASE CONTACT & ADVISE MANUFACTURER IF INTENDED LOADING

MAT	ERIAL	LIST

BER	DESCRIPTION	ORG	NOTES
)	SHIPPING ASSEMBLY	ANN	
	TAMPER PROOF WRENCH	ANN	1 FOR EVERY 5 POLES

	DN POLE www.amerc	PROD					
	PORTLAN	ID PARKS	6				
	PORTLA	AND, OR					
VE	VEO03.7 POLE WITH TENON ASSEMBLY						
NTAIN DISCL	S INFORMATION WHICH IS PRO OSED TO ANYONE WITHOUT TH	PRIETARY TO NA IE PRIOR WRITTE	TIONAL OILWEL	L VARCO. IT SHAL OF NATIONAL OIL	L NOT BE WELL VARCO.		
	DATE: 4/6/23	APPR:		DATE:			
ER		REVISION	SHEET		SCALE		
<u>04</u>	-010	В	1 (	)F 1	NTS		

# Installation Steps for a Direct Embedded Ameron™ Concrete Pole



Position pole for pre-wining, Protect pole as described in handling and storage guide, Wire and install juminaire,



Use only synthetic straps. Singla pick point is preferred method of handling. Use double clove hitch to avoid alippage.



Excevete hole to proper depth (plus 6-in, if special backfill is required).



Set pole. Align/plumb. Naintain lension on the pole until compacted to bottom of cable entrance.

## Recommended backfill requirements\*

## Good soil

Compact well-graded sand and gravel, hard clay, or well-graded fine and coarse sand (all drained so that water will not stand).

Une as is for book Q.

#### \*Based on location review by a qualified civil engineer.

(# 2000 Matternal Office) Verse (4) Mights Reported - CANT-ADA\_MAG\_2003.

## Medium soil

Compact fine send, medium and clay, compact sendy loam, loose coarse send and gravel (all drained so that water will not stand).

#### Regebres select backfill—clean, washed send or X-in, minut well-graded gravel.



Use proper backfill, See recommended backfill requirements below, Tamp a 6-in, back to ensure connect setting depth and drainage (if required).



Compact required backfill in two operations. Tamp 9-in. Intervals to bottom of cable entrance. Install underground cable. Check alignment. Finish compaction to a height of 2-in. above grade sloping away from pole to allow proper drainage.

## Poor soil

Soft clay, clay loam, poorly compacted send, or clays containing large amounts of site. Water may stand during wet seeson.

Gen connections earth backfill—mir one part dry coment paneler to 25 parts clean, weahed caud.



# Ameron Concrete Pole Handling Instructions

Ameron<sup>®</sup> poles are made of pre-stressed concrete: a lough, elastic, durable material not limited by the properties of low strength, conventionally reinforced concrete. Like many other fabricated structures, Ameron poles are designed to withstand specific service loads and handling loads—with safety factors considered. Loads induced through handling are periaps the ones most easily overlocked, even though only a few simple rules need be ramembered. Attention to the following will minimize damage from handling and storage.

## Storage (See Figs. 1 through 3)

1. Store on durinage placed % of the total length from each end. Location of temporary support points may vary from this rule for both storage and handling. Durinage is idently made from 4×4 fit, pine, or similar wood, which is linkshed enough to have opposite sizes flat and parallel (no lags or branches). The durinage should be in one place for the full width of the stack and be of sufficient thickness as to allow the placing of sings or the investion of foridilt fingers between the invest of poles. Westhered lumber is better than newly cut because the latter may stain the concrete when molisture is present.

 Store on a level surface. If surface is not paved, be certain the ground is solid enough so that the durinage does not uink into it.

3. When poles are stared in more than one layer, each piece of during e must be placed one above the other, so that the weight of the poles above is transmitted directly downward through the during e and does not induce bending stresses in the poles.

4. Distribution poles should be studied no higher than nine layers and smaller poles no higher than 12 layers.

5. Each succeeding layer of poles should be placed with the tips in the opposite direction of the layer below.

Poles should be aligned so that the tips in each layer form a straight line normal to the center line of the poles.

7. Piece wedges on the dunnage next to the poles to prevent their rolling.

4. Do not step on the cantilevered tips of small poles in storage.

 Hundle poles with reasonable care so as to avoid dropping or otherwise striking them against each other or other hard, solid objects.

# Handling

#### (See Fig. 4)

 In lifting the pole from a single pick-up point, use either a choker sling or a loop sling with one complete extra turn around the pole just above the balance point.

When lifting the pole using two pick-up points from a single hook, a choice-type attachment should be used on the pole.

Poles with a polished or textured surface should be handled with a nylon or other non-metallic sling.
For these poles, fingers of a forkift should be fitted with protective covers.

4. When using a forklift to handle poles, always use softeners on the fork times. Also, always use wedges to prevent poles from rolling.





Total pole count: 88

# Existing product - Specs

## Existing lamp information used for calculation

Brand	Philips Lighting	Bulb Finish	Clear
Product Line	Ceramalux	Bulb Technology	High Pressure Sodium
Model Number	SON 150W E39 ED75 CL SL/12	Average Rated Life (hr)	24000
Energy Used	150 Watts	Length (in)	7.75
Base	Mogul (E39)	Diameter (in)	2.938
Bulb Shape	ED-23 1/2	Ballast Code	S55
Bulb Color	Warm White	Contains Mercury (Hg)	Yes
CRI	17	GE	44043 - LU150/55
Color Temperature (Kelvin)	2100	Osram Sylvania	67516 - LU150/55
Brightness (Lumens)	16000	Not For Sale In	WA



Existing pole details:

Pole height: 12'-2"

Lamp lumen distribution used for calculation - T5 type optic

06/21/2023

# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215

(E) Decorative Post-top luminaire

MT TABOR - EXISTING CONDITION





# Existing product - Approximate calculation

MT. TABOR - EXISTING POLE APPROX. CALC						
Label	Units	Avg	Max	Min	Uniformity Ratio	
Walkway	Fc	0.31	5.2	0.0	N.A.	
Walkway 2	Fc	0.28	5.3	0.0	N.A.	

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

## Note:

1. Lighting calculations were performed at 0'-0" AFF.

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.





# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



CONDITION

EXISTING

TABOR -





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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



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#### LIGHTING LEVEL (FC) LEGEND Range > = 0 To<= 0 > = 0.1 To<= 0.3 > = 0.4 To<= 0.7 > = 0.8 To<= 1 > = 1.1 To<= 100

06/21/2023



Please note that the drawing is not to scale and is for illustrative purposes only.



CONDITION

EXISTING

TABOR -



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#### LIGHTING LEVEL (FC) LEGEND



Please note that the drawing is not to scale and is for illustrative purposes only.

# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215





CONDITION

EXISTING

TABOR -





# New LED product - Specs

Decorative Post-top:



Spring City - William and Mary Post-top fixture ALMWMS-LE060-EVX-2G2-27-[OPTIC]-YPBP-CU



Optics used for calculation - T3, T5 type

Decorative Post-top luminaire # T3 Poles: 74, # T5 Poles: 14 Pole height: 12'-2"

06/21/2023



# MT TABOR - NEW LED FIXTURE (1-1 REPLACEMENT)





MT. TABOR - 1-1 REPLACEMENT APPROX. CALC							
Label	Units	Avg	Max	Min	Uniformity Ratio		
Walkway	Fc	0.45	2.6	0.0	N.A.		
Walkway 2	Fc	0.41	2.5	0.0	N.A.		

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



(1-1 REPLACEMENT)

FIXTURE

LED

TABOR - NEW

Σ



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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



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#### LIGHTING LEVEL (FC) LEGEND



# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



LU 23-088549 HR DM, Exhibit A.3

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TABOR - NEW LED FIXTURE (1-1 REPLACEMENT)



# Portland Parks Photometrics | P25 INC

## Comparison of Existing and Proposed Distribution Diagrams

The new T3 type lights (to be located in the SE Taylor right-of-way) will greatly reduce the amount of light spill on adjacent properties compared to the existing T5 type lights. The distribution graphs show the total quantity of light emitted (lumens) by the fixture at various angles. Using the two views we can determine the location of maximum illumination; the blue line shows the maximum vertical lumens (section view) and the red line shows maximum horizontal lumens (plan view):

- For new Type 3 fixture, maximum illumination occurs when you are looking up at 20° angle and standing 75° to the side.
  - For a new fixture on a 12' pole, this would put us about 38' away from the pole. This would make a brighter light dimmer at a distance.
- The max illumination of 2148 for the old fixture is when you are looking up at a 55° angle and standing 55° to the side.
  - For an old fixture on a 12' pole, this would put us about 15' away from the pole. This closer distance would make a dimmer light seem brighter.

Despite the old fixture producing less lumens, by having the light shine closer it ends up being nearly twice as bright as new fixture. Being an omnidirectional fixture, this creates brighter spots all around the pole vs the new directional fixtures.



Figure 1. Light Spill from existing T5 fixture



Figure 2. Light Spill from proposed new T3 fixture

pkmichaelv






S.E. 70th Ave.	East Tabor Dr.
Portland Parks and Recreation Dan Ryan, Commissioner - Adena Long, Director Mt. Tabor Park Hardscape Features Portland, Oregon DATE: 9/7/2023 SCALE: 1"=100' DRAWN BY:Mike Van Yserloo SECTION:	- LU 23-088549 HR DM, Exhibit A.3



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	Protocol         Date: 9/7/2023         SCALE: 1"=50'         DRAWN BY:Mike Van Yserloo         SECTION:	LU 23-088549 HR DM, Exhibit A.3 2





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	Portland, Oregon     PROJECT MANAGER:       DATE: 9/7/2023     SCALE: 1"=30'     DRAWN BY:Mike Van Yserloo     SECTION:	LU 23-088549 HR DM, Exhibit A.3



of 21		REVISIONS DESCRIPTION BY	Dan Ryan, Commissioner - Adena Long, Director         Mt. Tabor Park         Irrigation Features - SW         Portland, Oregon       PROJECT MANAGER:         DATE: 9/7/2023       SCALE: 1"=50'       DRAWN BY:Mike Van Yserloo       SECTION:	V Parts, Healthy Ports, Healthy Parts, Healthy Part
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	Portland, Oregon PROJECT MANAGER: DATE: 9/7/2023 SCALE: 1"=50' DRAWN BY:Mike Van Yserloo SECTION:	LU 23-088549 HR DM, Exhibit A.3



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of 21	Dan Ryan, Commissioner - Adena Long, Director         Mt. Tabor Park         Civil Features - SW         Portland, Oregon       PROJECT MANAGER:         DATE: 9/7/2023       SCALE: 1"=50'       DRAWN BY:Mike Van Yserloo       SECTION:	LU 23-088549 HR DM, Exhibit A.3and
	Portland Parks and Recreation	Health A
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S.E. B. Taylor B. C.	
Portland Parks and Recreation         Dan Ryan, Commissioner - Adena Long, Director         Mt. Tabor Park         Electrical Features - Amphitheater and Play Area         Portland, Oregon       PROJECT MANAGER:         DATE: 9/7/2023       SCALE: 1"=30'       DRAWN BY:Mike Van Yserloo       SECTION:	Healthy Parks, Healthy Port LAND Healthy Parks, Healthy Porter LU 23-088549 HR DM, Exhibit A.3



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SL/	OFF       Portland Parks and Recreation         Dan Ryan, Commissioner - Adena Long, Director         Mt. Tabor Park         Electrical Features - NW         Portland, Oregon         DATE: 9/7/2023         SCALE: 1"=50'         DRAWN BY:Mike Van Yserloo         SECTION:	LU 23-088549 HR DM, Exhibit A.3and





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	Portland Parks and Recreation Dan Ryan, Commissioner - Adena Long, Director Mt Tabor Park	PORTLAND PARKS & RE Healthy Parks, P
	Protect in Colspan="2">PROJECT MANAGER:         PROJECT MANAGER:         DATE: 9/7/2023       SCALE: 1"=50'       DRAWN BY:Mike Van Yserloo       SECTION:	LU 23-088549 HR DM, Exhibit A.3thory



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Portland Parks and Recreation Dan Ryan, Commissioner - Adena Long, Director Mt. Tabor Park Electrical Features - E Portland, Oregon DATE: 9/7/2023 SCALE: 1"=50' DRAWN BY:Mike Van Yserloo S	LU 23-088549 HR DM, Exhibit A.34



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Portland Parks and Recreation	PORTLA PARKS & Healthy Par
Mt. Tabor Park	AND 3 RECRI
Project MANAGER: DATE: 9/7/2023 SCALE: 1"=50' DRAWN BY:Mike Van Yserloo SECTION:	LU 23-088549 HR DM, Exhibit A.3





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$\stackrel{\circ}{\scriptstyle \neg}$ $\overset{\circ}{\scriptstyle N}$	DATE DESCRIPTION BY	Portland Parks and Recreation         Dan Ryan, Commissioner - Adena Long, Director         Mt. Tabor Park         Civil Features - NW         Portland, Oregon       PROJECT MANAGER:         DATE: 9/7/2023       SCALE: 1"=50'       DRAWN BY:Mike Van Yserloo       SECTION:	ARKS & RECREATION LU 23-088549 HR DM, Exhibit A.390



OF 6	C C C C C C C C C C C C C C C C C C C	EVISIONS DESCRIPTION BY	Mt. Tabor Park         Civil Features - NE         Portland, Oregon         PATE: 9/7/2023         SCALE: 1"=50'         DRAWN BY:Mike Van Yserloo         SECTION:	- LU 23-0885	&RECRE ATION 649 HR DM, Exhibit A.3nd
		DATE	Portland Parks and Recreation Dan Ryan, Commissioner - Adena Long, Director		PORTL PARKS Healthy P
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DATE DESCRIPTION DATE DESCRIPTION OF 6	Portland Parks and Rec Dan Ryan, Commissioner - Adena Long, Director Mt. Tabor Park Civil Features - E Portland, Oregon DATE: 9/7/2023 SCALE: 1"=50'	PROJECT MANAGER: DRAWN BY:Mike Van Yserloo SECTION:	LU 23-0885	PORTLAND PARKS & RECREATION Healthy Parks, Healthy Portand A.39nd HR DM, Exhibit



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Portland Parks and Re Dan Ryan, Commissioner - Adena Long, Director Mt. Tabor Park Civil Features - S Portland, Oregon DATE: 9/7/2023 SCALE: 1"=50'	PROJECT MANAGER: DRAWN BY:Mike Van Yserloo SECTION:	LU 23-0885	Healthy Parks, Healthy Port LAND PARKS & RECREATION Healthy Ports, Healthy Ports HR DM, Exhibit A.3

	$\left( \right)$	LU 17-245440 CU AD CONDITIONS OF APPROVAL	LU 17-158467 HRM CONDITIONS OF APPROVAL
		<u>Condition A</u> : As part of the building <i>permit</i> application submittal, the following development-related conditions (B through L) must be noted on each of the four required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE - Case File LU 17-245440 CU AD." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED." <i>Response:</i> Condition is met on Zoning Compliance Page.	<u>Condition A</u> : As part of the building permit application submittal, conditions (B through I) must be noted on each of the 4 required numbered set of plans. The sheet on which this information appr COMPLIANCE PAGE - Case File LU 17-158467HRM." All required represented on the site plan, landscape, or other required plan a
		<u>Condition B</u> : At the Upper Nursery, a 15-foot-deep L3 high-screen landscape buffer will be installed outside of the decorative steel fence on the west side of the enclosed area; and a S-foot-deep L3 high- screen landscape buffer, minus the tree requirement, will be installed outside of the decorative steel fence along the north side of the enclosed area landscaping (Exhibit C.4). The landscaping will extend the length of the fenced area. One break in the landscaping up to 20 feet wide will be permitted to provide vehicle access into the Upper Nursery development area. The installation of any required landscaping may be deferred during the summer or winter months to the next planting season, but never for more than six months. All required landscaping must be installed prior to final inspection for the building or other permitts required for the Upper Nursery development. <i>Response:</i> Condition is met on Plan Sheets L3.3 and L3.4	Response: Condition is met on Zoning Compliance Page, and r Condition B: At the time of building permit submittal, a signed C www.portlandoregon.gov/bds/article/623658 must be submitted the Design. Response: A signed Certificate of Compliance form is included
PLOTTED FROM:		<u>Condition C</u> : The two temporary modular buildings within the Yard, approved through building permits 16- 113354 CO and 16—113360 CO, must either be removed or brought into conformance with the requirements of the Stormwater Management Manual within three years of the original certificate of occupancy for these buildings (end date of January 31, 2020). <i>Response:</i> The offsite stormwater management fee was paid to BDS (Reference BDS receipt number 2307687) on February 14, 2020, thus satisfying compliance with Condition C.	<u>Condition C</u> : The two temporary modular buildings within the Ya 16-113354 CO and 16-113360 CO, must either be removed, or requirements of the Stormwater Management Manual (SWMM) certificate of occupancy for these buildings (end date of January <i>Response</i> : The offsite stormwater management fee was paid to 2307687) on February 14, 2020, thus satisfying compliance with
:4:		<u>Condition D</u> : The trees identified for tree protection in Exhibits C.34, C.35, and C.36 are required to be preserved to Title 11 specifications throughout all related building or other permits required to carry out the work approved herein. <i>Response:</i> Condition is met on Plan Sheets L0.00 through L0.09 <u>Condition E</u> : A landscape buffer will be provided on the east side of the multi-use path that is at least eight feet wide and planted to the L3 high-screen standard between the path and the proposed decorative steel fence. This landscape buffer will extend from the southern property line up approximately 250 linear feet to the north, where the proposed landscaping widens to more than this 8-foot minimum. The required trees on the east side of the multi-use path will be planted such that they are staggered	<u>Condition D</u> : All trees, structures and fences must be located at sanitary sewer pipe. BES will allow shrubs and shallow-rooted we the event of future construction, maintenance, or other sewerage sewer crossing this site, the property owner will be responsible f as a result of said work with landscaping matching landscape pla <i>Response</i> : Condition is met on plan C302. Landscape area is u maintenance activities.
PLOTTED BY:		with the existing row of trees on the adjacent property to the west. <i>Response:</i> Condition is met on Plan Sheets L3.0. <u>Condition F</u> : Prior to building permit issuance for the multi-use path, Applicant will provide evidence of a recorded easement allowing PP&R access to a 5-foot-wide strip of land on the eastern edge of 6323 SE DIVi5ion Street, running from the Division Street right-of-way north some 290 linear feet. This easement will allow PP&R to remove the existing fence, build a new or relocated fence, and plant and maintain plantings in the area. Within this 5-foot-wide easement area, the existing fence must be removed; the eastern four feet must be planted as shown on landscape plan L3.00; and any new or relocated fence must be installed in the western one foot of the	<u>Condition E</u> : Prior to building or other permit issuance for the mula 24-foot-wide public access easement for a multi-use path that Sherman and SE Division Street in general alignment with SE 64 <i>Response:</i> Easement work is underway and will be resolved by <u>Condition F</u> : Prior to installation of the art pieces, an approved e
D ON: 4/14/2020 12:52:13		<ul> <li>easement area.</li> <li><i>Response:</i> Easement is currently under negotiation with neighbor; design requirements are shown in drawings.</li> <li><u>Condition G</u>: If an additional drive aisle is allowed off of SE 64th Avenue for access to the Upper Nursery through the current Historic Resource Review 17-158467 HRM, any one of the existing dirt or gravel vehicle access points on SE 64 h Avenue or within the first 100 feet of the southern Park entrance will be closed, so that the total number of vehicle access points from SE Sherman Street north 700 feet, is limited to four. The drive aisle will be closed as part of the building permit approving development in the Upper Nursery area.</li> <li><i>Response:</i> Condition is met on demolition plans, Sheets C0.50.</li> </ul>	be obtained. Response: PP&R is coordinating the permits with PBOT. Permi are finalized. Noted on Sheets ART1.0 & ART1.1 Condition G: The public art in the three noted locations along the by the Regional Arts & Culture Council (RACC) and installed price certificate of occupancy, or sooner. Response: PP&R has coordinated public art through RACC. Pro- te certificate of occupancy. Noted on Sheets APT1.0 & APT1.1
PLOTTE		Condition H:Maintain the landscaping buffer between the western tennis courts and the west property line to the L3 standard for trees and shrubs into perpetuity. <i>Response:</i> The landscape buffer between the western tennis courts and the property line is within Mt Tabor Park and will be maintained by PP&R staff into the future. Pending response from City. <u>Condition I:</u> Prior to issuance of a building permit for the new Maintenance Building, Applicant shall remove damaged plantings and supplement current healthy landscape plantings in the curbed landscape islands within and directly south of the Caldera Parking Lot to match the original 1999 landscape plan, as shown on Exhibit H.14p. The installation of any required landscaping may be deferred during the summer or winter months to the next planting season, but never for more than six months. All required landscaping must be installed prior to final inspection. <i>Response:</i> Reference Exhibit A - L3.21.	<u>Condition H</u> : Public art or significant landscaping will be installed Parks, near the intersection of SE Lincoln Street and SE 65th Av the next phase of the Parks Master Plan implementation. <i>Response:</i> The landscape buffer between the western tennis co Tabor Park and will be maintained by PP&R staff into the future. <u>Condition I</u> : Railings at the bridge shall be similar to, but simpler for the Mt. Tabor Park stairway. The railings shall be painted, rat
		<u>Condition J</u> : In the event of future construction, maintenance, or other sewerage system activities on the Bureau of Environmental Services sanitary sewer crossing this site, the property owner will be responsible for replacing any vegetation removed as a result of said work with landscaping matching landscape plans L3.00 and L3.10. <i>Response:</i> Future construction activities related to conditions of approval are not currently planned. PP&R management team will be informed of the condition. <u>Condition K</u> : In the reduced buffer area between the new maintenance building and the west property line/SE 64t' Avenue right-of-way between the south end of SE Sherman Street and the north end of SE Grant Street, the LI standard for trees and groundcover will be met, and a minimum of 25 shrubs will be planted (Exhibits H.14j and H.14k). <i>Response:</i> This condition is met on Sheets L3.2.	narmonizes with the neighboring landscaping, and need not be la <i>Response:</i> This condition is met on plan sheets A5.13. <u>Condition J</u> : No field changes allowed. <i>Response:</i> No field changes will be made.
A WING\$FILE\$		Condition L: Prior to building or other permit issuance for the multi-use path, Applicant must provide a 20- foot-wide public access easement for a multi-use path that is a minimum of 12-feet wide between SE Sherman and SE Division Street in general alignment with SE 64th Avenue. <i>Response:</i> Easement work is underway and will be resolved by permit issuance.	
DR			





PLANT SCHEDULE				
KEY		BOTANICAL NAME	COMMON NAME	
TRE ACM, ALRU MASU PRP, QURU ZSVO	E: 4 5 4 5 4 4 5	ACER MACROPHYLLUM ALNUS RUBRA MALUS 'SNOWDRIFT' PRUNUS PADUS QUERCUS RUBRA ZELKOVA SERATA 'VILLAGE GREEN'	BIGLEAF MAPLE RED ALDER 9NOWDRIFT CRABAPPLE EUROPEAN BIRD CHERRY RED OAK VILLAGE GREEN ZELKOVA	
SHRUB:         DAOD       DAPHNE ODORA         HYPE       HYDRANGEA MACROPHYLLA 'PINK ELF'         POMU       POLYSTICHUM MUNITUM         RHCH       RHODODENDRON 'CHRISTMAS CHEER'         RHCC       RHODODENDRON 'CREAM CREST'         RHDA       RHODODENDRON 'DORA AMATEIS'         RHEL       RHODODENDRON 'GUMPO PINK'         RHMA       RHODODENDRON 'GLARETH'         RHSW       RHODODENDRON 'GCARLET WONDER'         RORM       ROSA 'RED MEIDILAND'         SARU       SARCOCOCCA HOKERANA HUMILIS         SARU       SARCOCCCA RUSCIFOLIA         SKJA       SKIMTIA JAPONICA         SPNI       SPIRAEA NIPPONICA 'SNOWMOUND'		DAPHNE ODORA HYDRANGEA MACROPHYLLA 'PINK ELF POLYSTICHUM MUNITUM RHODODENDRON 'CHRISTMAS CHEER' RHODODENDRON 'CREAM CREST' RHODODENDRON 'DORA AMATEIS' RHODODENDRON 'GUMPO PINK' RHODODENDRON 'GUMPO PINK' RHODODENDRON 'GARLET WONDER' ROSA 'RED MEIDILAND' SARCOCOCCA HOKERANA HUMILIS SARCOCOCCA RUSCIFOLIA SKIMMIA JAPONICA SPIRAEA NIPPONICA 'SNOWMOUND' YIBURNUM TINUS 'COMPACTA'	WINTER DAPHNE PINK ELF HYDRANGEA SWORD FERN CHRISTMAS CHEER RHOD. CREAM CREST RHODODENDROI DORA AMATEIS RHODODENDRON PINK GUMPO AZALEA MARS RHODODENDRON SCARLET WONDER RHOD. RED MEIDILAND ROSE CREEPING SARCOCOCCA FRAGRANT SARCOCOCCA JAPANESE SKIMMIA SNOUMOUND SPIRAEA DWARF LAURUSTINUS	
GRC	DUNDCO	VER6:		
		ARCTOSTAPHYLOS UVA-URSI	KINNIKINNICK	
		FRAGARIA CHILOENSIS	WILD STRAWBERRY	
		GERANIUM MACRORRHIZUM 'BEVENS'	BEVENS GERANIUM	
		MAHONIA REPENS	CREEPING MAHONIA	
		NARCISSUS 'GOLDEN SPUR'	GOLDEN SPUR DAFFODIL	
		ROGA 'ROBIN RED BREAST'	ROBIN RED BREAST ROSE	
		ROSA 'SNOW ON THE HEATHER'	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	
		TYPE 1 SEED, SEE SPECIFICATIONS.	33.700.020, Conformance With LU 17-24544 Review and Adjustment Review, Condition o issuance of the new Maintenance Building bu damaged plantings and supplement current I plantings in the curbed landscape islands wit the Caldera Parking Lot to match the original shown on Exhibit H.14p. The installation of a may be deferred during the summer or winder	
NO	TES		planting season, but never for more than 6 m landscaping must be installed prior to final in	
1)	SEE CO	/ER SHEET FOR GENERAL NOTES.	uuuuuu	
2	GRADE : AND SEE	9MOOTH ALL AREAS DISTURBED BY CO ED WITH TYPE I SEED MIXTURE, SEE SPE	NSTRUCTION NOT SCHEDULED FOR CIFICATIONS.	
3)	QUANTITI AS DRAI	IES INDICATED ARE FOR THE CONVENIEN UN.	NCE OF THE CONTRACTOR ONLY. IN	
4)	PROVIDI BY OWNE	E SMOOTH FLOWING TRANSITIONS BETWEE ER'S REPRESENTATIVE PRIOR TO PLANT	EN PLANT MATERIALS. LOCATE PL; ING.	
5	ADD BARK MULCH TO EXISTING SHRUB AREAS DISTURBED BY CONSTRUCTION. PRO FOR DISTURBED SHRUB AREAS, TYPICAL.			
6	OWNER'S	REPRESENTATIVE TO LOCATE PLANTS	IN RESTROOM AREA FOR INSTALLA	
T	PROVIDI AUTOMA	E TEMPORARY WATERING TO ALL NEW P. TIC IRRIGATION UNTIL FINAL ACCEPTANC	LANT MATERIAL LOCATED IN AREA E. SEE SPECIFICATIONS.	
8	STAKE A	ALL TREE LOCATIONS IN FIELD FOR OWNE	ER'S REPRESENTATIVE TO ADJUST F	
٩	WHERE F	ROSES ARE PLANTED INDIVIDUALLY, MIN	IMUM PLANTING PIT TO BE 24"×24"×	
10	SEE SHE	ET LI.I FOR ADDITIVE ALTERNATE PLAN	T MATERIAL.	
			WORK BY OWNER	

CC	City Of Portland	PØRT & Recreati	LAND PARKS						
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E	Conditional Use II. Prior to mit, remove discape plan, as di ladscaping to the next required IMPROVEMENTS NUMBER OF PLANTS FIELD FOR ADJUSTMENT A MINIMUM OF 2' THICK	Portland Parks and Re Jumes Francesconi, comissioner CHARLES	AMPHITHEATER and MAIN PARKIN Planting Plan MT. TABOR PARK Portland, Oregon DATE: 05/2193 SCALE: AS NOTED DRAWN B						
LATION. REAS WHICH	H DO NOT RECEIVE	DATE 1	EVISIONS DESCRIPTION BY						
ST PRIOR	TO INSTALLATION.								
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LU 23-088549 HR DM, Exhibit A.3



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	RF	VIEWED E	0R	PARKS &	& R E C R E A	ATION
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IreeNo Genus species	Common Name	DBH Size	1 reeNo Genus species	Common Name	DBH SI	ze Ireel	to Genus species	Common Name	DBH Size	197 Decudateura manziacii Dauglas fir	DBH Size	
2 Cruntomoria ianonia		4.4 L	63 Enuja piicata	western reacedar	10 L	125	iaponicum svn.	Japanese pagoda tree, Uninese	3.6 IVI	187 Pseudolsuga menziesii Douglas-Iir	33.7 L	1
2 Cryptomena japonic 2 Dipus strobus	a Japanese cedar	10.4 IVI	64 Sequoia sempervirens	inconso codar	29.3 L		Sophora japonica			188 Zeikova serrata Japanese zeikova	10 M	1
A Dicca smithiana		10.0 L	66 Ouorcus palustris	nin oak	21 L	126	Cladrastis kentukea	American yellowwood	12.9 M	100 Pseudotsuga menziosii Douglas-III	30.7 L	1
5 Prupus sorrulata		0 L 20 S	67 Prupus sorrulata	Japaposo floworing chorry	3.1 L 20 C	127	Calocedrus decurrens	incense cedar	30 L	101 Psoudotsuga monziosii Douglas fir	27.7 L	1
6 Prunus serrulata		2.9 5	69 Prunus serrulata	Japanese flowering cherry	2.0 3	128	Malus spp.	ornamental crabapple	13.9 S	191 Pseudotsuga menziesii Dougias-mi	41.1 L 25 I	1
7 Drunus serrulata		30 S	60 Picco smithiana		54 S	129	Sequoiadendron	giant sequoia	11.8 L	192 Pagus Sylvatica European Deech	25 L	1
7 Prunus serrulata		20.0 5	70 Prupus sorrulata	lananoso floworing chorry	0 L 225 S		giganteum			195 Pseudotsuga menziesii Douglas-III	47.2 L	
O     Drupus corrulata		0.7 5	70 Prurius serruiata	papariese nowering cherry	22.0 J	130	Malus fusca	Pacific crabapple	14 S	194 Pseudotsuga menziesii Douglas-III	35.9 L	
9 Prunus serrulata		4.3 5	71 Pillus polidelosa	ponderosa pine	10.8 L	131	Picea pungens	Colorado blue spruce	31.4 L	195 Pseudolsuga Meliziesii Dougias-iii	30.1 L	
10 Prunus serruiata	Japanese nowening cherry	28.0 3	72 Sequoia sempervirens		24.3 L	132	Crataegus monogyna	English hawthorn, common	24.4 S	196 Plunus celasitera noveling plum	4.4 5	
11 Gymnociadus dioica		3.2 L	73 Pseudotsuga menzies	n Douglas-III	11.2 L	133	Crataegus monogyna	English hawthorn, common	12.5 S	197 Pseudotsuga menziasii Douglas-III	31.7 L	
12 Pluilus seriulata		14.4 3	74 Pillus politierosa		12.3 L	134	Crataegus monogyna	English hawthorn, common	19.5 S	198 Pseudotsuga menziesii Douglas-III	31 L	
13 Pierocarya spp.	sii. Douglos fir	3.2 3 12.0 I	75 Chamaeoyparis obtus		0 L	135	Pyrus calleryana	flowering pear	6.1 M	200 Corpus puttallii Dasifia dogwood	42.9 L	U U
14 Pseudotsuga menzie	sii Douglas-fir	15.9 L	76 Criatiaecyparis obtus	English hawthern, sommen		136	Acer macrophyllum	bigleaf maple	15.5 L	200 Cornus nutraini Pacific dogwood	4.0 WI	
15 Pseudotsuga menzie	sii Douglas-fir	10.0 L	77 Crataegus monogyna	snakebark manle	0.0 5	137	Populus nigra	black poplar, Lombardy poplar	13.6 L	201 Pseudotsuga menziesii Douglas-III	30.2 L	
17 Acor boldroichii	Balkan manlo	13.3 L 11.4 M	70 Compine botulus		1.0 J	138	Ostrya virginiana	American hophornbeam	2.7 M	202 Thuis plicate western redeader	40.3 L	( <del></del>
17 Acel neidreichli	Baikan maple	11.0 1	79 Calpinus betulus	European normbeam	12.5 IVI	139	Crataegus monogyna	English hawthorn, common	13 S	203 Thuja piicata western redicedar	1.3 L	
18 Thuja piicata		13.0 L	80 Thuja piicata	inconce coder	δ L 25 I	140	Pseudotsuga menziesi	i Douglas-fir	48.8 L	204 Pseudotsuga menziasii Douglas-III	45.3 L	
19 Chamaecypans obtu		0 L	81 Calocedrus decurrens	incense cedar	20 L	141	Thuja plicata	western redcedar	4.9 L	205 Pseudolsuga Menziesii Dougias-III	44.1 L	
20 Carpinus betulus	European nornbeam		82 Calocedrus decurrens	Incense cedar	25 L	142	Acer saccharum	sugar maple	4.9 L	206 Prunus sargentii Sargentis cherry	3.4 5	
	western reacedar	8 L	84 Acer platanoides	Norway maple	ა.Ծ M 17 י	143	Sequoiadendron	giant sequoia	99 L	207 Zeikova serrata Japanese zeikova	13./ IVI	
22 Ables grandis x concolor	Leuteneggeri nybrid fir	23.8 5	84 Acer macrophyllum	biglear maple	1.7 L	144	giganteum	de e deu se de u	27.0	208 Zelkova serrata Japanese zelkova	10.1 M	
23 Seguoia sempervire	as coast redwood	24.6	85 Filia tomentosa	silver linden	63.9 L	144	Cedrus deodara	deodar cedar	37.8 L	209 Zeikova serrata Japanese zeikova	12.5 M	
24 Thuia plicata	western redcedar	23.2	86 Crataegus monogyna	English nawthorn, common	20.4 5	145	Cedrus deodara	deodar cedar	40.7 L	210 Pseudotsuga menziesii Douglas-tir	24.7 L	
25 Acer campestre	hedge maple	5 M	87 Sequoladendron giganteum	giant sequoia	I L	146	Sequoladendron	giant sequoia	22.4 L	211 Pseudotsuga menziesii Douglas-tir	34.4 L	
26 Tilia tomentosa	silver linden	40.5 L	88 Cedrus deodara	deodar cedar	23 L	147	Sequoiadendron	giant seguoia	31.6	212 Pseudotsuga menziesii Douglas-tir	47.4 L	
27 Acer macrophyllum	bigleaf maple	15 1	89 Cedrus deodara	deodar cedar	31 1	,	giganteum	giant sequela	51.0 L	213 Pseudotsuga menziesii Douglas-tir	30.8 L	
28 Acer macrophyllum	bigleaf maple	17 1	90 Cedrus deodara	deodar cedar	31.9 I	148	Cedrus deodara	deodar cedar	21.6 L	214 Zelkova serrata Japanese zelkova	10.5 M	Φ
29 Crataegus monogyn	English hawthorn, common	16 S	91 Crataegus monogyna	English hawthorn, common	17.5 S	149	Cedrus deodara	deodar cedar	31 L	215 Pseudotsuga menziesii Douglas-tir	21.8 L	ag ag
30 Cedrus deodara	deodar cedar	39.2	92 Crataegus monogyna	English hawthorn, common	13 S	150	Crataegus monogyna	English hawthorn, common	11 S	216 Quercus rubra northern red oak	30.2 L	
31 Crataegus monogyn	English hawthorn common	22.7 S	93 Pseudotsuga menzies	ii Douglas-fir	54 1	151	Cedrus deodara	deodar cedar	26.2 L	217 Pseudotsuga menziesii Douglas-fir	45.9 L	e e
32 Cedrus deodara	deodar cedar	33 1	94 Malus spp	ornamental crabapple	12.5 \$	152	Malus spp.	ornamental crabapple	15.8 S	218 Acer platanoides Norway maple	14.3 M	ab ab
33 Crataegus monogyn	English hawthorn common	11 7 5	95 Prunus avium	bird cherry	7 M	153	Crataegus monogyna	English hawthorn, common	10.8 S	219 Pseudotsuga menziesii Douglas-fir	33.9 L	
34 Cedrus deodara	deodar cedar	35.7	96 Crataegus monogyna	English hawthorn, common	15 5	154	Crataegus monogyna	English hawthorn, common	11 S	220 Pseudotsuga menziesii Douglas-fir	69.4 L	
35 Crataegus monogyn	English hawthorn common	18.3 \$	97 Pseudotsuga menzies	ii Douglas-fir	28.8	155	Crataegus monogyna	English hawthorn, common	18.5 S	221 Pseudotsuga menziesii Douglas-fir	23 L	
36 Sequoiadendron	diant sequoia	26	98 Malus spp	ornamental crabapple	10.1 \$	156	Populus nigra	black poplar, Lombardy poplar	17.7 L	222 Pseudotsuga menziesii Douglas-fir	38.4 L	
giganteum	giant sequela	20 2	99 Pseudotsuga menzies	ii Douglas-fir	41.2 1	157	Crataegus monogyna	English hawthorn, common	11.8 S	223 Pseudotsuga menziesii Douglas-fir	36.8 L	
37 Cedrus deodara	deodar cedar	41.1 L	100 Pseudotsuga menzies	ii Douglas-fir	23.5 L	158	Pseudotsuga menziesi	i Douglas-fir	44.5 L	224 Platanus x aceritolia London plane tree	11.2 L	
38 Acer macrophyllum	bigleaf maple	36.7 L	101 Prunus serrulata	lapanese flowering cherry	32.4 S	159	Ostrya virginiana	American hophornbeam	2.5 M	225 Pseudotsuga menziesii Douglas-tir	32.7 L	
39 Crataegus monogyn	English hawthorn, common	14.3 S	102 Crataegus monogyna	English hawthorn, common	21.2 S	160	Pseudotsuga menziesi	i Douglas-fir	40.6 L	226 Pseudotsuga menziesii Douglas-tir	37.4 L	
40 Salix spp.	willow	19 M	103 Prunus serrulata	Japanese flowering cherry	21 S	161	Pseudotsuga menziesi	i Douglas-fir	56.8 L	227 Thuja plicata western redcedar	3 L	
41 Pseudotsuga menzie	sii Douglas-fir	36 L	104 Prunus serrulata	Japanese flowering cherry	28.7 S	162	Acer macrophyllum	bigleaf maple	28.8 L	228 Pseudotsuga menziesii Douglas-tir	37.1 L	
42 Crataegus monogyn	a English hawthorn, common	25.7 S	105 Prunus serrulata	Japanese flowering cherry	26 S	163	Pseudotsuga menziesi	i Douglas-fir	37.3 L	229 Fagus sylvatica European beech		
43 Crataegus monogyn	a English hawthorn, common	19.8 S	106 Gymnocladus dioica	Kentucky coffeetree	8.3 I	164	Crataegus monogyna	English hawthorn, common	13.6 S	230 Pseudoisuga menziesii Douglas-fir	49.2 L	
44 Malus spp.	ornamental crabapple	12.4 S	107 Prunus serrulata	Japanese flowering cherry	25.2 S	165	Crataegus monogyna	English hawthorn, common	13.1 S	231 Prunus sargentil Sargent's cherry	5.7 S	
45 Crataegus monogyn	a English hawthorn, common	15.5 S	108 Pinus ponderosa	ponderosa pine	17.3 I	166	Crataegus monogyna	English hawthorn, common	19.9 S	232 Fagus sylvatica European beech	20.5 L	
46 Liquidambar styracif	ua sweetgum	13 M	109 Prunus serrulata	Japanese flowering cherry	34.5 S	167	Crataegus monogyna	English hawthorn, common	20.2 S	233 Pseudotsuga menziesii Douglas-fir	48.7 L	
47 Prunus serrulata	Japanese flowering cherry	23.2 S	110 Pinus ponderosa	ponderosa pine	17.6 I	168	Crataegus monogyna	English hawthorn, common	10.3 S	234 Pseudotsuga menziesii Douglas-fir	33 L	
48 Quercus palustris	pin oak	3.3 L	111 Pterocarva spp.	wingnut	2.1 S	169	Pseudotsuga menziesi	i Douglas-fir	34 L	235 Pseudotsuga menziesii Douglas-fir	35 L	
49 Prunus serrulata	Japanese flowering cherry	28.2 S	112 Pseudotsuga menzies	ii Douglas-fir	1 1	170	Crataegus monogyna	English hawthorn, common	18.2 S	236 Pseudotsuga menziesii Douglas-fir	30.5 L	
50 Prunus serrulata	Japanese flowering cherry	22.7 S	113 Pterocarva spp.	wingnut	3.5 S	171	Crataegus monogyna	English hawthorn, common	18.2 S	237 Pseudotsuga menziesii Douglas-fir	31.0 L	
51 Prunus serrulata	Japanese flowering cherry	28.6 S	114 Pseudotsuga menzies	ii Douglas-fir	1.2 I	172	Crataegus monogyna	English hawthorn, common	13.2 S	238 Pseudotsuga menziesii Douglas-fir	43.8 L	
52 Gymnocladus dioica	Kentucky coffeetree	7.6 L	115 Sequoiadendron	giant seguoia	32.3 I	173	Crataegus monogyna	English hawthorn, common	20.4 S	239 Pseudotsuga menziesii Douglas-fir	33.9 L	
53 Prunus serrulata	Japanese flowering cherry	14.7 S	giganteum		L	174	Crataegus monogyna	English hawthorn, common	13.1 S	240 Pseudotsuga menziesii Douglas-fir	40.7 L	
54 Alnus rubra	red alder	12.9 M	116 Sequoiadendron	giant sequoia	30.8 L	175	Pyrus communis	European pear (including	8.1 M	241 Pseudotsuga menziesii Douglas-fir	28.0 L	
55 Pseudotsuga menzie	sii Douglas-fir	1.2 L	giganteum			176	Pseudotsuga menziesi	i Douglas-fir	41.3 L	242 Pseudotsuga menziesii Douglas-fir	4/ L	
56 Styrax japonicus	Japanese snowbell	4 S	117 Pseudotsuga menzies	ii Douglas-fir	15.3 L	177	Pseudotsuga menziesi	i Douglas-fir	37.6 L	243 Pseudotsuga menziesii Douglas-Tir	20.9 L	
57 Sequoiadendron	giant sequoia	29 L	118 Chamaecyparis obtus	a Hinoki falsecypress	4.2 L	178	Pseudotsuga menziesi	i Douglas-fir	34.9 L	244 Pseudotsuga menziesii Douglas-fir	41.3 L	
giganteum			119 Thuja plicata	western redcedar	10.8 L	179	Pseudotsuga menziesi	i Douglas-fir	46.1 L	245 Pseudotsuga menziesii Douglas-fir	39.9 L	
58 Pinus ponderosa	ponderosa pine	14.1 L	120 Chamaecyparis obtus	a Hinoki falsecypress	5 L	180	Prunus sargentii	Sargent's cherry	9.6 S	246 Pseudotsuga menziesii Douglas-fir	19.5 L	
59 Chamaecyparis obtu	sa Hinoki falsecypress	6 L	121 Picea pungens	Colorado blue spruce	5.3 L	181	Pseudotsuga menziesi	i Douglas-fir	44.2 L	247 Pseudotsuga menziesii Douglas-fir	51.5 L	
60 Picea smithiana	Himalayan spruce	7.5 L	122 Acer davidii	snakebark maple	9.2 S	182	Prunus sargentii	Sargent's cherry	2.5 S	248 Pseudotsuga menziesii Douglas-fir	30 L	
61 Acer davidii	snakebark maple	5.8 S	123 Pinus ponderosa	ponderosa pine	25.1 L	183	Prunus sargentii	Sargent's cherry	6 S	249 Acer macrophyllum bigleaf maple	9 L	
62 Acer davidii	snakebark maple	8.3 S	124 Fagus sylvatica	European beech	14 L	184	Pseudotsuga menziesi	i Douglas-fir	49.2 L	200 Acer pairnatum Japanese maple	LU 23-088549 HR DM	, Exhibit A.3

TreeNo Genus species Common Name DBH Size TreeNo Genus species Common Name DBH Size TreeNo Genus species Common Name DBH Size TreeNo Genus species Common Name 215 Alexa advantational adva	DBH Size	
251 Platanus x acerirolia London plane tree 19.5 L 315 Ainus rubra red alder 11.6 M 379 Pseudotsuga menziesii Douglas-tir 51.4 L 443 Pseudotsuga menziesii Douglas-tir	33.3 L	
252 Pseudolsuga menziesii Dougias-iii $27.7$ L $310$ Pseudolsuga menziesii Dougias-iii $27.7$ L $300$ Pseudolsuga menziesii Dougias-iii $444$ Pseudolsuga menziesii Dougias-iii $27.7$ L $310$ Pseudolsuga menziesii $27.7$ Pseudolsug	40.3 L	
27.7 E $301$ reductsuga menziesii Douglas-iii $52.5$ E $445$ reductsuga menziesii Douglas-iii $27.7$ E $301$ reductsuga menziesii Douglas-iii $52.5$ E $445$ reductsuga menziesii Douglas-iii $27.7$ E $301$ reductsuga menziesii Douglas-iii $52.5$ E $445$ reductsuga menziesii $52.5$ F $445$ reductsuga menziesii $52.5$	27.3 L	
255 Malus spp or pamental crabapple 8.2 S 319 Pseudotsuga menziesii Douglas-fir 33.4 383 Pseudotsuga menziesii Douglas-fir 44.1 447 Pseudotsuga menziesii Douglas-fir	25.9 L	
256 Pseudotsuga menziesii Douglas-fir 31.6 L 320 Pseudotsuga menziesii Douglas-fir 34.1 L 384 Pseudotsuga menziesii Douglas-fir 37.1 L 448 Pseudotsuga menziesii Douglas-fir	35.4 L	
257 Quercus rubra northern red oak 15.4 L 321 Calocedrus decurrens incense cedar 8.8 L 385 Pseudotsuga menziesii Douglas-fir 39 L 449 Pseudotsuga menziesii Douglas-fir	43.3 L	
258 Pseudotsuga menziesii Douglas-fir 38.8 L 322 Tsuga heterophylla western hemlock 27.7 L 386 Pseudotsuga menziesii Douglas-fir 63 L 450 Pseudotsuga menziesii Douglas-fir	41.7 L	
259 Pseudotsuga menziesii Douglas-fir 35.4 L 323 Thuja plicata western redcedar 12.9 L 387 Betula pendula European white birch 8.5 M 451 Pseudotsuga menziesii Douglas-fir	60.3 L	
260 Pseudotsuga menziesii Douglas-fir 32.2 L 324 Sorbus aucuparia European mountain ash 16.3 S 388 Malus spp. ornamental crabapple 7.1 S 452 Pseudotsuga menziesii Douglas-fir	7.4 L	
261 Pseudotsuga menziesii Douglas-fir 27.7 L 325 Pseudotsuga menziesii Douglas-fir 39.7 L 389 Pseudotsuga menziesii Douglas-fir 41 L 453 Pseudotsuga menziesii Douglas-fir	31.6 L	
262 Pseudotsuga menziesii Douglas-fir 53 L 326 Pseudotsuga menziesii Douglas-fir 39.7 L 390 Pseudotsuga menziesii Douglas-fir 43.5 L 454 Pseudotsuga menziesii Douglas-fir	40.6 L	<b>t</b>
263 Pseudotsuga menziesii Douglas-fir 44.7 L 327 Pseudotsuga menziesii Douglas-fir 39.1 L 391 Pseudotsuga menziesii Douglas-fir 41.3 L 455 Crataegus monogyna English hawthorn, common	17.5 S	
264 Pseudotsuga menziesii Douglas-fir 44.2 L 328 Sorbus aucuparia European mountain ash 9.8 S 392 Quercus rubra northern red oak 22.1 L 456 Pseudotsuga menziesii Douglas-fir	39.9 L	$ $ $\forall$
265 Pseudotsuga menziesii Douglas-fir 30 L 329 Pseudotsuga menziesii Douglas-fir 50 L 393 Malus spp. ornamental crabapple 9.5 S 457 Pseudotsuga menziesii Douglas-fir	34.2 L	
266 Pseudotsuga menziesii Douglas-fir 35.9 L 330 Acer macrophyllum bigleaf maple 48 L 394 Fagus sylvatica European beech 22.6 L 458 Pseudotsuga menziesii Douglas-fir	54 L	
267 Pseudotsuga menziesii Douglas-fir 40.8 L 331 Pseudotsuga menziesii Douglas-fir 39.3 L 395 Juglans regia English walnut 9.4 L 459 Pseudotsuga menziesii Douglas-fir	21.7 L	
268 Pseudotsuga menziesii Douglas-fir 30.2 L 332 Pseudotsuga menziesii Douglas-fir 28.2 L 396 Fagus sylvatica European beech 17.6 L 460 Pseudotsuga menziesii Douglas-fir	54.8 L	
269 Pseudotsuga menziesii Douglas-tir 36.2 L 333 Pseudotsuga menziesii Douglas-tir 39.8 L 397 Fagus sylvatica European beech 13.4 L 461 Pseudotsuga menziesii Douglas-tir	50.3 L	
270 Pseudotsuga menziesii Douglas-Tir 36.3 L 334 Acer macrophyllum biglear mapie 56.5 L 398 Pseudotsuga menziesii Douglas-Tir 40 L 462 Picea pungens Colorado biue spruce	10 L	
271 rseudotsuga menziesii. Douglas-Tir 38.8 L. 399 rseudotsuga menziesii. Douglas-Tir 29.1 L. 463 rseudotsuga menziesii. Douglas-Tir 37.5 L. 400 Potula pondula. European white hireh 15.1 M. 464. Decudotsuga menziesii. Douglas fir	44.7 L 20.2 I	
272 i securicizuga menziesii. Douglas-iii 47.3 L 330 i securicizuga menziesii. Douglas-iii 27.3 L 400 becula pendula European white hirch 23.7 M 465 Becudotsuga menziesii. Douglas fir	27.2 L 30.0 I	
274 Pseudotsuga menziesii Douglas-fir $34.6$   $338$ Pseudotsuga menziesii Douglas-fir $21.1$ $402$ Pseudotsuga menziesii Douglas-fir $55.1$   $466$ Pseudotsuga menziesii Douglas-fir	27.4 L	
274 Pseudotsuga menziesii Douglas-iii $34.0$ $1$ $350$ Pseudotsuga menziesii Douglas-iii $2.1$ $1$ $402$ Pseudotsuga menziesii Douglas-iii $35.1$ $1$ $400$ Pseudotsuga menziesii Douglas-iii $32.1$ $1$ $400$ Pseudotsuga menziesii $32.1$ $1$ $1$ $1$ $1$ $1$ $1$ $1$ $1$ $1$	27.4 L 40 l	
275 Malus spp or pamental crabapple 5.2 S 340 Pseudotsuga menziesii Douglas-fir 35.5 L 404 Acer circinatum vine maple 9.2 S 468 Pseudotsuga menziesii Douglas-fir	55.1	
277 Pseudotsuga menziesii Douglas-fir 26 L 341 Crataegus monogyna English hawthorn, common 7.1 S 405 Pseudotsuga menziesii Douglas-fir 30.2 L 469 Prunus avium bird cherry	15.7 M	
278 Pseudotsuga menziesii Douglas-fir 41.9 L 342 Pseudotsuga menziesii Douglas-fir 39.5 L 406 Pseudotsuga menziesii Douglas-fir 23.2 L 470 Pseudotsuga menziesii Douglas-fir	29.6 L	5 OC
279 Betula papyrifera paper birch 5.7 M 343 Pseudotsuga menziesii Douglas-fir 50.6 L 407 Prunus avium bird cherry 11.6 M 471 Pseudotsuga menziesii Douglas-fir	44.2 L	ge D
280 Malus fusca Pacific crabapple 6.9 S 344 Pseudotsuga menziesii Douglas-fir 24.5 L 408 Pseudotsuga menziesii Douglas-fir 35.4 L 472 Pseudotsuga menziesii Douglas-fir	30.8 L	
281 Pseudotsuga menziesii Douglas-fir 37.6 L 345 Pseudotsuga menziesii Douglas-fir 40.5 L 409 Prunus serrula paperbark cherry, birchbark 17 S 473 Pseudotsuga menziesii Douglas-fir	59.5 L	
282 Tsuga heterophylla western hemlock 34.2 L 346 Pseudotsuga menziesii Douglas-fir 40.4 L 410 Prunus serrula paperbark cherry, birchbark 22.3 S 474 Pseudotsuga menziesii Douglas-fir	49.2 L	
283 Alnus rubra red alder 12 M 347 Pseudotsuga menziesii Douglas-fir 37.4 L 411 Prunus serrula paperbark cherry, birchbark 19.3 S 475 Pseudotsuga menziesii Douglas-fir	35.3 L	$ \sum_{a}  $
284 Pseudotsuga menziesii Douglas-fir 29.7 L 348 Pseudotsuga menziesii Douglas-fir 31.4 L 412 Pseudotsuga menziesii Douglas-fir 40.6 L 476 Acer macrophyllum bigleaf maple	27.8 L	
285 Pseudotsuga menziesii Douglas-fir 35.8 L 349 Pseudotsuga menziesii Douglas-fir 48 L 413 Pseudotsuga menziesii Douglas-fir 38.4 L 477 Pseudotsuga menziesii Douglas-fir	45.7 L	
286 Pseudotsuga menziesii Douglas-fir 27.6 L 350 Picea pungens Colorado blue spruce 7.7 L 414 Pseudotsuga menziesii Douglas-fir 33.3 L 478 Pseudotsuga menziesii Douglas-fir	55.1 L	
287 Pseudotsuga menziesii Douglas-fir 42.9 L 351 Pseudotsuga menziesii Douglas-fir 45 L 415 Pseudotsuga menziesii Douglas-fir 35.7 L 479 Pseudotsuga menziesii Douglas-fir	30.9 L	
288 Fagus grandifolia American beech 41.9 L 352 Malus spp. ornamental crabapple 9.6 S 416 Pseudotsuga menziesii Douglas-fir 51.4 L 480 Pseudotsuga menziesii Douglas-fir	41.9 L	
289 Pseudotsuga menziesii Douglas-fir 23.7 L 353 Pseudotsuga menziesii Douglas-fir 39 L 417 Malus spp. ornamental crabapple 9 S 481 Pseudotsuga menziesii Douglas-fir	39 L	
290 Pseudotsuga menziesii Douglas-fir 36.7 L 354 Betula pendula European white birch 17.7 M 418 Pseudotsuga menziesii Douglas-fir 35.4 L 482 Pseudotsuga menziesii Douglas-fir	37.4 L	
291 Pseudotsuga menziesii Douglas-fir 32.6 L 355 Pseudotsuga menziesii Douglas-fir 45.9 L 419 Prunus serrulata Japanese flowering cherry 9.8 S 483 Pseudotsuga menziesii Douglas-fir	53.2 L	
292 Pseudotsuga menziesii Douglas-tir 45.9 L 356 Betula pendula European white birch 15.7 M 420 Picea abies Norway spruce 19 L 484 Pseudotsuga menziesii Douglas-tir	35.7 L	
293 Pseudotsuga menziesii Dougias-IIr 40.9 L 357 Pseudotsuga menziesii Dougias-IIr 37.3 L 421 Picea ables Norway spruce 14.5 L 485 Pseudotsuga menziesii Dougias-IIr	38.6 L	
294 Pseudotsuga menziesii Douglas-III $50.4$ L $358$ Pseudotsuga menziesii Douglas-III $53.8$ L $422$ Betula pendula European white birch $20.8$ M $486$ Pseudotsuga menziesii Douglas-III	27.4 L	
270 i seudolsuga menziesii. Douglas-iii 2000 40 L 307 i seudolsuga menziesii. Douglas-iii 10.1 L 420 i seudolsuga menziesii. Douglas-iii 40 L 407 Pseudolsuga menziesii. Douglas-iii 2000 40 L 407 Pseudolsuga 40 L 407 Pseudol	20.0 L 513 I	
	32 1	
298 Pseudotsuga menziesii Douglas-fir 36.1 L 426 Pseudotsuga menziesii Douglas-fir 43.1 L 490 Pseudotsuga menziesii Douglas-fir	22 L	
299 Pseudotsuga menziesii Douglas-fir 34.2 L 363 Pseudotsuga menziesii Douglas-fir 30.5 L 427 Pseudotsuga menziesii Douglas-fir 26.5 L 491 Pseudotsuga menziesii Douglas-fir	58 L	
300 Pseudotsuga menziesii Douglas-fir 36.4 L 364 Pseudotsuga menziesii Douglas-fir 41.9 L 428 Pseudotsuga menziesii Douglas-fir 45.9 L 492 Pseudotsuga menziesii Douglas-fir	33 L	
301 Pseudotsuga menziesii Douglas-fir 31.7 L 365 Magnolia spp. magnolia 13.1 S 429 Pseudotsuga menziesii Douglas-fir 42.6 L 493 Pseudotsuga menziesii Douglas-fir	26.8 L	
302 Pseudotsuga menziesii Douglas-fir 54.4 L 366 Picea abies Norway spruce 15.7 L 430 Pseudotsuga menziesii Douglas-fir 25.8 L 494 Acer macrophyllum bigleaf maple	56.3 L	
303 Pseudotsuga menziesii Douglas-fir 40.1 L 367 Picea abies Norway spruce 17.9 L 431 Pseudotsuga menziesii Douglas-fir 41.1 L 495 Pseudotsuga menziesii Douglas-fir	26.2 L	
304 Pseudotsuga menziesii Douglas-fir 34.5 L 368 Pseudotsuga menziesii Douglas-fir 56.4 L 432 Acer macrophyllum bigleaf maple 11.3 L 496 Pseudotsuga menziesii Douglas-fir	19 L	
305 Tsuga heterophylla western hemlock 29.4 L 369 Pseudotsuga menziesii Douglas-fir 50.5 L 433 Pseudotsuga menziesii Douglas-fir 37.3 L 497 Pseudotsuga menziesii Douglas-fir	46.4 L	
306 Pseudotsuga menziesii Douglas-fir 26.5 L 370 Malus spp. ornamental crabapple 6.6 S 434 Pseudotsuga menziesii Douglas-fir 24.6 L 498 Acer macrophyllum bigleaf maple	34.8 L	
307 Pseudotsuga menziesii Douglas-fir 23 L 371 Acer macrophyllum bigleaf maple 39.8 L 435 Pseudotsuga menziesii Douglas-fir 34.3 L 499 Pseudotsuga menziesii Douglas-fir	34.7 L	
308 Pseudotsuga menziesii Douglas-fir 29.8 L 372 Acer macrophyllum bigleaf maple 37.1 L 436 Acer macrophyllum bigleaf maple 5.3 L 500 Pseudotsuga menziesii Douglas-fir	49.8 L	
309 Malus spp. ornamental crabapple 5.6 S 373 Pseudotsuga menziesii Douglas-fir 32.9 L 437 Pseudotsuga menziesii Douglas-fir 20.1 L 501 Pseudotsuga menziesii Douglas-fir	52.6 L	
310       Malus spp.       ornamental crabapple       4.4       S       374       Pseudotsuga menziesii       Douglas-fir       30.9       L       438       Acer macrophyllum       bigleaf maple       52.4       L       502       Pseudotsuga menziesii       Douglas-fir	36.7 L	
311       Pseudotsuga menziesii       Douglas-fir       28.9       L       375       Magnolia spp.       magnolia       7.3       S       439       Acer macrophyllum       bigleaf maple       41       L       503       Pseudotsuga menziesii       Douglas-fir	30.8 L	
312       Pseudotsuga menziesii       Douglas-fir       49.4       L       440       Pseudotsuga menziesii       Douglas-fir       28.9       L       504       Pseudotsuga menziesii       Douglas-fir	27.1 L	
313       Pseudotsuga menziesii       Douglas-fir       56.8       L       441       Pseudotsuga menziesii       Douglas-fir       57.8       L       505       Acer macrophyllum       bigleaf maple         314       Devedeturga menziesii       Douglas-fir       56.8       L       441       Pseudotsuga menziesii       Douglas-fir       57.8       L       505       Acer macrophyllum       bigleaf maple         314       Devedeturga menziesii       Douglas-fir       56.8       L       442       Devedeturga menziesii       Douglas-fir       57.8       L       505       Acer macrophyllum       bigleaf maple	66.7 L	
314 Pseudotsuga menziesii Douglas-tir 41.2 L 378 Pseudotsuga menziesii Douglas-tir 49 L 442 Pseudotsuga menziesii Douglas-tir 51 L 506 Pseudotsuga menziesii Douglas-fir	3-088549 HR DM	Exhibit A 3

TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Na	ime DBH Size	TreeNo Genus species Common Name	DBH Size	
507 Pseudotsuga menziesii Douglas-fir	30.5 L	570 Pseudotsuga menziesii Douglas-fir	32.1 L	633 Pseudotsuga menziesii Douglas-fir	24.3 L	696 Pseudotsuga menziesii Douglas-fir	42.9 L	
508 Pseudotsuga menziesii Douglas-fir	31.4 L	571 Pseudotsuga menziesii Douglas-fir	37.6 L	634 Fraxinus latifolia Oregon ash	9.4 M	697 Robinia pseudoacacia black locust	7.5 M	
509 Pseudotsuga menziesii Douglas-fir	58 L	572 Pseudotsuga menziesii Douglas-fir	25.1 L	635 Pseudotsuga menziesii Douglas-fir	34.9 L	698 Robinia pseudoacacia black locust	7.5 M	
510 Pseudotsuga menziesii Douglas-fir	20.2 L	573 Pseudotsuga menziesii Douglas-fir	31.4 L	636 Pseudotsuga menziesii Douglas-fir	39.6 L	699 Pseudotsuga menziesii Douglas-fir	52.8 L	
511 Pseudotsuga menziesii Douglas-fir	30 L	574 Pseudotsuga menziesii Douglas-fir	20.2 L	637 Pseudotsuga menziesii Douglas-fir	40.2 L	700 Thuja plicata western redcedar	33.7 L	
512 Pseudotsuga menziesii Douglas-fir	49.8 L	575 Crataegus monogyna English hawthorn, common	14.3 S	638 Pseudotsuga menziesii Douglas-fir	39.8 L	701 Pseudotsuga menziesii Douglas-fir	37.5 L	
513 Pseudotsuga menziesii Douglas-fir	31.6 L	576 Pseudotsuga menziesii Douglas-fir	28.5 L	639 Pseudotsuga menziesii Douglas-fir	31.9 L	702 Pseudotsuga menziesii Douglas-fir	35.7 L	
514 Pseudotsuga menziesii Douglas-fir	22.1	577 Acer macrophyllum bigleaf maple	5.8 L	640 Pseudotsuga menziesii Douglas-fir	39.2 L	703 Pseudotsuga menziesii Douglas-fir	37.2 L	
515 Pseudotsuga menziesii Douglas-fir	27.2	578 Pseudotsuga menziesii Douglas-fir	18.1	641 Pseudotsuga menziesii Douglas-fir	40.2	704 Pseudotsuga menziesii Douglas-fir	45.8	
516 Pseudotsuga menziesii Douglas-fir	22.2	579 Pseudotsuga menziesii Douglas-fir	40 1	642 Pseudotsuga menziesii Douglas-fir	50.9 L	705 Corpus spp dogwood	15 S	
517 Pseudotsuga menziesii Douglas-fir	33.7 1	580 Pseudotsuga menziesii Douglas-fir	24.3	643 Acer macrophyllum bigleaf maple	46.7	706 Acer macronhyllum bigleaf manle	79	Ō
518 Pseudotsuga menziesii Douglas-fir	30.1	581 Pseudotsuga menziesii Douglas-fir	32.7 1	644 Prunus cerasifera flowering plu	n 11.1 S	707 Pseudotsuga menziesii Douglas-fir	41.4	t
510 Pseudotsuga menziesii Douglas-fir	33.2 1	582 Pseudotsuga menziesii Douglas-fir	38.4	645 Pseudotsuga menziesii Douglas-fir	43.6	708 Pseudotsuga menziesii Douglas-fir	31.6	
520 Pseudotsuga menziesii Douglas-fir	27 / I	583 Pseudotsuga menziesii Douglas fir	36.4	646 Acer macrophyllum bigleaf maple	36.9	709 Pseudotsuga menziesii Douglas fir	25.8	e
520 Fiseudotsuga menziesii Douglas-fii	27.4 L 25 l	505 Fiseudotsuga menziesii Douglas fir	25.5 L	647 Acer macrophyllum bigleaf maple	22.8	710 Pseudotsuga menziesii Douglas fir	23.0 L	>
521 Pseudotsuga menziesii Douglas-III	35 L	504 Eseudotsuga menziesii Douglas fir	30.0 L	649 Acer macrophyllum bigleaf maple	10 L	710 Fisculatsuga menziesii Douglas fir	20 0 I	D
522 Pseudotsuga menziesii Douglas fir	17.3 L	565 Pseudotsuga menziesii Douglas fir	29.2 L	640 Illmus v olm bybrid	10 L	711 - Fseudotsuga menziesii - Douglas fir	30.7 L	—
523 Pseudotsuga menziesii Douglas-III	40.3 L	580 Pseudotsuga menziesii Douglas-III	32.1 L	450 Liquidambar styraciflua, sweetqum	75 M	712 Pseudotsuga menziesii Douglas fir	27.4 L	
524 Pseudotsuga menziesii Douglas-III	42.2 L	587 Pseudotsuga menziesii Douglas-III	38.4 L	451 Decudetourse menzicali Decudes fin	7.3 IVI	713 Pseudolsuga menziesii Douglas-m	29.4 L	Û
525 Pseudotsuga menziesii Douglas-III	37.2 L	588 Pseudotsuga menziesii. Douglas-III	39.2 L	452 Drumus servilete	47.0 L	714 Acei circinatum vine mapie	0.2 3	Ĥ
526 Pseudotsuga menziesii Douglas-III	34.8 L	589 Pseudotsuga menziesii. Douglas-III	34.1 L	452 Provideteuro menzicali Develes fin	vering cherry 25 5	715 Pseudotsuga menziacii Douglas-fii	33.7 L	Ē
527 Pseudotsuga menziesii Douglas-Tir	∠3.4 L	590 Pseudotsuga menziesii Douglas-fir	24.0 L	653 Pseudolsuga menziesii Dougias-Tir	45.2 L	710 Pseudotsuga manziasii Douglas-IIF	27.7 L	
528 Pseudotsuga menziesii Douglas-fir	33.3 L	591 Pseudotsuga menziesii Douglas-tir	27.4 L	654 Prunus serrulata Japanese nov	vering cherry 25 S	717 Pseudotsuga menziesii Douglas-fir	47.3 L	$\mathbf{X}$
529 Pseudotsuga menziesii Douglas-fir	35.1 L	592 Pseudotsuga menziesii Douglas-fir	27.3 L	655 Pseudotsuga menziesii Douglas-fir	32 L	718 Platanus x acerifolia London plane tree	9.6 L	JL
530 Pseudotsuga menziesii Douglas-fir	22.6 L	593 Pseudotsuga menziesii Douglas-fir	29.2 L	656 Pseudotsuga menziesii Douglas-fir	32 L	719 Platanus x aceritolia London plane tree	14.1 L	
531 Pseudotsuga menziesii Douglas-fir	35.5 L	594 Pseudotsuga menziesii Douglas-tir	39 L	657 Pseudotsuga menziesii Douglas-fir	62.1 L	720 Pseudotsuga menziesii Douglas-fir	48.7 L	
532 Pseudotsuga menziesii Douglas-fir	33.1 L	595 Pseudotsuga menziesii Douglas-fir	36.6 L	658 Pyrus communis European pea	ir (including 17.9 M	721 Acer macrophyllum bigleat maple	22.7 L	<u> </u>
533 Pseudotsuga menziesii Douglas-fir	43.6 L	596 Pseudotsuga menziesii Douglas-fir	22.4 L	659 Prunus serrulata Japanese flov	vering cherry 8 S	722 Acer macrophylium biglear maple	28 L	0
534 Pseudotsuga menziesii Douglas-fir	20.2 L	597 Pseudotsuga menziesii Douglas-fir	43.8 L	660 Pseudotsuga menziesii Douglas-tir	48.2 L	723 Pseudotsuga menziesii Douglas-Iir	59.3 L	e <b>p</b>
535 Pseudotsuga menziesii Douglas-tir	22.2 L	598 Pseudotsuga menziesii Douglas-Iir	30 L	diganteum	24.5 L	724 Pseudotsuga menziesi Douglas-m	48.9 L	ag ag
536 Pseudotsuga menziesii Douglas-fir	40.8 L	599 Pseudotsuga menziesii Douglas-Iir	22.7 L	662 Thuia nlicata western redo	odar 33.1 l	725 Quercus coccinea scanet dak	9.8 L	
537 Pseudotsuga menziesii Douglas-fir	29.1 L	600 Pseudotsuga menziesii Douglas-Iir	35.8 L	663 Pseudotsuga menziesii Douglas-fir	27.9	726 Acer macrophylium biglear maple	21.7 L	
538 Pseudotsuga menziesii Douglas-tir	27.8 L	601 Pseudotsuga menziesii Douglas-fir	35.1 L	664 Prunus serrulata lapanese flov	vering cherry 17.7 S	727 Liquidambar styracinual sweetgum	/ WI	//I
539 Pseudotsuga menziesii Douglas-tir	28.5 L	602 Pseudotsuga menziesii Douglas-fir	34 L	665 Prunus serrulata Japanese flov	vering cherry 27.4 S	728 Pseudotsuga menziesii Douglas-Iir	40.5 L	$\neg$
540 Pseudotsuga menziesii Douglas-III	25.7 L	603 Pseudotsuga menziesii. Douglas-III	10.3 L	666 Amelanchier spp. serviceberry	2.5 S	729 Pseudolsuga menziesii Douglas-m	40 L	
541 Pseudotsuga menziesii. Douglas-III	20.7 L	604 Pseudotsuga menziesii Douglas-III	18.5 L	667 Pseudotsuga menziesii Douglas-fir	51.9 L	730 Prunus seriulata Japanese nowening cherry	21.3 S	
542 Pseudotsuga menziesii Douglas-III	30 L	605 Pseudotsuga menziesii Douglas-III	23 L	668 Amelanchier spp. serviceberry	1.6 S	731 Pseudotsuga menziecii Douglas fir	54 L	
544 Pseudotsuga monziosii Douglas fir	10.0 L	607 - Recudotsuga menziesii - Douglas fir	20.4 L	669 Pseudotsuga menziesii Douglas-fir	37.1 L	732 Pseudotsuga menziesii Douglas-fir	25.5 L	
544 Escudotsuga monziosii Douglas fir	43.0 L	609 - Recudotsuga menziesii - Douglas fir	27.2 L	670 Pseudotsuga menziesii Douglas-fir	48.4 L	734 Magnolia spn magnolia	20.5 E	
545 Escudotsuga monziosii Douglas fir	20.3 L	600 Escudotsuga menziesii Douglas fir	20 L	671 Pseudotsuga menziesii Douglas-fir	36.7 L	735 Pohinia pseudoacacia black locust	20 5 75 M	
540 Escudotsuga monziosii Douglas fir	27.4 L	610 - Recudotsuga menziesii - Douglas fir	3.7 L	672 Pseudotsuga menziesii Douglas-fir	38.1 L	736 Pseudotsuga menziesii Douglas-fir	7.5 Wi	
547 Fiseudotsuga menziesii Douglas-fir	23.0 L	611 - Recudotsuga monziosii - Douglas fir	40.0 L	673 Pseudotsuga menziesii Douglas-fir	30.1 L	737 Pseudotsuga menziesii Douglas fir	52 L	
540 Pseudotsuga monziosii Douglas fir	10.6 L	612 Pseudotsuga menziesii Douglas-fir	28 I	674 Pseudotsuga menziesii Douglas-fir	26.7 L	738 Pseudotsuga menziesii Douglas-fir	48.2	
547 Fiseudotsuga menziesii Douglas-fii	17:0 L	612 Acer circinatum vine manle	50 E	675 Pseudotsuga menziesii Douglas-fir	1.1 L	739 Pseudotsuga menziesii Douglas fir	39.6	
550 Fseudotsuga menziesii Douglas-fii	37.2 L	614 Psoudotsuga monziosii Douglas fir	3.2 3 27.0 I	676 Arbutus menziesii Pacific madro	ne 1 M	740 Pseudotsuga menziesii Douglas fir	37.0 L 32.0 I	
551 Pseudotsuga menziesii Douglas fir	34.7 L	615 - Decudotsuga menziesii - Douglas fir	21 L	677 Pseudotsuga menziesii Douglas-fir	52.9 L	740 Tseudotsuga menziesii Douglas-iii	32.7 L	
552 Pseudotsuga menziesii Douglas-III	43.0 L	615 Escudotsuga menziesii Douglas fir	31 L 270 I	678 Pseudotsuga menziesii Douglas-fir	44.3 L	741 Fisculotsuga menziesii Douglas fir	31.7 L	
554 Decudotsuga monziosii Douglas fir	20.7 L	617 - Pseudotsuga menziesii - Douglas fir	28.7 I	679 Pseudotsuga menziesii Douglas-fir	31.7 L	743 Acer marrophyllum higlaaf manla		
554 Fseudotsuga menziesii Douglas-fii	34.7 L	619 - Recudotsuga monziosii - Douglas fir	20.7 L	680 Pseudotsuga menziesii Douglas-fir	33.1 L	744 Psoudotsuga monziosii Douglas fir	24.4	
555 Pseudotsuga menziesii Douglas fir	20.3 L	610 Escudotsuga menziesii Douglas fir	34.2 L	681 Pseudotsuga menziesii Douglas-fir	47.1 L	744 Eseudolsuya menziesi Douglas-m	54.4 L	
556 Pseudotsuga menziesii Douglas-III	17.7 L	619 Pseudotsuga menziesii Douglas-III	27.0 L	682 Pseudotsuga menziesii Douglas-fir	23.5 L	745 Solbus aucuparia European mountain asin	5.5 S	
557 Pseudotsuga menziesii Douglas-III	23.6 L	621 Decudetouga menziesii Deuglas fir	34.5 L	683 Pseudotsuga menziesii Douglas-fir	29.2 L	740 Fiseudotsuga menziesii Douglas fir	30.7 L	
556 Pseudotsuga menziesii Douglas fir	40.4 L	621 Pseudotsuga menziesii Douglas-III	29.2 L	684 Pinus sylvestris Scots pine	15.5 L	747 Escudotsuga menziesii Douglas fir	31.1 L	
539 Pseudotsuga menziesii. Douglas-III	21.7 L	622 Aser einingtum ving manla	50.1 L	685 Cupressus nootkatensis Alaska vellow	-cedar 17.5 M	740 Procudotsuga menziecii Douglas fir	40.4 L	
500 Pseudotsuga menziesii Douglas fir	42.7 L	623 Acel circinatum vine mapie	0.0 J	syn. Xanthocyparis		747 Esecutivisaya menziesii Douglas-m	54.0 L	
562 Regulateura manziasii Dauglas fir	37.1 L 310 I	024 Focuulouya IIICIIZICON Dulyido-III 625 Degudateura manziasii Dauglas fir	30.7 L	nootkatensis		750 Acer circinatum vine maple	0.0 0 31 / I	
562 i seudotsuga menziesii. Douglas fir	31.0 L 27.2 I	626 - Pseudotsuga menziesii - Douglas fir	40 L 346 I	686 Pseudotsuga menziesii Douglas-fir	53.8 L	752 Pseudotsuga menziesii Douglas-fir	48.4 1	
564 Depudotsuga monziosii Douglas fir	21.2 L	627 - Degudatsuga manziasii - Douglas fir	ј4.0 L /2.2 I	687 Acer macrophyllum bigleaf maple	35 L	752 Locar circinatum vine mente	40.4 L 6.2 C	
565 Dseudotsuga menziesii Douglas fir	27.7 L	628 - Degudatsuga manziasii - Douglas fir	4-5.5 L 21.6 I	688 Pseudotsuga menziesii Douglas-fir	28.8 L	753 Acel circinatum vine maple	0.2 J	
566 Depudotsuga monziosii Douglas fin	24.0 L	620 I seudolsuga menziesii Douglas fir	18 / I	689 Crataegus monogyna English hawth	norn, common 22.6 S	755 - Degudotsuga menziesii - Douglas fir	22.0 L 13.7 I	
500 r seudotsuga menziosii. Douglas fir	23.4 L 36.0 I	627 i seudoisuga menziesii. Douglas fir	40.4 L 200 I	690 Pseudotsuga menziesii Douglas-fir	54.3 L	755 Fravinus latifolia Oregon ach	+3.7 L 70 M	
568 Decudotsuga menziosii Douglas fir	30.0 L	631 Pseudotsuga menziesii Douglas fir	32.2 L 24.2 I	691 Pseudotsuga menziesii Douglas-fir	41.7 L	750 Frannus latitulia Vieguil astr 757 - Degudotsuga monziosii - Douglas fir	/.7 IVI ДБ 1 I	
500 rseudotsuga menziasii. Douglas fir	20.0 L	632 - Pseudotsuga menziesii - Douglas-fir	27.2 L 27 I	692 Pseudotsuga menziesii Douglas-fir	58.9 L	757 Escudotsuga menziesii Douglas fir	40.1 L 22.7 I	
507 i seudoisuga (iteriziesii Douglas-III	41 L	ooz i seudoisuga menziesii Dougids-III	2.7 L	693 Pseudotsuga menziesii Douglas-fir	62.1 L	759 Pseudotsuga menziesii Douglas-fir	35.7 L 35.6 I	
				694 Prunus serrulata Japanese flov	vening cherry 8.9 S	LU	23-088549 HR DM	, Exhibit A.3

TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	
760 Pseudotsuga menziesii Douglas-fir	56.4 L	822 Pseudotsuga menziesii Douglas-fir	3.7 L	884 Pseudotsuga menziesii Douglas-fir	51.6 L	946 Pseudotsuga menziesii Douglas-fir	26 L	
761 Pseudotsuga menziesii Douglas-fir	48.6 L	823 Sequoiadendron giant sequoia	35 L	885 Liriodendron tulipifera tuliptree	9.5 L	947 Pseudotsuga menziesii Douglas-fir	36.4 L	
762 Pseudotsuga menziesii Douglas-fir	40.2 L	giganteum		886 Pseudotsuga menziesii Douglas-fir	51.5 L	948 Pseudotsuga menziesii Douglas-fir	37.3 L	
763 Sequoiadendron giant sequoia	3.7 L	824 Sequoladendron glant sequola	28.8 L	887 Pseudotsuga menziesii Douglas-fir	25.2 L	949 Cedrus atlantica blue Atlas cedar	34.8 L	
giganteum		825 Pseudotsuga menziesii Douglas-fir	26.6	888 Aesculus common horsechestnut	28 L	'Glauca'		
764 Acer macrophyllum bigleaf maple	39.1 L	826 - Recudotsuga menziesii - Douglas fir	20.0 L 27.3 I	hippocastanum		950 Pseudotsuga menziesii Douglas-fir	34.2 L	
765 Acer macrophyllum bigleaf maple	32 L	927 - Recudotsuga monziosii - Douglas fir	40 L	889 l'ilia tomentosa silver linden	39.6 L	951 Chamaecyparis Port Orford cedar	35 L	
766 Prunus cerasifera flowering plum	19.7 S	827 Pseudotsuga menziesii Douglas-III	40 L	890 Juglans nigra black walnut	38.4 L	052 Decudateura monziecii Dourdes fir	20.4	
767 Acer macrophyllum bigleaf maple	29 L	828 Pseudotsuga menziesii Douglas fir	9.5 L	891 Pseudotsuga menziesii Douglas-fir	33.5 L	952 Pseudotsuga menziesii Douglas-III	30.0 L	
768 Sequoia sempervirens coast redwood	31 L	829 Pseudotsuga menziesii Douglas fir	30.1 L	892 Pseudotsuga menziesii Douglas-fir	33 L	955 Pseudotsuga menziesii Douglas-III	30.4 L	
769 Pseudotsuga menziesii Douglas-fir	50.7 L	830 Pseudotsuga menziesii Douglas-Iir	23.5 L	893 Pseudotsuga menziesii Douglas-fir	52 L	954 Pseudotsuga menziesii Douglas-Iir	49.5 L	
770 Pseudotsuga menziesii Douglas-fir	44.6 L	831 Pseudotsuga menziesii Douglas-Iir	30.9 L	894 Pseudotsuga menziesii Douglas-fir	16.3 L	955 Pseudotsuga menziesii Douglas-Iir	30.4 L	
771 Liquidambar styraciflua sweetgum	6.7 M	832 Pseudotsuga menziesii Douglas-tir	41 L	895 Pseudotsuga menziesii Douglas-fir	31.3 L	956 Pseudotsuga menziesii Douglas-fir	19.6 L	
772 Pseudotsuga menziesii Douglas-fir	42.2 L	833 Pseudotsuga menziesii Dougias-tir	43.5 L	896 Pseudotsuga menziesii Douglas-fir	42.6 L	957 Pseudotsuga menziesii Douglas-fir	27.8 L	
773 Prunus serrulata Japanese flowering cherry	18 S	834 Aesculus common horsechestnut	35.4 L	897 Pseudotsuga menziesii Douglas-fir	48.9 L	958 Pseudotsuga menziesii Douglas-fir	29.5 L	2
774 Pseudotsuga menziesii Douglas-fir	36.9 L	925 Erovinus latifalia Oragon ash	20 F M	898 Pinus ponderosa ponderosa pine	4.6 L	959 Pseudotsuga menziesii Douglas-fir	41.4 L	
775 Prunus serrulata Japanese flowering cherry	20.5 S	924 Acor macronbullum bigloof monto	20.5 1	899 Pinus ponderosa ponderosa pine	3.8 L	960 Cornus nuttallii Pacific dogwood	4.7 M	—
776 Pseudotsuga menziesii Douglas-fir	36.6 L	030 Acel Inaciophyliani bigleal maple	32.5 L	900 Pinus ponderosa ponderosa pine	2 L	961 Pseudotsuga menziesii Douglas-fir	26.5 L	
777 Pseudotsuga menziesii Douglas-fir	46.5 L	037 Pseudotsuga menziesii Douglas-IIr	31.1 L	901 Pseudotsuga menziesii Douglas-fir	39.4 L	962 Pinus ponderosa ponderosa pine	3.9 L	L Ū
778 Robinia pseudoacacia black locust	7.5 M	838 Pseudotsuga menziesii Douglas-fir	37.2 L	902 Pseudotsuga menziesii Douglas-fir	37.4 L	963 Pseudotsuga menziesii Douglas-fir	33.5 L	Ľ.
779 Robinia pseudoacacia black locust	7.5 M	839 Pseudotsuga menziesii Douglas-fir	24.3 L	903 Pseudotsuga menziesii Douglas-fir	34.8 L	964 Pseudotsuga menziesii Douglas-fir	41.4 L	
780 Pseudotsuga menziesii Douglas-fir	2.1 L	840 Pseudotsuga menziesii Douglas-fir	31.9 L	904 Pseudotsuga menziesii Douglas-fir	35 L	965 Pseudotsuga menziesii Douglas-fir	25.7 L	
781 Prunus serrulata Japanese flowering cherry	14.8 S	841 Pseudotsuga menziesii Douglas-fir	34.3 L	905 Acer macrophyllum bigleaf maple	31.8 L	966 Pseudotsuga menziesii Douglas-fir	34 L	
782 Pseudotsuga menziesii Douglas-fir	51 L	842 Pseudotsuga menziesii Douglas-fir	24.4 L	906 Pseudotsuga menziesii Douglas-fir	30.8 L	967 Pseudotsuga menziesii Douglas-fir	29.5 L	
783 Amelanchier spp. serviceberry	1.6 S	843 Pseudotsuga menziesii Douglas-fir	44 L	907 Juglans nigra black walnut	41.1 L	968 Pseudotsuga menziesii Douglas-fir	17.4 L	
784 Cornus spp dogwood	13 S	844 Abies grandis grand fir	12.4 L	908 Chamaecyparis obtusa Hinoki falsecypress	18.2	969 Pseudotsuga menziesii Douglas-fir	33.5 L	
785 Pseudotsuga menziesii Douglas-fir	38.4	845 Pseudotsuga menziesii Douglas-fir	39.4 L	909 Pseudotsuga menziesii Douglas-fir	22.1 1	970 Pseudotsuga menziesii Douglas-fir	38.5 L	
786 Pseudotsuga menziesii Douglas-fir	45.2	846 Pseudotsuga menziesii Douglas-fir	29.4 L	910 Pseudotsuga menziesii Douglas-fir	42.9	971 Pseudotsuga menziesii Douglas-fir	27.5 L	
787 Pseudotsuga menziesii Douglas-fir	34.9	847 Pseudotsuga menziesii Douglas-fir	37.3 L	911 Pseudotsuga menziesii Douglas-fir	3.9 1	972 Pseudotsuga menziesii Douglas-fir	29 L	Φ
788 Pseudotsuga menziesii Douglas-fir	35.1	848 Acer macrophyllum bigleaf maple	11.4 L	912 Pseudotsuga menziesii Douglas-fir	32.2 1	973 Pseudotsuga menziesii Douglas-fir	36 L	ag a
780 Pseudotsuga menziesii Douglas-fir	35.1 L 35.2 I	849 Pseudotsuga menziesii Douglas-fir	24.9 L	912 Pseudotsuga menziesii Douglas-fir	14.7 L	974 Pseudotsuga menziesii Douglas-fir	33.9 L	
700 Recudotsuga monziosii Douglas fir	25.2 L	850 Pseudotsuga menziesii Douglas-fir	43.5 L	914 Decudotsuga monziosii Douglas fir	14.7 L	975 Pseudotsuga menziesii Douglas-fir	32.7 L	e e
701 Decudotouga manziacii Douglas fir	10 E	851 Pseudotsuga menziesii Douglas-fir	40 L	915 Decudotsuga monziosii Douglas fir	20.5 L	976 Pseudotsuga menziesii Douglas-fir	40 L	ab all
791 Pseudotsuga menziesii Douglas-III	19.0 L	852 Pseudotsuga menziesii Douglas-fir	39.2 L	916 Dinus pondorosa pondorosa pino	20 I	977 Acer macrophyllum bigleaf maple	11.3 L	
792 Pseudotsuga menziesii Douglas-III	37.1 L	853 Pseudotsuga menziesii Douglas-fir	41.1 L	910 Finds ponderosa ponderosa pine	2.0 L	978 Pseudotsuga menziesii Douglas-fir	9.7 L	
793 Pseudotsuga menziesii Douglas-fir	37.1 L	854 Quercus palustris pin oak	19.9 L	917 Pseudotsuga menziesii Douglas-III	20.8 L	979 Pseudotsuga menziesii Douglas-fir	32	
794 Ables grandis grand IIr	12.4 L	855 Pseudotsuga menziesii Douglas-fir	27.4 L	918 Pseudotsuga menziesii Douglas-III	44.9 L	980 Pseudotsuga menziesii Douglas-fir	24.6 L	
795 Pseudotsuga menziesii Douglas-fir	68.6 L	856 Pseudotsuga menziesii Douglas-fir	27.6 L	919 Pseudotsuga menziesii Douglas-Iir	37.3 L	981 Pseudotsuga menziesii Douglas-fir	29.3	
796 Pseudotsuga menziesii Douglas-fir	48.1 L	857 Pseudotsuga menziesii Douglas-fir	32.6 L	920 Fraxinus latifolia Oregon ash	26.4 M	982 Pseudotsuga menziesii Douglas-fir	29.8	
797 Pseudotsuga menziesii Douglas-fir	33.4 L	858 Pseudotsuga menziesii Douglas-fir	39.2 L	921 Pseudotsuga menziesii Douglas-fir	42 L	983 Pseudotsuga menziesii Douglas fir	26.4	
798 Pseudotsuga menziesii Douglas-fir	34.3 L	859 Acer macrophyllum bigleaf maple	26.6 L	922 Pseudotsuga menziesii Douglas-fir	22.3 L	084 Pseudotsuga menziesii Douglas-fir	20.4 L	
799 Pseudotsuga menziesii Douglas-fir	46.4 L	860 Pseudotsuga menziesii Douglas-fir	45.6 L	923 Pseudotsuga menziesii Douglas-fir	27.3 L	095 – Roudotsuga monziosii Douglas fir	20 L 27.7 L	
800 Pseudotsuga menziesii Douglas-fir	17.1 L	861 Pseudotsuga menziesii Douglas-fir	36.9 L	924 Acer macrophyllum bigleaf maple	7.7 L	965 Pseudotsuga menziesii Douglas-III	37.7 L	
801 Pseudotsuga menziesii Douglas-fir	14.1 L	862 Pinus nigra Austrian black pine	15 L	925 Pseudotsuga menziesii Douglas-fir	43.8 L	960 Pseudotsuga menzies Douglas-m	20.9 L	
802 Pseudotsuga menziesii Douglas-fir	27.8 L	863 Pseudotsuga menziesii Douglas-fir	20 L	926 Quercus rubra northern red oak	56.4 L	987 Solbus aucuparia European mountain ash	3.0 5	
803 Pseudotsuga menziesii Douglas-fir	38 L	864 Pseudotsuga menziesii Douglas-fir	47.9 L	927 Acer macrophyllum bigleaf maple	24.5 L	700 rseudulsuya menziesii Duuyias-ili	27.0 L	
804 Pseudotsuga menziesii Douglas-fir	33.2 L	865 Pseudotsuga menziesii Douglas-fir	22.8 I	928 Pseudotsuga menziesii Douglas-fir	16.3 L		43.0 L	
805 Sequoia sempervirens coast redwood	41.1 L	866 Acer macrophyllum bigleaf manle	1.2	929 Pseudotsuga menziesii Douglas-fir	37.5 L	990 Pseudotsuga menziesii Douglas-fir	42./ L	
806 Acer macrophyllum bigleaf maple	6.5 L	867 Pseudotsuga menziesii Douglas-fir	69.5 L	930 Quercus garryana Oregon white oak	38.9 L	991 Pseudotsuga menziesii Douglas-fir	31.3 L	
807 Pseudotsuga menziesii Douglas-fir	34 L	868 Pseudotsuga menziesii Douglas-fir	38.1 1	931 Umbellularia californica Oregon myrtle	29 L	992 Pseudotsuga menziesii Douglas-fir	21 L	
808 Pseudotsuga menziesii Douglas-fir	11 L	869 Pseudotsuga menziesii Douglas-III	47.8	932 Chamaecyparis obtusa Hinoki falsecypress	21.7 L	993 Fagus sylvatica European beech	11.6 L	
809 Pseudotsuga menziesii Douglas-fir	38.8 L	870 Pseudotsuga menziesii Douglas-III	430 L	933 Pseudotsuga menziesii Douglas-fir	49.3 L	994 Cedrus deodara deodar cedar	35 L	
810 Pseudotsuga menziesii Douglas-fir	33.9 L	871 Degudatsuga manziasii Dauglas fir	4J.7 L	934 Pseudotsuga menziesii Douglas-fir	33.7 L	995 Ulmus americana American elm	43.4 L	
811 Acer macrophyllum bigleaf maple	34.8 L	972 – Decudatsuga manziasii – Dauglas fir	41.0 L	935 Pseudotsuga menziesii Douglas-fir	38.7 L	996 Pseudotsuga menziesii Douglas-fir	31 L	
812 Sequoiadendron giant sequoia	11.2 L	672 Pseudotsuga menoguna Epolish houthorn common	0.9 L	936 Pseudotsuga menziesii Douglas-fir	45.1 L	997 Pseudotsuga menziesii Douglas-fir	34.2 L	
giganteum			12.4 S	937 Pseudotsuga menziesii Douglas-fir	36.3 L	998 Pseudotsuga menziesii Douglas-fir	27 L	
813 Pseudotsuga menziesii Douglas-fir	36.7 L	or4 Pseudotsuga menziesii Douglas-Tir	31.1 L	938 Pseudotsuga menziesii Douglas-fir	5.1 L	999 Pseudotsuga menziesii Douglas-fir	33.4 L	
814 Pseudotsuga menziesii Douglas-fir	45.2 L	oro Pseudotsuga menziesii Douglas-fir	3∠.8 L	939 Pseudotsuga menziesii Douglas-fir	33.5 L	1000 Pseudotsuga menziesii Douglas-fir	27.8 L	
815 Pseudotsuga menziesii Douglas-fir	15.5 L	870 Pseudotsuga menziesii Douglas-fir	4U./ L	940 Acer macrophyllum bigleaf maple	6 L	1001 Prunus avium bird cherry	13.2 M	
816 Pseudotsuga menziesii Douglas-fir	40.5 L	877 Pseudotsuga menziesii Douglas-fir	33.5 L	941 Fraxinus latifolia Oregon ash	16.8 M	1002 Juglans nigra black walnut	24 L	
817 Pseudotsuga menziesii Douglas-fir	8.1 L	878 Crataegus monogyna English hawthorn, common	30 S	942 Pseudotsuga menziesii Douglas-fir	34.5 L	1003 Pseudotsuga menziesii Douglas-fir	30.1 L	
818 Pseudotsuga menziesii Douglas-fir	24.6 L	879 Pseudotsuga menziesii Douglas-fir	32.8 L	943 Fraxinus latifolia Oregon ash	16.8 M	1004 Tsuga heterophylla western hemlock	29.1 L	
819 Acer rubrum red maple	4.1 M	880 Pseudotsuga menziesii Douglas-fir	43.3 L	944 Pseudotsuga menziesii Douglas-fir	28 L	1005 Sorbus aucuparia European mountain ash	29.8 S	
820 Pseudotsuga menziesii Douglas-fir	46.7 L	881 Pseudotsuga menziesii Douglas-fir	43.5 L	945 Quercus garryana Oregon white oak	0.3 L	1006 Cornus nuttallii Pacific dogwood	5.9 M	
821 Pseudotsuga menziesii Douglas-fir	36.3 L	882 Pseudotsuga menziesii Douglas-fir	33.3 L			1007 Fraxinus latifolia Oregon ash	39.4 M	
		883 Pseudotsuga menziesii Douglas-fir	30.3 L			1008 common horsechestnyt	, 23-088549 <sup>∟</sup> HR DM	, Exhibit A.3

TreeNo	Genus species	Common Name	DBH	Size	TreeNo	Genus species	Common Nam
1009	Aesculus	common horsechestnut	25.5	L	1048	Pseudotsuga menziesii	Douglas-fir
	hippocastanum				1049	Juglans nigra	black walnut
1010	Celtis occidentalis	common hackberry	17	Μ	1050	Aesculus	common horsec
1011	Amelanchier spp.	serviceberry	2.1	S		hippocastanum	
1012	Prunus cerasifera	flowering plum	16.2	S	1051	Pseudotsuga menziesii	Douglas-fir
1013	Juglans nigra	black walnut	45.3	L	1052	Pseudotsuga menziesii	Douglas-fir
1014	Quercus garryana	Oregon white oak	0.3	L	1053	Pseudotsuga menziesii	Douglas-fir
1015	Quercus garryana	Oregon white oak	0.3	L	1054	Pseudotsuga menziesii	Douglas-fir
1016	Platanus x acerifolia	London plane tree	16.6	L	1055	Pseudotsuga menziesii	Douglas-fir
1017	Amelanchier spp.	serviceberry	1.3	S	1056	Ilex aquifolium	English holly
1018	Pseudotsuga menziesii	Douglas-fir	25.8	L	1057	Pseudotsuga menziesii	Douglas-fir
1019	Juglans nigra	black walnut	45.7	L	1058	Acer macrophyllum	bigleaf maple
1020	Aesculus	common horsechestnut	20.5	L	1059	Acer circinatum	vine maple
	hippocastanum				1060	Pseudotsuga menziesii	Douglas-fir
1021	Pseudotsuga menziesii	Douglas-fir	33.3	L	1061	Pseudotsuga menziesii	Douglas-fir
1022	Aesculus	common horsechestnut	21.8	L	1062	Acer platanoides	Norway maple
1022	Psoudotsuga monziosii	Douglas fir	20.9	1	1063	Fagus grandifolia	American beech
1023	Pseudotsuga menziesii	Douglas-III	30.0 25.4	L	1064	Quercus rubra	northern red oa
1024	Pseudotsuga menziesii	Douglas-III Douglas fir	20.4	L	1065	Prunus serrulata	Japanese flower
1025	Pseudotsuga menziesii	Douglas-III Douglas fir	30 25	L	1066	Aesculus	common horsec
1020		Douyids-III	20 10 1	L		hippocastanum	
1027	hippocastanum	continuit noi sechestnut	10.1	L	1067	Pseudotsuga menziesii	Douglas-fir
1028	Aesculus	common horsechestnut	21.6	L	1068	Pseudotsuga menziesii	Douglas-fir
	hippocastanum				1069	Pseudotsuga menziesii	Douglas-fir
1029	Pseudotsuga menziesii	Douglas-fir	33.9	L	1070	Pseudotsuga menziesii	Douglas-fir
1030	Acer macrophyllum	bigleaf maple	3.4	L	1071	Aesculus	common horsec
1031	Pseudotsuga menziesii	Douglas-fir	29.3	L	1070		Davalas fin
1032	Pseudotsuga menziesii	Douglas-fir	31.7	L	1072	Pseudotsuga menziesii	Douglas-fir
1033	Pseudotsuga menziesii	Douglas-fir	16	L	1073	Pseudotsuga menziesii	Douglas-fir
1034	Pseudotsuga menziesii	Douglas-fir	33.8	L	1074	Metasequoia	dawn redwood
1035	Pseudotsuga menziesii	Douglas-fir	27.2	L	1075	Prunus cerasifera	flowering plum
1036	Pseudotsuga menziesii	Douglas-fir	25.5	L	1076	Pseudotsuga menziesii	Douglas-fir
1037	Pseudotsuga menziesii	Douglas-fir	28.1	L	1077	Pseudotsuga menziesii	Douglas-fir
1038	Thuja plicata	western redcedar	5	L	1078	Pseudotsuga menziesii	Douglas-fir
1039	Crataegus monogyna	English hawthorn, common	17	S	1070	Pseudotsuga menziesii	Douglas-fir
1040	Liquidambar styraciflua	sweetgum	34.6	Μ	1080	Prunus corasifora	flowering nlum
1041	Thuja plicata	western redcedar	12.5	L	1000	Prunus cerasifera	flowering plum
1042	Thuja plicata	western redcedar	11.7	L	1001	Cratagous monogyna	English hawthor
1043	Quercus garryana	Oregon white oak	0.3	L	1002	Psoudotsuga monziosii	Douglas fir
1044	Quercus rubra	northern red oak	42.9	L	1003	Cratagous monogyna	English hawthor
1045	Prunus serrulata	Japanese flowering cherry	9.3	S	1004		sonvicoborry
1046	Platanus x acerifolia	London plane tree	18.9	L	1000	Amelanchier spp.	serviceberry
1047	Pseudotsuga menziesii	Douglas-fir	33.7 33.5	-	1086	Ameianchier spp.	serviceberry
	i soudotsaga menzicsii		55.5	-			

Common Name	DBH	Size	TreeNo	Genus species	Common Name	DBH	Size	
Douglas-fir	34.6	L	1087	Pseudotsuga menziesii	Douglas-fir	15	L	
black walnut	41.5	L	1088	Thuja plicata	western redcedar	11.3	L	
common horsechestnut	28.7	L	1089	Prunus serrulata	Japanese flowering cherry	10.4	S	
			1090	Prunus serrulata	Japanese flowering cherry	11.2	S	
Douglas-fir	32.3	L	1091	Pseudotsuga menziesii	Douglas-fir	25.5	L	
Douglas-fir	28.6	L	1092	Juglans nigra	black walnut	36.8	L	
Douglas-fir	56.1	L	1093	Aesculus	common horsechestnut	22.7	L	
Douglas-fir	29	L		hippocastanum				I O I
Douglas-fir	43.4	L	1094	Pseudotsuga menziesii	Douglas-fir	32.8	L	j t
English holly	11.4	Μ	1095	Pseudotsuga menziesii	Douglas-fir	20.5	L	G
Douglas-fir	37.8	L	1096	Pseudotsuga menziesii	Douglas-fir	24.8	L	$\geq$
bigleaf maple	22.9	L	1097	Pseudotsuga menziesii	Douglas-fir	33.5	L	
vine maple	6.3	S	1098	Pseudotsuga menziesii	Douglas-fir	27.8	L	
Douglas-fir	28.3	L	1099	Pseudotsuga menziesii	Douglas-fir	26.7	L	
Douglas-fir	36.5	L	1100	Pseudotsuga menziesii	Douglas-fir	36.9	L	
Norway maple	21.7	Μ	1101	Pinus sylvestris	Scots pine	7.8	L	
American beech	24.9	L	1102	Pseudotsuga menziesii	Douglas-fir	38.5	L	
northern red oak	28.5	L	1103	Pseudotsuga menziesii	Douglas-fir	28.2	L	ar
Japanese flowering cherry	9.5	S	1104	Pseudotsuga menziesii	Douglas-fir	46.4	L	
common horsechestnut	28.3	L	1105	Pseudotsuga menziesii	Douglas-fir	37.3	L	
			1106	Pseudotsuga menziesii	Douglas-fir	19.3	L	
Douglas-fir	39.4	L	1107	Pseudotsuga menziesii	Douglas-fir	27.8	L	
Douglas-fir	31.2	L	1108	Pseudotsuga menziesii	Douglas-fir	35	L	
Douglas-fir	29	L	1109	Pseudotsuga menziesii	Douglas-fir	38.2	L	
Douglas-fir	24.7	L	1110	Acer negundo	box elder	8.3	L	l ⊇ ⊣ ⊇
common horsechestnut	27.2	L	1111	Acer macrophyllum	bigleaf maple	22.3	L	
			1112	Pseudotsuga menziesii	Douglas-fir	24	L	
Douglas-fir	29.5	L	1113	Acer macrophyllum	bigleaf maple	21.9	L	
Douglas-fir	26.1	L	1114	Chamaecyparis	Port Orford cedar	25.7	L	
dawn redwood	16.4	L		lawsoniana		2017	-	
flowering plum	10 5	S	1115	Acer macrophyllum	bigleaf maple	22.5	L	
Douglas fir	22.0	5 I	1116	Acer macrophyllum	bigleaf maple	28.1	L	
	JZ.7	L	1117	Acer macrophyllum	bigleaf maple	11.7	L	
	21.2 12 5	L	1118	Acer macrophyllum	bigleaf maple	12.6	L	
	20.1	L	1119	Acer macrophyllum	bigleaf maple	15.2	L	
flowering num	39.1	L	1120	Acer macrophyllum	bigleaf maple	36	L	
flowering plum	10.5	S C	1121	Acer macrophyllum	bigleaf maple	22.5	L	
Finalish howthern common	1.5	с С	1122	Acer macrophyllum	bigleaf maple	13.4	L	
	20.3	5	1123	Acer macrophyllum	bigleaf maple	21.4	L	
	45.3	L						
English hawthorn, common	19.8	5						
serviceberry	1.0	5 5						
servicederry	2.2	2						

LU 23-088549 HR DM, Exhibit A.3
### 23-047200 PC 6325 SE Division – Mt Tabor Park Sign-in Sheet June 27, 2023

Matt Wickstrom, BDS, <u>matt.wickstrom@portlandoregon.gov</u>, 503-865-6513

Tanya Paglia, BDS Design and Historic Review Team, <u>tanya.paglia@portlandoregon.gov</u>, 503-865-6518

Timothy Novak, BDS Land Division Environmental Team, <u>timothy.novak@portlandoregon.gov</u>, 503-823-5395

Tammy Boren-King, PBOT Development Review, <u>tammy.boren-king@portlandoregon.gov</u>, 503-823-2948

Eileen Cunningham, PBOT Development Review, <u>Eileen.cunningham@portlandoregon.gov</u>, 503-823-2999

Emma Kohlsmith, BES, emma.kohlsmith@portlandoregon.gov, 503-823-8427

Erin Mick, Water Bureau, erin.mick@portlandoregon.gov

Brandon Namm, Urban Forestry, <u>brandon.namm@portlandoregon.gov</u>, 503-729-1703

Ericka Koss (did not attend), BDS Site Development, ericka.koss@portlandoregon.gov

Brett Horner, Portland Parks and Recreation, brett.horner@portlandoregon.gov

Jill Hutchinson, Portland Parks and Recreation, jill.hutchinson@portlandoregon.gov

Robin Laughlin, Portland Parks and Recreation, robin.laughlin@portlandoregon.gov

George Tkebuchava, Portland Parks and Recreation, George.tkebuchava@portlandoregon.gov

City of Portland, Oregon - Bureau of Development Services
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Early Assistance Application	File Number:	
FOR INTAKE, STAFF USE ONLY	Appt Date/Time:	
Date Recby         LU Reviews Expected         Related cases         Y       N         Unincorporated MC         Y       N         Potential Landslide Hazard Area (LD & PD only)	Qtr Sec Map(s)    Zoning      Plan District	
<ul><li>Y N 100-year Flood Plain</li><li>Y N DOGAMI (high)</li></ul>	Business Assoc Neighborhood within 400/1000 ft	

Site Address				Site Size/Area	
Property ID(s)	R	R	R	R	
Short Project D	oscrintion: do not	loove blank or direct to "see at	tachad" Attach additional ch	acts for a more detailed day	orintion if

Short Project Description: do not leave blank or direct to "see attached". Attach additional sheets for a more detailed description, if needed.

Design & Historic Review (New development: give project valuation. Renovation:	give exterior alteration	value) 💲
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Select an Early Assistance Type and check boxes for desired meeting/written notes options:

BTLA

Early Assistance Type	City Reviewers	On-line MS Teams meeting & written notes provided	No meeting, written notes provided
Pre-application Conference     Only required for Type III and IV land use reviews	BDS Land Use Services, Transportation, Environmental Services, Water, Parks, others as needed		
Design Advice Request Public Zoom meeting with Design Commission or Historic Landmarks Commission	BDS Land Use Services and Design Commission or Historic Landmarks Commission		
Zoning and Infrastructure Bureaus     (including initial bureau responses for street vacations)	BDS Land Use Services, Transportation, Environmental Services, Water, Parks		
Zoning Only	BDS Land Use Services		
<ul> <li>Pre-Permit Zoning Plan Check</li> <li>1-2 housing units</li> <li>all other development</li> </ul>	BDS Land Use Services		
Public Works Inquiry for 1-2 housing units Only for 1-2 unit projects that do not require a land use review, land division or property line adjustment	Transportation, Environmental Services, Water		

Applicant Inform	ation	Include a se	parate sheet f	or additiona	names if needed.
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PRIMARY CONTACT, check all that apply  Applicant  Owner  Other					
Name	Invite to MS 1	Teams Meeting?:□ Y Company	Yes 🗆 No		
Mailing Address					
City		State	Zip Code		
Day Phone		email			
Check all that apply	□ Applicant □ Owner Invite to MS Teams Meeting	□ Other ?:□ Yes □ No			
Name		Company			
Mailing Address					
City		State	Zip Code		
Day Phone		email			
Check all that apply	□ Applicant □ Owner Invite to MS Teams Meeting	□ Other ?:□ Yes □ No			
Name		Company			
Mailing Address					
City		State	Zip Code		
Day Phone		email			

### Please submit the following materials to LandUseIntake@portlandoregon.gov:

- Written project description, including proposed stormwater disposal system and additional property IDs if not included above.
- List of questions to be discussed.
- Site plans drawn to a measurable scale, with scale and scale bar identified and building elevations drawn to a measurable scale (if appropriate), with scale and scale bar identified.
- □ If the site is in a design overlay and you're planning to meet design standards, completed scorecards are required. Scorecards are available at https://www.portland.gov/bds/land-use-review-fees-and-types/design-standards.

#### Note:

- 1. See the Land Use Services fee schedule for detailed fee information: www.portland.gov/bds/current-fee-schedules.
- 2. Public notice (email and internet posting) is provided for Pre-application conferences and Design Advice Requests.
- 3. Only material submitted with the original application will be addressed by City staff; we are unable to address any additional material that is submitted after the application is received.
- 4. For some proposals, such as those using the Community Design Standards, you will receive more detailed information if you provide full-sized plans.
- 5. Estimates for System Development Charges (SDCs) are not provided at Early Assistance Meetings. Refer to SDC information on the BDS website.
- 6. Plans examiners do not participate in Early Assistance meetings and they do not provide written comments. For life/ safety and building code questions, consult with a plans examiner by scheduling a 15-minute appointment or a Life Safety Preliminary Meeting (<u>www.portland.gov/bds/documents/life-safety-preliminary-meeting-request-packet</u>).



1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 • Mingus Mapps, Commissioner • Dawn Uchiyama, Director

# **Pre-Application Conference Response**

Date:	June 27, 2023
To:	Matt Wickstrom, Conference Facilitator
	503-865-6513, Matt.Wickstrom@portlandoregon.gov
From:	Emma Kohlsmith, BES Systems Development
	503-823-8427, Emma.Kohlsmith@portlandoregon.gov
Case File:	EA 23-047200
Location:	6325 SE DIVISION ST
R#:	R332503, R332503, R332503
Proposal:	Remove and replace 88 park light poles and fixtures due to faulty anchoring. Please also see the attached Powerpoint. The lighting fixtures are not the original fixtures. Some of the concrete poles are original (1920s) but others have been repalced in the 1950s and 1980s. The new poles and fixtures will be replaced in the same location as the existing ones. No storm water changes in the park.

The Bureau of Environmental Services (BES) has reviewed the submitted materials to identify potential issues and requirements and provide the following comments. Some references to Portland City Code (PCC) are included below; the applicant may refer to the Auditor's Office <u>Online Charter and Code</u>.

#### A. KEY ISSUES AND REQUIREMENTS

Following is a brief summary of issues and requirements that may impact your proposed project or are submittal requirements that will require time to prepare prior to submittal of the application.

1. None anticipated.

#### B. SANITARY SERVICE

- 1. Sanitary Infrastructure: According to available GIS data, the following sewer infrastructure is located in the vicinity of the project site:
  - a. There are BES-owned sanitary and combined sewers within the roadways surrounding Mt Tabor Park. However, it does not appear that the project scope will impact BES sanitary infrastructure or require new connections to the sewer.

#### C. STORMWATER MANAGEMENT

- 1. *Stormwater Infrastructure*: According to available GIS data, the following stormwater infrastructure is located in the vicinity of the project site:
  - a. There are no public storm-only sewers within the vicinity of the site.
  - b. Currently, stormwater from the public right-of-way discharges to the combined sewer.
- 2. General Stormwater Management Requirements: Development and redevelopment sites that include any of the triggers listed in PCC 17.38.040 are subject to the policies and standards of PCC 17.38.035, Portland's <u>Stormwater Management Manual</u> (SWMM) and <u>Source Control Manual</u> (SCM). Projects must comply with the current adopted version of the SWMM as of the permit application date. A fundamental evaluation factor in the SWMM is the Stormwater Infiltration and Discharge Hierarchy (Section 1.3.3), which sets the framework that will be used to determine when a project's stormwater runoff must be

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infiltrated onsite and when offsite discharge will be permitted, and the parameters that must be met for either scenario.

- 3. *Public Right-of-Way Stormwater Management:* Stormwater runoff from the public right-ofway must comply with all applicable standards of the SWMM and Sewer and Drainage Facilities Design Manual and be conveyed to a discharge point along a route of service approved by the BES Director or the Director's designee. Additional guidance on meeting the 2020 SWMM for projects in the public right-of-way is available at <u>https://www.portland.gov/bes/stormwater/swmm-and-right-way-projects</u>.
  - a. Based on the scope of PBOT requirements, no public stormwater management facilities are required because public frontage improvements are not required. Note that if changes in the scope of the proposed development alter PBOT requirements for public improvements, then public stormwater management facilities that conform with the SWMM or payment of an Offsite Stormwater Management Fee may be required.
- 4. *Private Property Stormwater Management*: Stormwater runoff from this project must comply with all applicable standards of the SWMM and SCM and be conveyed to a discharge point along a route of service approved by the BES Director or the Director's designee.
  - a. *SWMM Triggers:* Based on the described project scope, it does not appear that stormwater management requirements are triggered. Stormwater management requirements described in the SWMM are triggered for projects that develop or redevelop greater than 500 SF of impervious area. Pavement removal and replacement within an existing paved area will trigger stormwater management requirements only if soil (subgrade) is exposed or the pavement is replaced with a different material. The applicant may refer to Section 1.2.1 of the SWMM and coordinate with BES staff for information on what qualifies as development and redevelopment for this project.

#### D. GENERAL PUBLIC WORKS PERMIT INFORMATION

For questions related to the public improvements described throughout these notes, please contact Rod Krauter at (503) 823-7064 or <u>rodney.krauter@portlandoregon.gov</u> or the BES Development Engineering hotline at (503) 823-7761, option 3.

#### E. SUBMITTAL REQUIREMENTS FOR LAND USE

1. Full land use plan set, including preliminary utility plan showing all existing and proposed sanitary and storm facilities and connections. All BES assets and easements must also be shown and labeled on plans.



**City of Portland, Oregon Bureau of Development Services** Land Use Services

# **BDS – Land Use Planner Response**

# **Pre-Application Conference**

Date: To: From:	August 3, 2023 Brett Horner   (971) 409-3518   Brett.Horner@Portlandoregon.gov Tanya Paglia, City Planner   503-865-6518, Tanya,Paglia@portlandoregon.gov
	Timothy Novak   503-823-5395, Timothy.Novak@portlandoregon.gov
File No.:	23-047200
Location:	6325 SE DIVISION ST
Tax Account:	R332503, R332503, R332503
State ID Number:	1S2E05 00100, 1S2E05 00100, 1S2E05 00100, 1S2E05 00100, 1S2E05
	00100
Zoning:	OS, c,s, None
Proposal:	A Pre-Application Conference to discuss replacing 88 faulty light poles in Mt. Tabor
	Park. The location of the replacement poles will be the same as the existing light poles. None of the replacement light fixtures are the original 1920s fixtures. The proposed replacement poles are already located in Laurelhurst Park, Washington Park and 5 other Portland parks.

Please contact me with questions regarding this memo, or if I can be of further assistance as you move forward with your proposal.

The information provided at the conference and included in this response is based on the information you provided prior to and at the conference and reflects regulations in effect at the time of the conference. This response provides information and guidance only. It is preliminary in nature and based on the information the applicant provided to BDS staff. It is neither a land use review nor a final decision regarding this project. References are to the Portland Zoning Code available online at <a href="http://www.portland.gov/code/33">www.portland.gov/code/33</a>.

### Zoning:

- Base: OScs, Open Space base zone (33.100 Multi-Dwelling Zone)
- Overlay(s): Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
- Pattern Area: Inner
- Pedestrian District: N/A
- **Transit:** Some of the site is considered "close to transit"
- Corridors: Division Street is considered a Civic or Neighborhood Corridor
- Historic Designation: Mount Tabor Parks Historic District, Mount Tabor Park Reservoirs Historic District

#### A. KEY ISSUES AND REQUIREMENTS

The following issues and requirements have been summarized for the applicant to pay special attention to as they may impact the proposed project.

Carn

#### 1. Historic Resource Review Process

- a. Removal (demolition) of lights.
  - Process:
    - <u>Contributing</u>: Removal of lights identified as contributing is subject to Demolition Review. Proposals to demolish an accessory structure are processed through a Type II procedure per 33.846.080.B.1.

Note: removal of contributing lights may be deemed exempt from Demolition Review if the Bureau of Development Services requires demolition due to an immediate danger to the health, safety, or welfare of the occupants, the owner, or that of the general public, as stated in Section 29.40.030 of Title 29, Property Maintenance Regulations. Such a determination has not been made.

 <u>Non-contributing</u>: Removal of non-contributing lights would not require review so long as they only require an electrical permit and thus meet exemption 33.445.200.D.2.a:

> "Alterations that do not require a building, site, zoning, or sign permit from the City, and will not alter the exterior features of a resource having such features specifically listed in the Historic District documentation or National Register nomination as attributes that contribute to the resource's historic significance".

- **Approval Criteria:** Proposals to demolish a historic resource will be approved if the review body finds that one of the four criteria listed under *33.846.080.C* is met. Of the four, staff believes criteria number four ("C.4") is the simplest applicable option:
  - The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

#### b. Installation of lights – Historic Resource Review Track.

- **Process:** For the installation of new lights, a Type III Historic Resource Review would be required if the project value is >\$547,400 based on the thresholds of table 846-3 of Section 33.846.060. Additional information about Historic Resource Review can be found below in the sections below, including Historic Resource Review submittal requirements in Section D.
- Approval Criteria: The applicable approval criteria are the 33.846.060.G. Other Approval Criteria and can be found at <u>https://www.portland.gov/sites/default/files/code/33.846-historic-resource-reviews.pdf</u>.
- c. Installation of lights Community Design Standards Track. The proposal is not eligible to use the non-discretionary design standards track based on the thresholds in Section 33.445.510.
- **d. Guide to Historic Resource Review.** You are encouraged to review the Guide to the Historic Resource Review Process prepared by the Historic Landmarks Commission, which provides guidance and expectations of the Historic Resource Review process. The guide can be found on the Landmarks Commission webpage at <u>portland.gov/bds/landmarks/about-hlc.</u>
- e. Certificate of Compliance. Approval of a Historic Resource Review allows for the proposed work to be built. The expectation is that the building permit will reflect the project (including the details) that was approved. To ensure this, a Certificate of Compliance will be required at the

time of building permit as indicated in a condition of approval. The Certificate of Compliance form can be found at <u>portland.gov/bds/documents/certificate-compliance-design-and-historic-resource-review-approvals</u>

#### 2. Other Land Use Review Information

- a. Environmental Review. Please see follow-up addendum for detailed information.
- b. Additional Land Use Reviews. Additional land use reviews can be requested in addition to the Historic Resource Review. The development standards of the Zoning Code are expected to be met. However, if a standard cannot be met, a *Modification* or *Adjustment* review can be requested. Please note, requests for Modifications or Adjustments must better meet the approval criteria <u>and</u> meet the purpose of the standard or demonstrate the preservation of the character of the resource is more important than meeting the purpose of the standard.
  - A *Modification* review may be requested for site-related standards (such as setbacks, size of loading spaces) that are not met.
  - An Adjustment review may be requested as part of the Historic Resource review for userelated development standards (such as floor area ratios, number of loading spaces, number of parking spaces) that are not met.

All additional land use reviews should be listed on the land use application, the respective fees paid, and a response provided that addresses the additional approval criteria listed in the relevant Portland Zoning Code Chapters.

- **c.** Other Approval Criteria. May apply if Modifications (Section <u>33.846.070</u>) or Adjustments (Section <u>33.805.040</u>) to development standards are requested.
- d. Fee(s). Current fee(s) for land use reviews can be found at Land Use Services Fee Schedule.

#### 3. Historic Resource Review Issues to Address

This preliminary feedback is a response to the information in your Pre-Application Conference submittal and based on the approval criteria of the 33.846.060.G. Other Approval Criteria.

#### a. "Macro" Issues

- Architectural compatibility The guidelines call for design solutions that will not compromise the architectural integrity of the resource and notes that where the severity of deterioration requires replacement, the new feature will match the historic feature in design, color, texture, and other visual qualities and, where practical, in materials. The proposed light poles are very similar to those proposed for removal; therefore, such a replacement may be found to meet general approval criteria with regard to compatibility. Explore the existing lighting vocabulary for the park and try to come up with a unified plan for all the lighting. (33.846.060.G 4, 8, 9, 10)
- Historic character Mt. Tabor Park is individually listed in the National Register, with the "historic lighting system" identified as a contributing aspect of the site, and retaining the park's historic character will be a focus of the review. Because the guidelines note that removal of historic materials should be avoided and deteriorated historic features should be repaired rather than replaced, the application should include strong evidence that every effort was made to preserve and retrofit the existing light structures before a replacement path was selected. Information on how the project might impact any abutting paths, landscape and hardscape should also be included and efforts made to avoid significant impacts. (33.846.060.G 1, 4, 9)

#### b. "Mid" Issues

- Record of its time and changes over time The park must remain a physical record of its original time, place, and use and changes that have acquired historic significance should be preserved. The lighting history of the park should be documented as part of this process including creating an inventory of the lights with information about their materiality and their history. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other structures should be avoided. (33.846.060.G 2, 3)
- Landscaping Avoid impacts to trees, especially large shade trees which are increasingly critical to the health and comfort of residents as temperatures soar. (33.846.060.G 1, 10)
- Electric conduit No electrical conduit should be visible. (33.846.060.G 1, 8)

#### c. "Micro" Issues

- Historic materials Create a plan for the salvage of the historic materials so they don't end up in a landfill. (33.846.060.G 1, 4, 5)
- Materials High quality, durable materials that match existing are expected. (PCDG 08) / (CCFDG C2, C4). (33.846.060.G 8, 10)

#### 4. Applicable Development Standards

Please note, meeting the minimum Title 33 standards does <u>**not**</u> ensure that a project will meet the Historic Resource Review approval criteria and receive approval. It is recommended you design to meet/exceed the approval criteria, and not begin with just meeting the minimum Title 33 standards.

- a. Development standards that will apply to the project. These include, but are not necessarily limited to, those from the following chapters in the Zoning Code (Title 33) and other City codes available online at portland.gov/code/33.
  - <u>33.846 Historic Resource Review</u>
  - Mount Tabor Park Historic District
  - <u>33.445 Historic Resource Protection Overlay Zone</u>
  - 33.430 Environmental Conservation Overlay Zone
  - <u>33.480 Scenic Resource Overlay Zone</u>
  - <u>33.266 Parking and Loading</u>
  - <u>33.258 Nonconforming Upgrades</u> interior or exterior improvements to a site totaling more than \$347,000 requires up to 10% of the project cost must be spent toward bringing the site into conformance with identified zoning code standards.
  - <u>33.248 Landscaping and Screening</u>
  - <u>33.100 Open Space Zone</u> OScs, Open Space base zone with Environmental, Scenic and Historic Resource Overlays
  - <u>Title 11 Tree Code</u> Exemptions for tree density and preservation of this Title only apply to private trees on properties zoned IH, on sites with more than 85% building coverage, and sites less than 5,000 SF in area.
- **b.** Specific development standards to note for this project. This list is not intended to be comprehensive. Always reference Title 33 for all applicable development standards and the exact language of each standard.
  - Nonconforming Development 33.258.070. Whenever a property owner or tenant makes interior or exterior improvements to a site totaling more than \$347,000 up to 10% of the project cost must be spent toward bringing the site into conformance with the Zoning Code and Tree Code. Mandatory improvements for fire, life safety, and accessibility do not count toward the thresholds. Installation of electric vehicle parking, seismic and some stormwater upgrades, as well as remediation of hazardous substances per state law also do not count

- a. Landscaping and trees required for the following areas:
  - Exterior display, storage, and work activity areas;
  - Setbacks for surface parking and exterior development areas;
  - Interior parking lot landscaping;
  - Existing building setbacks;
  - Minimum landscaped areas other than described above; and
  - Tree density standards of Chapter 11.50 for the site.
- b. Pedestrian circulation systems, as set out in the pedestrian standards that apply to the site;
- c. Bicycle parking by upgrading existing bicycle parking and providing additional spaces in order to comply with 33.266.220;
- d. Screening of exterior mechanical equipment, and trash/recycling areas;
- e. Paving of surface parking and exterior storage and display areas;
- f. Title 11 Tree Density (for projects with exterior improvements).

#### 5. Coordination with Other Agencies

Refer to individual responses from all participating bureaus, review groups and agencies for more detailed information.

#### a. Electric Utility Provider Coordination

- Plan for power early in the process. Consult with the Case Planner assigned to this Early Assistance appointment and coordinate with the utility providing electrical service to determine power needs on the site. If a new transformer were needed, lease note this document *Guidance to Siting Electrical Transformers* and this one <u>Path to Siting Electrical</u> <u>Transformers</u>.
- For properties served by PGE <u>portlandgeneral.com/construction/electric-service-requirements</u>
- For properties served by Pacific Power <u>pacificpower.net/working-with-us/builders-</u> <u>contractors/electric-service-requirements.html</u>
- Note that the service requirements included in these links may not cover all requirements associated with your project. Applicants should contact the PGE Service Coordinator at 503-736-5450 or the Pacific Power Business Center at 888-221-7070 to identify issues that are specific to your project and to coordinate electric service requirements.
- PGE requires minimum clearances from electric wires, conductors and cables. Please be aware of these clearances by calling PGE at 503-736-5450. More information on PGE minimum clearance can be found at <u>portland.gov/bds/documents/why-you-should-respect-portland-general-electrics-power-line-clearances</u>

#### b. Transportation (PBOT)

 <u>Public Works Permit</u> – If PBOT requires a 30% Public Works Permit approval before their response to a Historic Resource Review, it should be noted that such approvals can often take longer than the Land Use Review process. Therefore, you are highly encouraged to initiate the Public Works Permit process before you submit the Historic Resource Review.

#### c. Environmental Services (BES)

 <u>Stormwater Management</u>. Stormwater management information, including infiltration tests, utility plans, stormwater facility designs, and site landscaping, must be submitted with the Historic Resource Review application. BES needs to review these elements early to ensure there are no issues that could affect the building size, location or site design.

#### d. Fire / Life Safety

- <u>Preliminary Life Safety Meeting</u>. A separate, preliminary life safety meeting is very beneficial to identify critical life safety and building code issues early in the process and allow the Historic Resource Review proposal to address those issues. This meeting is encouraged prior to submitting the Historic Resource Review. More information and the application can be found at <u>portland.gov/bds/documents/life-safety-preliminary-meetingrequest-packet</u>.
- **e. Urban Forestry** Projects that require street tree preservation and planting should reach out to Urban Forestry early in the concept design phase to understand the requirements and process.
- f. State Historic Preservation Office (SHPO) Projects that impact a resource on the National Register of Historic Places should reach out to SHPO to understand their separate processes and requirements early in the concept design phase.

#### B. QUESTIONS RAISED AT THE MEETING

#### 1. What other information is needed for the Type III Historic Review?

For the Historic Resource Review submittal, the following would be helpful:

- Detailed information on all the materials that are in the existing and the proposed light poles and fixtures.
- o Information on structural integrity issues.
- Information as to why the existing poles and fixtures cannot be repaired. If it is an attachment issue, provide information on why they cannot be re-attached in a new manner. If it is a structural issue with the poles themselves, provide information.
- Provide information on consultations with restoration specialists that do this kind of work and provide information on their feedback as to why they would not be able to restore these poles.
- o Provide more information about the safety concerns with the existing poles.
- An inventory of the lights and their history is important to the site history. With the submittal, please provide a detailed accounting/mapping of all the poles with their installation dates to understand which ones and how many are from the 20s and which ones and how many are from the 80s as well as any other information about the lighting history.

#### 2. Who does the neighborhood noticing (mailing and posting of signs)?

- <u>Notice of Proposal</u>. As part of a Type III Historic Resource Review, BDS mails out a Notice of Proposal to all property owners within 400 feet, and all neighborhood associations and recognized organizations within 1,000 feet of your site.
- Physical Posting of Site. The applicant will be the one to post the site with signs.

- The applicant will need to seek out a sign company, print shop or prepare the sign boards via in-house production.
- The overall board must be printed at its full 18-inch by 24-inch size.
- Your local sign manufacturer will have a variety of options available, but for environmental reasons we recommend corrugated plastic because it can be recycled. Corrugated plastic is sold under many trade names. It is an extruded twin wall plastic-sheet product produced from high-impact polypropylene resin with a similar make-up to corrugated cardboard and is ideally suited for outdoor signage. It can be direct printed or will accept pressure sensitive adhesive graphics.
- The sign must be printed in color.
- Signs may be attached to an existing building or structure, or mounted on posts, stakes, a fence, or other reasonable and sturdy structure that is fully accessible to the public.
- The top of the sign when mounted should be no higher than 60" inches above grade and free from any obstruction. The bottom of the sign must be at least 24" above the ground.
- The applicant is required to post notice on the site of the proposal 30 days before the hearing.
- The applicant must post one of these signs every 600 feet, or fraction thereof, on each street frontage of the property.
  - In the case of Mt Tabor, this amounts to a total of **30 signs**.
- These signs must be placed within 10 feet of the street frontage line, and must be visible to pedestrians and motorists, and must not be posted in the public right-ofway.
- The signs should not be removed before the meeting, but must be taken down within two weeks after the meeting.
- 3. Can we submit the Type III before we receive the Pre-App comments?

Yes.

### C. PREVIOUS LAND USE REVIEWS

As part of your application, address relevant conditions of approval from previous land use reviews on the site and discuss the current status of compliance. Below are the relevant land use case reviews that the City of Portland has on record for the subject site:

- LU 61-001380 (ref. file: CU 029-61) Conditional Use approval for a small storage building;
- LU 64-002651 CU (ref. file: CU 067-64)- Conditional Uwe approval to construct a plant potting building on the SW corner of Mt. Tabor Park on park warehouse land;
- LU 65-002285 CU (ref. file: CU 056-65) Conditional Use Approval with the condition that planting be provided to screen the facilities from adjacent park and residential areas;
- LU 67-003406 (ref. file: CU 93-67) Conditional Use approval for a maintenance building and office;
- LU 74-000650 (ref. file: CU 007-74) Conditional Use approval for a greenhouse;

- LU 74-002392 (ref. file: CU 059-74) Conditional Use approval for a picnic shelter;
- LU 77-002064 (ref. file: CU 49-77) Conditional Use approval for a water pumping station;
- LU 89-003906 CU (ref. file: CU 26-89) Conditional Use approval for parking lot expansion;
- LU 89-021552 (ref. file: MP 107-89) Approval of a 3-lot minor partition;
- LU 90-024202 Approval to locate and maintain a motor vehicle service building;
- LU 99-017214 EN (ref. file: LUR 99-00809) Environmental Review approval of trail constructions and improvements in the Environmental Concern zone;
- LU 06-178213 HDZ Historic Design Review approval for an 8' wide accessible path on the north side of Reservoir #6;
- LU 07-139442 HDZ Historic Design Review approval for interim security and deferred maintenance improvements;
- LU 14-218444 HR EN Historic Resource Review and Environmental Review approval of disconnection of reservoirs #1, #5, and #6 from the public drinking water system;
- LU 16-148005 HR Historic Resource Review approval for rehabilitation of the Mt. Tabor Summit Restroom building;
- LU 17-158467 HRM Historic Resource Review approval for exterior alterations to the Mount Tabor Yards;
- LU 17-206893 HR Historic Resource Review approval for the replacement of existing and addition of new railings along the existing stairway of the Mount Tabor steps and the Summit Comfort Station;
- LU 17-245440 HR Conditional Use approval for uses and improvements for the 13.3-acre project area including the Yard, Upper Nursery and Long Block areas of the Park, in the Mount Tabor Park Historic District;
- LU 18-103566 HR Historic Resource Review approval for replacement of existing non-historic light poles with new, historically-appropriate pole lighting; and
- LU 21-053526 HR Historic Resource Review approval for installation of an Interpretive Program to satisfy the requirement per Condition of Approval 'C' of LU 14-218444 HR EN.

#### D. SUBMITTAL REQUIREMENTS FOR LAND USE REVIEWS

This list identifies the materials you must submit for your Land Use application to be considered complete. For additional details, see Zoning Code Section <u>33.730.060</u>.

#### GENERAL

- Digital submittal required.
- For final drawings (C Exhibits) and Appendix set (APP Exhibits):
  - Use 11"x17" format
  - Leave a 1.5"x5" blank space at the bottom right corner for Staff to add the case number, exhibit number and stamp.
- Conduct a thorough review before submitting your drawing packet.
- Review all color quality in submittal to ensure it accurately represent the colors intended.
- When returning for a 2nd hearing, revisions to the prior submittals should be illustrated and clearly marked in a side-by-side comparison.

#### PROJECT INFORMATION & NARRATIVE

- Land Use Review application form
- Project team and project cost

- Project description
- Zoning summary
- Response to guidelines/approval criteria (Word doc.)
- Modifications and Adjustments requests & approval criteria responses (Word doc.)
- Response to DAR (narrative)
- Technical Reports Stormwater Loading Analysis, Queuing Study, etc.

#### DRAWINGS

"C" Exhibits should represent proposed development/alterations and be at an architectural or engineering scale:

- Title Page
- Table of Contents
- Site Plan
- Floor and Roof Plans roof plan should show all rooftop elements, including mechanical
- Elevations B/W and color, and without shade or shadows, include material key, street-facing elevations in their immediate context, including adjacent buildings
- Building Sections Include some depicting relationships to adjacent buildings
- Enlarged Details windows/doors, storefronts, canopies, balconies, signage and their attachments, etc., control joints, seismic joints, and other visible construction details
- Materials / Colors clearly identify each building material by name
- Landscape Plans
- Lighting Plans
- Civil Plans
- Cut Sheets only pertinent product info like type, finish, color, dimensions

#### SUPPORTING INFORMATION

Appendix ("APP" Exhibits) should include information that supports the drawings:

- Renderings day and night in context, must be simple and not enhanced marketing-type images, avoid dramatic lighting effects
- Context plan area, urban (3-block radius), site
- Sightlines sightline drawings from relevant vantage points
- Material Photos & Examples
- Massing & Design Concept
- Miscellaneous Diagrams FAR, ground floor windows, clear vs. spandrel panels, height, Modifications, Adjustments, etc.
- Responses to DAR (diagram)

#### **NEIGHBORHOOD NOTIFICATION**

When you apply for a Type III Land Use Review, all property owners within 400 feet, and all neighborhood associations and recognized organizations within 1,000 feet of your site will receive notification of your proposal.

- The site is located within the neighborhood association of Mt. Tabor, contact Stephanie Stewart at contact.MTNA@gmail.com.
- The site is located within 1,000 feet of South Tabor neighborhood association, contact John Carr at landuse@southtabor.org.
- The site is located within the district neighborhood coalition of Southeast Uplift, contact Matchu Williams at matchu@seuplift.org.
- Contact information for neighborhood associations, neighborhood district coalitions, and business
  associations is available at <u>portlandoregon.gov/civic/search</u>.

#### E. SUBMITTAL – LAND USE REVIEWS & PERMITS

**PLEASE BE ADVISED** - If a Land Use Review is required, permits for the work subject to the Land Use Review cannot be accepted until the Land Use Review approval is issued and recorded.

#### Land Use Reviews and other LUS applications:

When you are ready to submit a land use review application, please see the BDS Website at <u>portland.gov/bds/land-use-review-fees-and-types/land-use-reviews-and-final-plat-applications</u> for current submittal requirements. Currently, we are accepting electronic land use applications via email at <u>LandUseIntake@portlandoregon.gov</u>. A Land Use Services technician will contact you with instructions for providing payment for emailed applications.

#### Permits:

When you are ready to submit a permit, please see our website for updated information on how to apply for permits at <u>portland.gov/bds/permit-review-process/apply-or-pay-permits</u>.



1900 SW Fourth Ave., Suite 5000 Portland, OR 97201 503-823-5185 Fax 503-823-7576 TTY 503-823-6868 www.portlandoregon.gov/transportation Mingus Mapps Commissioner Tara Wasiak Interim Director

# **PBOT – Development Review**

# **Pre-Application Conference Response**

- Date: June 27, 2023
  - To: Brett Horner, Portland Parks & Recreation, 971-409-3518, brett.horner@portlandoregon.gov
- From: Eileen Cunningham, PBOT Development Review 503-823-2999, Eileen.Cunningham@portlandoregon.gov
- **Case File:** EA 23-047200
- Location: 6325 SE DIVISION ST

**R#:** R332503

**Proposal:** A Pre-Application Conference to discuss replacing 88 faulty light poles in Mt. Tabor Park. The location of the replacement poles will be the same as the existing light poles. None of the replacement light fixtures are the original 1920s fixtures. The proposed replacement poles are already located in Laurelhurst Park, Washington Park and 5 other Portland parks.

Portland Transportation/Development Review staff has reviewed the pre-application conference materials to identify potential issues and requirements.

- 1. There are no transportation related approval criteria for the subject review.
- 2. The proposal does not trigger either of the public improvement requirements of 17.88.020. No public improvements or dedication are required.
- 3. The light poles to be replaced are not PBOT assets, although, at least one light pole appears to be within the right-of-way. The poles will be replaced in their current location.
- 4. Any encroachments within the right-of-way will require an encroachment permit. The City's Encroachment Policy has provisions for recognizing pre-existing encroachments. (See page 4 at <u>https://www.portland.gov/sites/default/files/2020-03/409066.pdf</u>.) If the site contains existing encroachment within right-of-way, PBOT will require a current encroachment permit to document all the encroachments on the site. If so, the applicant will be required to apply for an encroachment permit, which will need to be approved prior to land use review approval. The encroachment permit application is available at <u>https://www.portland.gov/transportation/development/encroachment-permits</u>, including applicable fees. Please email the application and all supporting documentation to: <u>encroachments@portlandoregon.gov</u>. Please contact PBOT encroachment questions via email at <u>encroachments@portlandoregon.gov</u> (preferred). You may also call 503-823-7002 and select Option 3. For an overview of the encroachment permit process, please visit <u>https://www.portland.gov/transportation/development/encroachment permit process</u>, please visit <u>https://www.portland.gov/transportation/development/encroachment-permit permit process</u>, please visit <u>https://www.portland.gov/transportation/development/encroachment-permit process</u>, please visit <u>https://www.portland.gov/transportation/development/encroachment-permit process</u>, please visit <u>https://www.portland.gov/transportation/development/encroachment-permit process</u>, please visit <u>https://www.portland.gov/transportation/development/encroachment-permits</u>.

5. If the proposed development will impact the use of an area within the public right-ofway, a separate street temporary closure permit will be required. Additionally, closures that do not allow safe passage and unobstructed flow of normal public use in a partially open area or lane, will also require a City approved Traffic Control Plan. For an application, general information, cost, and submittal information, please visit Temporary Street Use Permitting (TSUP) | Portland.gov or call 503-823-7365. **PORTLAND PARKS & RECREATION** 



# Urban Forestry Early Assistance Response

June 26, 2023 Date: From: Brandon Namm 503-823-5844, Brandon.Namm@portlandoregon.gov Case File<sup>-</sup> EA 23-047200 6325 SE DIVISION ST Location:

A Pre-Application Conference to discuss replacing 88 faulty light poles in Mt. Tabor Park. The Proposal: location of the replacement poles will be the same as the existing light poles. None of the replacement light fixtures are the original 1920s fixtures. The proposed replacement poles are already located in Laurelhurst Park, Washington Park and 5 other Portland parks.

Portland Parks, Urban Forestry staff has reviewed the Early Assistance materials to identify potential issues and requirements in accordance with Title 11, Trees. This response identifies potential issues and/or impacts on existing street and heritage trees, and trees on city-owned or managed sites, if applicable. Trees on private property are subject to development standards from the Bureau of Development Services. See planner requirements for private property trees.

## Please note that there may be other applicable tree requirements in Title 33 Planning & Zoning.

## A. Response Summary

The development will be subject to Urban Forestry standards and requirements during the permit review process as detailed below.

A Preliminary Project Design Form must be submitted for Urban Forestry's review. The Preliminary Design Form can be found here: https://www.portlandoregon.gov/trees/article/513293

## **B.** Tree Plan (11.50.060)

A tree plan must be submitted with each phase of review including land use reviews. A tree plan was not submitted with the EA application, but additional tree information is required. The plan must include the following information for street trees and trees on city owned property:

- a. The size and location of street trees adjacent to the subject property, and trees onsite.
- b. Trees proposed to be preserved including tree protection specifications in accordance with 11.60.030.
- c. Tree(s) proposed for removal.
- d. Tree planting plan (tree species and location(s)).



## C. On Site Trees

# City Managed Sites (11.50.040.C.2.a)

For development on City owned or managed sites, applicants are required to consult with the City Forester at the preliminary project design phase if City or Street Tree removal is likely to occur to complete the project. The purpose of this consultation is to identify potential impacts and opportunities to retain existing trees, as well as any measures required to protect trees on site, on adjacent sites, or in the street. In order to meet this requirement, you must go through a review with Urban Forestry. A Preliminary Project Design Form must be submitted early in the design process (prior to 30% plan completion). The Preliminary Design Form can be found here: <a href="https://www.portlandoregon.gov/trees/article/513293">https://www.portlandoregon.gov/trees/article/513293</a>

The proposal is under review by Urban Forestry in case # 23-007867.

The light poles are located all around the park and will be replaced at their current locations. The documents in this Land Use Early Assistance focus on the light style, but the applicant should know that tree protection will be necessary when installing new poles.

1. On-Site Tree Preservation (11.50.040)

Based on the proposed development it appears existing trees may be impacted. Development proposals must be configured to avoid city trees

Trees must be preserved at all phases of construction. If the applicant believes the tree must be removed to facilitate development, the applicant must provide adequate technical analysis demonstrating why the tree cannot be preserved while developing the site to City standards.

2. On-Site Tree Protection Specifications (11.60.030)

Tree protection is required in accordance with Title 11 Trees, Protection Methods (11.60.030). Tree protection shall follow either the Prescriptive or Performance path. Protection methods must be shown on the tree plan. If using the Performance path, the alternate tree protection plan must be prepared by an arborist who has visited the site.

A Prescriptive path protection zone is established as follows; a minimum of 1 foot radius (measured horizontally away from the face of the tree trunk) for each inch of tree diameter. Protection fencing shall be a minimum 6-foot high metal chain link construction fence, secured with 8-foot metal posts established at the edge of the root protection zone and permissible encroachment area.

3. On-Site Tree Density Standards (11.50.050.D)

The applicant has not provided a conceptual tree planting plan. The required tree area is based on the size and the type of proposed existing development as shown in Table 50-2. Trees must be planted at a minimum 1.5 caliper inches. Trees will be required to be planted through the Urban Forestry Permit.

# **D. Heritage Trees** (11.20.060):

There are heritage trees located on the site that is on the City of Portland's Heritage Tree list (Trees 152, 62). This tree must be preserved unless removal is approved by the Urban Forestry Commission. The Urban Forestry Commission shall hold a public hearing on a request to remove a Heritage Tree. Consent to remove the tree shall be supported by at least six members of the UFC. Any work done in the root protection zone of the tree must receive prior approval from Urban Forestry.



PORTLAND PARKS & RECREATION Healthy Parks, Healthy Portland

# URBAN FORESTRY TREE REQUIREMENTS Early Assistance and Land Use Review

Portland Parks & Recreation Urban Forestry staff review Early Assistance and Land Use Review materials to identify potential issues and requirements in accordance with Title 11, Trees and Title 33, Zoning Code. The purpose of these reviews is to identify potential issues and/or impacts on existing street trees, heritage trees, and trees on City-owned or managed sites (if applicable), as well as to provide adequate areas for future street tree planting on existing and proposed public streets. Trees on private property are subject to development standards from the Bureau of Development Services. See planning requirements for private property trees or call the Zoning Hotline at 503-823-7526.

## Tree Plan Submittal Requirements (11.50.070)

A tree plan must be submitted with each phase of review including land use reviews, building permit applications, and public works permits. The tree plan information may be combined with other relevant plan sheets. The tree plan submittal shall include the following information:

- □ existing improvements;
- □ proposed alterations;
- $\Box$  existing street trees  $\geq$  3" DBH including size and location;
- $\Box$  existing on-site trees  $\geq$  6" DBH within 15' of the limits of disturbance;
- □ trees proposed for removal;
- □ tree planting proposal, including tree size, species and location; and
- □ trees to be retained and proposed tree protection measures meeting the specification in Chapter 11.60.

Any changes to an approved Tree Plan, including amending tree species must be approved by the City Forester. Please note that the City Forester may not approve revised tree planting plans based on the lack of species availability. To facilitate species availability, it is recommended that tree procurement occur approximately 6 months prior to installation.

## Tree Mitigation (11.50.040.C.2)

Healthy street trees  $\geq$  6" DBH that are approved for removal shall be replanted with two trees <u>in</u> <u>addition</u> to trees required to be planted to meet Street Tree Planting Standards, below. When street improvements are to partially or fully unimproved streets, healthy street trees  $\geq$ 12" DBH approved for removal shall be replanted with two trees, with trees planted to meet Street Tree Planting Standards credited towards meeting this requirement. Tree replacement for trees removed shall occur in the street planter strip, on site, or in the same watershed either by planting or by paying a fee in lieu of planting in accordance with table 60-1, below.

On City-owned or managed sites, healthy, non-nuisance trees  $\geq$  6" DBH that are approved for removal shall be replanted per the Administrative Rule for tree replacement standards, below:



Managed Sites		
Size of tree to be removed (inches in diameter)	Number of trees to be planted	
6 and up to 12	Up to 2	
More than 12 and up to 20	Up to 3	
More than 20 and up to 25	Up to 5	
More than 25	Up to 6	

# Tree Replacement for Development on City Owned or Managed Sites

# Street Tree Planting Standards (11.50.050)

One street tree shall be planted or retained for each full increment of 25 linear feet per side of street frontage. Planting is exempt when <u>existing</u> above or below grade utilities prevent planting of street trees, or if the existing design of the street will not accommodate street tree planting because the planting strip is less than 3 feet wide, there is not a planting strip, or there is insufficient space to add tree wells. Trees planted to meet street tree planting standards are credited toward mitigation requirements when street improvements are to partially or fully unimproved streets. When the required number of trees cannot be planted, a fee in lieu of planting will be required, in accordance with Table 60-1, below.

Development	Tree	Size
Туре	On Site	Street
One and Two Family Residential	1.5"	1.5"
Multi Dwelling Residential	1.5"	2"
All others	1.5"	2.5"

**Table 60-1 Broadleaf Tree Size Requirements** 

## Tree Planting Specifications

If there are fewer than 8 required trees, they may all be the same species. If there are between 8 and 24 required trees, no more than 40 percent can be of one species. If there are more than 24 required trees, no more than 24 percent can be of one species. Street tree species shall conform to the appropriate "City of Portland Approved Street Tree Planting List." The City Forester may approve or require an alternate or unlisted species.

All required street trees shall be planted in-ground following Standard Drawing Number P-581 "Typical Street Tree installation," except when in raised planters that are used to meet Bureau of Environmental Services storm water management requirements. Please include the Standard



Drawing Number P-581 as part of the Public Works permit application. Plant materials shall be installed to current nursery industry standards and proper arboricultural practices [American National Standards Institute, *ANSI A300 Part 6: Tree, Shrub, and Other Woody Plant Maintenance-Standard Practices (Planting and Transplanting)* 2012, Tree Care Industry Association, Inc. Londonderry, NH]. Plant materials shall be properly supported to ensure survival.

All trees required or approved to be planted by Title 11 shall be planted or payment in lieu of planting made prior to the expiration of the permit or City's final acceptance of the project, as applicable. However, it is encouraged that planting occur during the wet months or as per City Forester recommendations. Street tree planting may be deferred between May 1 and September 30 upon filing a performance guarantee as provided in Section 11.10.060 or other assurance deemed acceptable by the City Forester or BDS Director as applicable.

## Tree Protection Specifications (11.60.030)

Trees to be retained shall be protected in accordance with Title 11 Trees, Protection Specifications (11.60.030.C). Tree protection shall be shown on the tree plan and include the distance from the trunk of the tree to the fence. A standard root protection zone is established as follows; a minimum of 1 foot radius (measured horizontally away from the face of the tree trunk) for each inch of tree diameter. Protection fencing shall be a minimum 6-foot high metal chain link construction fence, secured with 8-foot metal posts established at the edge of the root protection zone and permissible encroachment area.





Mingus Mapps, Commissioner Gabriel Solmer, Administrator

1120 SW Fifth Avenue, Suite 405 Portland, Oregon 97204-1926 Information: 503-823-7404 portlandoregon.gov/water



# Water Bureau

# **Early Assistance Appointment Response**

Date:	June 16, 2023
To:	
From:	Kari Ann Spoon, 503-865-6372, KariAnn.Spoon@portlandoregon.gov
Case File:	EA 23-047200
Location:	6325 SE DIVISION ST
Property ID:	R332503, R332503, R332503
Proposal:	A Pre-Application Conference to discuss replacing 88 faulty light poles in Mt. Tabor Park. The location of the replacement poles will be the same as the existing light poles. None of the replacement light fixtures are the original 1920s fixtures. The proposed replacement poles are already located in Laurelhurst Park, Washington Park and 5 other Portland parks.

The Portland Water Bureau (PWB) has reviewed the early assistance materials to identify potential issues and requirements.

## A. KEY ISSUES

Mt. Tabor light replacement-The only concern Water Available has is regarding if any exiting light poles are within 5ft of the outside "skin" of any existing water main. At time of permitting through BDS, demonstration of adequate separation distances from all water mains will need to be submitted on a site utility plan, showing all water mains and any poles within 5ft of the outside edge/skin of any water main. If any poles are within 5ft, it is recommended that the replacement poles be shifted to achieve 5ft minimum horizontal separation.

No other concerns exist for water bureau with this project.



# City of Portland, Oregon - Bureau of Development Services

1900 SW Fourth Avenue • Portland, Oregon 97201 | 503-823-7300 | www.portland.gov/bds

# Request for an Evidentiary Hearing and Waiver of Right to a Decision within 120 Days

State law requires the City to issue a final decision on your land use proposal within 120 days of receiving a complete application. In order to ensure that the decision on your land use review application is rendered within 120 days, any appeal of your proposal to City Council will be held based on evidence submitted as part of your first hearing to the Hear-ings Officer, Design Commission, or Historic Landmarks Commission.

If you prefer a hearing on appeal to City Council where anyone may bring in new facts and evidence (an "evidentiary hearing"), you must request a full 245-day extension of the 120-day review period by completing this form <u>within 21 days of submitting your land use review application</u>. You may choose to extend the 120-day review period for up to 245 days at any point in the land use review process. However, if the request is received more than 21 days after the application date, any appeal to City Council will be on-the-record and no new evidence can be submitted.

STAFF USE ONLY Date Land Use Application received by BDSCase File No				
Date this form is due to BDS for evidentiary hearing				
APPLICANT: Complete all sections below that apply to the proposal. Please print legibly. Email this application and supporting documents to: LandUseIntake@portlandoregon.gov				
DATE:				
TO:	Bureau of Development Services Attention: Case Planner 1900 SW Fourth Avenue, Suite 4500 Portland, OR 97201			
REGARDING:	Type of Land Use Review Site Address/Street			

### I understand the following information:

- 1. I have the right, under State law, to a final decision on my application no more than 120 days after my application is determined to be complete by BDS staff.
- 2. I am not required to sign this form. If I do not sign this form, the City of Portland will process my application to meet the 120-day requirement.
- **3.** By signing this form, I am making an irrevocable decision to extend the review period a full 245 days, and may not change my mind later except by withdrawing this application, filing a new application, and paying the associated fee.
- 4. By signing this form, I am waiving my right under State law to a final decision on my application with the 120-day review period. I am waiving my right to file any legal action to enforce the 120-day review period.

## All applicants must print their name on this form.

Print Name		Day Phone	
	I acknowledge this typed name as my signature		
Print Name		Day Phone	
	I acknowledge this typed name as my signature		
			1

# **120-day Review Period Information**

State law requires that the City make a final decision on your application no more than 120 days after it is deemed complete. State law also allows an applicant to extend the 120-day review period for an additional 245 days. Generally, we have been able to meet the 120-day deadline. However, where the proposal is complex or there is an appeal to City Council, it is difficult to meet this deadline. This is due to the amount of time required to review cases, make findings, provide time for neighbors to comment, and hold public hearings.

The 1995 Oregon Legislature adopted new laws which change how this 120-day period is calculated, and these laws make it much more difficult for us to meet the timeline. As a result, City Council adopted a resolution allowing us to comply with the new laws. The way this affects you, the applicant, is that an appeal of your proposal to City Council will be held based only on the evidence already in the record.

Our Type III procedure provides for a hearing before a Land Use Hearing Officer or a commission (Design or Landmarks). It also provides for a hearing before City Council if there is an appeal. Our Zoning Code allows City Council to choose how it will hear appeals. City Council may hold a full evidentiary hearing, or the Council may hear the appeal "on the record." An evidentiary hearing is one where anyone may bring in new facts and evidence. For instance, a neighbor or applicant could bring a traffic study to the City Council hearing and request that Council consider it, even though it was not submitted to the original review body (Hearings Officer, Design Commission or Historic Landmarks Commission).

For an "on the record" appeal, the City Council relies only on the testimony and other evidence that was submitted to the original decision-maker—evidence that is "in the record." For an appeal based on the review body's decision and record, the appellant presents arguments to the Council about what is wrong with the review body's decision. The person that did not file the appeal is responsible for defending the decision. Neither side presents new evidence, and no new issues may be raised. Hearing appeals that are "on the record" saves considerable time, and makes it possible to meet the 120-day review period requirement.

The right to a final decision within 120 days is the applicant's right and guarantee under State law. The only

way this can be changed is if the applicant requests that any appeal include an evidentiary hearing. If you prefer the process that allows for a full evidentiary hearing if there is an appeal, you must extend the 120-day review period by a full 245 days. We will still handle your application differently, but still in a timely manner.

There are several reasons why you may want to extend the 120-day review period. The most significant advantage is that it allows time for all parties—you, the neighbors, and the city agencies-to work together to develop solutions. It allows time for you to provide additional information in response to concerns, and to help everyone better understand the application. This can avert a costly appeal to City Council or even to the Land Use Board of Appeals (LUBA), but it does take time. In addition, it allows for modification to the proposal as it moves through the process. This gives you the opportunity to change your project to address concerns or improve the proposal. Extending the 120-day review period allows for flexibility in the nature, number, and types of hearings that can be held so your case is reviewed in the way best suited to your particular case. Finally, it allows for a full evidentiary hearing if there is an appeal to City Council. This would allow new information to be submitted, including new information to support your application.

Although we think the longer process can benefit everyone involved, you are fully entitled to the 120-day process. If you prefer that option, do not sign or return this form. We will then proceed in processing your application within the required 120-day review period. If you prefer to extend the 120-day review period by 245 days, you must sign and return this form to the Bureau of Development Services within 21 days of submitting your application.

Once you choose the timeline you want to follow, we will include that information in the notice to neighbors, and process your application accordingly. For that reason, once you choose a timeline, you may not change your request. If you choose the 120-day review period, you may not opt for an evidentiary appeal hearing unless you start the entire process over, including a new application fee. Conversely, once you choose to extend the review period by 245 days, you may not demand that a final decision be issued within 120 days.

For more information regarding 120-day review period, contact the planner assigned to your case, or the Zoning Hotline at 823-7526.

For more information, call the Planning and Zoning staff at 503-823-7526 Information is subject to change, for current Portland Zoning Code visit www.portland.gov/code/33

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December 7, 2023

- To: Arthur Graves, Planner Land Use Services Division Bureau of Development Services 1900 SW 4th Ave Suite 7007 Portland, OR 97201
- Re: Land Use Review LU 23-088549 HR DM

This letter and attachments provide the Portland Parks and Recreation (PP&R) response to your questions (*shown in italics*) located in Section I. of your correspondence dated October 19, 2023. PP&R believes that this submittal, with attachments (revised submittal narrative and exhibits) addresses all the comments received. No additional materials are being submitted at this time.

1. Please clarify the specific reason for the removal of the proposed historic light poles from the Mt Tabor Historic District.

The work proposed in Mt. Tabor Park is part of a city-wide light pole safety project. Decorative concrete poles installed utilizing an anchor wire connection within the Portland Parks system are affected. The reason for removal is to address the public safety hazard associated with the connection method that was used to install poles, and other code deficiencies.

The primary hazard is wind or seismic lateral loads that exceed the capacity of the wire used to connect the poles to the footings. Even if the wire connection could be replaced, the poles cannot be reinstalled 'as-is' due to a lack of sufficient reinforcing metal within the poles and the footings to meet current code requirements. Additional details regarding these code deficiencies are provided in response to question 3.

As stated on page 5 of the narrative, poles were installed using an anchoring system that does not meet current code standards. Further, it is not practicable to rehabilitate the poles to meet current code standards due to the age and condition of the poles (also page 5 of the narrative). Additional information regarding light pole installations and the problematic anchoring system is provided below.

Administration

1120 SW Fifth Avenue, Suite 858 Portland, Oregon 97204 503-823-PLAY (7529) | Fax 503-823-6007 PORTLANDPARKS.ORG Commissioner Dan Ryan Director Adena Long



Sustaining a healthy park and recreation system to make Portland a great place to live, work, and play.

Concrete light poles are currently installed in Portland parks using the direct bury method to assure structural stability. Metal light poles may be bolted to a buried concrete footing. There is no base added between the pole and the buried footing (or foundation) with these modern installation methods.

However, in the past, decorative concrete poles were installed with a grout base. As shown in Figure 1, reinforcing metal bars (or rebar) bent into hairpin-shaped loops (or rings) extrude from the bottom of the pole and the top of the concrete footings. The pole hairpins and the footing hairpins were attached to each other by steel wire ('tie wire') within the grout base.



Figure 1. Typical Wired Anchoring Connection Detail

In November 2022, Asset Management staff visually inspected 1,020 light poles and found grout bases present on 252 decorative concrete light poles, indicating the presence of a tie wire anchor. Multiple decorative concrete poles with grout bases have since been removed, confirming that the poles with grout bases use the internal tie wire method. Figures 2 and 3 show a pole removal in progress at Mt. Tabor Park, which documents the presence of the substandard wire anchor within the grout base.

The 88 light poles proposed for replacement at Mt. Tabor Park all have grout bases and use this wire anchor method to connect the poles to buried concrete footings. Metal poles and other decorative concrete poles installed around the historic reservoirs do not use grout bases and are not proposed for replacement. December 7, 2023 Re: Land Use Review LU 23-088549 HR DM



Figure 2 (Top). Pole at Mt. Tabor, removal in progress. Grout base to right of pole. Hair pin loops are visible protruding from the bottom of the pole. Remanent tie wire shown in bottom right of photo.



Figure 3 (Bottom). Base of pole shown in Figure 2 showing condition of the bottom of the pole and tie wire fragments from the internal wire anchor connection.

By removing the light poles with wire anchors that present a hazard to the public in Mt. Tabor Park (as well as 11 other parks in the city), the light pole safety project will resolve this public safety issue. The removal was approved by City Council through the authorizing ordinance provided as APP Exhibit A (see in particular Sections I. 3 through I. 6, page 1-2).

2. Please clarify the submitted Exhibits with labels and page numbers. When referencing Exhibits cite the specific Exhibit and page number.

The exhibit sets have been revised to provide an exhibit label and page number on each page. The narrative has been revised to specify the exhibit relevant to each reference; all pages within the referenced exhibit are considered relevant unless specific pages are listed.

3. Please clarify the statements on page 5 of the Application Narrative regarding the existing light poles not meeting building code requirements. Please provide documentation and support for this.

As noted on page 5 of the narrative, the existing connection between the pole and the foundation does not meet current code requirements. This assessment was provided by the project team's consulting engineers, KPFF. The third-party engineers performed the code analysis and prepared a report that recommended replacement due to the hazard presented by the poles. The hazard was discovered after a park visitor attached a hammock to a light pole, causing the pole anchoring system to fail and the light pole to fall over in June 2022.

The primary issue with the wire anchor connection is that the steel tie wire connection was not designed to meet lateral loads. Additionally, some tie wires have deteriorated over time because of water/moisture influence. Even with a retrofit to replace the wire anchor, the following light pole elements would not meet code requirements according to the consulting engineers:

- Footing depth of 3'-4';
- Footings lack reinforcing steel; and
- Poles lack reinforcing vertical steel with transverse ties.

These code deficiencies led the consultant to recommend replacement of the entire light poles and their footings, as documented in the emergency declaration issued by the Commissioner-in-Charge on December 28, 2022 (added as APP Exhibit K).

With this incompleteness response, PP&R is sharing photographs and a construction detail of the inadequate and code-deficient anchoring system discovered after the June 2022 hammock incident.

December 7, 2023 Re: Land Use Review LU 23-088549 HR DM



Figure 4 (Top). Close up of materials in the grout base showing foundation (footing) hairpin and severed tie wires.



Figure 5 (Bottom). Same materials as above from different angle show hair pin and severed tie wire shown from a different angle.



Figure 6 (Left). Construction detail "Existing Light Pole" (1996)

4. Please provide information clarifying the structural integrity of the light poles to be removed. Provide both documentation and drawings.

The structural condition of light poles is discussed in the narrative on pages: 5, 7, 8, 37, 38, 48, 49, 50 and is substantiated by the emergency declaration (APP Exhibit K). Photographic documentation regarding the existing conditions that make the reuse of the poles through rehabilitation infeasible was provided in APP Exhibit H. Additional photographs and drawings in this letter supplement the original information.

As noted in the response to question 3, even if the anchor was replaced, the poles cannot be reinstalled due to the lack of sufficient internal reinforcement to meet current code requirements. Adding structural supports to the pole would severely compromise the appearance of the original historic poles, defeating the entire purpose of saving them for their historic integrity.

The availability of planned and as-built construction plans in the record varies. For newer construction, more documentation is available than for older projects. The as-builts provided in the original submittal are the best source of information on the historical poles specific to Mt. Tabor Park, however, some information gaps remain. The only records of the lighting system for the park's circulation system that contain construction details are those from 1987 (previously included in APP Exhibit F, page 4).

The same decorative concrete light poles were used throughout the park system, so while there are no structural drawings specific to Mt. Tabor Park, there are plans available for other locations, such as Irving Park (provided in this letter as Figure 6). According to the project's consulting engineers, these plans document a lack of sufficient rebar in both footings *and* poles to provide enough structural reinforcement to meet current minimum code standards.

As noted above and throughout the narrative, the technique used to connect historic poles to buried footings poses a potential life safety hazard and the rehabilitation of existing poles to add metal reinforcement to meet current code standards is not considered feasible due to the age and condition of the poles. The photograph in Figure 7 showing a pole removal in progress illustrates the structural instability of the grout bases.



Figure 7. Removed pole; broken wire tie circled; base of concrete pole is shown along with grout base in pieces.

The "deterioration" noted on page 38 of the narrative refers to external conditions observed by parks staff and the consulting engineers, as well as the internal deterioration affecting the tie wires making up the anchor connection visible during pole removals (Figure 4, 5, 7). Staff photographs documenting the external conditions were provided in APP Exhibit H).

5. Please provide the engineers report(s) mentioned on page 7 of the <u>Application Narrative</u>.

Ongoing litigation limits the amount of materials that can be made public relating to the condition of specific light poles. The engineer's report is subject to Attorney-Client privilege and the City has not made the report available to the public at this time due to legal proceedings.

6. Please clarify which of the poles to be replaced will not be located in exactly the same locations as the existing light pole to be removed/replaced. Please provide documentation and drawings.

Changes to pole locations to avoid conflicts with waterlines previously shown in Exhibit C-6 are now shown on page 4 of exhibit C-9. There is the potential for pole locations to be revised slightly to limit impacts on existing trees and assure compliance with Title 11, since the project plans to retain all existing trees on site.

7. Please provide complete drawings (plans, elevations, sections, etc.) of the historic light poles. ALL DRAWINGS MUST BE TO SCALE.

Historic plans from the Bureau's archive of as-built plans are stored as scanned versions of oversized scaled plans and were provided in APP Exhibit F. These plans of the illumination system show the location of the decorative concrete poles within the park in 1958, 1984, and 1987 on pages 1-3, 5-6. Scaled details are shown on pages 3 and 4 of APP Exhibit F. The location of the poles is also shown in the scaled plan set in C Exhibit 6, excluding pages 8 and 15.

8. Please provide complete drawings (plans, elevations, sections, etc.) of the proposed replacement light poles. ALL DRAWINGS MUST BE TO SCALE.

The plans showing the mapped disturbance area for the proposed replacement light poles have been revised to show the scale when printed at 11" x 17" and are now Exhibit C-9.

Elevations and sections of the poles and the fixtures available from the manufacturer are provided in Exhibit C-4 on pages 1-2 with spacing in the bottom right-hand corner as specified in the early assistance pre-application conference notes. A new page was added as Page 2-B which shows the pole to scale.

Construction plans for the replacement poles have been added as Exhibit C-10, however since they are oversized, the plans will be submitted separately (rather than scale plans to print on 11" x 17" paper).

9. Please clarify exactly which of the historic light poles are failing and need to be removed due to clearly visible structural deterioration.

All the poles in the Mt. Tabor circulation lighting system proposed for removal were installed using the wire anchor method identified as a public safety hazard. Since the anchor is internal it is not externally visible.

The structural deterioration that *is* visible on certain poles in the park substantiates the poor condition of the poles for the purpose of rehabilitating the existing poles to meet current code standards. Additionally, as noted on the last page of APP Exhibit H, spalling most often starts internally and is usually not visible until the deterioration process has progressed significantly – waiting until specific poles show visible signs of spalling before replacement could lead to an increased (and unacceptable) risk of structural failures.

10. Please clarify specifically what " 'dark skies' compliance" (mentioned on page 7 of the <u>Application Narrative</u>) refers to.

Principles of "dark sky" or responsible outdoor lighting were identified by the Bureau of Planning and Sustainability (BPS) in their August 2020 report, *Dark Skies – Strategies for Reducing Light Pollution in Portland* (see excerpt from report in newly submitted APP-Exhibit Q). Consistent with these principles, the replacement lights at Mt. Tabor:

- Serve a specific purpose (lighting the circulation system within the park).
- Direct illumination where needed (fixtures are shielded at the top to reduce up light and therefore illumination is directed downward).
- Light levels are no brighter than necessary (wattage is limited to 60 watts)
- Lights in the system will be controlled (a control system is part of the replacement plan).
- Use warmer colors and limit blue-violet lights (luminaire produces a warm white light in the 24000 L wavelength).

### 11. Within the 'dark skies' comment, please clarify how the proposed light poles are shielded.

The shielded light fixture has a solid barrier (cap) at the top of the fixture in which the LEDs are located. The LEDs are installed in the cap, so LEDs are not visible below the barrier (no light is visible below the horizontal angle). This prevents any light from spilling skyward from the LEDs. Horizontal spill into the adjacent environment is also minimized as the LEDs are placed in a manner to direct more light toward the pathways.



12. Please clarify the statement in the fourth bullet on page 7 of <u>Application Narrative</u> regarding lumens. Is this saying the proposed lights will be 33% less bright?

For context, the referenced statement is provided here:

• The existing 150W HPS lamp delivers 9000 luminaire lumens, while the new 60W light emitting diode (LED) lamp is more efficient and will deliver 6000 luminaire lumens (a reduction of 33%).

Light is measured in a variety of ways. The intensity at the light source is measured in lumens, while the amount of light present at a particular distance from a light source is measured in foot candles (fc). The proposed lights will emit 33% less amount of visible light as measured at the light source (6000 proposed vs 9000 existing lumens).

How far the light reaches – or how bright it is at a particular distance – depends on several factors, including the amount of illumination produced at the source modified by factors such as lamp direction and concentration, fixture paneling, and absorption from barriers such as vegetation. Information on the amount of light reaching the pathways is provided on page 11 of Exhibit C-5.

13. Please clarify the statement on page 7 of the <u>Application Narrative starting</u>, "Due to an inadequate anchoring system...it is not practicable to reuse the poles". Please provide information clarifying why existing bistoric light poles footings cannot be repaired and/or reinforced.

The footings are buried, not visible, and were not identified as a feature of the illuminated lighting system in the historic nomination. Regardless, the city's consultant assessed the possibility of retrofitting existing poles and footings using new metal anchors, as discussed further in response to question 26. Unfortunately, this method was not considered to be practicable by the consultants and, as noted in the original narrative, the third-party engineering consults could not recommend reuse based on safety considerations.

In addition to deteriorating pole and footing conditions, consultants noted that footings lacked sufficient depth and both footings and poles lacked sufficient steel reinforcement, as discussed in the response to question 3 in this letter. All of which led consultants to recommend replacement to address life and safety requirements. The practicality of retrofitting poles for reuse by adding reinforcing steel to meet current code criteria was also discussed in the narrative (page 38, 44, 48-49, and 50-51).

14. Please clarify what the industry standard is for light pole installation in parks.
The standard practice for determining the method of installation for light poles is to follow the manufacturer's recommendations. The replacement poles will be direct buried in a manner consistent with the manufacturer's recommendations, as previously provided in Exhibit C-4 (page 3).

Regarding when light poles are replaced, the city has adopted policies for capital asset management. These standards identify the expected lifespan of capital assets. Lighting assets are expected to have at least a 33-year lifespan, as shown in administrative rule FIN 6.11.03 Lifecycle Examples for Capital Asset Administrative Procedures (Exhibit L). Based on the installation dates associated with PP&R light poles in Mt. Tabor Park, the proposed replacement is in line with adopted city policy.

There is no consistent industry standard used to determine when it is appropriate to provide illumination at parks or what level of illumination is best suited for various park settings. However, the Illumination Engineers Society (IES) provides technical recommendations that may be purchased from the American National Standards Institute, or ANSI, which is a private, non-profit organization that administers and coordinates the U.S. voluntary standards and conformity assessment system. These proprietary guidelines are not regulatory standards, nor do they replace guidance from subject matter experts.

ANSI information is not publicly available, however, experts in lighting may pay to access the information when developing location and context-specific solutions. In a recently published guide prepared for the City of Denver, industry professionals used the ANSI/IES standards as a starting point to make recommendations for Denver-specific policies. This guide is provided as Exhibit N in the revised APP Exhibit set. Information regarding Portland's efforts to update the lighting throughout our park system is summarized on pages 17-19. Proposed Lighting Illumination standards for pedestrian trails are provided on pages 36-39.

Unlike the proposed standards for Denver, which appear to apply to paved trails, the historic illumination system at Mt. Tabor Park lights soft surface trails, stairs, <u>and paved drives</u>. Therefore, the recommendations for Denver trails are not necessarily appropriate for the Mt. Tabor mixed-mode circulation system. Further, the existing historical illuminated circulation system provides cultural value and is proposed to be retained in this application, regardless of modern industry practices.

15. Please clarify where the specific structural issue is with the historic light poles: the footing, base, poles, light, etc. Clarify if this a systemic issue will all historic light poles within the Mt Tabor Historic District.

The risk posed by the wire anchor connection is a systemic issue affecting more than 250 decorative concrete light poles that are not direct buried in multiple city parks. See Light Pole Safety Project Frequently Asked Questions (added to the revised APP Exhibit Set, as Exhibit M, page 1). In addition to the wire anchor, footings and pole do not meet code requirements as detailed in response to question 3.

While there are more than 200 light poles at Mt. Tabor Park, the poles to be replaced are only those within the historic lighting system associated with the park's circulation system. All the poles in the park's historic lighting system provided to illuminate the park circulation system are decorative concrete poles installed using the deficient tie wire anchor method. The poles can be easily identified because they all have the same grout base and were originally installed in the 1920s or 1930s.

16. On page 7 of the <u>Application Narrative</u>, in the last paragraph, "other information" is mentioned regarding "determining full replacement". Please provide this "other information".

Information to make the determination was provided by the consulting engineers and the City Attorney's office.

17. The closure of the Columbia Pool is mentioned on page 8 of the <u>Application Narrative</u>. Please clarify why this pool was closed.

Columbia Indoor pool was closed due to life-safety hazards and diminishing structural integrity, including poor condition of the roof. The decision to close Columbia Pool, like the decision to replace light poles, epitomizes PP&R's commitment to prioritizing life and safety in decision-making.

18. On page 14 of the <u>Application Narrative</u>, in the fourth paragraph, a comment is made about, "Similar poles at historic parks..." Please provide the supporting citation for this comment.

The National Register of Historic Places reference number for the Laurelhurst Park Historic District is No. 01000134 and is added as APP Exhibit P. See in particular page 5 of the exhibit (registration narrative page 2):

"The circulation system was lit in 1915. The lamp standards and fixtures were replaced in the 1960s and again in 1996. Because it is not known if the new structures are placed in the same locations as the original structures and because the existing lamp structures are entirely modern, the lighting system is a noncontributing structure." Irving Park is not considered a contributing resource to the historical character of the Irvington Historic District since it contains modern sports fields and structures. The park's lighting system which dates from a similar era is not mentioned in the listing for the District at all.

19. On page 15 of the <u>Application Narrative</u>, in the second paragraph, a comment is made about 61 light poles. Please clarify in drawings where these light poles are located.

The notated plan from 1987 shows the location of each pole and labels each pole with Staff's estimated installation date. This was provided in APP Exhibit F and is located on page 6 of that exhibit.

20. Please provide a schedule and corresponding plan for the light poles in the Mt Tabor Historic District to include: light pole age, installation date, construction type, degree of deterioration, reason for proposed removal and replacement. Number light poles 1-88 on the plan and in schedule.

See Exhibit C-10, page 8 for the pole schedule.

As noted in answer 19 above, the 1987 notated plan identifies the location of each pole proposed for replacement in this project and the <u>estimated</u> installation date. Each pole is numbered in the 1987 plan, consistent with the numbering used in earlier plans also provided in the same exhibit. In many cases, including for the Mt. Tabor Park illuminated circulation system, there is no primary source record to definitively date the original installation of the lighting system for the circulation system.

The oldest record is the 1958 lighting plan which notes a <u>1924</u> installation. However, as noted in the application narrative, the historical nomination asserts the lighting system was installed in <u>1928-1929</u>, while portions of the lighting system associated with the historic drives constructed in the <u>1930s</u> were probably installed concurrently with roadway construction, and there does not appear to have been any attempt to date each pole in the system in the historic nomination (page 14-15).

The reason for removal is the same for all the poles - the anchor attachment that was identified as a potential life safety hazard. Even if the anchor connection could be replaced, the poles cannot be reinstalled 'as-is' due to insufficient internal reinforcement to meet current code requirements as discussed in the response to question 3.

21. Please clarify in drawings (plans, elevations, etc.) where Nonconforming Situations associated with LU 17-245440 and mentioned on page 23 of the <u>Application Narrative</u> will be installed.

The BDS-permitted plans that show where the nonconforming improvements will be made were provided as Exhibit C-7. This exhibit has been revised to add a site plan from the decision showing where adjustments approved existing conditions on page 4.

22. Please clarify why irrigation drawings have been submitted.

The prepared plan set for the site was sequentially numbered inclusive of the irrigation plans. The irrigation plans were included so the reviewer could see all plans included in the plan set for the site and not have to inquire about what was missing. Based on the email instructions the scaled plan set for the site will be provided separate from the rest of Exhibit C.

23. Please clarify how conduit will be concealed with the proposed replacement light poles.

The lighting system utilizes an underground conduit. Poles contain internal conduit, as shown in the 1987 plan details (APP Exhibit F, page 4) and in the pole schematics on page 2 of C Exhibit 4). Conduit will remain buried and will enter the poles 18" below the ground through cable entrances built into the embedded portion of the poles. The area of interest from Exhibit C-4 is reproduced here for reference:



#### 24. Please clarify where "Sheet 4" is located (this is mentioned on page 41 of the <u>Application</u> <u>Narrative</u>.

The previously submitted Exhibit C-6 contained the disturbance area plans, however, this plan is now a separate exhibit. Sheet 4 of the mapped disturbance area is now located on page 4 of Exhibit C-9.

25. Please clarify why the bases/footings of the existing historic light poles cannot be repaired and/or reinforced.

Many of the grout bases are in poor external condition as documented in APP Exhibit H and photographs in this letter. Additional internal deterioration of the components located within the grout bases was documented by third-party engineering consultants, as shown in the photographs in this letter. Repair or replacement of the connection within the grout base while physically possible, would not meet current code standards (as discussed in the answer to question 3). Retrofitting to use a different method to connect poles to new footings would severely stress the poles (the 99-year-old concrete would crumble).

26. Please clarify options investigated to repair the historic light poles. Please provide restoration experts/specialists consulted.

The third-party engineers considered both a replacement and retrofit option.

- Replace existing wire anchors with new materials (replacement option)
- Remove or sever existing hair pins and embed new anchors (retrofit option).

The existing anchoring method does not meet code requirements as discussed in response to question 3. Therefore, even if materials could be replaced, this option is not a feasible solution since it would not meet the code or resolve the hazard. a Alternatively, poles could be retrofitted with a new anchor. Thiswould entail shearing off the protruding hairpin rebar and inserting a new anchor into the footing along with steel shims, which would then be epoxied to the footing – however due to the condition of the poles and the footings, the retrofit is not a practicable option. Regardless of anchor replacement or retrofit, the design and condition of the poles themselves are a cause for concern. Replacing the poles will mitigate the structural risk to public safety and ensure another 100 years or so of expected life span.

Due to interest in preserving the poles, consulting engineers were also asked about reinforcing poles but such internal reinforcement to preserve the visual character of the historic poles was not considered practicable, as discussed in pages 7, 38, and 48 of the narrative.

Park staff did contact the Oregon State Historic Preservation Office (SHPO), and consult with historic preservation organizations to offer the poles for preservation. As noted in the application narrative on page 45, none were willing to take the poles. While the most robust discussion occurred with the Oregon Historical Society, ultimately only light fixtures were conveyed.

PP&R recognizes the value of historic restoration expertise; however, this expertise does not supersede structural deficiencies or health and safety concerns. Any recommendations from a historic restoration expert would still need to align with the engineer's recommendations to abate the safety hazard. Since the consulting engineers determined that repair, retrofitting, or structural rehabilitation was not practicable and would not address the safety hazard, there was no need for a formal consultation of a historic resources specialist on this matter. Public safety was the most important criterion in deciding whether to keep or replace the light poles in the Bureau's decision-making process.





## Light Pole Safety Project: Mt. Tabor Park

Type III Historic Resources Review for Accessory Utility Upgrades (Revised)

LU 23-088549 HR DM, Exhibit A.7

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**General Information** 

Project:	PP&R Light Pole Safety Project
Applicant:	Portland Parks and Recreation (PP&R) 1120 SW Fifth Ave, Suite 858 Portland, OR 97201 Contact: Brett Horner, Parks and Trails Planning Manager 971-409-3518   Brett.Horner@portlandoregon.gov
Property Owner:	City of Portland 1900 SW Fourth Ave, Suite 7007 Portland, OR 97201
Land Use Planner:	PP&R, 1120 SW Fifth Ave, Suite 858 Contact: Carine Arendes, AICP 503-679-0826   Carine.Arendes@portlandoregon.gov
Engineer:	PP&R, 1120 SW Fifth Ave, Suite 858 Contact: George Tkebuchava, P.E. 503-250-0355   George.Tkebuchava@portlandoregon.go
Site:	Mt. Tabor Park (6325 SE Division Street) Pre-application conference June 27, 2023 (23-047200 PC)
Improvement Value:	88 new concrete light poles with acrylic/metal fixtures and decorative metal strapping (value \$8000 each, total \$704,000)

## Section 1.1 Proposal

This application narrative is provided to request land use approval to replace light poles at Mt. Tabor Park. The replacement work at Mt. Tabor Park is part of the City of Portland's Light Pole Safety project to replace light poles in 12 city parks. The current phase of the Light Pole Safety project was approved by City Council through the adoption of Ordinance No. 191222 on April 5, 2023. The replacement project is part of a larger effort to reduce the Parks and Recreation Bureau's environmental footprint and address a growing capital maintenance backlog.

Usually, the removal or installation of light poles does not require a building, site, or zoning permit. Mt. Tabor Park was nominated as a historic resource in 2004 and listed as a historic district. Historic resource review is required in this case because the lighting system is a noted attribute along with the circulation system and other elements within the park's landscape. The park's landscape (or 'park land' as it is referred to in the nomination) is a contributing feature in the listing of Mt. Tabor Park in the National Register of Historic Places. Therefore, a historic resources review is required.

Mt. Tabor Park was designed in the early 1900s by Emanuel Mische, a landscape architect who started his career with the well-known Olmsted Brothers landscape consulting firm. In addition to its notable designer, the park's landscaping elements, along with historic architecture and statuary contribute to the park's value as a historic resource. As discussed further in Section 3.3, the historic nomination does not list individual poles as important structures, rather it is the overall illumination provided to the circulation system as it meanders through the landscape of the park that is valued as an important feature within the park site.

Individual light poles to be replaced are located within the park and along SE Taylor St. 84 light poles are located within Mt. Tabor Park and four additional poles are located in the SE Taylor St. right-of-way (ROW). Poles in the ROW will be addressed through the Portland Bureau of Transportation (PBOT) permit process for existing utility structures (encroachment permit review).

Documentation for individual poles varies, some were replaced at least once before with installation dates ranging from the 1950s through the 1980s. About 60 of the poles are thought to have been installed during the 1920s and 1930s. Currently, 81 poles are installed at Mt. Tabor Park along the circulation system. The light system will be restored to 88 light poles to match the number of poles identified in the historic nomination. All of the new replacement poles will match the existing ones in design and material (see Exhibit C- 4 pages 1-2, and Exhibit APP - G).

## SECTION 1 - PROPOSAL AND PROJECT NEED

Current fixtures to be replaced are not original - though they are consistent in design to existing lantern-style metal framed fixtures within Mt. Tabor Park and those found in other city parks (Irvington, Lair Hill Parks, Laurelhurst, Washington, etc.). Archival records indicate the now iconic lantern-style fixtures were first installed at Mt. Tabor Park in the 1950s. The replacement fixtures will match the existing fixtures in both materials and design (see Exhibit APP-G).

Existing poles are showing their age and the impacts of Portland's wet environment and the freeze-thaw cycle. Conditions include cracking and flaking in the concrete surface, as well as efflorescence (white discoloration from moisture loss), pitting, and even external evidence of corrosion of internal metal components, or 'spalling' (see photographs included in Exhibit APP-H). Additionally, poles were installed using an anchoring system that does not meet current building code. The project team and engineering consultants explored options to retain, rehabilitate, and reuse the existing light poles in Mt. Tabor Park. However, this is not practicable as there is not an acceptable way for them to be anchored in a manner that would meet current building code for anchoring, while also retaining enough of the pole's historic and design integrity. Therefore, all the poles are being removed and replaced.

Park landscape features identified in the listing are the circulation system – which consists of multiple scenic drives along with formal entrances, historic staircases, and the formal trail system; the lighting system for the circulation system; scenic viewpoints; spaces of refuge created by screening vegetation; two tennis courts and three play areas (69th Avenue playground and group picnic area, Harrison playground, and main playground). At the time of nomination, Mt. Tabor Park also contained seven contributing buildings and five additional contributing structures, along with 10 non-contributing buildings and six non-contributing structures.

The historic reservoirs and associated elements were detailed in a separate resource designation and constitute a separate historic district within the park. None of the <u>Reservoir</u> Historic District resources will be affected by this project (the boundaries of the two separate districts are shown in the APP Exhibit Set as Exhibit C). Additional information on the <u>Park</u> Historic District is in Section 3.3 of this application and a copy of the nomination (NRIS Reference No. 04001065) is included in the APP Exhibit Set as Exhibit J.

Mt. Tabor Park is located in inner East Portland, generally bounded by SE Yamhill St. to the north, SE 71<sup>st</sup> Ave. to the east, SE Division St. to the south, and SE 60<sup>th</sup> Ave. to the west (see Vicinity Map, Exhibit C-1). Used first in 1894 as a site for the city's public water reservoir, records indicate Mt. Tabor was established as a public park and nursery for Portland's city parks in either 1908 or 1909. Built on a volcanic butte, the site's

## SECTION 1 - PROPOSAL AND PROJECT NEED

topography is highly variable, with shallow inclines to the west, steeper slopes in the east, a forested ravine in the northwest corner, and multiple peaks, the tallest of which is the namesake volcanic cider cone rising to more than 640' in height.

The interior of the park is a mixture of grassy and forested areas that provide users with options for a wide variety of activities, including two scenic views identified in the city's Scenic Resources Protection Plan. The southern portion of the site, south of SE Lincoln/Harrison St. contains the historic nursery and maintenance yard (approved for updates via 2017 land use approval), a small play area, and a dog-off leash area.

The replacement light poles will be installed along the historic drives and portions of the park's soft surface trail system. The location and age of poles planned for replacement is shown in a modified version of the 1987 lighting plan in the APP Exhibit F, page 6. Replacement poles will be installed in the same location as the current poles to maintain the spatial pattern in existence at the time of the historic listing wherever possible. A one-for-one replacement will also minimize tree impacts and ensure large shade trees are retained onsite.

Poles will consist of a concrete post and a metal framed lantern-style light fixture consistent with existing poles. Pole design details and fixture design details are provided in Exhibit C- 4 pages 1 -3 (page 4 provides pole installation and storage information). As shown in the comparison of a current pole in Mt. Tabor Park and a replacement pole (already installed in Laurelhurst Park), the replacement poles match the character of the existing poles from the materials used, design of pole and fixture, as well as height and form (Exhibit APP-G).

The replacement light poles include the following features:

- Tapered gray concrete octagonal pole with flared base similar in shape and style to the posts in existing light poles.
- Pole material is concrete consistent with period poles. Unlike the period poles, however, the replacement ones are precast for a durable and structurally stable life cycle. They have an exposed aggregate finish and anti-graffiti coating.
- Poles will be embedded 5' underground. Once buried in place, the overall 17'2' pole will have above ground height of 12' 2" similar in height to existing park poles.
- Poles will be placed directly into an augered hole, a technique referred to as direct burial, to minimize installation damage and loss. Direct burial provides a clean and uncluttered appearance eliminating anchor footings, or the need to

cover unsightly base plates, studs, or nuts. This technique saves time and money, and is more visually appealing.

- Decorative metal strapping will be affixed to the top of the pole below the fixture, consistent with existing fixtures in this and other historic parks in the city.
- Fixtures affixed to the tops of the poles are framed metal lantern-style to match existing lantern-style metal framed fixtures within Mt. Tabor Park and those found in other Portland Parks, historic (Irvington, Lair Hill) and otherwise (Laurelhurst, Washington, etc.).
- Fixtures (or luminaires) are made of cast aluminum with acrylic panels. The new fixtures are shielded to achieve "dark skies" compliance. The new fixtures will also direct more focused illumination onto the circulation system.
- The existing 150W HPS lamp delivers 9000 luminaire lumens, while the new 60W light emitting diode (LED) lamp is more efficient and will deliver 6000 luminaire lumens (a reduction of 33%).

## Section 1.2 Project Need

Over 1,000 light poles in city parks were inspected as part of a system-wide review of the structural safety of light poles in city parks. Through this effort, PP&R identified more than 240 light poles in 12 City Parks that may pose a life and safety hazard to the public due to structural issues. Initially, the Bureau was removing hazard light poles while planning to replace light poles as funding became available. The Bureau has since developed a funding plan to replace all poles with structural issues. Poles will be replaced as new poles are delivered and are available to install. The Mt. Tabor Park replacement poles are currently scheduled for installation in April and May 2024.

The Bureau engaged the services of the engineering firm of KPFF to provide expert analysis on certain light poles used in the City of Portland parks. The engineers were tasked with identifying structural issues and recommending solutions that prioritize public safety. Due to an inadequate anchoring system that relied on a tie wire technique and the condition of the concrete at the base of the poles, it is not practicable to reuse the poles. Concrete poles are required to have reinforcing steel capable of withstanding specific seismic and tensile loads to meet current code standards and it was the project team's determination that the existing poles could not meet these standards. Adding structural reinforcement while also keeping the concrete poles intact was determined to be not practicable.

## SECTION 1 - PROPOSAL AND PROJECT NEED

Based on the age and condition of the poles and fixtures, and other information and recommendations from the engineers and City Attorneys on the project team, the Bureau determined full replacement was warranted. This determination is in line with City Policy FIN 2.19, which requires that, *"Bureaus shall employ a conservative approach to public and employee safety, erring on the side of caution."* It is crucial the public feels safe when using our parks and natural areas. When public safety is at stake, the Bureau acts out of an abundance of caution to preserve the health and safety of Portlanders and others who use our facilities. PP&R has a long history of prioritizing life and safety in decision-making as evidenced by the recent difficult decision to close Columbia Pool, a community-cherished asset.

The decision to replace the period light poles in Mt. Tabor Park and those in 11 other city parks was carefully considered. A thorough review of more than 1,000 light poles throughout the park system was conducted, input from park friend groups and recommendations from legal and engineering experts were considered before making a final decision. Although replacement was not an easy decision, there are a number of benefits that will result from the decision to replace these light poles.

This project is an investment in adequate illumination of the park's circulation system for the long term. Benefits to the replacement of the light poles include improving public safety and energy benefits. Replacement of outdated and inefficient lighting systems is expected to result in reducing operating costs in the future. The light safety replacement project is estimated to reduce utility costs by \$79,000 every year.

Replacement fixtures will provide more focused and direct lighting toward walkways, reducing the amount of light exposure in natural areas and on adjoining properties and enhancing safe use of our facilities. This project also advances the City's Renewable Energy Goal by improving the energy efficiency of our infrastructure to avoid the future consumption of over 362,313 kWh of electricity per year and over 10,092 therms of natural gas (as noted in Ordinance No. 191222 in the APP Exhibit A).

Using new poles and fixtures will extend the life of the lighting in the park, far beyond the expected lifespan of the existing poles and fixtures. Investing in these improvements now helps ensures safe, efficient, and welcoming parks in the future, consist with the Bureau's mission to provide equitable access to welcoming places, programs, and services that improve community health and our environment.

## SECTION 2 - EXISTING SITE AND VICINITY

#### Section 2.1 Existing Site

Mt. Tabor is located in a residential area of southeast Portland, approximately 3 miles east of the Willamette River, directly east of the central city core. The city purchased land on Mt. Tabor in 1888 to be part of the new system bringing water to town from the Bull Run. In 1894, the Water Bureau constructed Reservoir 1. Reservoirs 5 and 6 were completed in 1911. (Reservoirs 3 and 4 are located within Washington Park.)

The area was identified for park purposes in the 1903 Olmstead Portland Parks System Plan due to its importance as the most significant landscape feature in the area, the notable scenic view available from various points of the mountain's slopes, the existing mix of both cleared areas and lush tree groves, as well as its use by the public for "Sunday and holiday outings" at the time and the growing population projected in the vicinity of the site. From its volcanic peaks and "picturesque ravines," the Olmsteds were convinced that Mt. Tabor would provide a variety of "attractive features in a public pleasure ground." Portland leaders agreed and designated Mt. Tabor a public park. The site was expanded when additional land was purchased in 1909 to establish park uses on the site according to the historic nomination. Additional land purchases for park purposes also occurred in 1929, according to the park's 2000 Master Plan.

Access to the park is taken from SE Salmon St., SE 69<sup>th</sup> Ave., SE Harrison St., and SE Lincoln St. The adjacent maintenance yard can be accessed from SE 64<sup>th</sup> Ave. and SE Division St. While the park and the maintenance yard are located on the same tax lot, the Bureau classifies the park and maintenance yard as two separate assets based on their function. The portion of the site used as a public park totals 176.04 acres and is located on R332679, R149581, R149582, and R332503. Within R332503, the park site includes the Mt. Tabor Community Garden – but not the area immediately to the west of the community garden within the "long block" or the maintenance yard. The maintenance yard consists of approximately 6.83 acres and is located on the southern portion of R332503 and the entirety of R239658. Historical remnants of unvacated rightof-way still exists in the NE corner of the park, including where the tennis courts are located, and are not usually included in the Bureau's calculation of the park's size.

The site generally slopes from east to west and north to south. The park's elevation to the west (approximately 300') and south (ranging from 215' to 235') is generally consistent with the surrounding urban fabric. The eastern portion of the site contains slopes ranging in elevation from 400-250', with the steepest slopes in the northern portion, which also contains the namesake volcanic cone. The 69<sup>th</sup> Ave historic staircase in the northeast corner of the site contains a staggering 18 flights to span an elevation

## SECTION 2 - EXISTING SITE AND VICINITY

gain of 180 feet before intersecting with Harvey Scott Circle at the center of the park near the summit of Mt. Tabor.

Within the interior of the park, a series of flat terraced areas host a variety of amenities. Paved drives, soft surface paths, and staircases provide connections between active areas and more contemplative passive uses. Amenities include view areas, play areas, restrooms, picnic areas (some with shelters in addition to tables), a variety of sports courts (tennis, basketball, volleyball), a horseshoe pit, hard surface plaza areas, and a dog off-leash area. In active areas, lawns and soft surfaces are surrounded by towering Douglas Firs while ravines and steep slopes are vegetated with native understory plants and contain a mix of conifers and deciduous trees. Landscaping adjacent to some developed areas also includes non-native ornamental plantings.

Exposed volcanic rock is apparent in a small section of the northwest corner of the park due to historical excavation on the site. The USDA Natural Resources Conservation Service identifies two dominant soils, Multnomah Silt Loam and Urban Land Latourell Complex, in disturbed areas. These soil types are well-drained, moderately permeable, and prone to erosion, particularly on steeper slopes.

The forest and woodlands on Mount Tabor are organized into natural communities based on slope and aspect. The native tree canopy is well-developed in most of the natural areas; however, the shrub layer is dominated by non-native, invasive species and some areas lack native understory. Plantings of horticultural shrubs and trees occur throughout the park alongside trails and roadways, and in meadows. The Bureau of Environmental Services identified the park as an "anchor site" in its 2006 Terrestrial Ecology Enhancement Strategy and the park's vegetation is managed in accordance with the Portland Watershed Management Plan, PP&R's Natural Areas Restoration Plan, and Urban Forestry regulations in Title 11 of the city's code.

## Section 2.2 Vicinity

The park is situated on a volcanic butte, Mt. Tabor, contained within the Boring Lava Fields that underlie East Portland. At the landscape scale, Mount Tabor is part of the East Buttes. These buttes are composed of complex sediments, share a common geological history, and are part of the same uplifted area.

The surrounding development was established during the city's streetcar era in rectangular blocks and is primarily residential in nature. The park boundaries contain the steepest slopes associated with Mt. Tabor, however much of the immediate area around the park is also noticeably sloped. The adjacent rectangular street grid gives way to curvilinear streets in steeper areas.

## SECTION 2 - EXISTING SITE AND VICINITY

Nearby development is finely grained, residential homes on small lots are oriented to the street. Larger lots to the west or south also contain courtyard style multifamily development, commercial enterprises, or campus use. Western Seminary is located west of the park, and Warner Pacific College is located to the southeast.

Although planned for vehicular access, the highly connected street pattern facilitates access to the park on foot or by bike. Belmont St. to the north, Division St to the south, and SE 60 Ave to the east, are intensely developed collectors supporting bus service and provide easy transit access to the park. Although located within 1.5 miles of Interstates 84 and 205, vehicular access to the park is via local streets.

#### Section 3.1 Zoning

#### Zoning

- Base: Open Space base zone
- Overlay(s): Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
- Pattern Area: Inner
- Pedestrian District: N/A
- Transit: Some of the site is considered "close to transit"
- Corridors: Division Street is considered a Civic or Neighborhood Corridor
- Historic Designation: Mount Tabor Parks Historic District, Mount Tabor Park Reservoirs Historic District

Mt. Tabor Park is entirely zoned Open Space (OS). Portions of the park are also within two Environmental Overlays, the Conservation (c) and Scenic (s) overlay zones, as shown in Exhibit C-3. Per the City zoning code, the OS zone is intended to preserve and enhance public and private open, natural, and improved park and recreation areas. The environmental overlays conserve identified resources while also providing for development. Due to its listing as a Historic District in the National Register of Historic Places, Mt. Tabor Park is also within the Historic Resource overlay zone, which ensures development impacts on historic resources – although allowed – are limited.

#### Section 3.2 Land Use History and Previous Approvals

Mt. Tabor Park was originally zoned Singe Family Zone I in 1924 despite already established as a city park, according to the BPS study *The Historical Context of Racist Planning: A History of How Planning Segregated Portland* (see APP Exhibit D, pages 1-2).

According to the historic nomination, seven buildings and five structures were established within the park prior to 1937. One of these, the historic Administrative Building, was modified to add attached garages between 1938 and 1941, followed by a second-story addition in 1958.

Additional buildings and structures were added to the site in the 1950s and 1960s. City land use records for the site show Conditional Use (CU) approvals issued as early as 1961 for a storage building on-site. Additional CU approvals followed in the 1960s and 1970s for maintenance and nursery ('plant potting') buildings, along with a new parking lot, pumping station, and park shelter. The main parking lot dates from 1970.

The City's first state-acknowledged Comprehensive Plan, effective in 1981, identified the site as Open Space (see APP Exhibit D pages 3-4). In the 1980s and 1990s a parking lot expansion, the establishment of a motor vehicle service building, and trail improvements were approved. After a historic reservoir was decommissioned in the portion of the site managed by the Water Bureau, a flat portion of the park was partitioned from the parent parcel and sold for residential development.

The master plan for the park was updated in 2000. The primary focus of the plan is to preserve and enhance the natural qualities of Mt. Tabor. The plan envisioned updates to the circulation system, recreational uses, and facilities in manner that maintained the balance between developed areas and the environmental qualities of the natural areas in park. In 2009, a master plan to improve and update the Mt. Tabor Central Maintenance Yard & Nursery was completed.

The Historic Designation occurred in 2004. Since then, projects to provide deferred maintenance, an ADA-accessible pathway, reservoir disconnection, rehabilitation of the summit restroom, replacement and addition of railings along existing stairways, and replacement of non-historic light poles in the reservoir areas have been approved via historic resource or design review.

Most recently, updates including the addition of new structures, art and fencing; relocation of existing structures; removal of non-contributing structures; a new horticultural area; and the preservation of north elevation of one of the historic buildings were approved. These improvements occurred primarily, but not exclusively, in the vicinity of the Maintenance Yard. The Conditional Use review included a review of the site's nonconforming elements and approval of the existing parking lot and perimeter landscaping through the adjustments process.

No prior conditions of approval appear to conflict with the proposed site improvements and all conditions of approval are currently in compliance. Outstanding conditions for LU

17-245440 will be completed prior to final approval after construction is completed. A list of land use decisions for the site is included in the APP Exhibit E.

#### Section 3.3 Historic Designation

The park was nominated for the National Register of Historic Places and listed in 2004. In addition to the 'park land', seven buildings, five structures and a statute of Henry Scott (one-time editor of the Oregonian) are listed as contributing to the site's value as a historic resource. An additional ten buildings, five structures, and multiple greenhouses that do not contribute to the site's value as a historic resource were also inventoried in the nomination.

The period of significance for the park's historical listing is a 50-year period spanning from 1889 to 1939. The park's development was influenced by the City Beautiful movement's emphasis on establishing parks in urban areas according to the listing. The recognized architectural vernacular is both Late Victorian and Late 19<sup>th</sup> and 20<sup>th</sup> Century Revival. The park is also recognized for its utilization of the Depression era Works Progress Administration (WPA) program. In particular, the park is associated with the 1903 Olmsted Brothers report to the Portland Parks Board, the first year of significance noted in the listing, and was designed by Olmsted protégé Emmanuel Mische.

Mische was hired as Portland's Park Superintendent in 1908, the other year noted as significant in the listing. He submitted a plan of development for Mt. Tabor to the Parks Board in 1911 that identified scenic viewpoints and a circulation system of paved drives and pathways to traverse the heavily vegetated site (see 1911 site plan in the historic listing, Exhibit APP-J page 66). Most of the improvements that occurred during the period of significance were actually implemented by another former Olmsted employee, Parks Superintendent Charles P. Keyser. The resulting park is a mix of formal and natural elements where no one feature is preeminent and a variety of activities and experiences can occur, and – according to the listing – "illustrates the design principles advanced by the Olmsted firm."

The listing details a long period of land acquisition and subsequent development within the park, noting that:

"The active acquisition of the land that makes up the park and the park design occurred with local funding during the Progressive Era and included the influence of the City Beautiful movement at the turn of the nineteenth to the twentieth century. Work on Mount Tabor Park's amenities continued through the next decades with the ebb and flow of local funding. With the Great Depression came federal aid through the New Deal programs of the 1930s."

As Portland Parks Superintendent, Mische had significant interest in providing a wide variety of plants and trees for the whole park system, including native plants. Archival records indicate that the on-site Nursey was established in 1908 or 1909 and it is a significant contributing feature to the site's value as a historical resource. The earliest contributing historic building, the Horticultural Services Building, was located adjacent to the Nursery and was established sometime between the completion of Mische's 1911 plan for the park and 1918. The adjoining maintenance yard contains multiple contributing swith varying dates of construction according to the listing.

The contributing historic buildings within the park utilize revivalist designs. These consist of two Tudor-style restrooms dating from the mid-1920s and the Caretaker's House, a 1920s Colonial. A notable contributing structure in the park is the Crater Amphitheater. The completion date is not known, but records demonstrate construction was underway by 1934 (as documented in historic photographs in the listing). The historical listing describes both contributing and non-contributing architectural elements in both park and the maintenance yard in detail.

The listing identifies the 'park land' as a contributing resource and details physical elements within the landscape of the park. According to the listing, the park's design does not focus on or feature any one element, rather it provides for a variety of pastoral and scenic experiences. The listing identifies the circulation and lighting systems, the formal entrances, and three playground areas as notable elements withing the landscape of the park. Other site attributes within the park's landscape include the west and east tennis courts with records of constructing dating from 1923 and 1928.

While construction of the first scenic drives was funded in 1912 and 1913, later construction to finish the planned drives was funded by the WPA (as documented in historic photos of WPA funded work dated 1934 in the nomination). The circulation system is a key element to the experience of the landscape at Mt. Tabor Park. The meandering drives enhance the sense of moving between separate spaces and various experiences within the park. Having lights alongside the circulation system increased the comfort and safety of those using the circulation system at a time when private vehicles and illuminated roadways were a relatively new phenomenon.

The circulation's lighting system consisted of 88 poles at the time of nomination. <u>No</u> <u>attempt is made in the nomination to date individual poles or ascertain the number of</u> <u>poles dating from the period of significant compared to more recent installations.</u> Similar poles at historic parks such as Laurelhurst and Irving were not considered contributing resources, in part due to the lack of information to confirm installation dates and because fixtures for such poles were not original to the period of significance. In the Mt. Tabor Park nomination, lighting for individual buildings is not considered a

contributing resource since those objects are separate from the park's circulation system and are of varying age.

According to the historic listing, archival records show a request to install an electric lighting system in 1911 alongside the planned drives, although the listing notes installation didn't occur until 1924 and 1925. The lighting system was an important enhancement to the growing circulation system as it improved access to the park's various pleasant experiences, especially the forested areas. In addition to the historic paved drives, a bridle path system dating from 1929 is also included in the park's circulation system in Superintendent Mische's design and was provided with electric illumination at an unknown point in time. It is also likely that as the system of paved drives expanded during the 1930s - additional lighting followed.

A review of as-built plans from different eras indicates park staff replaced and relocated individual poles as needed to support park needs in and around the circulation system (see APP Exhibit F). A 1958 Lighting Plan shows the illumination for the circulation system consisted of 85 poles. Later plans from the 1980s show a total 87 poles, 24 of which were replacement poles. A 1999 plan shows the installation of new pole near a restroom, which is likely the 88<sup>th</sup> pole noted in the historical nomination.

Based on archival records and field examinations, park staff have concluded that <u>at</u> <u>most</u>, 61 of the poles currently illuminating the park's circulation system are original installations. As noted above, records indicate 24 poles were replaced in the 1980s. Installation dates for 3 poles is uncertain and may have occurred in tandem with the change to the fixtures associated with the 1958 mapping of the light system.

Based on a review of the historical listing and the identified contributing resources (which does not specifically identify the lighting system), the nomination's description of the strong association between the circulation system and its lighting system, and the archival records relating to the installation and replacement of individual light poles over time, park staff conclude the <u>historic value lies with the system of illuminated</u> <u>pathways and historic drives as a whole</u> – not individual light poles – and the resulting social and cultural value experienced by community members who used the circulation system to observe and interact with the park's natural and scenic landscapes at time when private vehicles were providing increased access to natural areas in park systems throughout the nation.

## SECTION 4 – TITLE 11

#### Section 4 Title 11

Title 11 of the city code regulates tree preservation and removal. A tree permit for the removal of light poles citywide was obtained March 3, 2023, and modified on March 28, 2023 (Permit # 23-007867-000-00-UF). A separate review will be completed for the installation of the replacement poles within Mt. Tabor Park.

Since the review authority has determined that a development permit is required on this site, the criteria in Chapter 11.50 apply to this application in accordance with 11.10.020. Applicable code standards are provided below in italics, followed by the response.

#### 11.20.060 Heritage Trees

F. Heritage Tree removal. Heritage Trees may be removed only with the consent of the UFC, except as provided in Subsection I., below. The UFC shall hold a public hearing on a request to remove a Heritage Tree. Consent to remove the tree shall be supported by at least six members of the UFC.

<u>Response.</u> No Heritage Trees will be affected by this project. There are two heritage trees in the park, located near Reservoir 6; neither of which are close to the proposed area of work. The northern tree is a giant sequoia located on the east side of Reservoir 6, is not directly adjacent to the circulation system, and is more than 250' from the SE Reservoir Loop Drive (where the closest light pole to be replaced is located). The southern tree is a bigleaf linden located on the SE corner of the same reservoir and while located near pathways that provide access to and from various points within the historic reservoir district, it is more than 350' feet to a light pole that will be replaced in this project.

#### Chapter 11.50 Trees in Development Situations

11.50.020 When a Tree Plan is Required.

A tree plan is required in conjunction with all development permits, unless there are no Private Trees 12 inches or more in diameter, no City Trees 6 inches or more in diameter, and/or no Street Trees 3 inches or more in diameter, and the site or activity is exempt from Section 11.50.050 On-Site Tree Density Standards; and Section 11.50.060 Street Tree Planting Standards. If multiple development permits are required for a development proposal, including demolitions and subsequent construction, the same Tree Plan shall be included with each permit. For tree removal when no development permit is required, following completion of the development permit, or when tree preservation does not apply per Subsection 11.50.040 A.1., see Chapter 11.40. SECTION 4 – TITLE 11

<u>Response.</u> A tree plan is provided in Exhibit C-8 that shows the location of trees 6" and greater in diameter in the developed areas of the park. A scaled plan showing the areas of temporary disturbance is also provided in Exhibit C-6 pages 23-28.

11.50.030 Development Impact Area Option For Large Sites and Streets.

Where development is proposed on a site larger than one acre or where work is occurring in the street and is not associated with an adjacent development site, the applicant may choose to establish a development impact area. For sites using the development impact area option, tree preservation requirements shall be based on the trees within the development impact area and tree density will be based on meeting Option A as applied only to the area within the development impact area. Trees may be planted to meet tree density requirement elsewhere on the site.

<u>Response.</u> The maximum area of disturbance as shown on the tree plan in Exhibit C-6, pages 23-28 constitutes the development impact area. The development impact area totals 2200 square feet.

11.50.040 Tree Preservation Standards.

- C. Tree Preservation Requirement. Any trees preserved shall be protected in accordance with the specifications in Section 11.60.030. The regulations for Private Trees in Subsection 11.50.040 C.1. sunset after December 31, 2024. After December 31, 2024 the regulations in effect will be those in effect on January 1, 2015.
  - 1. Private Trees...
  - 2. City and Street Trees.
    - a. General Tree Preservation
      - (1) Retention. The City Forester will identify potential impacts and opportunities to preserve and protect existing trees, as well as any measures required to protect trees on site, on adjacent sites, or in the street. Any work on any Street Tree or City Tree must be approved by the City Forester.
      - (2) Mitigation. Any required mitigation specified below shall occur on the site, in the street planter strip, elsewhere on City property or in the street, or as a payment into the Tree Planting and Preservation Fund. The City Forester may reduce or waive the following mitigation requirements.

- (a) Approved Street Tree removal in conjunction with improvements to partially or fully unimproved streets. Each tree at least 12 inches in diameter that is allowed to be removed shall be replaced with at least one tree. Trees planted to meet Street Tree Planting Standards will be credited toward meeting this requirement.
- (b) Any other Street Tree or City Tree allowed to be removed that is 6 or more inches in diameter shall be replaced with at least one tree in addition to trees required to meet required tree density or Street Tree planting standards.
- (3) Removal. Any trees approved to be removed by the City Forester may be removed. Any trees removed shall be removed in accordance with the specifications in Section 11.60.050.

<u>Response.</u> No trees are requested for removal in this request.

- 11.50.050 On-Site Tree Density Standards.
  - A. Where these Regulations Apply. This Section applies to sites within the City of Portland and the County Urban Pocket Areas. Unless exempted in Subsection 11.50.050 B., the following are subject to the On-Site Tree Density Standards:
    - 1. New Development;
    - 2. Exterior alterations to existing development with a project valuation that is more than the threshold stated in Subsection 33.258.070 D.2.a.

Response. Project value exceed the threshold in Subsection 33.258.070 D.2.a.

- C. New development shall meet City specifications and standards in Chapter 11.60 and the on-site tree density requirements in Subsection D., below. Exterior alterations shall meet City specifications and standards in Chapter 11.60 and the on-site tree density requirements in Subsection D., below, but are only required to spend 10 percent of project value on the requirements in Subsection D. and the nonconforming upgrades required by Chapter 33.258, Nonconforming Situations.
- D. On-Site Tree Density Requirements.
  - 1. Required Tree Area. The required tree area is based on the size of the site and the type and size of proposed and existing development as shown in Table 50-2. Applicants may choose Option A or Option B for calculating required tree

area except only Option A may be used to apply standards to a "Development Impact Area".

Table 50-2 Determining Required Tree Area			
Development Type	Option A	Option B	
Other	25 percent of site or development impact area	Site area minus building coverage of existing and proposed development	

<u>Response.</u> The park is 176 acres, therefore the required tree area (or 25% of the site) is 44 acres or 1,916,640 square feet (sf). Tree canopy covers approximately 62% of the site as shown in Exhibit C-8 page 1. Therefore, the minimum tree area is met.

The Bureau has inventoried 1,131 trees in the developed portions of the park, as shown in Exhibit C-8 pages 2- 6. 74 trees have diameters more than 1.5" and less than 6" inches; 1,041 have diameters of 6" or greater. As shown in the tree inventory, 921 of the inventoried trees have large mature canopies, 59 have medium mature canopies, and 142 have small canopies at maturity. Additional trees in various stages of growth are located within the natural areas of the park.

11.60.030 Tree Protection Specifications.

- C. Protection methods. The Tree Plan shall show that trees retained are adequately protected during construction using one of the methods described below:
  - 1. Prescriptive Path.
    - a. A root protection zone is established as follows:
      - (1) For trees on the development site a minimum of 1 foot radius (measured horizontally away from the face of the tree trunk) for each inch of tree diameter (see Subsection 11.80.020 C., Measurements):
    - b. Protection fencing
      - (1) Protection fencing consisting of a minimum 6-foot high metal chain link construction fence, secured with 8-foot metal posts shall be

established at the edge of the root protection zone and permissible encroachment area on the development site. Existing structures and/or existing secured fencing at least 3.5 feet tall can serve as the required protective fencing.

- c. Signage designating the protection zone and penalties for violations shall be secured in a prominent location on each protection fence;
- d. Installation of landscaping required by Title 33 is allowed within the root protection zone and is not an encroachment. Any in-ground irrigation systems are considered encroachments.
- e. The following is prohibited within the root protection zone of each tree or outside the limits of the development impact area: ground disturbance or construction activity including vehicle or equipment access (but excluding access on existing streets or driveways), storage of equipment or materials including soil, temporary or permanent stockpiling, proposed buildings, impervious surfaces, underground utilities, excavation or fill, trenching or other work activities; and
- *f.* The fence shall be installed before any ground disturbing activities including clearing and grading, or construction starts; and shall remain in place until final inspection.

<u>Response.</u> Trees onsite will be protected in accordance with the above standards, unless the Bureau's contractor determines it is not practicable, in which case an arborist will be retained to provide site-specific recommendations and prepare a protection plan approved by the City Forester in accordance with 11.60.030 C. 2.

#### Section 5 Title 33

Using the terms defined in Chapter 33.920 (shown in italics), the proposed light pole replacement project is characterized as follows:

- the project will replace *utility structures* in the *Basic Utility Use Category* that provide an *accessory use* to the *primary use* (the public park).
- this action will constitute an *alteration to exterior development*.
- soils will need to be disturbed to install the poles in the ground, which will result in a *temporary disturbance area*.

## SECTION 5 – TITLE 33

The proposed use is identified in Chapter 33.100 Open Space Zone and is subject to the following overlay zones:

- 33.430 Environmental Zone.
- 33.480 Scenic Resource Zone.
- 33.445 Historic Resource Overlay Zone.

The replacement poles serve an accessory function to the primary park use and are subject to additional development standards related to off-site impacts as well as those that apply through the historic resources review.

Section 5.1 The Base Zone: *Open Space Zone* 

The Open Space criteria are in Chapter 33.100 and allowed uses are identified in Table 100-1 *Open Space Zone Primary Uses*.

Table 100-1 Open Space Zone Primary Uses				
Use Categories	OS Zone			
Institutional Categories				
Basic Utilities	L/CU [5]			
Y = Yes, Allowed L = Allowed, But Special Limitations CU = Conditional Use Review Required N = No, Prohibited				
<ul> <li>Notes:</li> <li>The use categories are described in Chapter 33.920.</li> <li>Regulations that correspond to the bracketed numbers [] are stated in 33.100.100.B.</li> <li>Specific uses and developments may also be subject to regulations in the 200s series of chapters.</li> </ul>				

As shown in the excerpt from Table 100-1, basic utility uses are allowed, either as a Limited Use or a Conditional use as determined by note [5] in 33.100.100 B (addressed below). The use is not identified in the 200s series of standards. Applicable code standards are provided in italics below, followed by the response.

Use Regulations 33.100.100 Primary Uses

- B. Limited uses. Uses allowed that are subject to limitations are listed in Table 100-1 with an "L". These uses are allowed if they comply with the limitations listed below and the development standards and other regulations of this Title...
  - 5. Basic Utilities. This regulation applies to all parts of Table 100-1 that have note [5].
    - a. Basic Utilities that serve a development site are accessory uses to the primary use being served.

<u>Response.</u> Lighting systems are utilities that serve a development site and are accessory to the primary park use. The subject lighting system is classified in this section as a Basic Utility pursuant to 5.a. (hereafter referred to as a *Basic Utility, type 5.a.)* and meets the standards for a Limited Use. As such the use is subject to the standards for accessory uses in this Chapter.

## 33.100.110 Accessory Uses

Uses that are accessory to a primary use are allowed if they comply with specific regulations for the accessory uses and all applicable development standards.

<u>Response.</u> The proposed use is subject to the development standards in 33.100.120 shown below.

## 33.100.120 Nuisance-Related Impacts

A. Off-site impacts. All nonresidential primary and accessory uses must comply with the standards of Chapter 33.262, Off-Site Impacts.

<u>Response.</u> The proposed use is a nonresidential accessory use and is therefore subject to the development standards in 33.262. The additional development standards in the 200s series are addressed in Section 4.2.

## 33.100.200 Development Standards

- A. Allowed or limited uses. Allowed or limited uses are subject to the development standards stated below.
  - 1. Building setbacks. Except as specified in paragraph A.3., buildings must be set back from all property lines a minimum of 1 foot for each foot of building height.
  - 2. Outdoor activity facility setbacks. Except as specified in paragraph A.3. below, outdoor activity facilities, such as swimming pools, basketball

courts, tennis courts, or baseball diamonds must be set back 50 feet from abutting R-zoned properties. Playground facilities must be set back 25 feet from abutting R-zoned properties if not illuminated, and 50 feet if illuminated. Where the outdoor activity facility abuts R-zoned properties in School uses, the required setback is reduced to zero.

3. Recreational fields for organized sports. Recreational fields used for organized sports are subject to Chapter 33.279, Recreational Fields for Organized Sports

<u>Response.</u> None of the above criteria apply to accessory utilities, in this case, the lighting system.

The lighting system meets the standards for allowed Limited Uses and meets all the development standards that apply to a *Basic Utility, type 5.a.* in the Base Zone.

## Section 5.2 Additional Use and Development Regulations

No additional use regulations are identified in the 200s series for utilities accessory to primary park uses. Additional development standards are identified and addressed below.

#### Chapter 33.258 Nonconforming Situations

#### 33.258.030 Types of Nonconforming Situations

A specific site may be nonconforming because it contains either a nonconforming use, an allowed residential use that exceeds the allowed density, a nonconforming development, or a combination of these. Nonconforming uses, nonconforming residential densities, and nonconforming development are defined in Chapter 33.910, Definitions.

<u>Response.</u> *Chapter 33.910, Definitions* provides the following term and definition:

Nonconforming Development. An element of a development, such as a setback, height, or parking area, that was created in conformance with development regulations but which subsequently, due to a change in the zone or zoning regulations, is no longer in conformance with the current applicable development standards.

<u>Response.</u> Both the primary use on site, the park, and the accessory utility use proposed for modification in this application, are currently allowed uses that conform with current zoning regulations. However, the development of the primary use, the park and the accessory utility use occurred prior to the adoption of the first zoning regulation and development regulations for accessory utility uses have since been adopted.

The primary use onsite – the park – does not conform to all the current regulations that apply to the development of new parks today. In particular, the review authority determined in LU 17-245440 that the park's perimeter and parking lot landscaping do not meet current standards. Three adjustments to those standards were approved in that decision therefore, no additional nonconforming upgrades to the site's landscaping are required. However, since that time, standards related to bicycle parking in Chapter 266 have been updated.

## 33.258.070 Nonconforming Development

- A. Purpose. This section is primarily aimed at upgrading nonconforming development elements that affect the appearance and impacts of a site. It is not intended to require extensive changes that would be extremely impractical such as moving or lowering buildings.
- *B.* Continued operation. Nonconforming developments may continue unless specifically limited by Subsection D. below or other regulations in this Title.
- C. Changes. Changes may be made to the site that are in conformance with the development standards of the base zone, overlay zone, plan district or other development standards that apply to the site. Changes that bring the site closer to conformance are allowed. Proposed changes that are not in conformance or do not move closer to conformance, are subject to the adjustment process unless prohibited.

<u>Response.</u> The change proposed in this application, light pole replacement, will conform to the requirements of this code.

- D. Development that must be brought into conformance. The regulations of this subsection are divided into two types of situations, depending upon whether the use is also nonconforming or not. These regulations apply except where superseded by more specific regulations in the code.
  - 1. Nonconforming development with a new nonconforming use or new non-conforming residential density...
  - 2. Nonconforming development with an existing nonconforming use, allowed use, limited use, or conditional use. Nonconforming development associated with an existing nonconforming use, an allowed use, a limited use, or a conditional use, must meet the requirements stated below.

When alterations are made that are over the threshold of Subparagraph D.2.a., the site must be brought into conformance with the development standards listed in Subparagraph D.2.b. The value of the alterations is based on the entire project, not individual building permits.

- a. Thresholds triggering compliance. The standards of Subparagraph D.2.b., below, must be met when the value of the proposed alterations on the site, as determined by BDS, is more than \$347,000. The following alterations and improvements do not count toward the threshold:
  - (1) Replace a manufactured dwelling in a manufactured dwelling park;
  - (2) Alterations required by approved fire/life safety agreements;
  - (3) Alterations related to the removal of existing architectural barriers, as required by the Americans with Disabilities Act, or as specified in Section 1113 of the Oregon Structural Specialty Code;
  - (4) Alterations required by Chapter 24.85, Interim Seismic Design Requirements for Existing Buildings;
  - (5) Improvements to on-site stormwater management facilities in conformance with Chapter 17.38, Drainage and Water Quality, and the Stormwater Management Manual; and
  - (6) Improvements made to sites in order to comply with Chapter 21.35, Wellfield Protection Program, requirements.
  - (7) Energy efficiency or renewable energy improvements that meet the Public Purpose Administrator incentive criteria whether or not the project applies for and receives the incentive;
  - (8) Landscaping required by 33.475.220;
  - (9) Removal or remediation of hazardous substances conducted under ORS 465.200-545 & 900; and
  - (10) The installation of electric bike and electric vehicle chargers and accessory equipment.

## SECTION 5 – TITLE 33

<u>Response.</u> Nonconforming development exists on the site and the value of the proposed improvements is approximately \$704,000, which exceeds the threshold to trigger compliance with the standards of this section. However, these improvements are intended to meet life safety standards and so may be exempt pursuant to Subsection 33.258.070 D. 2.a(2) above.

b. Standards which must be met. Development not complying with the development standards listed below must be brought into conformance or receive an adjustment.

(1) Landscaping and trees required for the following areas:

- Exterior display, storage, and work activity areas;
- Setbacks for surface parking and exterior development areas;
- Interior parking lot landscaping;
- Existing building setbacks;
- Minimum landscaped areas (where land is not used for structures,
- parking, or exterior improvements); and
- On-site tree density standards of Subsection 11.50.050.C.

<u>Response.</u> The parking lot landscaping was approved via the adjustment procedure in LU 17-245440 which approved the updates to the Tabor Yard. The implementation of the approved improvements to the Tabor Yard are currently in construction. Conditions related to the landscaping will be completed by the Bureau's contractor for the Yard project prior to final approval in accordance with that decision. (See permitted landscaping for LU 17-245440 in Exhibit C-7.)

(2) Pedestrian circulation systems, as set out in the pedestrian standards that apply to the site;

<u>Response.</u> Pedestrian circulation system standards are identified in the base zone. The OS zone does not contain pedestrian circulation standards; therefore, this criterion does not apply.

- (3) Bicycle parking by upgrading existing racks and providing additional spaces in order to comply with 33.266.200, Bicycle Parking as follows:
  - Major remodeling projects must meet the standards for all bicycle parking;
  - Sites with accessory surface parking must meet the standards for all bicycle parking;
  - In all other situations, the amounts and standards for shortterm bicycle parking must be met.

<u>Response.</u> Mt. Tabor Park does have accessory surface parking; therefore, the bicycle parking standards apply.

The minimum number of bicycle parking spaces is calculated based on current and future bicycle use, as shown in Map 266-1 and pursuant to Table 266-1. Based on these requirements, Standard A applies to Mt. Tabor Park. Based on the site's primary use as a park, and in accordance with Table 266-6, no long-term bicycle parking is required. Short-term parking for public parks is determined through a conditional use review.

The most recent conditional review for the park occurred via LU 17-245440 did not determine a need to add more short-term bicycle parking. Currently, bike racks are located near the main parking lot and the western SE 64<sup>th</sup>/SE Lincoln St. entrance. Section 33.266 addresses bicycle parking. Sites that could considered for additional bicycle parking include the paved parking area by the playground in the middle of the park, as well as additional flat paved areas near other amenities such as the tennis courts, the south play area, and the summit.

## (4) Screening; and

<u>Response.</u> The existing nonconforming perimeter screening landscaping was approved via the adjustment procedure in LU 17-245440.

# (5) Required paving of surface parking and exterior storage and display areas.

<u>Response.</u> The existing surface parking areas are paved.

c. Area of required improvements.

- (1) Generally. Except as provided in D.2.c(2), below, required improvements must be made for the entire site.
- (2) Exception for sites with ground leases. Required improvements may be limited to a smaller area if there is a ground lease for the portion of the site where the alterations are proposed.

<u>Response.</u> No portion of the site is leased and therefore this subsection does not apply.

- *d. Timing and cost of required improvements. The applicant may choose one of the following options for making the required improvements:* 
  - (1) Option 1.

Under Option 1, required improvements must be made as part of the alteration that triggers the required improvements. However, the cost of required improvements is limited to 10 percent of the value of the proposed alterations. It is the responsibility of the applicant to document the value of the required improvements. When all required improvements are not being made, the applicant may choose which of the improvements listed in Subparagraph D.2.b to make. If improvements to nonconforming development are also required by regulations in a plan district or overlay zone, those improvements must be made before those listed in Subparagraph D.2.b.

<u>Response.</u> Required improvements will be completed as part of the light pole replacement work. The combined value of the proposed improvements is \$704,000. Therefore, the maximum cost of the required upgrades cannot exceed \$70,400.

#### 33.262 Off-Site Impacts

#### 33.262.010 Purpose

The regulations of this chapter are designed to protect all uses in the R, C, CI, IR, and OS zones from certain objectionable off-site impacts associated with nonresidential uses. These impacts include noise, vibration, odors, and glare...

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#### 33.262.020 Applying These Regulations

Nonresidential uses in all zones which cause off-site impacts on uses in the R, C, CI, IR, and OS zones are required to meet the standards of this chapter. Exempted equipment and facilities are stated in 33.262.030 below.

<u>Response.</u> Accessory utilities are for nonresidential use, and this project is in the OS zone, therefore the standards of this section apply.

#### 33.262.050 Noise

The City noise standards are stated in Title 18, Noise Control. In addition, the Department of Environmental Quality has regulations which apply to firms adjacent to or near noise sensitive uses such as dwellings, religious institutions, schools, and hospitals.

<u>Response.</u> Replacing light poles within the existing lighting system will not result in any permanent noise generation. Temporary construction impacts will comply with the standards in 18.10.060 for Construction Activities and Equipment, and the Oregon Administrative rules for DEQ in Chapter 340 Division 35.

#### 33.262.060 Vibration

#### 33.262.070 Odor

<u>Response.</u> Replacing light poles within the existing lighting system will not generate any vibrations or odors.

#### 33.262.080 Glare

- A. Glare standard. Glare is illumination caused by all types of lighting and from high temperature processes such as welding or metallurgical refining. Glare may not directly, or indirectly from reflection, cause illumination on other properties in excess of a measurement of 0.5 foot candles of light.
- B. Strobe lights. Strobe lights visible from another property are not allowed.

<u>Response.</u> Most of the light poles in the historic illumination system are located within the park at significant distance from nearby residences and will not result in any light spill on residential properties as shown in the photometric study in Exhibit C. No strobe lights are proposed.

There are light poles located within the SE Taylor ROW outside of the park and the historic district boundary shown in the historic listing. These poles are not subject to

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Title 33 due to their location outside of the historic district and within the ROW. However, additional information is provided about these poles below since they are located closer to residential property lines than others in the lighting system.

The homes on SE Taylor are orientated to the north and take access via the SE Yamhill frontage. The homes are located east of the heavily vegetated area encircling the northern parking lot within the park and there is significant vegetation within the SE Taylor right-of-way providing significant buffering and screening between the roadway and the residences. PBOT will review the proposed lighting on SE Taylor through the encroachment permit review process.

PBOT typically mounts pedestrian scale lighting at 14 feet compared to overhead "cobra-head" lighting that is mounted at 30-40 feet. At 12.5 feet in height, the proposed replacement light poles located in the SE Taylor St ROW are consistent with pedestrian scale lighting. SE 69th which intersects with SE Taylor contains typical overhead lighting which casts significantly more illumination compared to the pedestrian scale lighting provided on SE Taylor.

The illuminance value for street lighting is guided by street functional classification and minimum lighting levels rise on streets that provide higher levels of service. The brightest lighting is expected on Major Traffic or Transit streets, while Local Service roadways have the lowest lighting levels. SE Taylor is classified as a local street in the Transportation System Plan and provides City Bikeway services. Therefore, according to PBOT's 2019 Recommended Light Levels and Guidelines for Roadway Lighting, the recommended <u>minimum</u> level of lighting is 0.2 candle lights along the corridor and 0.3 candle lights at the intersection of SE Taylor and SE 69<sup>th</sup> Ave.

Photometrics for SE Taylor show the poles will meet the minimum levels of lighting required in this location (see Exhibit C-5 pages 1-3, 6-8, 11-12). The proposed new replacement lights will greatly reduce the amount of illumination cast on adjacent properties over the current ones due to improved light fixtures that focus light more effectively, thereby reducing the overall area illuminated by each light fixture.

The proposed replacement of light poles in Mt. Tabor Park for the light pole safety project will meet the additional development standards that apply to accessory utilities.

#### Section 5.3 Environmental Overlay

The criteria for environmental review are addressed in Chapter 33.430. Applicable code standards are identified in italics below, followed by the response.
## 33.430.080 Items Exempt From These Regulations

The following items, unless prohibited by Section 33.430.090, below, are exempt from the regulations of this chapter. Other City regulations such as Title 10, Erosion Control, and Title 11, Trees, must still be met.

- D. Existing development, operations, and improvements, including the following activities:
  - 1. Maintenance, repair, and replacement of existing structures, exterior improvements, roads, public trails, public rest points, public viewing areas, public interpretative facilities, and utilities....
  - 8. Pruning trees in accordance with Title 11 permit requirements;

<u>Response.</u> The request is to replace existing utility structures and is exempt from the regulations in Chapter 33.430. Estimated average temporary ground disturbance is 2.5' around each light pole and maximum temporary ground disturbance is 5' x 5' per light poles, for a maximum 2200 sq ft of temporary ground disturbance. For the majority of the poles, bare ground is present in the immediate vicinity, and although poles may be located under tree canopy, no trees are proposed to be removed to install replacement poles. Any pruning required to site equipment will occur in a limited fashion consistent with Title 11 requirements.

The proposed project to replace light poles in Mt. Tabor Park is a limited activity to maintain an existing accessory utility system and will comply with Titles 10 and 11. Any required permits will be obtained prior to any ground disturbance.

## Section 5.4 Scenic Overlay

The standards for development within the scenic overlay are addressed in Chapter 33.480.

There are two small areas of scenic overlay located in the interior of the park that allow for tree removal under certain conditions to preserve views. There are no view corridors or scenic corridors that regulate building height on the site. As shown in Exhibit C-3, there are two panoramic viewpoints identified in the 1999 Scenic Resource Protection Plan. The western viewpoint is located above Reservoir 6 and the other is located at the summit.

The following standards apply to viewpoints:

## 33.480.050 Tree Removal Review

- A. Tree removal without development...
- B. Tree removal in development situations. When tree removal is proposed as part of development, the standards of Subparagraph 33.480.040.B.2.h apply in addition to the tree preservation standards of Title 11, Trees.
- C. Trees that do not qualify for removal under Subparagraph 33.480.040.B.2.h may be removed if approved through tree review as provided in Chapter 33.853, Tree Review. However, where the tree removal would require environmental review, only environmental review is required.

<u>Response.</u> None of the light pole replacements are proposed in the vicinity of either viewpoint. Furthermore, any pruning required to install the new poles will occur in accordance with Title 11, the associated Tree Permit protection plan, and to proper arboricultural practices, thereby avoiding impacts to the health or structural integrity of any trees.

The proposed project meets the standards in Chapter 33.480 for the Scenic Overlay.

Section 5.5 Historic Resource Overlay Zone

Chapter 33.445 contains the standards for the Historic Resource Overlay Zone. The applicable standards are identified in 33.445.030.

## 33.445.030 Where These Regulations Apply

- A. Sections 33.445.010 through .060 and .400 through .500 apply to all historic resources.
- B. Sections 33.445.100 through .340 apply as shown in Table 445-1.

Table 445-1 Where These Regulations Apply						
	In Historic District	In Conservation District	In National Register District	Not in a district		
Not a Landmark or Significant Resource	33.445.200	33.445.210	33.445.220	N/A		

<u>Response.</u> Mt. Tabor Park was listed on the National Register of Historic Places as a Historic District prior to 2017 and is designated a Historic District by the city (and, consequently, is not a Landmark or Significant Resource). As shown in the excerpt of Table 445-1 above, this request is subject to Section 33.445.200.

#### 33.445.200 Historic District

#### A. Designation of a Historic District

1. National Register listing. Districts listed by the federal Keeper of the National Register of Historic Places or before January 27, 2017 are automatically identified as Historic Districts on the Official Zoning Maps. For Historic Districts that were listed by the federal Keeper of the National Register of Historic Places on or before January 27, 2017 but have not been independently designated by the City as the result of a legislative or quasijudicial procedure, any expansion of the boundary by the federal Keeper of the National Register of Historic Places is also automatically identified on the Official Zoning Maps. See Section 33.855.075, Automatic Map Amendments for Historic Resources.

<u>Response.</u> The listing of Mt. Tabor Park on the National Register of Historic Places occurred in 2004. The Mt. Tabor Park Historic District was therefore identified on the official zoning maps (in APP Exhibit B).

B. Removal of a Historic District designation.

<u>Response.</u> This criterion does not apply, as no change to the designation is proposed.

C. Relocation of a contributing resource in a Historic District.

<u>Response</u>. This criterion does not apply, as no relocation is proposed.

- D. Development in a Historic District. Certain development within a Historic District requires historic resource review to ensure the resource's historic value is considered prior to or during the development process.
  - 1. When historic resource review is required. Unless exempted by Paragraph D.2, the following proposals in a Historic District are subject to historic resource review...
  - 2. Exempt from historic resource review.

a. Alterations that do not require a building, site, zoning, or sign permit from the City, and will not alter the exterior features of a resource having such features specifically listed in the Historic District documentation or National Register nomination as attributes that contribute to the resource's historic significance;

<u>Response.</u> The replacement of light poles does not require a building, site, zoning, or sign permit. However, the lighting for the circulation system was specifically identified in the documentation for the historic listing as an important feature of the park's landscape, which is a contributing resource. Therefore, review staff have determined that historic resource review is required. The standards for historic resource review are in Chapter 33.846 and are addressed in the next section.

E. Demolition of resources in a Historic District. Conservation Landmarks in a Historic District that are not identified as contributing to the historic significance of the Historic District are subject to the regulations of Section 33.445.110.E. National Register Landmarks in a Historic District that are not identified as contributing to the historic significance of the Historic District are subject to the regulations of Section 33.445.120.E. Significant Resources in a Historic District that are not identified as contributing to the historic significance of the Historic District are subject to the regulations of Section 33.445.330.

Demolition of contributing resources within a Historic District requires demolition review to ensure their historic value is considered and that there is an opportunity for the owner and community to consider alternatives to demolition.

- 1. When demolition review is required. Unless exempted by Paragraph E.2., demolition of a contributing resource in a Historic District is subject to demolition review. For the purposes of this Chapter, demolition is defined as:
  - a. Total demolition;
  - b. An alteration that requires a demolition permit except for a demolition permit to relocate a structure;
  - c. An alteration that results in the removal of 50 percent or more of any streetfacing wall of a structure;
  - d. An alteration that results in:

- (1) The removal of 50 percent or more of the total exterior wall area of a structure; and
- (2) The removal of 50 percent or more of the total roof area of a structure; or
- e. For structures that are not buildings, an alteration that results in the removal of 50 percent or more of the structure;
- 2. Exempt from demolition review. The following are exempt from demolition review:
  - a. Demolition of noncontributing resources;

<u>Response.</u> The park landscape is a contributing resource, and the lighting system is a component of the landscape. While the lighting system itself is proposed to be retained, because more than 50 percent of the light poles that constitute the lighting system will be replaced in the light safety project, BDS has determined that the replacement is subject to demolition review.

- *b.* Demolition of contributing resources in Historic Districts when demolition is required because:
  - (1) The Bureau of Development Services requires demolition due to an immediate danger to the health, safety, or welfare of the occupants, the owner, or that of the general public, as stated in Section 29.40.030 of Title 29, Property Maintenance Regulations; or
  - (2) The Hearings Officer requires demolition, as provided for in Section 29.60.080 of Title 29, Property Maintenance Regulations;

<u>Response.</u> Park staff has proposed to replace light poles in 12 city parks to ensure public safety. However, neither BDS nor a Hearings Officer has required replacement, or demolition, in accordance with the requirements in Title 29.

c. Demolition of covered detached accessory structures in C and R zones that are identified as a contributing resource and are 800 square feet or less in total floor area; and

<u>Response.</u> Since this project will occur in the OS zone, the above criterion does not apply.

- *d.* Alterations to a contributing resource that meet the definition of demolition in Paragraph E.1.b.-e. when the following are met:
  - (1) The alterations are approved through historic resource review; and
  - (2) The historic resource review decision is final, and all appeals have been resolved.

<u>Response.</u> This request fulfills the requirement to obtain a historic resource review. Pole removal may occur once the decision for this request is final (including the resolution of any appeals).

Section 5.6 *Historic Resource Review* 

The standards for Historic Resource Reviews are located in Chapter 33.846. Review procedures for proposals within Historic Districts are located in Table 846-3.

Table 846-3						
Review procedures for proposals within Historic Districts						
Proposal	Zone	Threshold	Procedure			
Any other non-exempt	All	Project value > \$547,400	Type III			
proposal		Project value ≤ \$547,400	Type II			

<u>Response.</u> This request is not specifically listed and so falls into the final category, "*Any* other non-exempt proposal." Since the estimated project value is estimated at \$704,00 it must be reviewed through the Type III procedure.

33.846.060 Historic Resource Review

- E. Approval criteria for outside the Central City plan district. ...
  - 1. Historic Districts. When historic resource review is required for any resource in a Historic District, including Historic Landmarks and Conservation Landmarks, the approval criteria are:
  - a. Historic Districts with district-specific guidelines....
  - b. Historic Districts without district-specific guidelines. Where there are no guidelines that are specific to the Historic District, the approval criteria are:

- (1) The criteria in Subsection G;
- (2) If the resource is a Conservation Landmark, the criteria in Subsection *H*; and
- (3) If the proposal includes relocating a landmark or contributing resource, the criteria of Subsection I;

<u>Response.</u> There are no district specific guidelines for the Mt Tabor Park Historical District, therefore the project is subject to the criteria in Subsection G.

The resource is not a Conservation Landmark; therefore, Subsection H does not apply. The proposal does not include relocating any resources; therefore, Subsection I does not apply.

- *G.* Other historic approval criteria. When required by Paragraphs E. or F., the following approval criteria must be met:
  - 1. Historic character. The historic character of the landmark or contributing resource will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the historic significance of the landmark or contributing resource will be avoided;

<u>Response.</u> The historic listing identifies multiple parcels totaling 196-acres for the Mt. Tabor Park historical district, including both the park and maintenance yard. As mentioned previously, the district contains multiple contributing resources in addition to the park's landscape. The lighting system is a small component of the overall park site.

The replacement project will have little to no impact on the existing natural areas and decorative landscaping, as the areas around the poles are typically kept clear of vegetation. Minor refinements to pole locations to avoid impacts to landscaping and tree could occur if needed to preserve the character of the landscaping and ensure trees are protected. The vast majority of the landscape, the historic vehicle entrances and meandering drives, and all of the contributing buildings and structures will remain untouched by the light pole replacement project.

The lighting system itself will remain, even if components are replaced. Many of the original system components were replaced prior to the historical nomination, including all the light fixtures and 27 of the poles currently in use. The alternative to removing current poles would be to rehabilitate the existing poles despite their age and condition.

Bureau staff has verified with the consulting engineers at KPFF that the work necessary to mount poles to current code (installing rebar or other structural supports within the pole) is not considered practicable or cost-effective. For reuse, poles and footings would need to be removed and poles structurally altered to increase their structural capacity and then anchored to a new footing to meet current code standards. External alterations to enhance structural capacity would have a detrimental effect on the look and character of the pole, while internal alterations to replace or add reinforcing steel would significantly impact the structural integrity of the concrete. Internal alterations to 99-year-old concrete that was not originally built to meet current building code standards would significantly compromise the integrity of the poles.

By preserving the spatial pattern of poles (adjacent to the circulation system and distributed across the landscape), and installing poles of similar materials and design, the illuminated pathways will retain their historical character. The compelling nature of the park's landscape as a place of urban refuge offering a variety of forested, pastoral, and scenic experiences will be preserved through this project. Therefore, the contributing resource, the park's landscape will not be negatively affected by this project.

2. Record of its time. The landmark or contributing resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided;

<u>Response.</u> The illuminated circulation system provided vehicular access at the dawning of the automobile age to one of the city's most prominent natural features and ensured even nighttime visits would be safe and enjoyable. Pole replacement will result in a restoration of the illumination system at the time of the historic nomination, thus preserving the warmly illuminated meandering drives that provide access throughout the park, even in the darkest of forested areas.

# 3. Historic changes. Most resources change over time. Those changes that have acquired historic significance will be preserved;

<u>Response.</u> The project proposes to provide light pole replacements consistent in number to the historical listing. Locations will match that documented in 1988 and 1989 to the extent possible. Although not part of the period of significance, the current lantern-style fixtures and the metal strapping at the top of certain light poles, have acquired significance and are considered representative of Mt. Tabor Park in particular. The proposed new light poles will be topped with lantern-style fixtures along with metal strapping of similar in design and style, as shown in the APP Exhibit G, to maintain the iconic significance these features have acquired over time. 4. Historic features. Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the historic feature in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence;

<u>Response.</u> The lighting system that illuminates the circulation system is identified as contributing to the park's historic landscape. The replacement of 88 poles is needed to maintain structural safety of the lighting system due to severe deterioration, as certified by the city's consulting engineers. Installing modern fixtures at the same time poles are replaced will ensure the illumination system meets current electrical code, will reduce the need for future spot replacements, and will generate significant saving by reducing energy consumption. The new poles will match the historic ones in material, texture, color, and design (as shown in the comparison photographs in the APP Exhibit G).

Written and graphic evidence regarding the existing system is provided in the APP Exhibit F, which documents at least 27 pole replacements over time and the installation of the now iconic lantern-style fixtures. While the first elements of the lighting system were installed in 1924 and 1925, development of the park's physical elements occurred over time and it is likely some individual poles were added later, for example when the bridle path was established in 1929 and Mt. Tabor Drive was constructed (circa 1934). The earliest record of the number and location of light poles dates from the 1950s (outside the period of significance). Over time, individual poles have been replaced as needed – however the overall system of illuminated drives and paths providing circulation through the landscape has been maintained. Documentation of the lighting system is also located in the historic listing (APP Exhibit J, pages 7-8, 44, 78, 86, 88). The existing light poles and fixtures are compared in photographs in the APP Exhibit G and details of the proposed replacements are shown in the specification sheets in Exhibit C-4 pages 1-3.

5. Historic materials. Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used;

<u>Response.</u> Poles will be ground-mounted, and the installation will not affect historic materials. Under normal circumstances, a direct buried concrete pole can be set directly into an augered hole that minimizes the amount of ground disturbance or impacts to surrounding soils or any historic concrete. Depending on the strength of the soil, backfilling can be accomplished with aggregate, concrete, or the original soil. This

technique does not require the use of sandblasting or chemicals and meets modern building code requirements for structural safety.

6. Archaeological resources. Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken;

<u>Response.</u> There are no known archaeological resources on site. Development, including significant ground disturbance and excavation on the site has been documented since 1894. Given the project will install replacement light poles in previously developed locations using modern techniques that limit ground disturbance, it is very unlikely any materials of archaeological interest will be encountered. Regardless, should any archaeological discoveries occur, work will be stopped in the affected area and the Bureau will notify the State Historic Preservation Office (SHPO). Prior to submitting this application, the Bureau contacted the SHPO but has not heard back from them regarding any state requirements, concerns, or suggestions about this project.

- 7. Differentiate new from old. New additions, exterior alterations, or new construction will not destroy historic materials that characterize a landmark or contributing resource. New work may be differentiated from the old if the differentiation does not diminish the character, features, materials, form, or integrity of the landmark or contributing resource and, if in a Historic District, the district as a whole;
- 8. Architectural compatibility. New additions, exterior alterations, or new construction will be compatible with the massing, size, scale, and architectural features of the landmark or contributing resource and, if in a district, the district as a whole. When retrofitting to improve accessibility for persons with disabilities or accommodate seismic improvements, design solutions will not compromise the architectural integrity of the landmark or contributing resource;

<u>Response.</u> The integrity of the park's landscape (the contributing resource) will not be affected by the replacement poles, as they will maintain the existing spatial pattern of the lighting system adjacent to the circulation system. As previously noted, poles will match those in existence today and at the time of the historical listing. Any new conduit needed will be concealed.

Many of the current components of the light system are almost a hundred years old. By replacing the poles now, the structural integrity of the lighting system is assured for a hundred more years. No other changes to the landscape or to any of the contributing architectural structures or buildings are proposed.

9. Preserve the form and integrity of historic resources. New additions, exterior alterations, or new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the landmark or contributing resource and, if in a district, the district as a whole would be unimpaired; and

<u>Response.</u> The lighted circulation system is an integral component of the landscape in the Mt. Tabor Park Historic District, as the illumination provided alongside the historic drives and formal pathways enhances access to the park's various experiences. However, individual pole replacement has occurred repeatedly over time without affecting the integrity of the overall system of lighting or circulation. Therefore, it is reasonable to conclude that if an individual pole needs to be removed in the future, as long as it was replaced in the same vicinity and with similar materials and design, neither the system of illumination or circulation would be affected, and the character of the landscape would remain unimpaired.

10. Hierarchy of compatibility. New additions, exterior alterations, or new construction will be designed to be compatible primarily with the landmark or contributing resource and, if located within a district, secondarily with contributing resources located within 200 feet and, finally, with the rest of the district. Where practical, compatibility in districts will be pursued on all three levels.

<u>Response.</u> The lighting system will maintain its function and role of illuminating the park's circulation system. Replacement poles will maintain the look and design of the current poles within the illumination system. There is a compelling relationship between the lighting system and the circulation system. Areas in the vicinity of the existing lighting system that are part of the circulation system will not be affected by the replacement, as the overall lighting system will remain intact and individual replacement poles are of compatible materials and design to existing ones. Most importantly, the illuminated nature of the circulation system will be maintained.

No changes are proposed to the location or pattern of the circulation system within the park. The replacement of individual poles will not affect the contributing architectural resources. No changes are proposed to alter other aspects of the landscape, such as the terrain or vegetation.

The overall spatial pattern of the light poles illuminating the circulation pattern will be retained. Only minor refinements to pole locations are anticipated. Two poles near Reservoir 5 may conflict with water lines, as shown in the disturbance area site plans (Sheet 4), however, no changes are proposed that would affect the contributing resources within the Mt. Tabor Park Reservoir Historic District.

Based on the above, the planned pole replacements will be compatible with the circulation system, the landscape as a whole, other contributing resources, and both of the historic districts at the site.

#### 33.846.080 Demolition Review

A. Purpose. Demolition review protects landmarks and contributing resources in districts. Demolition review recognizes that historic resources are irreplaceable assets significant to the region's architectural, cultural, and historical identity and their preservation promotes economic and community vitality, resilience, and memory. In the event that demolition of a historic resource is approved, demolition review also addresses the potential for mitigation of the loss.

<u>Response.</u> The lighting system for the Park's circulation system was identified as an attribute within the Park's landscape, which is a contributing resource to the Park Historic District. The lighting system is composed of light poles installed alongside the circulation system that was designed in 1911 and constructed between 1912 and 1934. Light poles within the system have been replaced over time and feature fixtures installed outside the period of significance identified in the historic listing.

As noted previously in this application, the value of the lighting system is the illumination provided to the historic circulation system which is a core component of the 1911 park design. The circulation system is composed of paved drives, soft surface formal trails, and staircases that convey park users from one experience to another within the park. Individual portions of the circulation system have been replaced, rebuilt and refurbished over time, just as the individual poles that constitute the illumination system have been replaced over time.

- B. Review procedure. Demolition reviews are processed as follows:
  - 1. Proposals to demolish an accessory structure are processed through a Type II procedure;
  - 2. Proposals to demolish a Conservation Landmark, National Register Landmark, contributing resource in a Conservation District, or contributing resource in a National Register District are processed through a Type III procedure;
  - 3. All other proposals to demolish a historic resource are processed through a Type IV procedure.

<u>Response.</u> This request is being processed through the Type III procedure consistent with B.2. above.

- *C. Approval criteria. Proposals to demolish a historic resource will be approved if the review body finds that one of the following approval criteria is met:* 
  - 1. Demolition of the resource has been evaluated against and, on balance, demolition has been found to be equally or more supportive of relevant goals and policies of the Comprehensive Plan, and any relevant area plans, than preservation, rehabilitation, or reuse of the resource. The evaluation must consider:
    - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
    - b. The economic consequences for the owner and the community;
    - c. The merits of demolition;
    - d. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
    - e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
    - f. Any proposed mitigation for the demolition.
  - 2. The proposal is to demolish a contributing resource in a Conservation District or National Register District and demolition of the resource will be mitigated to enhance, preserve, or restore the archaeological, architectural, cultural, or historic significance or integrity of the district. The mitigation must be responsive to the significance and integrity of the resource proposed for demolition. The evaluation must consider:
    - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
    - b. The economic consequences for the owner and the community;
    - c. Relevant goals and policies of the Comprehensive Plan.

- 3. The proposal is to demolish a contributing resource in a single-dwelling zone in a National Register District, and demolition of the resource will facilitate the creation of more deeply affordable dwelling units...
- 4. The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

<u>Response.</u> The lighting system is a Basic Utility and as such is classified as an accessory use in the OS base zone. Therefore, the proposal to remove and replace light poles within Mt. Tabor Park may be reviewed subject to the requirements in C. 4 above. As noted previously in this application, replacement of the proposed light poles will not have any effect on the architectural contributing structures or buildings in either the Mt. Tabor Park Historic District or the Mt. Tabor Park Reservoir Historic District.

In terms of the historical listing, the primary cultural or historic significance of Mt. Tabor Park as articulated in the historic listing, is the Park's association with the Olmsted Brothers through the 1903 Olmsted Plan which identified Mt. Tabor as a desirable site for a public park, and its design which embodies the principles of landscape architecture espoused by the Olmsteds.

As such, the lighting is a feature within the contributing resource of the park landscape as a whole and provides historic and functional value by illuminating the park's circulation system. Some care was taken to determine when the various drives and formal pathways were constructed for the historical nomination, however, no such attempt was made regarding the lighting system. Further, no attempt was made to distinguish individual poles or their location, date individual poles to the period of significance, or assign historical value to individual poles in the nomination.

Updating the light poles within the existing landscape will do nothing to erode the cultural importance of Mt. Tabor Park as a significant park within the Portland Park System, nor will it impact the integrity of the landscape itself. In fact, by replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

While the light poles clearly met the criteria for accessory structures, given input received at the Historic Landmarks Commission briefing on March 13, 2023, it seems prudent to consider the additional demolition criteria that applies to contributing resources in Historic Districts under C.1. and National Register Districts in C.2. as well.

Relevant goals and policies of the 2035 Comprehensive Plan relate to encouraging development that promotes human health and safety, historical resource preservation and development that is energy and resource efficient. Goals and polices to implement these admirable intentions are located in Chapter 4 Design and Development and include the following:

• Goal 4.B: Historic and cultural resources

Historic and cultural resources are identified, protected, and rehabilitated as integral parts of an urban environment that continues to evolve.

<u>Response.</u> The historic resource is Mt. Tabor Park. The park is integral to the Mt. Tabor Neighborhood and an important part of the Portland Park System. Ensuring the park is a place of safety is a key component of its value as an "urban refuge." It is critical that park visitors feel safe and welcome in Mt. Tabor Park. As the city's park system's components age, maintaining park safety through replacement of outdated components will be become a more common aspect of the evolving urban environment.

This request proposes to maintain the historical integrity of the lighting system and its role of illuminating the circulation system in park while also ensuring all the light pole structures are of the most modern construction and installed to current health and safety codes. The historic value and character of the system of illuminated pathways and historic drives within the park is derived from systems as a whole (rather than individual light poles), and the resulting social and cultural value experienced by community member's when partaking in the park's natural and scenic landscapes.

By replacing the light poles within the park's landscape with light poles that maintain the historic design and materials of the existing light poles, the light safety project will ensure that the overall park site remains available and open to public in a manner that honors the historic and cultural value the Park provides to the community.

• Policy 4.1 Pattern areas. Encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Portland's five pattern areas described in Chapter 3: Urban Form.

<u>Response.</u> The site design of Mt. Tabor Park is one that respects the natural topography of the site and the inner neighborhood pattern area. The site's curvilinear drives and mix of trails and staircases respects the site's sloped nature. The site's design also provides for a variety of edge treatments to integrate the park into the residential fabric of development that surrounds it. Utilizing long approaches and screening vegetation creates buffers between park users and residential users. The updated light fixtures proposed in this project will improve the lighting system for the park's circulation

system by reducing the amount of illumination reaching nearby residential uses and improve the park's integration into the neighborhood. The proposed update will only enhance the value Mt. Tabor Park brings to the highly connected, densely populated inner neighborhood it is located within.

• Policy 4.46 Historic and cultural resource protection. Within statutory requirements for owner consent, identify, protect, and encourage the use and rehabilitation of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

<u>Response.</u> The Bureau supports sensible neighborhood nominations of historic parks to protect the historic and cultural relevancy of our revered park assets. Previous improvements at Mt. Tabor Park have included restoration of historic buildings, including the Gate House (Head House) and the Summit Restrooms. Interpretive elements onsite identify historic resources in the vicinity of the Cinder Cone, the Crater Amphitheater, and the Historic Reservoir District. Historic significant architectural resources within the park have been protected and preserved including the Crater Amphitheater, the Summit and Volcano restrooms, and the Caretaker's House.

• Policy 4.50 Demolition. Protect historic resources from demolition. When demolition is necessary or appropriate, provide opportunities for public comment and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

<u>Response.</u> The illuminated circulation system will be maintained through this project, even though individual light poles will be removed. Prior to submitting this application, Bureau staff attended the following public meetings to discuss the light safety project:

- Historic Landmarks Commission, March 13, 2023.
- Portland City Council, April 5, 2023.
- Light Pole Safety Project neighborhood meetings, May 11 &12, 2023.
- Light Pole Safety Project community-wide meeting, May 17, 2023.

Community input at meetings focused on safety, with strong preferences for maintaining lights until replacement poles and lights are funded. There was no opposition expressed regarding the appearance of the proposed poles, fixtures, and strapping, all of which have been used in other City parks (Laurelhurst and Duniway for example). Given the conditions of the existing poles, there was strong interest in replacing poles – however there was also community interest in salvaging old poles and fixtures where possible.

Bureau staff agreed to offer poles for salvage to mitigate for the loss of original Mt. Tabor Park light poles. Bureau staff contacted a variety of organizations and offered to donate the poles for this purpose. The following organizations have been offered original light poles, including fixtures from a variety of parks:

- Oregon Historical Society.
- Oregon Architectural Heritage Center.
- Habitat for Humanity ReStore.

The above organizations have accepted donations of fixtures (2, 4, and 35 fixtures respectively) for preservation, and in some case rehabilitation and resale. Despite offers, no organizations have chosen to preserve any of the concrete light poles due to pole size (12' and taller), weight (about 1200 pounds), and condition. It is expected that future removals will be managed by the city's contractor and materials will be recycled when practicable.

• Policy 4.51 City-owned historic resources. Maintain City-owned historic resources with necessary upkeep and repair.

<u>Response.</u> The Bureau maintains a wide range of assets within the Park System using funds from the General Funds as authorized by City Council and the 2020 Parks Local Option Levy as authorized by the city's voters. The Bureau operates and maintains 154 neighborhood parks, 11 indoor and outdoor pools, 14 community and art centers, six golf courses, 160 miles of regional trails, and a motor raceway. The revised budget for maintenance in FY 22-23 was \$21.8 million and the Bureau expects to spend between \$22.5 and \$23.9 million on maintenance in this fiscal year (FY 23-24).

Resources are allocated in accordance with the Healthy Parks, Healthy Portland framework and adopted Level of Service plans. Within the parks system, resources are prioritized based on number of factors, including how many park users are served by an asset and equity considerations to address historic underinvestment within the park system. Parks with historic resources are not prioritized over other park assets under the current policy framework, however they are not assigned a lower priority either.

All developed parks, community center, and natural areas with public access receive basic daily maintenance. And although the Bureau prioritizes maintenance for health and safety, the system as a whole has a backlog of \$560 million in deferred maintenance expenses. Additional resources to fund maintenance and operation expenses for the city's aging park system are currently under consideration through the Bureau's Sustainable Futures program. The citywide light safety project will help reduce future maintenance expenses through a combination of reducing future operating expenses, leveraging external funding, and securing materials and labor at current costs, while also ensuring public safety. Investing in new light poles now for Mt. Tabor's historic light system will ensure that the illuminated circulation system remains in good repair well into the future.

• Policy 4.60 Rehabilitation and adaptive reuse. Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.

<u>Response.</u> The park's existing contributing buildings and structures will not be affected by the proposed replacement of the light poles. Replacement of the proposed light poles will ensure that contributing architectural resources are not impacted should aging or structural deficient poles fail.

• Policy 4.62 Seismic and energy retrofits. Promote seismic and energy-efficiency retrofits of historic buildings and other existing structures to reduce carbon emissions, save money, and improve public safety.

<u>Response.</u> Replacement light poles will meet current code standards and seismic requirements. The replacement light fixtures to be installed through the light pole safety project feature improvements in energy efficiency and will result in monetary saving over time. Most importantly, the replacement poles will improve public safety.

• Policy 4.63 Life cycle efficiency. Encourage use of technologies, techniques, and materials in building design, construction, and removal that result in the least environmental impact over the life cycle of the structure.

<u>Response.</u> The current manufacturing process for precast light poles proposed in this project will ensure a lengthy life cycle. The concrete is precast and prestressed to improve longevity. In addition, high tensile steel is incorporated into the pole during manufacturing which reduces freeze-thaw impacts and yields a stronger pole able to bear higher loads (APP Exhibit K).

The existing concrete poles are experiencing a variety of impacts due to their age. Replacement of the reinforcing components inside the pole would compromise the pole's integrity, likely damage the external concrete casing, and destroying the desired appearance of the 1924 poles. While it is hypothetically possible to break down the concrete and melt down the existing rebar to reuse materials, doing so would be inefficient in terms of resource and energy use, as well as extend the amount time needed to complete this project. Thus, the project team concluded that replacement

poles will result in the less environmental impact than attempts to rehabilitate the existing poles.

• Policy 4.64 Deconstruction. Encourage salvage and reuse of building elements when demolition is necessary or appropriate.

<u>Response.</u> Although the poles removed as part of the citywide light safety project so far have not been salvaged due to the lack of interest by area reuse experts, they have been recycled. It is expected that light poles removed during the Mt. Tabor Park portion of the project will also be recycled by the contractor as part of their overall construction debris handling.

Based on the above responses, the proposed project does comply with relevant 2035 Comprehensive Plan policies.

The criteria for Historic Districts under *C.1.a.* and National Register Districts in *C.2.a.* relates to the <u>value of the historic resource</u>, considering the resource's <u>age, condition, significance, rarity, value to the community, and association with historically</u> <u>marginalized populations or communities</u>. The historic resource in this case is the lighting system that provides illumination to the park's circulation system of historic drives, formal pathways, and period staircases. Park staff was unable to locate any evidence that the Mt. Tabor lighting system holds significance for any historically marginalized communities in Portland.

The lighting of Mt. Tabor's circulation system in the 1920s (and likely the 1930s in association with WPA circa drive construction) was not unique, nor was it the earliest achievement in the Portland Park system. The city's first known illuminated circulation system that welcomed automobile users to travel within forested areas and experience previously inaccessible scenic views was the Terwilliger Boulevard Parkway. The lighting system for the parkway may have been installed as early as 1913.

Laurelhurst Park, another historic park in the city's park system, also has an illuminated circulation system. According to that park's historical nomination, its lighting system was installed in 1915 – although the nomination also recognized that the age of individual poles varied and therefore, the system itself wasn't a contributing resource. The lighting system at Mt. Tabor Park is neither the oldest example of such a resource nor is it rare. The proposed replacement, however, will maintain the system's integrity and ability to function far into the future.

As for the design of the light poles themselves, the octagonal design is almost the standard for Portland parks developed within the inner neighborhood pattern area and examples of such poles can be found throughout the inner eastside. The fixtures that

currently exist do have value for the community and the proposed replacement fixtures preserve the lantern-style design. Approximately 40 lighting fixtures of this style have already been donated. As noted previously though, the existing poles, especially those that date from the period of significance are not in good condition, lack the structural integrity necessary for restoration, and any rehabilitation or reuse would be far more resource intensive from an environmental standpoint than replacement.

The criteria for Historic Districts under C.1.b. and National Register Districts in C.2.b. focuses in on the <u>economic consequences</u> of demolition <u>compared to preservation</u>, <u>rehabilitation</u>, <u>or reuse of the resource for the owner of the resource and the</u> <u>community as a whole</u>. The lighting system is being preserved in this case, at issue is whether certain elements within the system should be or could be preserved, reused, or rehabilitated.

Many elements of the lighting system, such as electronic wiring and fixtures, and some of the poles, have already been replaced in order to maintain the lighting system in proper functioning order. The main structural components of the lighting system, the poles and fixtures, are not unique within the Portland parks system. Through the Bureau's citywide Light Safety project, light fixtures of various ages have been successfully donated for reuse or preservation.

When it comes to individual light poles from the period of significance, there is a preponderance of evidence that rehabilitation to current code standards is not possible. Preservation would entail costs to remove poles from their current location where they pose a potential safety hazard to another location. Specialty equipment and trained staff is needed to transport objects of this size. In addition, materials and labor would be required to install a light pole or poles in another location and secure the pole(s) in a manner that mitigates the structural risk. These costs are all currently unfunded. Reuse by other parties does not appear feasible or cost effective as local experts have declined to take ownership of any the poles removed through the light safety project to date.

The Bureau's funding plan to replace the light poles in twelve city parks, which leveraged grant funding from Metro, was authorized by City Council earlier this year. The Bureau currently faces significant capital maintenance expenses that lack funding. While the community supported the preservation of existing services through the passage of the 2020 Parks Operation Levy and capital maintenance through the passage of the 2017 Capital Bond, expending scarce public dollars to preserve structurally deficient components does not meet current policy priorities nor would such expenditures be consistent with City and Bureau goals to provide an equitable level of service in our community. Based on the above analysis, which considers feasibility as well as expenses, park staff have concluded that demolition and replacement of the light poles fixtures is a more cost-effective solution than reuse, rehabilitation, or preservation for both the Bureau <u>and</u> the community. However, it should be noted that cost is *not* the primary reason for proceeding with replacement was chosen; public safety, the impracticality of retrofitting the existing poles, and renewing the park's lighting system to last another century were more significant drivers in the decision to replace light poles in Mt. Tabor Park.

The subsequent criteria diverge at this point. Historic Districts require an examination of benefits for alternative scenarios, while in Conservation Districts the remaining criterion is focused on policies in the Comprehensive Plan. These policies were addressed above. Regarding the final Historic District criteria, since no redevelopment is proposed in this case, the <u>alternative scenarios to be considered are demolition and preservation</u> - taking into consideration the purposes described in Subsection A.

The benefits associated with demolition, or more specifically in this case, the benefits associated with the replacement of structural components in the historic light system and subsequent recycling and reuse of the light poles and fixtures, include the following:

- The integrity and character of the historic lighting system as a whole is maintained and available for use now and many years into the future.
- Park users will be able to continue to comfortably navigate the park in the evenings and access even the most densely forested portions of the circulation system regardless of the natural lighting conditions.
- Park users can have confidence in the city's park system as a safe place in which to recreate, exercise, and enjoy scenic vistas, with all members of their family, friends, and fellow community members.
- Future cost savings from increased energy efficient operation of the lighting system.
- Improved lighting conditions due to improvements in the lighting technology, including increased directional focus for light emitting diode (LED) lamps and improved shielding in fixtures that will result in dark skies compliance and less impact to off-site properties.
- Use of durable, proven, aesthetically pleasing and historic-honoring light pole and fixture products, with decades of performance in other City parks, including historic Terwilliger Boulevard, Duniway Park, Laurelhurst Park, and other Portland parks.

The merits of preservation that must be considered in Subsection A are *economic and community vitality, resilience, and memory.* Preservation of light poles in their current condition would require relocation away from the actual lighting system to a location

where their structural deficiencies would not cause a risk to park users and likely would defeat the purposes of preservation related to promoting community vitality and memory. Preservation is currently unfunded and additional funding would need to be identified, which would have a negative impact on economic vitality. Preservation is unlikely to increase community resiliency to potential natural or other hazards.

Based on the above considerations, the Bureau concludes that replacing the light poles and fixtures of the historic lighting system while maintaining the spatial distribution noted in the historic nomination is the most feasible, cost-effective, and reasonable method for preserving the historic illuminated circulation system within Mt. Tabor Park.

The proposed replacement of light poles in Mt. Tabor Park's historic lighting system will comply with the standards in the Historic Resource Overlay Zone and for Historic Resource Review.

## Conclusion

The Light Pole Safety project will replace 88 light poles adjacent to the park's circulation system, approximately 60 of which may date from the park district's historic period of significance. Economic and climate resiliency benefits will be realized by updating the aging lighting system, consistent with city policies. Replacement will ensure the system of illuminated pathways, staircases, and historic drives continues to provide comfort and safety as community members explore the historic landscape and cherished scenic views of Mt. Tabor Park.

Poles will be replaced in their existing location and replacement work will avoid existing trees. No trees are proposed for removal in the Light Pole Safety project. Any pruning or root cutting required to install the new poles will occur in accordance with Title 11 and the Tree Permit protection plan, consistent with proper arboricultural practices, and will not adversely impact the health or structural integrity of the tree.

The Bureau proposes to take significant efforts to preserve the spatial pattern of the illumination system. Materials and design of replacement poles closely resembles existing ones and will preserve the historic character of the lighting system. The reasoning provided in this narrative, along with the supporting evidence provided in the attached exhibits demonstrates project compliance with the applicable requirements of Title 33. Therefore, Bureau of Development Services staff should recommend, and the Historic Landmarks Commission should approve, the light pole safety project replacement of light poles within Mt. Tabor Park.





LU 23-088549 HR DM, Exhibit A.8









LU 23-088549 HR DM, Exhibit A.8















LU 23-088549 HR DM, Exhibit A.8










LU 23-088549 HR DM, Exhibit A.8



LU 23-088549 HR DM, Exhibit A.8



LU 23-088549 HR DM, Exhibit A.8









# 14 Proposed Spring City William & Marry with Type 5 optic.

# 74 Proposed Spring City William & Mary with Type 3 Optic

### PROPOSED LUMINAIRE





### LIGHTING CONTROLS



# nLight NECY Controller

Typical: Install 7-pin receptacle nLIGHT control node to each fixture.

Matchline





**EXAMPLE 1 EXAMPLE 1 EXAMP** 

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:



REGISTRATION:

NO	DATE	DESCRIPTION
_1	10/06/23	90% Completion Set
2	11/15/23	100% Completion Set
DESIGNI	ED: Dan	iel Shaw
DRAWN:	Dar	iel Shaw
CHECKE	D:	
JOB NO:	204	362-005 Pathway Light Pole Construction

SHEET TITLE:

0275-Mt. Tabor Park Proposed Pole Layout

SHEET NUMBER:

4 Proposed Spring City William & Marry with Type 5 optic.

# 23 Proposed Spring City William & Mary with Type 3 Optic

### PROPOSED LUMINAIRE

(#)



### LIGHTING CONTROLS



### nLight NECY Controller

Typical: Install 7-pin receptacle nLIGHT control node to each fixture.

Matchline



**EXAMPLE 1 EXAMPLE 1 EXAMP** 

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:







L-7.2



# 2 Proposed Spring City William & Marry with Type 5 optic.

# 10 Proposed Spring City William & Mary with Type 3 Optic

PROPOSED LUMINAIRE





### LIGHTING CONTROLS



# nLight NECY Controller

Typical: Install 7-pin receptacle nLIGHT control node to each fixture.



**EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building MCKINSTRY CO. MCKINSTRY CO. PORTLAND: 16790 NE MASON ST SUITE 100 PORTLAND, OR 97230 503-331-0234** 

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:



REGISTRATION:

NO DAT	E	DESCRIPTION
1 10/0	06/23	90% Completion Set
2 11/	15/23	100% Completion Set
DESIGNED:	Dan	iel Shaw
DRAWN:	Dan	iel Shaw
CHECKED:		
JOB NO:	204	362-005 Pathway Light Pole Construction

0275-Mt. Tabor Park Proposed Pole Layout Section B

L-7.3

1 Proposed Spring City William & Marry with Type 5 optic.

# 19 Proposed Spring City William & Mary with Type 3 Optic

### PROPOSED LUMINAIRE

(#)



**EXAMPLE 1 EXAMPLE 1 EXAMP** 

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:



ISSUES:		
NO	DATE	DESCRIPTION
	10/06/23	90% Completion Set
_2	11/15/23	100% Completion Set
DESIGNI	ED: Da	niel Shaw
DRAWN:	Da	niel Shaw
CHECKE	:D:	
JOB NO:	204	1362-005 Pathway Light Pole Construction

SHEET TITLE:

0275-Mt. Tabor Park Proposed Pole Layout SHEET NUMBER:

L-7.4

# 6 Proposed Spring City William & Marry with Type 5 optic.

# 16 Proposed Spring City William & Mary with Type 3 Optic

PROPOSED LUMINAIRE





### LIGHTING CONTROLS



# nLight NECY Controller

Typical: Install 7-pin receptacle nLIGHT control node to each fixture.



**EXAMPLE 1 CONTRACT OF THE DEFENSION O** 

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:



REGISTRATION:

NO DAT	E	DESCRIPTION
1 10/0	6/23	90% Completion Set
2 11/1	5/23	100% Completion Set
DESIGNED:	Dan	iel Shaw
DRAWN:	Dan	el Shaw
CHECKED:		
JOB NO:	2043	362-005 Pathway Light Pole Construction

0275-Mt. Tabor Park Proposed Pole Layout Sheet NUMBER:

L-7.5

(#)

Proposed Spring City William & Marry with Type 5 optic.

Proposed Spring City William & Mary with Type 3 Optic



**V G AINStry** For The Life Of Your Building MCKINSTRY CO. PORTLAND: 16790 NE MASON ST SUITE 100 PORTLAND, OR 97230 503-331-0234 www.mckinstry.com

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:



ISSUES:			
NO	DATE		DESCRIPTION
1	10/06/2	23	90% Completion Set
_2	11/15/2	23	100% Completion Set
DESIGN	ED:	Danie	el Shaw
DRAWN:	-	Danie	el Shaw
CHECKE	D:		
JOB NO:	-	20436	62-005 Pathway Light Pole Construction
SHEET 1	TITLE:		

0275-Mt. Tabor Park Proposed Pole Layout Section E

L-7.6

1 Proposed Spring City William & Marry with Type 5 optic.

0 Proposed Spring City William & Mary with Type 3 Optic

### PROPOSED LUMINAIRE



(#)

#



### LIGHTING CONTROLS



# nLight NECY Controller

Typical: Install 7-pin receptacle nLIGHT control node to each fixture.



Matchline

**EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF The Life Of Your Building EXAMPLE 1 CONTRACT OF THE Life OF** 

PROJECT:

### City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:



NO	DATE	DESCRIPTION		
1	10/06/23	90% Completion Set		
2	11/15/23	100% Completion Set		
SIGNE	D: Dan	iel Shaw		
RAWN:	Dan	niel Shaw		
CHECKED:				

SHEET TITLE:

0275-Mt. Tabor Park Proposed Pole Layout Section F

L-7.7

Pole #	Fixture	Lamp Distribution Type	Pole	Pole Footing Type	Pole Position	Pole #	Fixture	Lamp Distribution Type	Pole	Pole Footing Type	Pole Position	Fixture	Lamp Distribution Type	Qty by Type
1	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	51	Spring City	T5	12'2" Above Grade	Pole Footing (SK-1)	E	Spring City SPEC-34261	T3	74
2	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	52	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	Spring City SPEC-34261	T5	14
3	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	53	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E		TOTAL FIXTURE COUNT	88
4	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	54	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
5	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	55	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
6	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	56	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
7	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	57	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
8	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	58	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
9	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	59	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
10	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	60	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
11	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	61	Spring City	T5	12'2" Above Grade	Pole Footing (SK-1)	E			
12	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	62	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
13	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	63	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
14	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	64	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
15	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	65	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
16	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	66	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
17	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	67	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
18	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	68	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
19	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	69	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
20	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	70	Spring City	T5	12'2" Above Grade	Pole Footing (SK-1)	E			
21	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	71	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
22	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	72	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
23	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	73	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E			
24	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	74	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
25	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	75	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
26	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	76	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
27	Spring City	Т3	12'2" Above Grade	Pole Footing (SK-1)	E	77	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
28	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	78	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
29	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	79	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
30	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E	80	Spring City	T3	12'2" Above Grade	Pole Footing (SK-1)	E			
31	Spring City	15	12'2" Above Grade	Pole Footing (SK-1)	E	81	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E			
32	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E _	82	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E -			
33	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E -	83	Spring City	15	12'2" Above Grade	Pole Footing (SK-1)	E			
34	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E	84	Spring City	15	12'2" Above Grade	Pole Footing (SK-1)	E			
35	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E	85	Spring City	15	12'2" Above Grade	Pole Footing (SK-1)	E			
30	Spring City	13	12'2" Above Grade	Pole Footing (SK-1)	E	80	Spring City	15	12'2" Above Grade	Pole Footing (SK-1)	E F			
3/	Spring City	13 T2	12/2 Above Grade	Pole Footing (SK-1)		<u>8/</u>	Spring City		122 Above Grade	Pole Footing (SK-1)	E F			
38	Spring City	13 T0	12/2 Above Grade	Pole Footing (SK-1)		ŏŏ	spring City	15	12 2 Above Grade	Pole Footing (SK-1)	E			
39	Spring City	13 T0	12/2 Above Grade	Pole Footing (SK-1)										
40	Spring City	13 T2	12/2" Above Grade	Pole Footing (SK-1)										
41	Spring City	13 T2	12 Z Above Grade	Pole Footing (SK-1)										
42	Spring City	тэ ТЭ	12/2" Above Grade	Pole Footing (SK-1)										
43	Spring City	13 T0	12/2" Above Grade	Pole Footing (SK-1)										
44 лс	Spring City	сі тр	12 <sup>1</sup> 2" Above Grade	Polo Footing (SK-1)										
40	Spring City	сі тэ	12/2" Above Grade	Dole Footing (SK-1)										
40	Spring City	т	12 <sup>1</sup> 2 <sup>11</sup> Above Grade	Pole Footing (SK-1)										
47	Spring City	T5	12 <sup>1</sup> 2" Above Grade	Pole Footing (SK-1)										
40	Spring City	T5	12'2" Above Grado	Pole Footing (SK-1)										
50	Spring City	т <u>с</u>	12 <sup>1</sup> 2 <sup>11</sup> Above Grade	Pole Footing (SK-1)										
00	Spring City	IJ		1016100till8(3K-1)	L									



Pole Position Legend: Existing = E Relocate = R New = N



PROJECT:

# City of Portland Parks & Recreation Bureau Pathway Light Pole Project

SE 60th Ave & SE Salmon St, Portland, OR 97215

CONSULTANTS:

REGISTRATION:

ISSUES:

NO	DATE	DESCRIPTION			
_1	10/06/23	90% Completion Set			
2	11/15/23	100% Completion Set			
	_				
DESIGN	IED: Dan	iel Shaw			
DRAWN	I: Dan	aniel Shaw			
CHECK	ED:				
JOB NO	204	362-005 Pathway Light Pole Construction			

0275-Mt. Tabor Park Proposed Pole Schedule

SHEET TITLE:

SHEET NUMBER:

L-7.8



PROJECT PORTLAND PARKS & REC TITLE LIGHT POLE REPLACE BY MMR DATE 10/04//23

800.669.6223

www.mckinstry.com

ELECTRICAL POLE FOOTING SCHEDULE

Footing schedule				
Park	Allowable Lateral Bearing Pressure (psf/ft)	FOOTING TYPE		
Mt. Tabor	300	COMPACTED ROCK AND		
		CEMENT BACK-FILL		



www.mckinstry.com

CEMEI	NT	
ALE N	NTS JOB	# 204362-006
F.DWG	SHE	ET
	Min Embed: (ft)	SKETCH

5.0

For The Life Of Your Building MCKINSTRY CO. PORTLAND: 16790 NE MASON ST SUITE 100 PORTLAND, OR 97230 503-331-0234 www.mckinstry.com

PROJECT:

City of Portland Parks & Recreation Bureau Pathway Light Pole Project

CONSULTANTS:

REGISTRATION:

ISSUES: NO DATE DESCRIPTION 1 10/06/23 90% Completion Set 2 11/15/23 100% Completion Set \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ DESIGNED: DRAWN: CHECKED: 204362-005 Pathway Light Pole Construction JOB NO:

SK-1

**S**-1

SHEET TITLE:

Pole Footing Structural Details

LU 23-088549 HR DM, Exhibt A.9

SHEET NUMBER:

#### **REVISED APP Exhibit List**

- Exhibit A Portland City Council Ordinance #19122
- Exhibit B Official Zoning Maps # 3136, 3137, 3236, 3237
- Exhibit C Mt. Tabor Historic Districts
- Exhibit D Historic Zoning Maps
- Exhibit E Past Land Use reviews
- Exhibit F Historic records for illumination system (1958 Lighting Plan, 1984 Lighting + Electric As-Built Plan, 1987 Lighting Plan + Details, 1999 Restroom Electrical Plan) and Replacement Summary (notations on 1987 Lighting Plan)
- Exhibit G Comparison between existing and proposed
- Exhibit H Staff photographs showing existing pole conditions
- Exhibit J Mt. Tabor Park Historic District National Register listing
- Exhibit K December 28, 2022 Emergency Declaration (NEW)
- Exhibit L Administrative Rule FIN 6.11.03 USEFUL LIFE EXAMPLES, Capital Asset Administrative Procedures (NEW)
- Exhibit M Light Pole Safety Project Frequently Asked Question (NEW)
- Exhibit N Denver Parks & Recreation Trail Lighting Study (NEW)
- Exhibit P Laurelhurst Park Historic District National Register listing (NEW)
- Exhibit Q Excerpt from "Dark Skies Strategies for Reducing Light Pollution in Portland" 2020 BPS Report (NEW)

(\*note no capital I Exhibit to avoid confusion with lowercase I and no capital O Exhibit to avoid confusion with the numeral 0)



Home / Council Documents

### 191222

Emergency Ordinance

### \*Amend contract with McKinstry Essention, LLC for energy savings performance contracting services not to exceed \$18,500,000 (amend Contract 30007025)

Passed

The City of Portland ordains:

Section 1. The Council finds:

- 1. In partnership with the Office of Management and Finance (OMF) Procurement and the Bureau of Planning and Sustainability, Portland Parks & Recreation (PP&R) is committed to reducing our environmental footprint while improving the resiliency of our infrastructure. Our lighting, cooling, heating, and plumbing systems consume over \$6 million per year in gas, electricity, and water and many of these systems are well beyond expected service life and contribute to our \$600 million and growing capital maintenance backlog.
- 2. On April 5, 2017, City Council authorized a competitive solicitation per City Code 5.34.880 for an Energy Savings Performance Contract (ESPC) (Ordinance No. 188310). To complete the work most efficiently, PP&R determined that it would implement multiple design-build stages from one initial technical energy audit. On September 4, 2019, City Council accepted the Guaranteed Maximum Price for Stage 1 (GMP1) implementation of the ESPC. On November 20, 2019, the City entered into contract agreement with McKinstry Essention, LLC (Contract No. 30007025).
- 3. On December 28, 2022, the Commissioner-in-Charge signed an emergency declaration for lighting removal and replacement work to take place under this contract since many of the impacted parks and pathway lighting impacted by a structural deficiency were already within scope of the ESPC work.

#### Introduced by

Mayor Ted Wheeler

#### Bureau

Management and Finance; Revenue and Financial Services

#### Contact

**Biko Taylor** Chief Procurement Officer

- biko.taylor@portlandoregon.gov
- 503-823-1095

### Kelly Davis-McKernan

Construction, Supervisor II

- Kelly.Davis-McKernan@portlandoregon.gov
- <u>503-823-1248</u>

Requested Agenda Type Regular

#### **Date and Time Information**

Requested Council Date April 5, 2023 Time Requested 15 minutes

- 4. Both this Stage 2 amendment (GMP2) and GMP1 derive from the same feasibility, analysis, technical energy audit, technical specifications and know-how for the performance guarantee provided by McKinstry Essention, LLC. Performance has been satisfactory for Stage 1, including: 40% DMWESB firm utilization; direct annual cost savings of over \$79,000 per year; a 15% reduction of utility consumption at the Stage 1 sites; improved lighting coverage on pathways at seven parks; and DarkSky-compliant fixtures for improved conditions for wildlife.
- 5. In a continuation of that work, PP&R intends to award a GMP2 contract amendment that will include improvements to pathway lighting at an additional 12 parks; add more efficient heating and cooling to replace an obsolete heating-only system at Peninsula Park Community Center; and modernize the heating, ventilation, and air-conditioning system at Charles Jordan Community Center and East Portland Community Center so that they are better able to function in poor outdoor air quality environments. These investments support the Climate Emergency Declaration and Workplan and avoid 327 Metric Tonnes of CO2 per year the equivalent of 1,222,000 miles not driven in an internal combustion engine car.
- 6. The current contract amount is \$1,071,124.24 incorporating changeorders 1 and 2, and the GMP 2 amendment's cost is anticipated to be \$14,500,000, including the emergency approved change orders 3 and 4 for pole and base removals. An additional amount of \$2,928,875.76 is being requested as a contingency in case other issues arise during construction and change orders are required, for a new contract not to exceed value of \$18,500,000.
- 7. Sufficient funds are expected to be available in the Parks Capital Improvement Program Fund, No. P00924.

NOW, THEREFORE, the Council directs:

- A. The Chief Procurement Officer is authorized to execute amendment(s) that are approved as to form by the City Attorney's office and/or change orders to Contract 30007025 if the contract not-to-exceed amount is \$18,500,000 or less.
- B. The Mayor and City Auditor, or their designee(s), are hereby authorized to draw and deliver checks when demand is presented and approved by the property authority.

Section 2. The Council declares an emergency exists due to the need for climate action and to replace removed pathway lighting for public safety; therefore, this Ordinance shall be in full force and effect from and after its passage by the Council.

### **Official Record (Efiles)**

Ordinance and testimony (https://efiles.portlandoregon.gov/record/16069363)

An ordinance when passed by the Council shall be signed by the Auditor. It shall be carefully filed and preserved in the custody of the Auditor (City Charter Chapter 2 Article 1 Section 2-122)

Passed by Council April 5, 2023

Auditor of the City of Portland Simone Rede

#### Impact Statement

#### Purpose of Proposed Legislation and Background Information

Authorize the Chief Procurement Officer to execute amendment(s) that are approved as to form by the City Attorney's office and/or change orders to Contract 30007025 if the contract not-to-exceed amount is \$18,500,000 or less.

This is the second stage of a Guaranteed Maximum Price Energy Savings Performance Contract (ESPC) which was originally competitively bid in 2017. ESPCs follow City Code 5.34.880 where an expert firm performs technical analysis and feasibility of efficiency work and then performs and guarantees the utility savings of selected and funded designs. Stage 1 covered nine locations and this second stage covers an additional fifteen.

This Stage 2 amendment will improve pathway lighting at an additional 12 parks; add more efficient heating and cooling to replace an obsolete heating-only system at Peninsula Park Community Center; and modernize the heating, ventilation, and air-conditioning system at Charles Jordan Community Center and East Portland Community Center to ones that are better able to function in poor outdoor air quality and in pandemic operating environments.

#### **Financial and Budgetary Impacts**

Based on the proposed Guaranteed Maximum Price and also including contingency, Parks anticipates the contract cost to be up to \$18,500,000.00. The additional amount in the amendment authorization ordinance includes the original award plus additional contract contingency should the scope change between now and the end of 2024.

The current contract amount is \$1,071,124.24 incorporating change-orders 1 and 2, and the GMP 2 amendment's cost is anticipated to be \$14,500,000,

including the emergency approved change orders 3 and 4 for pole and base removals. An additional amount of \$2,928,875.76 is being requested as a contingency in case other issues arise during construction and change orders are required, for a new contract not to exceed value of \$18,500,000.

Funds are expected available from the following sources:

- Capital Set Aside: \$2,083,852
- System Development Charges: \$900,000
- Metro Bond Local Share: \$2,000,000
- PP&R Major Maintenance: \$8,916,148
- Department of Energy Block Grant: \$600,000
- Total anticipated funds available: \$14,500,000.00
- Previous contract amount: \$1,071,124.24
- Additional authorization for contingency: \$2,928,875.76
- Sum of authorization: \$18,500,000.00

No positions will be created, eliminated or re-classified as a result of this legislation. This project will reduce (or avoid the increase of) ongoing operating costs at the sites where these investments will be made.

#### **Community Impacts and Community Involvement**

The investment supports the Climate Emergency Declaration and Workplan and avoid 327 Metric Tonnes of CO2 per year – the equivalent of 1,222,000 miles not driven in an internal combustion engine car. In addition to progress on our major maintenance backlog, informal community feedback from the lighting conversion completed in the earlier pilot was positive and responds to extensive community involvement which shows extensive interest and concern about safety in-general and park lighting in-particular. The improved lighting is not only more energy efficient but also provides better coverage, appears brighter, and is more reliable. Based on preliminary consultation with the PP&R Community Engagement Team, implementation of the work will take an *inform* approach, where interested and impacted parties will be kept up to date on construction impacts through the project website, signage, and other appropriate site-specific strategies.

#### 100% Renewable Goal

This projects advances the City's Renewable Energy Goal by improving the energy efficiency of our infrastructure to avoid the future consumption of over 362,313 kWh of electricity per year and over 10,092 therms of natural gas.

### **Budget Office Financial Impact Analysis**

Based on the proposed Guaranteed Maximum Price and included contingency, the anticipated amended contract cost is expected to be up to \$18.5 million. That amount includes the original award plus additional contact contingency should the scope change. Funding for this project is expected to be available from the following sources: Capital Set Aside: \$2,083,852; System Development Charges: \$900,000; Metro Bond Local Share: \$2,000,000; PP&R Major Maintenance: \$8,416,148; Department of Energy Block Grant: \$600,000. Ongoing operating costs at the sites of these investments will be reduced or stay the same.

Breakdown of the total amount: The current unamended contract is \$1,050,624.24. Including all change-orders and GMP2, the amendment's cost is anticipated to be \$14.5 million. The contingency is \$2,949,375.76. The amendment's cost and the contingency total are for the new contact that is not to exceed \$18.5 million.

### Agenda Items

264 Regular Agenda in <u>April 5, 2023 Council Agenda</u> (https://www.portland.gov/council/agenda/2023/4/5)

Passed

Commissioner Dan Ryan Yea

Commissioner Rene Gonzalez Yea

**Commissioner Mingus Mapps Yea** 

Commissioner Carmen Rubio Yea

Mayor Ted Wheeler Yea













### HISTORICAL CONTEXT OF RACIST PLANNING

A HISTORY OF HOW PLANNING SEGREGATED PORTLAND





Figure 1. City of Portland map of Zone I single-family residential areas, 1927



Figure 2. Current City of Portland map boundaries with 1927 Zone I single-family residential areas, 2019

Legend

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IOM THE PLANNING COMMISSION	LAND USE AND PUBLIC PACILITIES	SECTION V. ECONOMIC DEVELOPMENT	SECTION IX: CITIZEN INVOLVEMENT	SOLID WASTE
Pentania Olizzone	GOALS AND POLICIES	A review draft of the proposed City Economic Development Policy has been impared and a process established for public review, discussion and public	9 Maintain carrier involvement in the on-going land use decision-making process and provide opportunities for cligan participation in the injustrum process and provide opportunities for doal and comparticipation in the injustrum 1945.	11D Provide for adaptatic polici wartle deponent POLICIES:
revealed manning commission a response for necessary a com- ensity Part to the City Council. This Proposed Comprehensive Plan te- the adaption process for meeting this responsibility. For the find as months	SECTION I: METROPOLITAN COORDINATION	heatings. The following goals are included in the proposed Petry.     SA PUBLIC/PRIVATE DEVELOPMENT PARTNERS/III     Evelop a relation strategies development partnership responsive to the exist.	POLICIES:	11.28 CISPOSAL Reduce relearce on landfilling for disposed of solid waster innough lappon of the Microsofter Service Dearch's Solid Waste Management Plan
In your, a Discussion bran do that can want a standard to be in 2000 inter- individual is and organizations. Over 100 meetings were haid to collarin want comments on the Dailt. This Proposed Plan is the result of those com- tent and comments and and and the standard the standard Athenances	1 The Comprehensive Plan shall be coordinated with Federal and State law and subject regional guale, objectives and plana adopted by the Columbia Beneral Associations of Onexempting and its survivation.	nome, media of Portland businesses and mekkints 18 JOBS AND INCOMES	9.1 OTTIZEN INVOLVEMENT COOPDINATION Encourage altern involvement in and law planning projects by activity coordinating the planning process with relevant community ingenerations.	11.29 EXEND RECOVERY Dupped the development and utilization of label waste energy recovery
and the part and core required thereig are points foreign period, removing some and a have alayed the same, there have been changes to various parts of the t	Sarvice District (MSD), to promote a regional planning hamawork.	Support the development of the formatic economy to meet an experiment needs and increase the disposable income of city reachers. SC BUBNESS AND INDUSTIVY	through the reasonable drasbying of parenty reports to the reporter to the businesses, and motion of thicking public hearings to neightborrhood associa- tions, business groups, attacted individuals and the parental public.	11.30 COLLECTION Continue to support the collection of valid waste by private operations
Planning Commission will begin public treamps on the Proposed Com- lensive Plan in Soptember which will lead to a formal recommendation to Day Council by the first of 1980. After the City Council receives our recom-	1.1 URBAN GROWTH BOUNDARY Support the concept of an urban growth boundary for the Portland metro-	Retain existing in-city time, keep Portland competitive for new boomers and industry.	9.3 COMPREHENSIVE FLAN REVIEW implement a process for complete review of the Comprehensive Plan on a live year basis, which provides opportunities for active involvement by the	WATER SERVICE
Mation, they will hold additional public hearings and adopt Portland's Com- tensive Plan. Designed and a distance will address the second work of with the Static and the Com-	politan area 1.2 URBAN PLANNING AREA BOUNDARY Metable area and an urban planning area facendary publications are current	50 Nectification to be an annual and apporting transmission and industrial apportunities promote retail, sonice, employment and avaestment responsive to approximate retail, and the fact of the factors.	UNY's residents, tournesses and organizations 8.3 COMPREMENSIVE PLAN AMENDMENT COMPREMENSIVE PLAN AMENDMENT of the selected Comprehen-	BOAL: INF instant that reliables unit ordersuate and at supply and delivery systems and
sion thus far to help make this Plan a solid, workable guideline for the growth development of our lutare, thank you! To those of you interested in the factors and the left are necessarily the programment of the first time. Invite your activity of the top of the programment of the programment of the test time.	city timits. The City will conclude agreements with abuting jurisds from satabiliting a process for monitoring activity willive fruit boundary.	SE EQUALIZATION OF ECONOMIC OPPORTUNITY Equalize the opportunities for employment and careet advancement, basis	ave Plan which assures official involvement opportunities for the city's residents, businesses and organications	available to provide sufficient quantities of high runnity water at addigoate perdame to meet the sufficient duty overhild number of the contenuality, on an exclusion, which and well-sufficient backs.
vard commonle as we move foward the final stages of adopting a Plan. Your immedia and participation now will control to theip up in the devices. No is non-meet the appreciations, house and expectations of everyotre. Our Plan	1.3 Growthy and about a urban service boundary within the urban planning smallboundary.	result development, and expansion for their segments in the population tacety the prestext methods and barrient to economic success.	9.4 INTERCOVERMMENTAL COOPERATION Promote citizen involvement is tend use decisions indiated by other gra- emmental agencies:	POLICIES
Vegure compromise from all of us, it is a serious and difficult task, and the inning Commission will need your guidance and help.	<ol> <li>INTERGOVERSMENTAL COORDINATION Insure continuous participation in intergonemmental attains with public agencies to premote council alled metropolitan land use planning and mas-</li> </ol>	Ensure that accounts development and other publicly spoosared ar funded activities are mutually supportive.	SECTION X: PLAN REVIEW AND ADMINISTRATION	TEAL SOURCE Mantain and sufequent the Bull Rim Watershed as the primary widor supply source for the community, with water cuality preservation taking
1 11 1 all	muse the efficient use of public funds 1.5 FUTURE MSD PLANNING EFFORTS Exhibition are underly access that means Publicating Commun-	POLICIES-INDUSTRIAL: 5.1 Promote jobs for only residents by sargeting economic development re-	GOAL: 10 Portand a Comprehensive Plan will undergo periodic rovers to assure that	11.32 QUALITY Mantain the quality of the water supply at its surrent level, which encodes
Joan W. Joneth	harmone Plan for amendments that consider compliance with posts, objec- tives and plans adopted by MSD subsequent to acknowledgement of the Conventionary Plan.	sources and inducting in the second of the second s	It remains an up-to-date and workable transwork for land use derivative ment. The Plan will be implemented in secondance with State twe and the Geals, Polyces and Comprehensive Plan Map contained in the adopted	all State and Frederal water guality standards and satisfies the reads in both domistic and edustrial buildomers. 11 31 ALTERNATE SOURCE
an H. Similli, President Intend City Planning Commission	SECTION II: URBAN DEVELOPMENT	transportation scotts, increased tand supply and food convol factores.     S.3 Encourage the controlled use of designabilit industrial districts for manufactores instructed and related and tables.	Completienerve Plan POLICIES	traurie a residule supply of water to the community theough the development and maintenance of an alternate source (ptrumbeter) for use during emergences or periods of externely high demand
TROPUCTION	GOAL:	5.4 Provide industrial lates in the city through redevelopment of existing industrial districts and annexation of new sand, to provide jobs for city residents	10.1 MAJOR PLAN REVIEW implement a process for complete review of the Comprehensive Plan on a flow wat heads. This precess will include land use and demographic data	11.34 MAINTENANCE Maintain storage and distribution facilities in order to protect water quality maintain storage and distribution accurate design of the for all over meets, and
In Comprehensive Plant establishes goals and policies to guide luture public	<ul> <li>custome remember through public policies that encourage expanded oppo- licity for resuma and jobs, while retaining the character of established</li> </ul>	5.5 Improve movement of goods and workers in the designated industrial districts.	collection and analysis, a Comprehensive Plan progress report, and a ofigue involvement process to evaluate the Plan's effectiveness and pro- posals for amendments is appropriate.	INCOMENTATION AND AND AND AND AND AND AND AND AND AN
A particle development of the city. A part of Land Use and Public Facilities Godis and Preices to guide the develop- mend and reduceded and to the city.	POLICIES:	POLICIES-COMMERCIAL	10.2 ANNUAL REPORT The Barreau of Planning will provide an annual status report on the imple- mentation of the Completeneous Plan.	Maintain City storage capacity or at each type interesting each good any cap of city same. Additional storage capacity cremacted by outside city water users wit storage maintained.
A Companianew Pran Map to public follow zoning patients in the city. A guide for the major public investments required to implement the Plan, A values to the review and attentiment of the Plan, and	2.1 POPULATION GROWTH Allow for papelating greats within the existing city boundary by providing land use opportunities that will accommodate the protected increase in city	at the city, and reinforces neighborhood livability 5.7 Mandam the central business district as the principal commercial center in	10.3 INTERIM PLAN REVIEW AND AMENDMENT Amendments to the goals, policies, map and implementing ordinations of	11.36 FIRE PROTECTION Install and maintain public fire hydrants with adequate flow to serve the fire protection heads of all City residents and businesses.
Recommendations for revising the Zoning Code to carry out the Poisces and argument the Comprehensive Plan Map. Seals and Polices solicitation what the City should do, while the Comprehensive	CONSTRUCTION OF THE PERFORMANCE AND A CONSTRUCT AND A CONSTRUCTION OF THE PERFORMANCE AND A CONSTRUCT AND A CONST	Support the vitality of commercial centers throughout this city is asses for trade and service.	the Contentional with the second of the content which cate in worker while Cay Council as dearmed recovery consistent with cate in worker ment procedures and State law.	11.37 DESIGN AND COMMUNITY IMPACT Design water facilities is be campable with the area in which they are invested.
Non-Map and Zoning Code provide the guidance and the tools for where and now to accomptain these Codes and Polices and the Reals and Bolices designs for action formation for Alice program	Pertane wedenty in order to attract and reten a stable and divergined population 3.3 Additionation	5.9 Mustum transit related commercial centers along designabled major transit compose	10.4 COMPREMENSIVE PLAN MAR AMENDMENTS Individual requests for modification of this Comprehensive Plan Map design indices that are determined to be consistent with the Comprehensive Plan	11.38 OUTSIDE USER CONTRACTS Secure Long-term contracts with outside city water purveyors in order to
and building decisions by the Planning Cremmission and City Council. Public Facilities Goals and Policies guilde how we spend money leach year to	Phase the animation program of the City within the urban service boundary to allow be smooth transition in service privateant, more special city beambered and accordinated canodil emprovement programming.	5.10 Fieldan existing resignation of commercial activities waterin waterin loss and on course of assistantial endowing challened along of new meghborhood sommercial development.	and State land userplanning geats will peccent under requirements and hearing projections for zone sharing projections. Recording they be considered concurrently with the request for modification	Ingrove long-term water suggy partning. 11.39 OUTSIDE LISEA BENDERT Require water users outside the city that benetil turn a new improvement.
manager and carebract the facilities that are necessary to happent the Comple- lemple-Plan. These policies were developed in concentions with the Department of Public Works, the Bonsson of Water, Plana, Fire and Police, and Portland	2.4 URBAN LANDS The Day shall encourage as resonal policy that urban and urbanizable	SECTION VI: TRANSPORTATION	10 the Competitioner has been been been been been been been bee	to finance that portion of the improvement constructed for their byness. 11.40 OUTSIDE UDER STORAGE Receive and instruments with whom the Dity has a contract, to provide
School Gathel #1 The Comprehensive Plan Map determines the type, location and density of and development and receivelopment permitted in the fullies. Although develop-	Approximation of the second seco	GOAL: 6 Promote an efficient and balanced urban interspontation system, consistent,	work and guide to the development and redevelopment of the silv 19.8 POBLIC FACILITIES Advestice the adve Excellence Code, and Pelotes as the long range guide to	torage of all least three times the average daily use of their community or to compensate the City for the additional cost of mantaining saith storage when the City storage.
ment in the only may not exactly match the map in five (sen or even) weekly years, the map shows where different kinds of activities are appropriate. It donther activities development apportunities for meeting the stilly a foculing and unpoly-	lands sparks, got counteer, trains, parkeways and curreturion. Estation a troop trail that encircles the city and promote the more allornal use of the city's reserve, creaters, lades. and block to	with the Arterial Streets Classification Policy, is encourage entry conservation, reduce as poliution, lessen the impact of vitratic on residential neighborhoods and improve access to major employment and	the investment of public funds through coordination with the City & Capital Inconvertients Program, and the budgeting process of related public again-	11.41 EQUITABLITY Establish water rates based on the cost of providing water service in an
need needs This Compenhansive Plan Map designates land uses and dentifies the maximum zoning destriction alcovable for each parts of land. The Reserved Public is many free for another that destruction the Compenhates Plan.	2.6 WILLAMETTE RIVER GREENWAY PLAN Implament the Willamethe Rivar Greenway Plan which preserves a strong writing four while prevention commercial and residential we- restring their while preventions commercial and residential we-	POLICIES:	10.7 COMPREMENSIVE PLAN MAP Adopt the Comprehensive Plan Map as the orticial long range planning	equision marrier 11.42 WATER PRESSURE Private water at standard pressures (40 to 110 bb, per aq, withit to all users
Therefore, incommendations for modifying the Code to respond to the Plan must be considered at the same time. Zoning must by law be "considered with the Connectionerine Plan." The does not meet that all and with be immediately in the considered of the same time. The connection of the plan to be immediately with the immediately same time.	sector development along the Wilamette south of the Broade sy Bridge 2.7 FOREST LANDS	6.1 INTERSOVERNMENTAL COOPERATION Encourage afficient management of the transportation resources located in the size and metropolitan area through cooperation and long range plan-	The Competentian Real Map will determine the maximum screen classi- treation that may be spotled to a specific site.	entensiver possible. 11.43 ENERGY CONSERVATION Pursue bettern improvements, efficiencies in operation, and maintenantial
zeniad, Writers "downzoning" (inscring to a line interest use) is processary to be recessioned with the Companionsee Plan Map, the law insparse that the must be there when the Plane a storghot. However, "uppring" (incompany denoting to a more related to the Plane a storghot. Therewere, "uppring" (incompany denoting to a more related to the Plane as a dorphot. Planewere, "uppring" (incompany denoting to a more related to the plane as a dorphot. Planewere, "uppring") in a company of the plane is a storget of the plane as a dorphot. Planewere, "uppring" (incompany denoting to a more related to the plane as a dorphot. Planewere, "uppring") in a company of the plane is a storget of the plane is storget of the plane is a storget of the plane is a storg	2.8 RESIDENTIAL NEIGHBORHOODS Improve and protect the only shaudential neighborhoods while allowing for	Ang web Pederal State and local agreedea     State and local agreedea     Sector AL AND CITY TRAFFIC PATTERNS     Constant marching company and ony traffic patterns that protect the in-	10.8 ZONING UPON PLAN ADOPTION Report those areas faving orating zoning classifications more permissive tran alivered by the Comprehensive Plan Map to conform to the Plan as	of facilities to reduce and conserve energy.
user need not take place units an appropriate development propriatilis submitted. Upporing is recommended to actual on a case by case beam, using established toping streadures, metabolish and topics hearings. Approval for up-	Increased density. Provide for resignational-prioritial commental active- tion within residential areas under certain conditions. 2.6. Drowsfrows PCHTLAND	ability of Partiand's established insidential neighborhoods while improving access and mobility within commercise and industrial small.	required by law. Areas with existing zoning multivater to or more relative man, that perimited by the Competentianive Plan Map share remain un- changed upon adoption of the Plan, and will be rezoned, if appendix	PARKS AND RECREATION
pering self depend on such factors as stability or change in the area, availability of public utilities or servicelal, and adequacy of transportation systems. By not automatively changing the zoning to the resonant level perintitial by the Com-	Reinforce the downlowing position as the principal convenictal, service, outprial and high density housing perform in the city and the region. Maintain the dwarters as the city's principal relial center.	6.3 Anteriol strategies consider with receiver will be guided by the traffic ways classifications, objectives and policies contained in the adopted ways classifications, objectives and policies contained in the adopted of the strategies of the	19.9 REVISED ZONING CODE Conduct a traview and revision of the city a Zoning Code with the objective	11F Maximum the quality, safety and usability of parktands and facilitate through the afficient mandamance and specalized park improvements, providing the afficient definition of park interviewed with a field parktine and parks.
prehensive Plan Map, existing uses should not be prematurely forbed out of an area. Note at of basis stormarts excluding tabeliner the Land Like and Public Pacifics.	2.10 HISTORIC COMMERCIAL CENTERS Expand the role of major history, burrentroal century which are well served Expand the role of major history, with used officer service and later.	K4 PLBLIC TRANSPORTATION     Encourage a safe, informit metropostalism public transportation system serv-	of spelating and simplifying to privide a aborter more accurate, under- standable and velocitable document. Wolk loward development of a system of performance standards in industriel zones, replacing the suisting	increation apportunities for the citizene of Portland.
Boald and Polices the Competitionarie Plan May and the Zoning Code). Portand tars move who the lutane, responding to changing needs while preserving the markine free make Police and an analysis place to live, work and play.	by tasked, sheengeen these contexts and high density assertions and expressive watartive accelerations. Locale mackum and high density assertions zoning adjacent to these conform	ing Portaind as an attenative to the automobile by providing more client cross-lown bervice to residential neighbarhoods which convent commen- cial aveas to other content of activity and employment throughout the say	use list system 10.10 DESKON REVIEW Develop resistmentationes for additional areas where design review would	11,44 MASTER DEVELOPMENT PLANS Mantain mautor dovelopment plana for city parks that address user proce
Additional information on vach of the Goals and Places Sections, the Plan Map worths Proceed Zoons Code Revisions is available in individual support docu-	2.11 TRANSIT CORPORATE Provide a mosture of activities along major transit routes to decreate de- pendence, on the subcondate. Encourage development of commercial pendences.	and the region     4.5 TRANSIT-ORIENTED DENSITY     Beinfaces the link between public transportation and land usin by increasing	be appropriate and prepare design review standards for both existing and proposed areas.	needs, downepment psychiatis, anewaythem and manadatice could pro- pare coportunities, financing attaing water and officien involvement. 11 AS MAINTENANCE
ments. Copies of these documents may be cleared at the BUREAU OF PLAN. NING, 434 5 W MAIN FORTLAND, CREGON 97204 (Telephone 248-4360).	same and medium density solutionaria and garden apartment terreto- ment near transit radius opportally where vacant fand affords an ropole- base for all devicement.	urban derestes along designated major transit streets and near continuer dat centers. 6.8. TRANSIT. DEPENDENT POPULATION	Develop michanisms for better entrocement of conditions required of individual projects in zone, changes, conditional use and vacance cause.	Provide programmed preventive maintenance to all outy park and recen- topical facilities in a manner which reduces septement reactive maintenace and emphasizes the use of activitized service delivery.
	2.12 AUTO-CREENTED COMMETICIAL Allow sale contrained commercial activities to socials along macro trailing	Encourage a public transit system that addresses the special needs of the transit-dependent population.	10.12 LONG FAMOLE PARKS PLAN The Bureau of Platning and the Park Bureau shall develop a long range parks plan for the city which wild provide standards for includion of parks and in mendform.	11.46 CARITAL PROGRAMMING Mardan a king-range pak capital improvement program that balances announces development and coversions, provides a process and criterius
LOOKING AHEAD	etersets designation for that purpose by the Anterna average Calculating Errors Policy. Also allow the location of branks. Indiversities and actual formation and other brank industrial ferms which do not adversely impact adjacent and other panel.	Coordinates the planning and development of mation related land use and available locations with the Port of Portland as well as other affected agon- ries, material and individuals.	hood, distinct and city-wide recreational parks and programs	for capital enprovement project selection, and emphasizes creative and Beadle Invectory athrengies
A VISION OF PORTLAND S FUTURE Portant is must than a group splice asso — If it a way of the Mary characteristics	213 INDUSTRIAL SANCTUARES Previde industrial sanctuaries. Encourage the growth of industrial activities	6.8 TAAL RIGHTS OF WAY Encounted the preservation of existing tail rights of way for use in fragm	SECTION XI: PUBLIC FACILITIES POLICIES	11.47 IMPHOVEMENTS Base two priorities for improvement and development of parkands on deportential friends and the following others: low long-term mechanistic deportential friends and the following others: low long-term mechanistic control of the second second second priority to priority in the second seco
compared to provide the advantage involves capped provide an the constant, a dynamic orban been and news according by across capped provide an the constant, a dynamic orban automy enhanced by the american yet human, character of the Oreanizown, an activity and the second second second beam dynamic orbits of an activity and activity of the second seco	<ul> <li>Dis city by preserving induces and primary or metabolicity po poses</li> <li>2.14 LIVING CLOSEN TO WORK</li> </ul>	ALTERVATIVE URBAN TRAVEL     Provide support for attemative forms of urban travel, such its providing and	11A Provide a timely, orderly and efficient amangement of public facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that support existing and planned land use patholic facilities and services that servi	<ul> <li>Costs - postance in defent public inclinities, support of neighborhood stabi- isation and opermonity development projects and policism, and consistency was used master development (atom).</li> </ul>
viding deventibled amployment; and a variety of beghtomoots, each unique in character, stowing for a bread cargo of liketyles.	Locale gradie single-tamily residential densities may major industrial em ployeent contens 5.55. STREP DEVELOPMENT	weaking Low resource in an exproving provide to employment careful and a set	GENERAL POLICIES	11.48 NEW PARKLAND Increase the supply of parkland, guing provide to weare where sendors
The parameters or a terminal years ago, it colors from the city of years day. The only of teening or a terminal years ago, it colors the city of years day. The future seems to be arriving at an even increasing pace, and in whys that could be a seems to be arriving at an even increasing pace.	Discourage the development of new sitio conversal areas and local fature activity in such sitious to create a more clustered pattern of commer- cial development	SECTION VII: ENERGY	11.1 SERVICE RESPONSIBILITY Writen is boundaries. The City of Portaind will provide public facilities and services at levels appropriate for all fand use types and will participate in services.	I stary to complete the "Pony Mile Loop" system: adoutation of lands appro- priate for park development which take base declared surplus to the starte surplus of accusation of environmentally unsue areas.
In fact that cannot change. This take facing us is to retain the model important chan- acteristics of our city in the face of changes we cannot control and by mendping, and will be executed and the second control of the changes.	2.16 TRANSIT STATIONS Where new regional transit lacilities and stations are to be ailed, increase measurements for exemplantial activities, the development of medium an	process established for public review, discussion and public hearings. The following goal and policies are included in the proposed Policy.	11.2 CRDERLY LAND DEVELOPMENT Urban development should occur only where urban public facilities and	1 11.49 SELD- SUSTAINING SPECIAL FACILITIES
of we can the tak of loang all the trings that make Portand "one of America's most triable class."	The second secon	GOAL 7 De indessas the energy efficiency of existing simultures and the terresporta- 7 To indessas the effective processing and programs enclo encourages	<ol> <li>Service exist or can be reacously matter existing</li> <li>ORDER, V SERVICE EXTENSION</li> <li>The engineering and expansion of ene urber public lacity or service</li> </ol>	Provide Enterocatry self-subtance special sectors for mount subtance, and and index tornes. 11.50 OTHER SPECIAL FACE ITES.
The city Energy reductions, particularly periodeum products are becoming truth many expension and more scarce. Land and reducing costs continue in themase and uncertainty provided provided provided provided and services.	actimitand. 2:18 MIXEDUSE	<ul> <li>conservation of representative address and the application of representative resources, where maintaining the attractiveness of the city as a place to vice and do business.</li> </ul>	<ul> <li>should real attendate development that significantly precision the City of advery to provide all other receiverary urbain public facilities and services a uniform levels.</li> </ul>	Develop and betwee spectral network for the end of the second terms when respect to the end of the terms of the spectra terms of the second terms of the framework is interesting to the framework in the end of the terms of the framework is interesting to the framework is interestis interesting to the framework is interesting to the framework is
The future must respond to these factors while presenting the bity's accretions headth and building.	c. Provide a mechanism that we alway to the control and which and the original of an analysis of market and character whiter such answs at as butters and when opportunities weet for creation of modes or creaters of moved commercial commercial commercial and commercial com	POLICIES: 21 THE CITY'S ACLE IN ENERGY CONSERVATION	11.4 CAPITAL EFFICIENCY Maximum use of existing public facilities and services should be supported through readuraging meet development to occur at the maximum densities	11.51 AQUATICS FACILITIES     Provide requires in conjunction with School District #1
Property and the detection of the early often of East Portant. St. Johns. Alterna Brue to be, Datacative source: The early often of East Portant. St. Johns. Alterna Bellevant and Lineton row times a several of commercial, reliability and residentia processes where Restrictions of the thicky foreign that accord freed prices of the order of the	SECTION III NEIGHBORHOODS	The role of this City is to insure the accomplianment of the Goal. All of the energy policies are its bij paticies of the City and depend on City action. The City and insurement conservation actions denoty within city government.	allowed by the Competituative Plan and though the development of vacant and writin presentity developed atexts.	<ul> <li>11.32 RECREATION Processions Provide relevation programs and writices including cultural, educational Provide relevance programs and sports (competitive and non Indenical, relevance and programs) a balance transition writing includes the provide programs and programs and an environment includes the programs of the programs and an environment includes the provide programs of the programs</li></ul>
Perfand and to such "suburban" communities as Multiroman, Levis, Woodinen, Kenton and Surrynside, became major transportation comdets still used tudiy Describen Perifand developed as the major activity center of the metapolate	GOAL.	and encourage conservation actions by the private sector. This shall be accomplished through education incentiving and mandatory actions. The City's estimation and include promoting conservation, informing all sectors of	To the maximum adant possible, the costs of important extension and constructive of pactic facilities should be borne by those whose land devel openent and networksoment actions, made such important end. extension	<ul> <li>Heads of the specially handscapped and the addenty within existing to Approxim.</li> </ul>
region, providing a financial, retail, industrial, cultural and reademail core meri a set alive and everyptic, and must remain act Well established, coace-in industrial and diatribution series provide diversa employment opportunities close to a time.	A Preserve and retrieve to a subject of the analytic order to all act and retain noods while providing for increased density in croin to all act and retain integration envidence and businesses and ensure the city's residential quad	n available programs and conservation techniques, terminiping the support actives, advocating the support of the CBy efforts of the state, regional, and federal eveloc and regulating conservation actions where agreements	and spristruction receivery 11.6 FACULTES SYSTEM PLAN Devices and memory a constructed Facilities System Plan IIIal provide	11.53/PUILLCI-PRIVATE CPPCONTUNITIES Support private development and copristion of single-use reconstition facility is which makes an identified public need and the City's remeatenal ob- tion which makes an identified public need and the City's remeatenal ob-
range of housing options. The Proposed Comprehensive Ptan cists for maintaining this basic develop mere advances where providing direction for responding to the future is demands. The	POLICIES:	effectiveness, competerenzyonus and farmess of private sector actions 7.2 RETROFIT OF EXISTING BUILDINGS AND EQUIPMENT	a framework to the provision of urban public facilities and services with Postanda Urban Service Boundary. The plan will be consistent with in designated land uses and denote of the applicable comprehensive plan.	A PARTY A PETY
proposed land use pattern limits the more interest readowned comparison to weat which reinforce the workstation of public transits. The commercial excertance all excertance transits comparisons are cleargered for new land uses which are full highly dependent transits.	3.1 Physical Conditions     Provide and coordinate programs to prevent the determination of existing     structures and public facilities.	9 At buildings in the only shall be made as sharing of control and price of en- pointified as determined by positive of concentrations actions and price of en- angy. The reference of existing buildings for the purpose of energy conserva- and and an another actions and an another actions with each of the purpose of the statement of the purpose of energy conserva- ant of the purpose of the statement of the purpose of energy conserva- ant of the statement of th	11.7 CAPITAL IMPROVEMENT PROGRAM The Capital Improvement Program will be the ensues patreng process to many improvements to assistion while tables and the construction of new many improvements to assistion while tables and the construction of new	FIRE
on the automotive A new type of angle-terrary houring taking type along terms of the mitted attactive maintenance is inversionizing. This houring type along to number in density reduces and and combination costs per and, and yet ratem number in density.	<ul> <li>32 SOCIAL CONDITIONS. Provide and coordinate programs to promote neighborhood interest, coordinate and security and to minimute the social expands of land use decretor</li> </ul>	<ul> <li>datory requirements imposed five years after the solphion of the policy Renotic programs and the sequirements must be cost effective, contre- sense and have the must exclude imposed to easily action of the sense.</li> </ul>	facilities. Planning will be in accordance with the transwork provided to the Facilities System Plan.	<ul> <li>GOAL: 11G Develop and estimate facilities that adequately respond to the fire profile.</li> </ul>
The quarters in the flastiness style server referent use of larger tomes and each Postaneous are included which allow more attributed to of larger tomes and each land, stroourage advectment dowingments, to be more compatible with other	<ol> <li>A STANDARDORHOOD DIVERSITY Premate neetboohood drivenity and security by enclavaging a balance ase, moone, race and wrinin background writer the only a reighborhood</li> </ol>	n community 7.3 LANDUSE	PUBLIC RIGHTS-OF-WAY	POLICIES
read-prime unex sense and an energy concervation, tenergement and poster inclusion areas, primerre and enhance berownerhead guality in the city and stability existing respherimoids from uncommuted development specchalism and development	S.4 HISTORIC PRESERVATION     Preserve and relation balance buckures and areas throughout the ofy     construction of a second sec	and together to relace the need to travel, sicrease access to travel, and permit building configurations which increase the efficiency of space heat no in readences.	110 Preserve the guality of Portland's land transportation system profect in City's vapital investment in public rights of way through continuing hip	Proven a unitory several of the protection invitaghout the city through comparation of both prevention and suppression activities.
In compared to know the charge reasonable. In these ways, include provide housing opportunities and neuron employment opportunities can be instructed an end of the second opportunities and the reaction of the second opportunities and the reaction opportunities and the second opportunities are second opportunitities are second opportunities are second opportunities ar	As Network Control of the Electric Provide for the active involvement of resignorihood residents and bus Network of the electric adjustment of the active of the promotion electricity of and the promotion and the active of the electric	74 RENEWABLE RESOURCES AND SUPPLEMENTAL ENERGY SYSTEM The consumption of non-manualitie vessurces for resourced and business	quality insurfacements in accordances with densities programs, and carry out after inspectivements in accordances with densities transits, transacturing limited accuracy withing the reads of neighborhoods, commerce and industry	11.85 NEW SERVICE A latent are annexed with the sity, evaluate the level of first protection an take action to insure that these peer areas recaive the same level of first take action to insure that these peer areas recaive the same level of first
Lose of public facilities is provider, more people can be closer to existing import ment and shopping services, costly until represent can be reduced, and publi- tioned and the more excentrates to inform provide.	SECTION IV HOUSING	administrative everys entrances. 7.5 TRANSPORTATION	POLICIES 11.5 MANTENANCE	Insection provide to the make of the city     11.56 MUTUAL RESPONSE     Coolesse to participate in mutual response agricements among the district
In the year 2000, the Downtown skylow will be different, with new Development reaching upwaid, as well as unique, obler areas being preserved. Both of these	GOAL:	The consumption of non-new able hash for transportation shall be induced to long in assame which increase the efficiency of the imangeoration system operating within the only. These actions will encourage individuals is	First picety for the expenditure of Centerel Fund revenues on public right of way will be formaintain and prevent deterioration of the satisfing time system:	<ul> <li>and departments as tong as the agreement provides equal and rectame benefits and antiances the ability of the City is provide uniform levels of fa protection investighted the city.</li> </ul>
will retain their industrial coaracter, but with some increase in density to reduc urban sprawi, recessed energy efficiency and provide more adoptace house enterer, deathterbuck will ensemble recease have been socied.	e Provide for a diversity in the type, density and occasion or requiring without only consistent with the adopted CBM Mousing Periods y nortice to provide adequate supply of safe; sample of provide adopted the version oper- tion of the same sector of the sample of the same of the same sector.	an     of the training or barried when it is the incomplete the training of the training	11.5 TRANSIT CORRIDORS High priority will be given to improvements which promote more effectly unlike improvement in those sheets functioning as transit correctors.	11.57 CONTRACTS Cordsasts for City line protection services to outside city bourseseus, ter bences, fre. Separtments and detricts should be installed only if negative
outlassed houses both detected and attached, altringthening heightorhood to billy. Opportunities for rendal under witi cultur accurd clamators and carters when here pool docents to public transmit is and from employment curities and exception	POLICIES     POLICIES	7.6 CITY GOVE FRAME/IT Off busiests shall near an energy consumption by investig in energy con- servation apportunities and changing operational procedures to the most any additional procedures of the most statement o	11 10 STREET MPROVEMENTS	tione for annivations or mutual response agreements are out successful Contracts, when reliablished, invaria to isoantraved with the scheadal policy of the City and should provide an incentive for annevation
Construction and industrial activities will remain active and dynamic as relating terms continue to grow and new tints charase Portaind as their tractile to device balance and characteria have serviced a second tracelation for the co-	<ul> <li>4.1 METROPOLITAN SERVICE DISTRICT AREAWICE HOUSING OPPORTUNITY FLAM Cooperate with the Metropolitan Service District and the Housing Author Cooperate with the Metropolitan Service District and the Housing Author</li> </ul>	ay SECTION VIII-ENVIRONMENT	of-way desorbations in the Arterial Streets Classification Policy 11.11 LOCAL SERVICE IMPROVEMENTS	11.64 EMERGENCY ACCESS Provide and manifally structure of high structure guality to insure access an energiency and survey sourcement.
Sinced development of the city. The city must baild on that boundaboo as we nee the challenges of the latters and respond in a manner which retains that only. "Portland: character.	<ul> <li>The balance postance are adjusted by the Provided Carl Council Dr Data and 145472, on March 29, 1978 as the Housing Policy for the City</li> </ul>	of GOAL: a Mantale and energies the master of Portland's air adder and even arter	registerrood and use patterns and accepted engineering standards 11.12 TRANSIT RAPROVEMENTS	POLICE

PEANNING COMMISSION PUBLIC HEARINGS: Grant High School Austorium Encoln High School Austorium Milson High School Austoriu Roosevelt High School Austorium Roosevelt High School Austorium Cleveland High School Austor Portland Planning Rureau, Rm. Sept. 11 Sept. 13 Sept. 20 Sept. 27 Oct. 4 Oct. 9 Oct. 11 ALL HEARINGS BEGIN AT 7:00 PH.

 8.10 Protect and prepares the natural and according guarties of another store the Waaruale from Record Instrumentation of the Carly Williamster Record Record Record Transformer Protection Store (Second Field Marcel Carl Store (Second Field Marcel Carl Store))
 8.11 Petano guartication of a fail Anotand Field Marcel Record 8.12 Land the density

POLICIES--NOISE: 4.13 Reduce and prevent excataive noise and vestation a dealings through construction requirements 8.14 Reduce and prevent excessive noise levels from one use which may impact another use through no-poing rese monitoring and enforcement procedures.

Maintain and improve the basing of Portland's six, water and open space instances and protect reighborhoots and business canters from detri-manial region politics.

CIES — AIR GUALTY ... Continue to cooperate with public agencies concerned with the imp ment of air goality, and imprenent base and regional plant and crop or attern overall Federal air castly standards. Cooperate and with MSD and the State Department of Environmental Cuulty in efforts to MSD and the State Department of Environmental Cuulty in efforts to

and allow for expanded employment and housing opportunities downlow
 B.D. Develop strategies that will allow for economic growth and are quality in provinements in an equality problem lanear identified outside of Development.
 Protects use of ride sharing and public transit forsization. We matroprist

8.8 Operate plan and regulate wattowater systems as designated in MSD Waste Treatment Management Component.

8.7 Maintain occindination of liand user planning and capital improvements to to insure the most efficient use of the City's sanitary and stormwater non-off facilities.

8.8 Protect Portland parks, cameteries and golf counses from Naura development tressign an Open Space designation on the Computernitive Plan Map.

Map
 Restrict development within Portland's makural drainageways through development and application of a desinageway overtay zone.

8.5 Continue cooperation with Federal. Blaze and regional agencies with the management and quality of Pontand's water resources.

n: Parking and Circulation Plan will garde future air guality standards in the penihal business dishe

POLICIES-AIR QUALITY

POLICIES-WATER QUALITY

POLICIES-LAND RESOURCES

60 NEW SERVICE TRIAN IMPROVEMENTS for safe pedelifian moviment along all new sr res-SCHOOLS

POLICE DOAL.

NUCIES:

LICIES

ing requests for street vacations, give consularator or bicycle ways, predestrian ways, parkland or other

#### SANITARY AND STORMWATER FACILITIES

Insure an efficient, adoputic and self-supporting

IMPROVEMENT Improve the earliering sower system in

najtir changes from the esti-Limited Commercial (C5) 20 C3) zone. The C3 is design

APARTMENT ZONES

ZONING CODE REV

OPEN SPACE DESIGNATION

SINGLE-FAMILY RESIDENTIAL

lignificant changes are proposed for the ones. A new zoning classification has bee ential construction (R2.5). This zone provi

ONE IN TINOLE FAMILY RESIDENTIAL ZONES Homes to Add a Rental Unit if the Islowing requirements are met a must have of least 2 000 sq. it. of gross floor area, exclusive of

side yard at least 15 feet wide.

C's means if well as the forme that may be assed to see these areas of the forme that may be assed to set from 200 kg if to 750 kg. If. One employ

AP AT The spartment zeroes have been modified from the existing code frequent criticisms that the current high density apartment zero produced lifts housing because of its dimensional partment produces buildings surrounded by sphale, with few amenits been altimized and replaced with

serve are limited to accordance tocordance of household smart in this home. This would be champed to allow pri-rounding services to be being with a service to the service is prese allower and would declard from the inseldential wave of the forces that must be used to the function eccu-tions of the forces that must be used for the force eccu-

Development Developments (PUD) are a memory of land development which on use claim for the online development, including stream, utilities, and use claim for the online development upon, but develop in based

the state from the set of the

eacterice: on its own R port. 15.9. of another truiding. unitying zone. In smaller their the maximum required in the underlying is may takened both.

COMMERCIAL ZONES

MIXED USE ZONE This is a new zone which provides for the continuation of areas of mixed use character where they form bothers and where opportunities exist for creation of mixed use creating.

MU Mixed Use: be lighted. A 5-th lands readential zone

#### MANUFACTURING ZONES

MANDFACTORING ZONGS Under the current zoning, tess intense uses are auto more intense zones. This has resulted in commerce cases, real/cential uses intruding into industrial data the comulative methods of deletimining which uses are removed, and industrial and clear the second second allowed in General and Heavy Manetal zone restricted.

#### MX Downtown Manufacturing:

Checking downs and entered as the underlying zone. A parent of lead may all more than down youring zone. For example, land with the underlying General Ceremencial (2) may be asperimentation with the underlying control of the Bulker as Some chenge, incl an every zone porter with an end public hearings. The current Zoning Code has sit error more. This discussion draft disminana the Parent Zoning code has sit error to some the second second the second second public has a second porter. This discussion draft disminana the Parent Zoning code has sit error to some the second second second second second public hearing and the second second second second second second second public hearing and the second second
Birde new overlay zones. The addition EXhibit D, Page

L Aircraft Landing

This zone restricts the con-ways to provert a confusie hazant.

Z Downtow

Quantities 1977 and 2000					
	Year 1977 Figures	Year 2000 Potential Figures			
	-	Present Zoning Pattern Continued	Dissization Orall Land User Patient	Properted Land Line Flan Felters	
Population	505.000**	1004 (ADD-T	#17,5081	414,000	
Haveling Single-Family Math-Partity Tiplat	Units durge 102.400 in 1000 00.000 1.000 102.600 in.600	Units Apres 110,000 (7,000) 79,000 (2,000) 180,000 (9,000)	Unite Acres (20.804.17.800 75.300 2.660 (92.300 19.805	Unite Aurer 116,709 17.80 83,809 03,00 201,880 18.80	
Englayment Communital Copyl Industrial Heavy Volustrial Instructors?? Total	Jabre         Azrea           94,000         3,300           77,760         3,105           21,400         3,300           41,700         10,500           pail,400         21,700	2008 Arres 123.402 2.000 82.000 2.000 72.000 2.000 72.000 0.000 932.000 0.000	Jules Acres (16.00) 2.407 10.000 2.407 10.000 2.407 00.757 16.400 202.400 26.100	Julies         Autres           101.000         0,000           85.000         3.400           87.000         3.400           81.400         10.300           812.000         31.000	
Benalty Paratra per Auto City Welle Company Auto	1.30-1	1.841	Alter	6.01	
Average Single Particip	4.65	6.0	8.17	8.84	
Average Multi- Facility	3879.	94.885	34.41	16.15	
Acres of Vacianti and Apricances*	\$3,671	5,485	A.MT	1581	

Parlows, Chardred, feedblak government humange, parks, mi "Annulas parks, streets, waterways and castmat rights of way."

Buts. The principles show

### Activities Allowed in Each Land Use Designation Activities o Ciperi Nomite Low Density Apartments Marian Danis Againtaria Approximation High Density Approximation Density Approximation Approxima Labor Manalish Manufathurnit

#### **Proposed Comprehensive Plan** Portland, Oregon September, 197



Tour Parts

### Past Land Use Reviews

File Name	Year	Category
LU 21 - 053526 HR	2021	LU
LU 18-103566 HR	2018	LU
LU 17-245440 CU AD	2017	LU
LU 17-206893 HR	2017	LU
LU 17-163203 CU	2017	LU
LU 17-158467 HRM	2017	LU
LU 16-148005 HR	2016	LU
LU 14-218444 HR EN	2014	LU
LU 13-236792 EN HR	2013	LU
LU 07-139442	2007	LU
LU 06-178213	2006	LU
LUR 99-00809	1999	LUR
MP1 107-89	1989	MP
HL 74-89	1989	HL
HL 75-89	1989	HL
CU 49-77	1977	CU
CU 059-74	1974	CU
CU 007-74	1974	CU
CU 93-67	1967	CU
CU 056-65	1965	CU
CU 067-64	1964	CU
CU 029-61	1961	CU












and the spectrum

## GENERAL NOTE

CONTRACTOR SHALL INSTALL NEW UNDERGROUND CONDUITS ALONG SIDEWALK PATHS AND EXCAVATIONS FOR OTHER PORTIONS OF THIS PROJECT. COORDINATE EXACT ROUTING WITH OWNER'S REPRESENTATIVE AND OTHER TRADES.

## SHEET NOTES

- (1) PROVIDE AND INSTALL WP, GFI RECEPTACLE AT +24" ABOVE FINISHED INSTALLATION.
- 2 PROVIDE COMPLETE COMPLIMENT OF CIRCUIT BREAKERS FOR REST ROOM FINISH PROJECT. COORDINATE WITH OTHER CONTRACT
- OR HIS REPRESENTATIVE.
- EXACT LOCATION WITH OWNER'S REPRESENTATIVE.

(5) PROVIDE AND INSTALL NEW 120V, IP, 20A CIRCUIT BREAKER IN EXISTING MAINTENANCE BUILDING PANEL BOARD AND NEW 3/4"C, 2#12, 1#12G AS REQUIRED TO POWER NEW IRRIGATION CONTROLLER IRRIGATION CONTROLLER SHALL BE PROVIDED BY LANDSCAPE CONTRACTOR WITH FINAL POWER CONNECTION BY ELECTRICAL CONTRACTOR.

(6) NEW SITE LIGHTING FIXTURE, POLE AND BASE SHALL BE PROVIDED BY PORTLAND PARKS AND RECREATION AND INSTALLED BY THE ELECTRICAL CONTRACTOR. THE ELECTRICAL CONTRACTOR SHALL PROVIDE AND INSTALL ALL OTHER ITEMS AS REQUIRED, INCLUDING, BUT NOT LIMITED TO A NEW 120V, ENERGY SAVING BALLAST, CONDUIT, WIRING AND HAND HOLE. HOMERUN SHALL BE VIA A TORK 7200EL TIMER, PROVIDED AND INSTALLED BY THIS ELECTRICAL CONTRACTOR. REFER TO SHEET EI OF THE VOLCANO RESTROOM DRAWING PACKAGE FOR EXACT LOCATION.

GRADE. SAW CUT SHELTER SLAB AS REQUIRED. VERIFY EXACT LOCATION AND MOUNTING HEIGHT WITH OWNER OR HIS REPRESENTATIVE PRIOR TO

3 ROUTE CONDUIT CONCEALED IN ATTIC SPACE. COORDINATE WITH OWNER

(4) PROVIDE AND INSTALL NEW PULL BOXES AS REQUIRED. COORDINATE



LU 23-088549 HR DM, Exhibit A.10

10

SCALE: 1"=10'

) 5



LU 23-088549 HR DM, Exhibit A.10

PRELIMIT

# Comparison

# Existing



# Proposed



LU 23-088549 HR DM, Exhibit A.10

# Comparison

# Existing

# Proposed





## Staff photographs of light poles at Mt. Tabor Park



#### Light poles in the landscape

Adjacent to paved drives

Adjacent to soft surface trail

Note areas around poles are clear of vegetation and, while poles installed on flat grade, they are often near slopes which may be prone to erosion and/or soil instability. The overall site is steeply sloped, and soil erosion is common in many areas of the park. Replacement poles will utilize direct burial techniques that will increase structural stability regardless of nearby slopes.

## Light poles in the landscape

In high traffic areas, signage reminds the public that it is prohibited to attach anything to light poles and provides the code reference for the prohibition.







White deposits, or efflorescence, is caused by chemical changes within the concrete due to moisture impacts.

Cracking in concrete often occurs due to thermal stresses and weathering. May also be caused by corrosion of steel reinforcement.



Flaking, or delamination, is a common type of concrete distress. Surficial delamination occurs when air or water is trapped between surface and may also be a sign of internal corrosion.



Despite install on flat grade, all three of these poles show clear signs of soil erosion at the base that could lead to structural instability.





Cracking can lead to materials loss, as has occurred on here. Loss may affect just the pole, as shown on the left, or both the pole and the base, as shown center and on the right. Replacement poles will be direct buried, thus eliminating the need for a separate base element.



(Left) Pole installed straddling mixed surface mediums (soil and concrete). This unfortunate installation is not as sound as installation on a single surface. This is an example where pole locations may be slightly refined for greater stability and safety.



Erosion around base is present, as is cracking.

Pitting, as shown in the center and right photo, is a sign of material instability and is caused when water freezes within concrete pores. As the concrete becomes weaker, more of the craters will appear. Smaller pits will often converge into larger ones, as shown here.



Pole with cracking and pitting. Vertical nature of pitting may indicate spalling.



Pole with cracking, pitting and efflorescence.



Spalling occurs when the concrete starts to break away from the reinforcing steel bars, reducing the stability of the structure.



Spalling is sometimes referred to as 'concrete cancer' since the problem is not initially obvious and can result in structural failure.

OMB No. 1024-0018

Date Listed: 9/22/2004

State

### United States Department of the Interior National Park Service

### NATIONAL REGISTER OF HISTORIC PLACES **CONTINUATION SHEET**

Section Page

SUPPLEMENTARY LISTING RECORD

NRIS Reference Number: 04001065

Multnomah OR County

Mount Tabor Park Property Name

N/A

Multiple Name

This property is listed in the National Register of Historic Places in accordance with the attached nomination documentation subject to the following exceptions, exclusions, or amendments, notwithstanding the National Park Service certification included in the nomination documentation.

∕o£′ the Keeper

Date of Action

\_\_\_\_\_\_ Amended Items in Nomination:

#### Location:

Signature

The street location should read: Roughly bounded by S.E. Division Street, S.E. 60th Avenue, S.E. Yamhill Street, and S.E. Mountain View Drive.

#### **Classification:**

The Category of Property is: District.

The Number of Contributing Resources previously listed in the National Register should read: 12 [Reservoir #1, Reservoir #5, Reservoir #6, Gatehouse #1, Gatehouse #5, Inlet Gatehouse #6, Outlet Gatehouse #6, Weir Building #1, Weir Building #5, Covered Storage Tank Building, Covered Storage Tank, and Reservoir #1 Fountain.]

#### Significance:

Entertainment/Recreation is added as an area of significance.

These clarifications were confirmed with the OR SHPO office.

#### **DISTRIBUTION:**

National Register property file Nominating Authority (without nomination attachment) LU 23-088549 HR DM, Exhibit A.10 NPS Form 10-900 (Oct.1990)

United States Department of the Interior National Park Service

## National Register of Historic Places Registration Form

		J, Page 2 10024-0018	
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			· · ·

This form is for use in nominating or requesting determinations for individual properties and districts. See instruction in How to Complete the National Register of Historic Places Registration Form (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classifications, materials and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property	·····
historic name Mount Tabor Park	
other names/site number	
2. Location	· · · · · · · · · · · · · · · · · · ·
street & number 6325 S.E. Division Street	not for publication
city or town <u>Portland</u>	vicinity
state <u>Oregon</u> code <u>OR</u> county <u>Multnomah</u> code <u>051</u> z	zip code <u>97215</u>
3. State/Federal Agency Certification	
As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that th request for determination of eligibility meets the documentation standards for registering properties in Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the not meet the National Register criteria. I recommend that this property be considered significant nation 	his X nomination the National Register of Historic he property X meets does nally statewide Xlocally.
4. National Park Service Certification   I hereby certify that the property is:	Date of Action 9/22/04
other (explain):	

Ownership of Property (check as many as apply)	Category of Property (check only one box)	Number of Resources within Property (Do not include previously listed resources in the count)	
private <u>X</u> public - local public - state public - Federal	building(s) district Xsite structure object	ContributingNoncontributing710buildings1sites56structures1objects1416Total	
Name of related multiple property listing (enter "N/A" if property is not part of a multiple property listing)		Number of contributing resources previously listed in the National Register	
N/A		1 (Mount Tabor Reservoirs Historic District)	
6. Function or Use			
Historic Functions (enter categories from instructions)		Current Functions (Enter categories from instructions)	
Recreation and Culture: ou Landscape: park Agriculture/Subsistence: h Industry/Processing/Extrac	orticultural facility	Recreation and Culture: outdoor recreation Landscape: park Agriculture/Subsistence: horticultural facility Industry/Processing/Extraction: waterworks	
7. Description			
Architectural Classification (Enter categories from instructions)		Materials (Enter categories from instructions)	
Late Victorian Late 19 <sup>th</sup> and 20 <sup>th</sup> Century Re	evivals	toundation: <u>CONCRETE</u> walls: <u>STUCCO; WOOD: plywood,</u> <u>weatherboard; CERAMIC TILE;</u> <u>CONCRETE</u> roof: <u>CONCRETE; WOOD: shingle;</u> <u>ASPHALT</u> Other: <u>EARTH; BRICK; STONE: granite,</u> <u>basalt; METAL: bronze, aluminum,</u> <u>increase</u>	

Narrative Description

(Describe the historic and current condition of the property on one or more continuation sheets)

See continuation sheets.

#### 8. Statement of Significance

Applicable National Register Criteria (Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing).

- X A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- \_\_\_\_\_B Property is associated with the lives of persons significant in our past.
- X C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
  - \_\_\_\_ D Property has yielded, or is likely to yield, information important in prehistory or history.

### Criteria Considerations

(Mark "x" in all the boxes that apply)

#### Property is:

- A owned by a religious institution or used for religious purposes
- \_\_\_\_\_B removed from its original location
- \_\_\_\_\_ C a birthplace or grave
- \_\_\_\_\_D a cemetery
- \_\_\_\_\_E a reconstructed building, object, or structure
- \_\_\_\_\_F a commemorative property
  - \_\_\_ G less than 50 years of age or achieved significance Within the past 50 years

Narrative Statement of Significance

(Explain the significance of the property on one or more continuation sheets)

#### 9. Major Bibliographical References

Bibliography (Cite books, articles, and other sources used in preparing the form on one or more continuation sheets) See continuation sheets

Previous documentation on file (NPS):

- \_\_\_\_ preliminary determination of individual listing (36CFR67) has been requested
- \_\_\_\_ previously listed in the National Register
- \_\_\_\_ previously determined eligible by the National Register
- \_\_\_\_ designated a National Historic Landmark
- \_\_\_ recorded by Historic American Buildings Survey
- \_\_\_\_ recorded by Historic American Engineering Record

Areas of Significance (Enter categories from instructions)

Landscape Architecture Community Planning and Development

Period of Significance

1888-1939

1908

Significant Dates 1903

Significant Person (Complete if Criterion B is marked above)

**Cultural Affiliation** 

Architect/Builder

Mische, Emanuel Tillman Keyser, Charles P.

Primary location of additional data:

- \_\_\_\_ State Historic Preservation Office
- \_\_\_\_ Other State agency
- \_\_\_\_ Federal agency
- \_\_\_\_ Local government
- \_\_\_\_ University
- \_\_\_\_ Other

Name of repository:

10. Geographical Data	·				
Acreage of Property <u>196 acres</u>					
UTM References (Place additional UTM references on a continuation sheet)					
1 10 532115 5040065	3 10 531517 5038988				
Zone Easting Northing	Zone Easting Northing				
2 10 532076 5039181	4 10 531181 5039637				
Zone Easting Northing See continuation sheet	Zone Easting Northing				
Verbal Boundary Description (Describe the boundaries of the property on a continuation sheet)					
Boundary Justification (Explain why the boundaries were selected on a continuation sheet)					
11. Form Prepared By					
name/title Cascade Anderson Geller					
organization <u>Mount Tabor Neighborhood Association</u>	date November 2003				
street & number <u>1934 S.E. 56<sup>th</sup> Avenue</u>	telephone 503-232-0473				
city or town Stat	e <u>Oregon</u> zip code <u>97215</u>				
Additional Documentation					
Submit the following items with the completed form:					
Continuation sheets Maps: A USGS map (7.5 or 15 minute series) indicating the property's location. A sketch map for historic districts and properties having large acreage or numerous resources. Photographs: Representative black and white photographs of the property. Additional items (check with the SHPO or FPO for any additional items)					
Property Owner	·····				
name City of Portland					
street & number <u>1221 S.W.</u> 4 <sup>th</sup> Avenue tele	ephone 503-823-4000				
city or town <u>Portland</u> stat	e <u>OR</u> zip code 97024				

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, PO Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.

United States Department of the Interior National Park Service

NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET Section \_7\_\_\_Page \_1\_\_\_ <u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

### DESCRIPTION

Mount Tabor Park is a 196-acre city park located in a residential area of southeast Portland, about three miles east of the Willamette River. The park encompasses most of a volcanic butte, with four peaks. The tallest summit rises to an elevation of 643 feet, making it a prime landmark visible from points all around the city. The terrain of the park varies from a limited number of level areas, especially around the reservoirs, to gentle hillsides and steeper slopes. The towering Douglas fir forest is punctuated with big deciduous trees and some glades. Large areas of the forest floor are kept mowed while steeper areas tend to have a predominance of native understory plants. Ornamental non-native shrubs and trees are found throughout the park, especially at buildings, entrances or other features. Non-native invasive species are also present.

Portland Parks and Recreation Bureau has authority over all but approximately 146 acres of Mount Tabor Park. The remaining 50 acres is under the jurisdiction of the Water Bureau. Mount Tabor Park is the site of three open reservoirs and a small concrete water tank. Mount Tabor Park, like Washington Park on the west side of the Willamette River, became a distribution site for Portland's gravity fed, mountain source drinking water in 1894 with the construction of the first reservoirs, two at Mount Tabor and two at Washington Park. Two additional Mount Tabor reservoirs, on the western slope, were constructed in 1911 soon after the time Mount Tabor Park became officially designated. All of these open reservoirs represent some of the finest examples of intact, stillin-use City Beautiful public works remaining in the nation. Because of their high integrity and historic significance to the city's water supply and development of Portland, and because they are outstanding examples of intact historic architecture and engineering, the reservoirs were listed in the National Register of Historic Places in 2004 as the Mount Tabor Reservoirs Historic District and the Washington Park Reservoirs Historic District. A majority of the reservoirs' features have been kept intact and contribute greatly to the integrity of Mt. Tabor Park. The surface of the water held in the reservoir basins represents approximately twenty acres, about one tenth of the entire park acreage. The deep, open water provides a chiaroscuro effect to the landscape and is an integral part of the experience of Mount Tabor Park. The lighted walkways around the perimeter of each parapet wall and wrought iron fence, the cleared, grassy areas associated with the reservoir basins and the outstanding views provide important park amenities.

Mount Tabor Park is a scenic reservation. The height of the various peaks allow for grand vistas in all directions from viewpoints attainable by auto, foot or bicycle. Two views on Mount Tabor have been rated by the City of Portland's Scenic Resource Inventory as among the top seven in the city and have been incorporated into the Scenic Resources Protection Plan.

The design principle of subordination is a key element of Mount Tabor Park. The historic drive and pathway system respects the topography, allowing accessibility without overwhelming the picturesque and pastoral landscape. The more than three miles of drives are popular destinations for local and out-of-town visitors to take in the views of the park, reservoirs, city skyline and surrounding mountains. Autos can still encircle the butte on the historic drives, arriving at one entrance and leaving at another. Since vehicular access has been restricted to certain areas in the park's interior since the 1970s, some of the paved drives provide popular routes for bicycles, skateboards, roller blades and baby carriages. Walking, jogging and bicycling are the primary activities noted in

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<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

the park. Many visitors arrive from the surrounding neighborhoods on foot or bicycle. These drives are conducive to the park being a popular site for various types of races including foot, bicycle and adult soap box derby tournaments. The wide, well-graded unpaved paths were in the original design and, like the drives, were added over a period of years when funds became available. The path system travels over the entire park. In recent years, more unofficial paths have been made by mountain bikes and hikers.

Adding distinctive charm and illumination is the period lighting system comprised of eighty-eight single concrete standard lampposts that follow the drives and some of the main interior pathways throughout the park. These lampposts give off a soft, friendly light, reminiscent of gaslights, especially in the interior forested areas where they serve as a reminder of the original design of accessibility. The lighting encourages pedestrian exploration of the hills and dells throughout the park even in the short days of the colder months. Originally topped with a single, white, glass globe, polygonal lantern-style shades have replaced the globes. In 1911, Superintendent Mische requested of the Park Board, lampposts with glass globes to be serviced by an alternating current feed. He also requested underground conduits. The lampposts are serviced via underground conduits. The lighting system dates from 1924 and 1925.

A variety of amenities have been added to the park over the years. These include picnic areas, playgrounds, an amphitheater, tennis courts, a soapbox derby track, and comfort stations (only one in service.) Most of these amenities can be accounted for during the period of significance and are described in the descriptions of the quadrants of the park. The varied topography and forest cover of the park has allowed the amenities to be tucked in here and there so that they do not dominate the general feel of the park as a forest retreat. As was the Olmsted counsel, the park's styles allow respite from urban life and a connection to the rural roots and historic and natural resources of the area.

As much as Mount Tabor Park is a forest refuge in an urban environment, it is also a pivotal "work-horse" park, not only for the Water Bureau, but also for Portland's Parks and Recreation Bureau. Superintendent Emanuel T. Mische was, above all, a horticulturist, and he established a nursery to supply trees and other plants to city properties, including tens of thousands of street trees, at the south end of the site soon after the property was acquired in 1909. The nursery and greenhouse complexes still provide stock for all the city's properties, including all of the parks.

Though Mount Tabor Park's grandeur is striking, closer observation reveals modern projects and alterations, fortunately few and small, which have not adhered to the graciousness of the historic understated features. No attempt has been made to utilize period light fixtures attached to buildings and around the reservoirs. Recent Park Bureau signs are at odds with the historic feel. The maintenance yard's hodge-podge of buildings displays the largest array of unaesthetic alterations, however, this area is separated from the recreation area and so does not pose a problem of aesthetics for the park at large.

The entire park is being nominated. The general outline of the park is a rough rectangle with irregular protrusions such as Mount Tabor Nursery and maintenance yard due south, the finger of nursery on the west boundary, and two narrow irregularities to the north and the east owned by the Oregon Department of

LU 23-088549 HR DM, Exhibit A.10

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<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

Transportation. It is roughly bounded by S.E. Division Street to the south, S.E. 60<sup>th</sup> Avenue to the west, S.E. Yamhill Street to the north, and S.E. Mountain View Drive to the east. The attached boundary map illustrates the current property lines.

#### **Resource Count**

Mount Tabor Park contains one contributing site, seven contributing buildings, five contributing structures, and one contributing object. In addition, Mount Tabor Park contains ten non-contributing buildings and six non-contributing structures. A sketch map and key delineate these features. The park land was counted as one contributing site; infrastructure such as driveways, paths, maintenance yard, and the lighting system, as well as those areas with loose physical definition such as play and picnic grounds, and the nursery, are included as part of the site. Substantial or distinctive buildings, structures, and objects were counted as contributing or non-contributing as follows:

#### **Summary of Contributing Features**

Site:

Mount Tabor Park site, including the circulation system: Drives (original names): Reservoir Loop Drive (Cascade Drive & Interlink Drive), East Tabor Drive (Woodland Drive), North Tabor Drive (East Overlook Drive), Tabor Summit Drive (Overlook Concourse), Lincoln Street Entrance (Linden Entrance), Salmon Street Entrance, and 69<sup>th</sup> Avenue Entrance; the historic lighting system; the Mount Tabor Nursery and maintenance yard, parking lot, and three play areas: 69<sup>th</sup> Avenue playground and group picnic area, Harrison playground and main playground.

Buildings:

Office-Horticultural Services Building Administrative Building & Additions Mechanical Offices Building (Community Gardens Building) Caretaker House-Mount Tabor House Volcano Comfort Station Summit Comfort Station Northeast Entrance Comfort Station

Structures:

Crater Amphitheater West Tennis Court East Tennis Court 69<sup>th</sup> Avenue Stairs Southside Stairs

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#### Object:

Harvey W. Scott Statue & Terrace

### **Summary of Non-Contributing Features**

#### Buildings:

Garages/Shops-West Side Row Garages/Shops-Eastside Row Lathe House Equipment Building Pole Barn building Duplex Screen House 50" Meter House 56" Meter House S6" Meter House Maintenance Building and Park Office

#### Structures

Summit Radio Tower Additional Greenhouses Picnic Shelter Greenhouse Complex Basketball Court Soap Box Derby Track

#### **Regions and Features of Mount Tabor Park**

Mount Tabor Park has four public vehicular entrances located roughly in the four corners of the rectangular property at S.E. Salmon Street (Salmon Street Entrance), S.E. 69<sup>th</sup> Avenue (69<sup>th</sup> Avenue Entrance), S.E. Harrison Street (Harrison Street Entrance) and S.E. Lincoln Street (Lincoln Street Entrance). Numerous pedestrian or bicycle entrances exist from footpaths on all sides of the park. Neighborhood streets dead end at park boundaries, especially at the north, west and south sides. The east side is steep and rugged and adjoined by a newer housing development with private properties abutting the parkland along Mountain View Drive. The southeast corner of the park property adjoins a small private college, Warner Pacific College. The far southwest corner now abuts the private apartment and nursing care facility, Courtyard Plaza, a five-acre parcel formerly occupied by one Mount Tabor Park's first two reservoirs. The reservoir gatehouse, now privately owned and listed in the National Register, remains at the corner of S.E. 60<sup>th</sup> Avenue and Division Street.

Many maps exist for Mount Tabor Park and over the years, vicinities, drives and features have been delegated various names. This has contributed to some difficulty in creating clear descriptive statements and guidelines for the photographers and other volunteers involved with the preparation of this nomination. The predominant

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park boundary has a roughly rectangular shape. For the sake of clarity, this nomination has the park divided into quadrants based off the four park entrances described above. The site, buildings, structures, and objects in each quadrant are described as follows:

#### **Lincoln Street Entrance**

The earliest development of the land now designated as Mount Tabor Park happened in this area of the park. The city acquired land in this quadrant to build the first two reservoirs, then known as Mount Tabor High and Low Service Reservoirs respectively, in 1888.

In between Reservoir 1 and 5 is one of the four peaks, which Mische called the Hilltop Grove. At the summit of this small peak is a grove of large big-leaf maples and Douglas firs. On the south slope of the Hilltop Grove, just above the Reservoir Loop Drive, is a small grove of digger and ponderosa pines. The north slope of the hill is popular on the rare snowy day as it is used for sledding and other snow play. A 1954 map shows a ski tow at this location. A well-graded path encircles this rise as Mische had planned. Another path leads up and over the summit from north to south.

Where Harrison Drive meets Lincoln Drive at the south base of the dam face of Reservoir 1, the Southside Stairs climbs north from the roadway up to the reservoir basin. Lincoln drive continues west winding down the southwest slope of Mount Tabor past the Water Bureau entrance to the park south of Reservoir 6. At this junction, laurels and a cornelian cherry grow to the north and a weigela and several large lilacs to the west. flanked to the southeast with a row of mature fuchsia-colored double flowering cherries that create a dramatic display in mid-spring. The west side is a mixture of tall well-established shrubs and trees, some deciduous such as lilacs and hawthorns and others evergreen conifers and laurels. Continuing south, the drive intersects the nursery sites at the S.E. Lincoln Street Entrance and the north service entrance into the maintenance yard.

It was approximately here that Emanuel Mische designed his formal entrance scheme: the Maple Entrance arriving from the south from S.E. Division Street and the Linden Entrance from S.E. 60<sup>th</sup> Avenue coming from the west into a circle. A photograph circa 1920 depicts S.E. Lincoln Street lined with trees, as it is today on the north, nursery side. A traffic circle of sorts, does exist approximately where Mische's circle was to be but it is much more informal and less aesthetic. It is a widened area that serves as an intersection for a service road leading south into the maintenance yard, a small gravel service road going east into Mount Tabor Nursery, the Lincoln Street Entrance drive running straight west to S.E. 60<sup>th</sup> Avenue, and the drive into the park climbing north and then east. Today a touch of Mische's more formal scheme remains with some interesting, primarily non-native plantings. A large fragrant viburnum, Thunberg's barberry, a large strawberry madrone and other ornamental shrubs grow on the east side of the intersection and plantings of red osier dogwood, oriental maple, cotoneaster, and other shrubs are planted across the drive on the northwest corner of this intersection. S.E. Lincoln Street, as it runs west, has private homes constructed in the 1980s and 1990s on the south side of the street. The north is bounded by the nursery property fully planted with a variety of trees. This north side of the Lincoln Street Entrance is flanked by ornamental pear trees that replaced the double flowering cherries in the 1990s.

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Mount Tabor Park Multnomah County, Oregon

The Mount Tabor Nursery includes a large tree and shrub planting area and a maintenance yard historically associated with the nursery, which is currently used to store and maintain park vehicles and equipment. The nursery and maintenance grounds together comprise 14 acres. While not indicated specifically on Mische's 1911 plan for Mount Tabor Park, park archival records state that the Mount Tabor Nursery dates from 1908-1909, and both the nursery and maintenance yard are located within the historic boundaries of the park. Located on the sunny, well-drained lower southwestern slope of the butte, the nursery also covers a long finger of land extending east and west between S.E. Lincoln Street and S.E. Harrison Street due south of what Mische had called the Linden Entrance (Lincoln Street Entrance). On the north side, the nursery is flanked with climbing roses on trellises and on the south, along the Lincoln Street Entrance drive, a row of ornamental pear trees. At the east end of this finger of nursery, two other nursery plots exist. These rise up further on the slope of the butte, in a wide, south-facing sloped area. These plots are also planted with tree and shrub species and are divided by an east-west service road that ends at a concrete patio area used for storage of soil amenities below Harrison Drive. The nursery has supplied street trees and other plants for the City of Portland continuously since the earliest years of Mount Tabor Park, propagating native species as well as those from around the world. Presently, the over 70 species of trees growing in the nursery provide visual interest, especially seasonally, and encourage various species of birds.

Inside the maintenance compound are a variety of buildings dating from various periods and serving a variety of functions to park maintenance for the Park Bureau. Park vehicles and machines, such as mowers and other tools are stored and maintained at this site. Offices and greenhouses are also located here. From the back of the compound, a maintenance vehicle exit ties into the Lincoln Street Entrance drive and the tree and shrub nursery areas. The main entrance to the maintenance vard is marked by a lawn with a row of large Atlantic blue cedars, shrubs and a bed of seasonal flowering annuals. Upon entering the maintenance grounds, the asphalt roadway is flanked by two rows of buildings. To the east is the Administration Building along with garages and shops. To the west is a long row of attached garages and shops. The Administration Building is the most formally designed building on the site. All other structures are of a functional nature and house offices, greenhouses, machine shops, paint shops, garages, and storage. Dates of construction range from pre-1918 through 1989. The back entrance of the yard leads out to the north, through the nursery stock onto S.E. Lincoln Street. A chain link fence encloses the entire maintenance grounds. The vard layout appears to be unplanned with buildings constructed when needed wherever space was available. Verbal interviews with park employees indicate that horses were kept at the compound for mowing and other work. Some of the buildings are reportedly converted stables. The grounds are primarily asphalt-covered with the exception of some landscaping around the Administration building and various trees near the Community Garden building. The eastern border of the yard is lined with a dense cedar hedge.

#### **Contributing Features**

#### Horticultural Services Building

This small office building appears to be the oldest remaining building, dated "pre-1918" on various Parks' sketches. It is located in roughly the center of the maintenance yard, facing south. The Horticultural Services Building is a small rectangular one-story building with a hip roof. The siding is horizontal shiplap. The corners

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are finished with a narrow board. A gabled dormer defines the front entrance. Wood shingles and a lunette window fill the gable end. No porch overhang exists currently. Windows are multi-over-one, double-hung wood sash of varying sizes. The foundation is concrete. There is a large brick chimney rising from the rear of the building venting the underground gas boiler. The boiler that heats the greenhouses was originally coal-burning. It continues to function as the boiler for the greenhouses. The chimney towers over the other structures in the yard, and has been extended to nearly twice its original height according to historical photographs. There is a greenhouse attached to the building.

#### Administrative Building and Additions

The most visible building on entering the maintenance grounds, and one of the most aesthetic, is the Administrative Building. Built in 1938, the Art Deco-styled, single-story, flat-roofed concrete building has a long rectangular plan with attached garages. In 1958, a two-story addition was added to the east facade. Both the 1938 building and the 1958 addition include a basement. The 1938 building was originally a combination of offices and garages. The front entrance is on the west elevation. It is defined by a slightly projecting bay decorated with telescoping vertical lines above the entrance. A flat concrete porch roof covers the entrance. Above this porch roof is a three-light, steel-sash window. To the south of the entrance is an unusual projecting triangular steel sash window; apparently a dispatcher's window overseeing the vehicle entrance. To the north is a series of garage entrances. Between the garage bays, at the top of the building, are a series of six-light, steelsash windows. A decorative cornice is done in the Art Deco style. The garage bay immediately north of the front entrance has been in-filled and a new aluminum slider window replaces the original overhead garage door. Four garage bays remain intact. Beyond the garage bays, the building facade becomes slightly recessed, but the Art Deco corrice continues to the end of the concrete portion of the structure. Extending north, the structure changes to wood frame with metal siding and the roof becomes a gable roof covered with standing-seam metal. A series of metal-covered, wood, side-opening garage doors open into areas now used for storage and shops. According to verbal interviews with long-time parks' employees, this area once served as stables for the city's horses. According to park records, these attached garages were constructed over a three-year period from 1938 -1941. The 1958 two-story addition was designed to match the original building, including the Art Deco cornice. The windows are a different type of steel sash. Typical of 1950s industrial buildings they are eight-light steelsash with a center hopper window.

#### Mechanical Offices - Community Gardens Building

Located north of the Administration Building, this building is labeled mechanical offices on Parks Department sketches. It now functions as the "Community Gardens" office. According to park records, it was built before1938. This is a one-story structure with a concrete foundation and a gable roof. It is sided with wood horizontal lap siding. The corners are finished with vertical boards and the roof is composition shingle. Many of the windows have been replaced by vinyl sliders. The remaining original windows are small four-light wood sash. A shed-roof addition was added to the east facade at an unknown date. Wide wood lap siding covers the extension.

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Mount Tabor Park Multnomah County, Oregon

#### Southside Stairs

On Mische's preliminary plan, a long flight of stairs was designed to climb from the south park boundary up to the Reservoir 1 terrace garden to tie into the pathway network of the park. Construction of 500 tread of stairs, location not given, were under construction in 1913. The lower flight of stairs between the Lincoln Street Entrance drive and the south boundary of the park no longer exists. There is a rough path there and there are metal pipes in the ground that could be remnants of earlier construction. There have been apparent excavations, perhaps on water pipes from Reservoir 1 directly above, following the line of the mapped stairs. The section of the Southside Stairs that is intact starts at the Lincoln Street Entrance drive and climbs up to Reservoir 1. The top of the stairs yields an impressive front-on view to the north of the 1894 Reservoir 1 and its associated gatehouse and weir building. To the south, the view is of southeast Portland, distant hills and the grounds of Warner Pacific College.

#### **Noncontributing Features**

#### Garages and Shops-West Side Row

Also built in 1938 and located across from the Administration Building is a row of attached shops and garages. They are covered with a gable composition shingle roof. The garage doors and siding are covered in standingseam metal. Some original windows remain and are eight-light wood sash. Some windows have been replaced by aluminum or vinyl sliders. Uses for this structure have varied over time; currently the spaces are identified as "Turf Maintenance, Building Maintenance, Ballfield Maintenance, Irrigation." Although falling within the historic period, it is considered a noncontributing building due to numerous alterations.

#### Garages and Shops-East Side Row

Roughly forming an L-shape, this group of buildings is located at the eastern border of the maintenance grounds. Built between 1950 and 1961, they are comprised of a series of attached buildings, all with gable roofs and concrete foundations. All roofs are covered with standing-seam metal. Siding is either wood board and batten (1961) or wide horizontal lap siding (1950s). Gable ends are filled with horizontal lap boards. Windows are identical to those in the 1958 addition to the Administration Building: twelve-light metal sash with center hoppers. This grouping has had numerous functions: paint shop, electric shop, storage, etc. The construction dates of these buildings fall outside of the historic period so they are considered noncontributing.

#### Other Buildings and Structures

An Equipment Building is located at the far north end of the maintenance yard. Built in 1971, it is a 1-1/2 story "tilt-up" building with metal siding and roof. Gas pumps are located in front. The Pole Barn building dating from 1987 is located at the south end of the yard adjacent to S.E. Division Street. Near the Horticultural Services Building to the west is the Lathe House. Built in 1963, it is a shed-roof building with horizontal lap siding. Directly behind the Horticultural Services Building is a Greenhouse Complex. According to sketches from the Parks Bureau, these were constructed in 1981, 1988 and 1989. Additional greenhouses dating from 1973 are located at the northwest corner of the maintenance yard. All of these buildings and structures are noncontributing because they fall outside the period of significance.

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#### Water Bureau Buildings and Structures

Below and to the south of Reservoir 1 are four small buildings associated with the Water Bureau and piping from the reservoirs. The Duplex Screen House is a three-sided building with a shed roof. The small concrete building is situated into the slope. A metal door bears the building name. Dating from 1967, it is void of ornamentation. Southwest and below the Duplex Screen House is the 50" Meter House, a small shed- roofed concrete utilitarian building. The only slight embellishment is the projecting concrete door and window lintels and sills. The construction date is 1967. At the foot of the concrete steps up to Reservoir 1 is the 44" Meter House. The south elevation of this building abuts Harrison Drive. The metal door faces east and is accessed by concrete steps. The shed-roofed concrete building is the largest of the meter houses with screened windows on all four sides. To the west of these buildings along a wooded path, is the 56" Meter House. This small shed roofed concrete utilitarian structure has a slight embellishment in the projecting concrete door and window lintels and sills. It matches the design and feel of the other 1967 building. All of these buildings and structures are considered noncontributing because they fall outside the period of significance.

#### **Salmon Street Entrance**

The main vehicular entrance to the park is the S.E. Salmon Street Entrance. Accessed from S.E. 60<sup>th</sup> Avenue, this entrance was another of Mische's formal entries into the park. Presently it is marked with a basalt retaining wall on the steep north side and a park sign on the south side. A basalt wall acts as the gatepost for the metal swinging gate that can close off the driveway. The historic Caretakers House - Mount Tabor House (presently a rental property), is situated on slope to the immediate south of the Salmon Street Entrance overlooking the west side tennis courts and Reservoir 6 further to the south. To the north of the entrance is the steep forested slope of Foothill Overlook rising up to the S.E. Yamhill Street service entrance.

Here the park entices visitors into the interior as the driveway curves and gently climbs through one of the groomed forest areas of the park. At the line of sight where the driveway curves is a lovely ravine, called Sweet Briar Vale by Mische. John C. Olmsted called this area out in his Report to the Park Board in 1903 saying,

"West of the summit ridge, it may be impracticable to take any considerable areas except in the ravines, which apparently have little value for residential purposes, and yet are very picturesque and would make attractive features in a public pleasure ground."

An important and picturesque trail network converges at Sweet Briar Vale, part of the inviting enticement of this region. Three paths climb up the ravine at this point. The one on the north side ascends the volcano through a large grove of tall rhododendrons beneath the overstory of Douglas firs. In the late winter or early spring the ground is covered with sweet violets. Passing historic lampposts standing in the forest, this path climbs occasional railroad tie steps (Mische had designed concrete steps) and arrives at the newly refinished basketball court at the south end of the Crater Amphitheater. An unofficial trail continues up the cinder cone, known as Foothill Overlook on the original map. Here also, the path intersects with a graveled east-west service drive that accesses the trash dumpsters to the west and continues out of the park onto S.E. Yamhill Street. Just to the east,

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this drive intersects with the main Reservoir Loop Drive at this pivotal access point with the main parking area, Maintenance Building-Park Office, Volcano Comfort Station, Picnic Shelter, and main playground.

The newest path follows the cleavage of Sweet Briar Vale where recent work was done to attempt to channel seasonal water down through a naturalized ditch of rock and earth to a small wetland area at the base of the ravine. On the higher ground near this area, old plantings of large heather family shrubs such as kalmia, rhododendron, and andromeda dominate. There is also the only sourwood tree, native to the southeast United States located here. This touch of formality continues as the path crosses the Salmon Street Entrance road with large mature azaleas and other shrubs marking the path that leads down the railroad tie steps to the west tennis courts passing to the south of the Caretakers House-Mount Tabor House, both constructs from the 1920s. This trail once led to the comfort station alongside the main entrance drive. All that remains now is a concrete foundation accessed with steps to a picnic table. The building was demolished when a tree fell on it in the 1990s.

One of the most popular trails in the park follows the south side of Sweet Briar Vale through native forest with an intact understory. This trail was on Mische's original plan and was apparently also included in the bridle path system established in 1929. Along the path grow a variety of tree species including numerous bitter cherries, a California buckeye and one of the largest alder trees in the park. It arrives at an eastern junction of several trails and the Reservoir Loop Drive.

Crossing the paved Reservoir Loop Drive, the path continues to the south, up railroad tie stairs, (stairs were originally designed here by Mische) passing by two immature ginkgo trees and a row of young, recently planted alders. Picnic Grove is at the top of the stairs. A modern drinking fountain and barbeque structure were recently removed from this area. Two picnic tables remain. To the south, this area overlooks the starting point for the Soap Box Derby Track. The groomed forest spot also provides a view of Reservoir 5 and the southwestern cityscape through the Douglas fir boughs. Picnic Grove, with its southwestern aspect is one of the nicest places in the park. It has hosted weddings and other gatherings in modern times.

The eastern path from Picnic Grove intersects with Reservoir Loop Drive below the Mountain Crest Summit. An unofficial trail climbs straight up the summit arriving to the north of the backside of the Summit Comfort Station. Two other trails descend down from Picnic Grove to Reservoir Loop Drive. One to the north follows the contour of the hill wrapping around from the north to the south. The other drops down directly from the summit. Both reconnect, arriving at the more formalized region with plantings of star magnolias, hawthorn, flowering crabapple and young sequoias just to the northwest of Reservoir 5.

This point intersects with the boundary of the Mount Tabor Park Reservoirs Historic District. Here another well-used pathway intersects at the northwest corner of Reservoir 5 and travels west on the grassy grade completely encircling the basin of the reservoir. This path parallels the lighted sidewalk around Reservoir 5 and defines part of the boundary of the Mount Tabor Reservoirs Historic District. The path comes to a junction with three other pathways and the paved Reservoir Loop Drive and the Soapbox Derby Track below the summit of Hilltop Grove. From this point, the Reservoir 1 basin and its northern glade is visible further to the southeast.

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This area is part of the narrowed, linear boundary defined by the underground tunnel that connects the waters of Reservoir 1 and Reservoir 5 of the Mount Tabor Reservoirs Historic District. This junction is a popular meeting ground and the lawn shows signs of wear and tear primarily because it has become a dog play area. Its popularity is understandable since the views of Reservoir 5 and the western cityscape are outstanding. In recent years, a bench has been placed northeast of this junction to take advantage of the fine vistas. The areas close to Reservoir 5, like those around Reservoir 1, are graced with the water sounds generated from the small cascades that feed into the reservoirs.

A west bound path continues along the southern boundary of the reservoir historic district south of Reservoir 5 to arrive at the top of the dam. Here Mische requested that the dam be widened so that visitors could have access the area and the views. This design created one of the most popular gathering places in the park and in the city to watch sunsets, fireworks over the Willamette River and to simply enjoy a sweeping, inspirational view of Portland. The view is enhanced by the twelve acres of the deep water reflecting from Reservoir 6 below. This is one of the protected views noted in the City of Portland's Scenic Resource Protection Plan and is within the boundaries of the Mount Tabor Reservoirs Historic District.

The Soapbox Derby Track runs north and south due east of Reservoir 5. Though seemingly not currently used by soap box derby afficionados, the south end of the track is located in a particularly scenic airy site overlooking Reservoir 5 with sweeping vistas of the cityscape. This site attracts many park visitors, both human and canine.

From the gate at Reservoir 5, going northeast on the Reservoir Loop Drive is a lovely curvilinear perfectly graded drive into the heart of the park. The forest dominates and every other distraction falls away, illustrating a chief Olmsted design principle. Passing by the top of Sweet Briar Vale at the base of two summits the road curves up to Mische's Foothill Overlook and the area to the west that is now called the "volcano" area or "crater." It is denoted with a tablet embedded in a stand of basalt rock that was erected in 1952 by the Oregon Society of the Geological Country of Oregon giving a brief summary of the volcanic activity.

This location, with its private feeling, lends itself to a natural amphitheater and has become the site of some of the amenities that the Mountain Crest Summit area hosted in the past. On the east side of the small peak, excavations unearthed a cinder cone in 1913. The east face of the cinder cone now comprises the west wall of the amphitheater. Excavations of rock for various city and private enterprises, created a quarried area that was eventually utilized as an outdoor amphitheater, the Crater Amphitheater. This is a defining and attractive feature of Mount Tabor Park.

Due south of the Crater Amphitheater and still within the volcanic crater is a regulation-sized basketball court, recently resurfaced with an orange substance made from recycled tennis shoes.

A path, from the original park design, surrounds the cinder cone, called Foothill Overlook on original maps. It is well graded and travels through an upland forest terrain that is mowed occasionally. The mid spring brings a carpet of yellow wood violets along the western slope interlaced with the earlier sweet purple violets. True

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dandelions are abundant here. This part of the park adjoins a donation land claim of a botanic physician trained at the Baltimore Botanic Institute, Perry Prettyman, who reputedly introduced dandelions to use as medicine.

Directly above and to the east of the Crater Amphitheater is the main parking lot for the park. This modest-sized parking lot, the largest in the park, was designed in 1971. At the north end of the parking area is the non-historic Maintenance Building and Park Office. To the east of the maintenance building is the Volcano Comfort Station, the only current serviceable restroom in the park. This pleasingly designed comfort station appears to date from 1928. Due south of the parking lot, across Reservoir Loop Drive, is the non-historic thirty-four square feet Picnic Shelter open on four sides. The Picnic Shelter appears to have been constructed in approximately 1974. The main playground with a few remaining older metal structures and an elaborate modern plastic structure is adjacent to the Volcano Comfort Station, parking area and Picnic Shelter. Benches overlooking the play area have been provided at the top of the slight rise accessible by a brick ramp. The bricks are stamped with the names of benefactors who purchased a brick for \$50 to help pay for the remodel in 1999. The ramp area is landscaped with miniature azaleas and other common ornamental shrubs. A row of young native red alders are planted to the south behind the benches. Paths lead up to the Mountain Crest Summit to the south and in every direction at this point.

#### **Contributing Features**

#### Caretaker House - Mount Tabor House

The house is situated at the base of Mount Tabor at the Salmon Street Entrance with a southern view overlooking the west tennis court and Reservoir 6. The house is accessed from an unpaved driveway, S.E. 63<sup>rd</sup> Avenue, off of S.E. Salmon Street. Facing west on a slight rise, it is of an unassuming design and does not dominant the landscape. It is surrounded by a wide expanse of shady lawn under towering Douglas fir trees with perimeter plantings. Originally it served as housing for the park caretaker but it is now rented out to a private individual. The house is designed in the Colonial style and is listed in park documents and assessor records as dating from 1920. It is a one-and-a-half story, side-gabled, rectangular house with a concrete foundation. The house is sided with cedar shingles and the roof has composition shingles. The gable ends have no eaves, but the front and rear elevations have wide boxed eaves. An eyebrow dormer penetrates the roof directly over the front porch. The front central entrance porch is recessed under the main roof. Sidelights flank the wood front door. On either side of the front porch are two built-in wood benches. Windows are either eight-over-eight, double-hung wood sash or three-over-three, double-hung wood sash. To the south of the entrance porch is a bay window. Wood shutters with diamond cut-outs decorate every window. An exterior stucco-covered chimney is located at the south facade. The rear facade has an off-set recessed back porch. City records indicate that construction costs of the dwelling were \$3,000 in 1920.

#### West Tennis Court

The construction dates of the two tennis courts in the park are given in park records as 1923 and 1928. It is unclear which one was constructed when, however, both dates fall within the period of significance. This tennis court is located just north of Reservoir 6; the tennis court on the east side of the park is located at the 69<sup>th</sup> Avenue playground. Fence and other repairs to the courts are recorded in 1926 and 1932.

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Volcano Comfort Station

Built in 1928 in the English Tudor style, this comfort station is in excellent condition. Park records show the cost for construction to be \$3,843.19. The plan for this building is roughly L-shaped with a combination crossgable and conical roof uniting three separate functions into one structure; restrooms, storage, and seating. This one-story roughcast stucco-covered building is comprised of two restrooms side by side and a storage area, a covered shelter with bench, and a small turreted storage room at the east end. The building has a concrete slab foundation and wood frame walls and roof. The roofing is composition shingles. Alterations were made to this building in the 1990s. At this time both men's and women's entrances were shifted to the south facade. Originally, the men's entrance was located on the west facade and was sheltered by a small Tudor-style covered porch. The women's entrance was located on the east facade under the attached covered shelter. An original window was removed from the south facade when the men's new entrance was installed. Both original entrance locations were replaced with windows. The porch on the west facade was removed. The gable end on the south facade (the current men's entrance) is filled with a decorative half-timber design. Small arched openings provide ventilation in the smaller gable end east of the men's entrance. A storage room is located to the north of the restrooms on the rear facade. Two entrances are located on the rear facade and retain their original vertical board doors. The attached gabled shelter is supported by a single square post with curved brackets in the Tudor style. The bracketing, exposed beams and cross bracing add to the English flavor. A wood built-in bench rests under the shelter. Seating is located on both sides of the bench. An attached round storage room at the far eastern end is topped with a conical roof that appears more French than English. Atop the roof is an iron weathervane depicting animals at play. It has an original vertical board round arched door cut into a round arch opening. The door has large iron strap hinges. A single step leading into this storage room is comprised of three massive cut stones. The charming nostalgic design is unique in the Portland parks system. Like the other two remaining Mount Tabor comfort stations, this one is set on a slight downhill slope to keep it from dominating the landscape. The approaching path from the south is through a touch of formal landscaping with common shrubs including Oregon grape and azaleas.

#### Crater Amphitheater

Making the most of the quarry established after the cinder cone was discovered in 1913, construction of the concrete stage and basalt rock retaining walls were apparently underway in 1934 according to archive photographs. A geological plaque on a basalt rock base, installed in 1952, remarks on the volcanic nature of this area. The concrete and basalt rock stage is located at the north end of a grassy "pavilion," with a large cindered area at the base of the stage. In the cindered area, wooden and metal benches are stored in stacks and set up for stage events. The grass pavilion was recently replanted with grass and three low angular curved basalt risers were installed to provide informal seating and enhanced viewing of the stage area. The stage area is wired for electricity. The Crater Amphitheater is accessible via remodeled concrete stairs or a long concrete ramp reconstructed to American Disabilities Act standards. The ramp parallels the high volcanic rock retaining wall all along the east side of the amphitheater that descends gradually to wrap around the back side of the stage. The stage area is accessed to the northeast by a small trail through old cedar plantings that connects with the trail that encircles the cinder cone. Though reconstruction has occurred at the Crater Amphitheater, it was done in a thoughtful manner and most of the historical features, including the stage, rock retaining walls, benches and

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railings are either original or in keeping with the original design of the area. Other amenities here include a modern drinking fountain.

#### **Non-contributing Features**

#### Maintenance Building and Park Office

Situated to the northwest of the comfort station, this building faces out onto the main parking lot. The rear elevation, that drops down from the south façade, is surrounded by fir trees and a footpath. The original construction may be dated to approximately 1965, although a photograph dating from 1953 does show a building close to the current location. This south-facing building is one story with an exposed basement level on the north side. It is covered with T-111 siding on all but the front facade, which is covered with wood lap siding. The gable roof faces south and has imitation half-timbering in the gable end. The front facade is dominated by two garage doors. The entrance is recessed on the east end. All windows are aluminum sliders. This building is considered non-contributing because it is outside the period of significance.

#### Picnic Shelter

Located midway up Mount Tabor along Salmon Way is a large thirty-four-square-foot picnic shelter. Plans for the structure were drawn by R. George in 1974. The shelter is situated in an open grassy area across from the Parks office building and parking lot. This is the only picnic shelter in the park. It is a square structure with a cross-gable roof supported by four log posts, wood beams and trusses. The roof structure is exposed. The flooring is concrete slab. This shelter serves as a gathering place for large group events with seating for eighty to one hundred visitors. This structure is considered non-contributing because it is outside the period of significance.

#### Soap Box Derby Track

The Mount Tabor Soap Box Derby Track is a long ribbon of pavement with six faded painted lines forming lanes. It appears as a roadway set in a bowl. The starting trench is on the north end and this trench is covered with a long narrow piece of heavy steel. Just south of the starting trench, on the east side of the track, are large piles of soil amendments used for park maintenance. These piles use the cement retaining wall along the north east edge of the track. The track follows the contours of a bowl-like depression. Historical information is sketchy regarding its origins, however, the first official track in the U.S.A. was constructed as a Works Progress Administration project in 1936 in an Akron, Ohio city park. Oral reports from derby aficianados indicate that the track at Mount Tabor Park was originally designed to official specifications and was very active in the 1940s through the 1960s. Most sources doubt that the track would have been built in the period of significance for this nomination since few communities had official tracks prior to the 1940s. According to City Archives records, the Mount Tabor Park Soap Box Derby Track was apparently refurbished in 1957. During that time, there was a discussion between City Council and the park superintendent regarding complaints of not completing the tract to specifications and of problems with silt deposition onto the apron of Reservoir 5 below it. In 1961, there was more City Council correspondence regarding a design for the track. The Soap Box Derby Track is considered a non-contributing structure because it is outside the period of significance.

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#### Basketball Court

The basketball court is open air and is bounded on the west by the crater, and to the northeast by the steps servicing the amphitheater. The date of construction is unknown but it has a modern feel and is subsequently considered a non-contributing structure.

### 69<sup>th</sup> Avenue Entrance

The northeast area of the park maintains much of its historic feel. Located in an historic and stable neighborhood, the 69<sup>th</sup> Avenue Entrance invites pedestrians to climb the long concrete stairs up the steep slope of Mount Tabor Butte. Historic drives travel to the southeast and due west. To the southeast, East Tabor Drive climbs gently in a curvilinear fashion past the 69<sup>th</sup> Avenue playground and group picnic site, eventually encircling the butte. To the west, the drive enters the park paralleling private residences to the north and arrives at the main playground, main parking lot, Crater Amphitheater, Picnic Shelter and Volcano Comfort Station.

To the southeast of the Northeast Entrance is the 69<sup>th</sup> Avenue playground. This historic playground and picnic area was built to take advantage of this relatively level spot on the steep east side of the butte. It is accessed by the 69<sup>th</sup> Avenue Stairs dropping down from East Tabor Drive. To the west, the butte rises dramatically upward. A comfort station, the Northeast Entrance Comfort Station, designed in 1916 and constructed in the 1920s, is also located in this area. This site includes an old style swing set, small ball diamond, volleyball court, two horseshoe pits and a group picnic area and drinking fountain. The open-air picnic site, like the entire area, is set amidst the lofty Douglas fir trees. The long tables are situated in close proximity to the recreational amenities. This area with its old-style recreational past-times and near-by historic comfort station, gives the visitor a sense of traveling back in time. Though the construction of every feature at this location cannot be dated precisely, there is a cohesiveness and sense of period that is intact. Also, early records report a high degree of neighborhood interest in recreation services at this entrance.

Mische designed a junction where park drives Interlink, West and East Overlook, Cascade, and Woodland met at the northern base of the park's highest point, Mountain Crest Summit. From this point pathways encircled the highest point and connected with a trail system to points all over the park. At the approximate location of Miche's junction there is now a primary intersection of the main driveways in the park and a small parking lot. A west locked gate at Reservoir Loop Drive (Cascade Drive) and an east locked gate at Tabor Summit Drive (East Overlook Drive) have been closed to public vehicular traffic since the 1970s when "partying youth" were prevalent and many nuisance reports were recorded. These driveways make excellent thoroughfares for bicycles, runners and baby strollers. Northwest of this junction is the main playground. Through the east locked gate, Tabor Summit Drive (East Overlook Drive) climbs the eastern slope to arrive at the summit area. This driveway has been referred to by numerous names on various maps such as Harvey Scott Circle, Mount Tabor Summit Drive, Tabor Summit Circle or simply Summit Drive. At the south end of the summit area there is a divider that directs traffic to the east side of the summit, circling around to the west side, and back down the east slope of the butte on the same driveway. Because this driveway has been closed to vehicular traffic for several decades the summit maintains a protected and peaceful feeling. Pedestrians, bicyclists, skateboarders

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and roller bladders frequent it as do those seeking solitude at the few picnic tables in the groomed forest area or at the overlook benches.

The Mountain Crest Summit is the highest point on the butte. The long flat summit area stretches approximately one-eighth of a mile north and south, sloping gently to the south. The summit is composed of mowed shady lawn with lofty Douglas firs and other deciduous trees. Views to the east and west from the summit have been incorporated into the Scenic Resources Protection Plan adopted by the city in 1991. Although Emanuel Mische preferred to leave the forest intact, he had planned for the views from the Mountain Crest Summit to be kept open. Since the tall trees in the key vista points have not been kept pruned, the views of east Portland, Mount Hood and the eastern foothills and mountain range have now become more or less obstructed from the highest points on the summit's east side. (Dropping down to the East Tabor Drive, however, affords several good views of Mount Hood, Larch Mountain and other peaks and the cityscape.) From the northeast vicinity of the summit, a glimpse of Mount St. Helens can be obtained on clear days. The northwest section of the summit provides a grand vista of downtown Portland and the west hills. With the sparkling waters and picturesque oval gatehouse of Reservoir 5 below, it is one of the finest views available in the city. This is a favorite site for sunset watching and a modern bench has been installed here. Where Mische had planned a modest, airy bandstand at the north end of the summit, two grand big-leaf maples grow. This site is utilized as a meeting ground for many people and impromptu nighttime concerts occur here in mild weather. Benches face east and north, and sunrises and moonrises can be witnessed there. Young beech trees have been set out to the north of the big maples. A brass geological marker reading City of Portland Benchmark number 1876 is embedded in the ground to the north of the large maples. To the west, is the historic 1920s Summit Comfort Station (probably constructed in 1926 according to city records). This comfort station replaced the original one that was remodeled in 1913 from the large J.H. Smith residence that presided over the summit area until it was demolished. To the northeast of the few stairs that access the comfort station, a 135-foot Summit Radio Tower was built. This tower is apparently used as a relaying system for the water system. The date of construction appears to be about 1968. The tower is unobtrusive due to the screening of the tall fir trees. At the south end of the summit is a large bronze statue of newsman Harvey W. Scott, by Gutzon Borglum of Mount Rushmore fame. Mounted in 1933 on a granite base, the statue sits atop a cut basalt rock terrace with steps and two benches.

Besides the asphalted Tabor Summit Drive, the summit area is accessed at the north and south by several pathways. As Mische envisioned, a long flight of concrete steps, the 69<sup>th</sup> Avenue Stairs, curves down the northeast slope of the butte to the 69<sup>th</sup> Avenue Entrance. These stairs, like the other long flight between Reservoir 5 and 6 on the west slope, get frequent use for athletic training by school groups and individuals. A short distance down the stairs, another wide trail forks to the north and drops down to the Reservoir Loop Drive above the main playground. At this junction, a small building built into the side of the north slope faces low round cement structures. This small round concrete covered water storage tank is a discontiguous feature of the Mount Tabor Reservoirs Historic District. From the Summit Comfort Station, another smaller paved path descends further to the northwest down to this same point. On the south end of the Mountain Crest Summit, Mische planned for another long flight of stairs to descend down to the Old Reservoir 1, site. A short flight of concrete steps descends directly south of the Harvey W. Scott statue across Tabor Summit Drive. From here several trails traverse the steep south side of the butte through some of the most natural forest in the

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park. Native understory, plants including fairy lanterns, trilliums, Solomon's plumes, snowberry, thimbleberry and hazel shrubs grow beneath the predominating conifer forest. One trail takes the steep route down to the north end of the Reservoir 1 site. The main path follows gentler contours of the hillside and is wide and well graded. Where it turns due west at a forest junction lamppost, it offers scenic glimpses of the waters and buildings of Reservoir 1. From this junction of several trails, the main trail turns northeast past another forest lamppost and accesses the eastern side of the summit area continuing either around to the 69<sup>th</sup> Avenue Entrance Stairs or tying into North Tabor Drive. This area of the park and the steep slope east of there has the most natural feel due to the forest undergrowth being intact.

Beginning at East Tabor Drive (Mische's Woodland Drive) was constructed with great difficulty across the rocky, steep slope of the east side of the butte. The east side of the roadbed has an attractive stacked basalt rock retaining wall. East Tabor Drive climbs and encircles the butte and arrives either at the Harrison Street Entrance, not in the original plan, or the Lincoln Street Entrance as Mische had essentially planned. Mische's 1911 preliminary park plan called for extending the boundary of the park so that the Woodland Drive (now East Tabor Drive) could be built at a more reasonable level farther down the slope. The property and drive he envisioned are analogous to what is now private homes along S.E. Mountain View Drive. East Tabor Drive, however, does provide the wide and inspirational views that Mische wanted to secure for the public. Mount Hood, the Cascade Range and all of east Multnomah County are visible as are the peaks in Washington State across the Columbia River to the north.

#### **Contributing Features**

#### Summit Comfort Station

The Summit Comfort Station is a Tudor-style building located to the northwest of the summit of Mount Tabor Park. It was built either in 1920 or 1926. In keeping with the other comfort station designs, it is located at a slightly lower elevation so as not to compete with the landscape. Several concrete steps and a low retaining-wall terrace landscaped with low ornamental shrubs lead down to the building from the Summit Drive. The one-story red-brick building faces east and is comprised of two restrooms with a storage/concessions area in between. The foundation is concrete and the roof is composition shingle. The plan is comprised of a main rectangular form with a projecting wing at either end. The center volume and wings are side gabled. Original round-arched wood doors to storage/concession are on the front (east) facade and a large central window opening has been boarded up. The gable ends of each of the wings (front facade) are filled with original timber and stucco. The original window openings in the gable ends have been filled in with brick. Restroom entrances are on the north and south facades in the wings. Wood vented window openings flank the entrances. The restroom entrances are sheltered by a small shed roof supported by Tudor-style brackets. Doors are original round-arched vertical board. The women's entrance retains an original curved iron railing. The rear elevation drops steeply down into the forest. The concrete foundation is more exposed on this side. Small boarded up windows are irregularly placed on this facade. The gable ends of the wings contain the same timber and stucco decoration as the front facade. Plans in 1953 were for a slight remodel for the women's side to accommodate a water bureau radio station. Though no longer in use, the building is in good condition and according to park records, can be made available for special occasions.

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#### Harvey W. Scott Statue and Terrace

At the southern end of the top of the butte, amidst the Douglas fir boughs, stands a full-body bronze statue of Harvey W. Scott, long-time editor of the daily newspaper, the *Oregonian*. Mounted on a granite pedestal approximately thirteen feet tall in total, it faces southeast, looking toward Mount Scott, another of the Boring Buttes that bears the influential man's name and where he once owned sizeable acreage. The statue's right hand points westward toward downtown Portland. An inscription on the base reads: Harvey W. Scott 1838 – 1910; Pioneer, Editor, Publisher, Molder of Opinion. It is among the last works by the sculptor Gutzon Borglum (1867 – 1941), who completed it around 1930 while he was working on the Mount Rushmore Memorial. The name of the artist is inscribed into the metal base on the east side. The statue and its pedestal stand in a small formalized terrace of a cut basalt rock patio with two concrete benches on the east and west sides of the statue. Cut basalt rock stairs and walkways approach the statue from the east and west. A cut basalt rock retaining wall faces south and follows the curve of the Summit Drive between the east and west stairs. The terrace landscape includes hardy shrubs for this south facing aspect. Oregon grape, rhododendrons, red osier dogwood and heather are among them. The statue was a gift from Scott's family and was dedicated at a ceremony at the site in 1933. The family established a maintenance fund, the "Scott Statue Memorial Fund," with \$5,000 in an interest bearing account in the city of Portland's name, in the 1940s.

#### Northeast Entrance Comfort Station

Plans for this building date from 1916 and were drawn by the architectural firm C. H. Kable & Company according to City Archives documents. The actual construction date is 1926 and the building's construction cost was \$5,049.60 according to inventory records for Mount Tabor Park. Situated in the northeast corner of the park, it services the 69<sup>th</sup> Avenue Playground area. The front facade of the comfort station faces north. A sidewalk winds around the building and continues up a short flight of stairs to the road. This one-story Tudorstyle building is clay tile construction with a concrete slab foundation. The building is situated on sloped ground so that the elevation drops down from north to south and west to east. Thus the foundation is higher on the southeast side. The top of the foundation is capped with a wide curved concrete water table. The exterior is roughcast stucco. Rectangular in plan, the hipped roof is intersected by a large gable-roofed front porch. The roof is composition shingle. The interior plan is comprised of two restrooms side by side and storage areas at the rear. Access to the women's restroom is from the front porch as is access to an ADA restroom. Access to the men's restroom is from a side porch on the north facade. The front facade is dominated by a large front porch. The porch gable end is filled with wood lap siding. Exposed rafters are curved as is the bargeboard. Squared brackets decorate the gable end. Identical rafters also decorate the eaves of the main hip roof. The porch is supported by square posts and is enclosed by a low stucco wall with an arched opening and inset tile and brick decoration. The porch ceiling is beaded board. A small built-in bench is integrated into the wood railing along the south end of the porch. The wood railing is decorated with bell shaped cut-outs. Window openings are located high up on the each of the facades and are filled in with wood vents. Under the hip roof on the rear facade is a recessed area containing a built-in bench. Original vertical board doors provide access to small storage areas here. This restroom is no longer open to the public, but the building is in good condition.
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## East Tennis Court

The construction dates of the two tennis courts in the park are given in park records as 1923 and 1928. It is unclear which one was constructed when, however, both dates fall within the period of significance. This tennis court is located at the 69<sup>th</sup> Avenue playground; the tennis court on the west side of the park is located at the Salmon Street Entrance near Reservoir 6. Fence and other repairs to the courts are recorded in 1926 and 1932.

## 69<sup>th</sup> Avenue Stairs

Long flights of stairs are one of the hallmarks of Mount Tabor Park. This concrete flight winds its way with steep grace up the entire northeast slope of the butte arriving at the summit. It begins at the 69<sup>th</sup> Avenue Entrance west of the playground. It was completed in 1915. Just past the junction with Tabor Summit Drive, concrete restoration work was completed recently on a section of the stairs.

## Non-contributing features

### Summit Radio Tower

The summit radio tower is a metal structure, 135 feet tall, located on the northwest portion of the Mountain Crest Summit. It reportedly serves the Water Bureau with communications to their various sites. Some of the power components are apparently housed within the Summit Comfort Station that was refitted to accommodate them. The date of construction could not be firmly determined, but through Archives and oral reports, it appears to be about 1968. The Summit Radio Tower is a non-contributing structure because it is outside the period of significance.

## **Harrison Street Entrance**

Mische's preliminary park plan of 1911 had the northern reaches of this region traversed by Woodland Drive and pathways. His plan called for extending the park land to include the steep lower reaches of the butte that are now developed for residences along S.E. Mountain View Drive. The Woodland Drive of Mische's plan was developed higher up the butte in the 1930s and is called East Tabor Drive today. Photographs depict construction on this drive in 1937 by a WPA crew (Project # 869C). This is one of the most scenic drives in the park. It is open to vehicle traffic six days a week and provides some of the grandest views to the east of Mount Hood, Larch Mountain, and the Washington State mountains north of the Columbia Gorge. Pedestrians have a sidewalk up the east side for most of the drive. Heading north, East Tabor Drive intersects North Tabor Drive that travels northwest below the Mountain Crest Summit arriving at a small parking lot bounded by a railroad tie terrace to the south. This terrace is landscaped with a variety of native and non-native plants but of particular interest are the flowering currants that attract hummingbirds. Here, also, is the primary junction of the locked gates to Tabor Summit Drive and the east portion of Reservoir Loop Drive. The main playground and Crater Amphitheater areas are to the northwest.

The Harrison Street Entrance was the last formal entrance developed in the park and not part of Mische's original scheme. The entrance appears to have been an extension of S.E. Mountain View Drive, the residential street paralleling the eastern boundary of the park. This entrance was apparently begun as W.P.A. Project #

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869C, 1/11/37 - 5/4/37 and labeled:  $72^{nd}$  and Harrison St. Approach to Mt. Tabor Park – Removing 1500 cu. Yard." The estimated cost was \$4,746 and actual cost was \$5,162.56. The drive associated with this entrance is called Harrison Drive because it is an extension of S.E. Harrison Street. It ties into the Lincoln Drive arriving from the west and the East Tabor Drive that curves down the eastern slope of the park. The junction of these drives is below and to the south of Reservoir 1, just east of the Southside Stairs. Harrison Drive is a good example of the difference noted between the newer road construction and the original. Harrison Drive is potholed and not of the same quality of that of the older drives.

The Harrison Street Entrance is flanked by ornamental tree plantings, predominantly flowering plums, on the north slope and the Harrison Playground, distinguished by the variety of lovely non-native shade trees, on the south side slope. The history of the planting of the mature grove of predominating black walnut, black oaks, linden, and other deciduous trees is unknown. They are well suited for this south-facing aspect and well-drained environment. The Mount Tabor Nursery is just to the west of this area, and along the paths in that direction, several other non-native or uncommon tree species are growing and so the area may have received the extra attention of nursery workers. The predominance of large, non-native nut-bearing trees makes this a distinguished site in the park and a favorite hunting ground for the plentiful fox squirrels and various birds. The deciduous trees make the area pleasantly shaded in the summer but well lit after the trees drop their leaves in the winter. The Harrison playground is old-style with several metal structures. The play structures are positioned with great distances between them in the sloped grove. The well-spaced great shade trees lend an airy, playful feel to this pastoral area, even without the play structures. The recent widening of the path that accesses this area from the east and west adds an unaesthetic element. The exact date of the construction of the playground is unknown.

A pathway leaves the playground going west through the primarily Douglas fir, partially groomed forest. It soon divides into a lower path and an upper path. These paths bisect what used to be the lower section of the Southside Stairs, from the southern boundary of the park up to the planned terrace garden of Reservoir 1. This portion of the stairs has been replaced by a rough trail that climbs steeply up to cross Lincoln Drive accessing the remaining upper section of the Southside Stairs. The lower path, bordering Warner Pacific College grounds, passes by two large native madrone trees, uncommon in the park and the neighborhood. The upper path traverses the south face of the slope and crosses a main, but undeveloped path climbing up to the Reservoir 1 area. The upper path passes by a tiny spring, one of the few visible springs in the park, emerging from beneath a big-leaf maple on the north side of the path. The pathway continues into a mature non-native Coulter or big-cone pines and other notable non-native species such as strawberry madrone. The upper trail arrives into a flat cedar grove that is used as a soil amendment storage area for the nursery . A low cement retaining wall along the north side is crowned with well-established plantings of uva ursi and a prostrate juniper.

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#### Summary

True to the prediction of John Charles Olmsted, Mount Tabor Park is one of the most important and largest parklands in the city of Portland, and a defining landscape feature of the city's east side. Mount Tabor Park's design retains its historic integrity and the principles of Olmstedian design.

Mische recognized the wisdom of letting the land speak for itself by primarily aiding accessibility with aesthetic drives and pathways. Though a city park in an urban neighborhood, Mount Tabor maintains elements of a forest preserve. The masterful network of drives and pathways fit the needs of the community. The interior of the park remains a sanctuary due to the limited access of vehicles, yet the drives and paths provide recreational opportunities and numerous places to enjoy the powerfully beautiful park landscape and outstanding views of the surrounding city and countryside. The oldest driveways are also testimony to timeless construction techniques. After extensive analysis of the roadways in the park, the City of Portland's Mount Tabor Master Plan of 2000 stated that the historic roads have held up very well for over 50 years unlike the newer constructs. The rock work from local basalt accents drives and other mammade features. Amenities are subordinate to the landscape. All of the comfort stations have maintained a high degree of integrity, though only one is open to the public at this time. As the park master plan points out, the open water reservoirs are, "integral historic and aesthetic elements directly tied to the public's identification with Mount Tabor Park." Ninety-five years after the city purchased the nearly 200 acres that make up the park today, little has been done that alters the experience of Mount Tabor Park.

### A PARTIAL LIST OF **Plants Growing in Mount Tabor Park** (alphabetized by most familiar common name)

Alder, red Alnus rubra Betulaceae Andromeda Pieris sp Ericaceae Barberry Berberis sp Berberidaceae Bittercress Cardamine sp Cruciferae Blackberry Rubus laciniatus, R. discolor Rosaceae Buddleia (Butterfly bush) Buddleia sp Buddlejacaceae Butdeia (Butterfly bush) Buddleia sp Buddlejacaceae Buttercup Ranunculus sp. Ranunculaceae Burdock Arctium lappa Asteraceae Brooklime, American Veronica americana Scrophulariaceae Bracken fern Pteridium aqulinum Polypodiaceae Camellia Camellia japonica Theaceae Cedar Thuja occidentalis, Chamaecyparis lawsoniana, C. nootkatensis, Calocedrus decurrens Cupressaceae Centaury Centaurium umbellatum Gentianaceae Cherry, wild Prunus emarginata, P. subcordata, P. virginiana Rosaceae Chestnut, horse Aesculus hippocastanum Aesculaceae

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Chickweed Stellaria media Caryophyllaceae Chicory Chicorium intybus Asteraceae Clematis Clematis sp Ranunculaceae Clivers Galium aperine, G. oregano Rubiaceae Clover, red Trifolium pratense Fabaceae Clover, white Trifolium repens Fabaceae Cotoneaster Cotoneaster sp Rosaceae Cottonwood Populus trichocarpa Saliaceae Cranesbill Geranium sp Geraniaceae Currant, red-flowering Ribes sanguineum Grossulariaceae Daisy, English Bellis perennis Asteraceae Daisy, ox-eye Chrysanthemum leucanthemum Asteraceae Dandelion Taraxacum officinale Asteraceae Dandelion, false Hypochoeris radicata Asteraceae Dock, yellow Rumex crispus, R., obtusifolius Polygonaceae Dogbane, spreading Apocynum androsaemifolium Apocynaceae Dogwood, Pacific Cornus nuttalli Cornaceae (in demise) Dogwood, creek (red osier) Cornus stolonifera Cornaceae Fairy lanterns (Fairy bells) Disporum hookeri, D. smithii Lilaceae Fir, Douglas Pseudotsuga menziesii Pinaceae Groundsel, common Senecio vulgaris Asteraceae Hawthorn Crataegus monogyna Rosaceae Hawkbit Leontodon sp Asteraceae Hazelnut Corvlus cornuta Betulaceae Hemlock, Poison Conium maculatum Apiaceae Hemlock (tree) Tsuga sp Pinaceae Hydrangea Hydrangea sp. Saxifragaceae Holly Ilex aquifolium Ilexaceae Horsetail Equisetum hymenale, E. arvense Equisetaceae Ivy, English Hedera helix Araliaceae Juniper Juniperis sp Cupressaceae Kalmia Kalmia sp Ericaceae Knotweed Polygonum sp Polygonaceae Lambsquarters Chenopodium album Chenopodiaceae Lettuce, wild Lactuca sp Asteraceae Madrone, Pacific Arbutus menziesii Ericaceae Madrone, Strawberry Arbutus uneda Ericaceae Mallow Malva neglecta Malvaceae Maple, big leaf Acer macrophyllum Aceraceae Maple, vine Acer circinatum Aceraceae Mock orange Philadelphus sp Saxifragaceae

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Mountain ash Sorbus sitchensis Rosaceae Nipplewort Lapsana communis Asteraceae Oak Quercus sp Fagaceae Oceanspray Holodiscus discolor Rosaceae Oregon grape Mahonia aquifolium, Mahonia nervosa Berberidaceae Osoberry / Indian plum Osmaronia cerasiformis Rosaceae Pearly everlasting Anaphalis margaritaceae Asteraceae Periwinkle Vinca major, V. minor Apocynaceae Pineapple weed *Maticaria matricarioides* Asteraceae Pine Pinus sp Pinaceae Pittosporum Pittosporum sp Pittosporaceae Plantain Plantago major, P. lanceolata Plantaginaceae Poison oak Rhus diversiloba Anacardiaceae Oueen Anne's lace Daucus carota Apiaceae Raspberry Rubus strigosus Rosaceae Rhododendron Rhododendron sp Ericaceae Rose, wild Rosa gymnocarpa, R. nutkana Rosaceae Rush Juncus sp Juncaceae Salsify/Oyster plant Tragopogon sp Asteraceae Scots broom Cytisus scoparius Fabaceae Sedge Carex sp Cyperaceae Self-heal Prunella vulgaris Laminaceae Sheep sorrel Rumex acetosella Polygonaceae Shepherd's purse Capsella bursa-pastoris Cruciferae Snowberry Symphoricarpos mollis Lonicerae Solomon's seal, branched/false, star-flowered Smilicina racemosa, S. stellata Liliaceae St Johnswort Hypericum perforatum Hypericaceae Strawberry Fragaria vesca Rosaceae Sword fern Polystichum munitum Polypodiaceae Tansy ragwort Senecio jacobaea Asteraceae Thimbleberry Rubus parviflorus Rosaceae Thistle Cirsium sp Asteraceae Trillium Trillium sp Liliaceae Uva ursi Arctostaphylos uva ursi Ericaceae Vetch Vicia sp Fabaceae Viburnum Viburnum sp Caprifoliaceae Violets Viola sp Violaceae Weigela Weigela (Dievilla) sp Caprifoliaceae Witch hazel Hamamelis sp Hamamelidaceae Willow Salix sp Salicaceae Yarrow Achillea millefolium Asteraceae

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Youth-on-age/Piggyback plant *Tolmiea menziesii* Saxifragaceae Yellow dock *Rumex crispus* Polygonaceae Yew *Taxus sp* Taxaceae

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# STATEMENT OF SIGNIFICANCE

Mount Tabor Park is a 196-acre city park located in southeast Portland, Multnomah County, Oregon. It is eligible for the National Register of Historic Places under Criterion A because of its association with early park planning achievements in Portland. The birth of this park characterizes the style by which many of Portland's parks, and the nation's parks, were obtained and developed through active citizen involvement in cooperation with the city government. Mount Tabor Park's story also illustrates how park design shifted with national trends, from a formalized European mode to a more naturalistic style, with later accommodations for the recreation/playground movement. The chronicle of Mount Tabor Park falls into the larger context of periods of park creation and development in the history of the United States. The earlier portion of the park's history, in the waning nineteenth century and emerging twentieth century, coincides with the City Beautiful movement's influence regarding the importance of parks and landscape on society. The ideas of these times held sway through the several decades of the Progressive Era. Also important in the park's development were the New Deal work programs of the 1930s, established during the years of the Great Depression.

Mount Tabor Park is also eligible as an example of Landscape Architecture under Criterion C because of its association with John Charles Olmsted, who identified it as a prime park location in 1903. Mount Tabor Park's design clearly exhibits elements that are associated with design principles followed by the Olmsted landscaping firm. John Charles Olmsted was the stepson and nephew of the famous landscape planner Frederick Law Olmsted, Sr. Frederick Law Olmsted is credited as being one of the prime instigators of the City Beautiful movement. Commissioned to aid in the planning of Portland's Lewis and Clark Exposition of 1905, his firm was also retained to review the city of Portland's existing and potential parklands. After John C. Olmsted's 21-day visit to Portland in April 1903, he produced his report to the Portland Park Board in December of 1903. Thirty-seven park projects were identified in Olmsted's 1903 Report to the Park Board, Mount Tabor Park among them. Olmsted's document has continued to shape the city's park planning to this day. In 1907, the Olmsted firm completed another review of Portland's parks, building on the earlier 1903 recommendations.

Mount Tabor Park's original design was created by Emanuel Tillman Mische, an outstanding horticulturist who had trained and worked at the Olmsted firm for eight years before being referred by them for the position of Portland's park superintendent. Mische was hired by the City of Portland in 1908. Emanuel Mische had a continuing relationship with the Olmsted family beyond that of an employee. On John Olmsted's subsequent visits they collaborated on various aspects of Portland's park planning and implementation. Mische's 1911 park design for Mount Tabor Park stayed true to the recommendations as discussed by Olmsted's report to the Park Board of 1903. Mount Tabor Park has maintained the look and feel of a park designed using the principles touted by the Olmsted firm in part due to the continuity afforded by Mische's assistant, Charles P. Keyser. Hired in 1909, the year of Mount Tabor's official park status, Keyser was made the superintendent of Portland's parks in 1917 where he remained until 1949.

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Criterion A: Mount Tabor Park Development Influenced by the Progressive Era, City Beautiful Movement, and the New Deal

Mount Tabor Park meets the guidelines for Criterion A as an example of the city of Portland's early park planning. This story is not unlike so many other parks across the country. Civic leaders in Portland sought outside council, specifically the Olmsted landscape firm, to plan not only the site for the 1905 Lewis and Clark Exposition, but to review lands suitable for parks. Mount Tabor Park was one among many identified by John Charles Olmsted's 1903 Report to the Park Board. The active acquisition of the land that makes up the park and the park design occurred with local funding during the Progressive Era and included the influence of the City Beautiful movement at the turn of the nineteenth to the twentieth century. Work on Mount Tabor Park's amenities continued through the next decades with the ebb and flow of local funding. With the Great Depression came federal aid through the New Deal programs of the 1930s. Money was channeled to all levels of government to produce public works projects that would employ millions of jobless people. Mount Tabor Park, like so many other recreation sites around the country, benefited by work crews who created well-crafted infrastructure and amenities. In the case of Mount Tabor Park, Works Progress Administration crews completed the drive system as it was originally designed in the 1911 plan prepared by Emanuel Tillman Mische. Other W.P.A. projects related to the construction of park maintenance buildings, drainage and clearing understory plants were undertaken at Mount Tabor Park.

## Progressive Era and City Beautiful Movement Stimulate Park and Urban Planning

The sweeping social and political changes that occurred during the ending years of the 1800s and the early years of the 1900s mark what is called the Progressive Era. Reform movements grew and created policies and institutions still powerful today. Progressive individuals and groups believed that it was possible to improve human nature by bettering living and working conditions. Women, from local civic clubs to scientists like Ellen Swallow Richards from M.I.T., were instrumental in providing leadership for the municipal housekeeping movement that spawned environmental consciousness and general improvements throughout the nation.

The Progressive Era emerged as the United States faced the end of the frontier. Settlement stretched from coast to coast. The population of the country burgeoned, tripling in size from thirty million in the 1860s to ninety million by 1910. Cities rapidly expanded with immigration, and migration from farms to urban jobs. Land became much more valuable as it became scarcer. Progressives grappled with the side effects of an unmitigated free enterprise system. Urban life brought the classes in close contact with each other, though the upper class could retreat to their estates. A compelling sense of responsibility to contribute to the community in positive ways grew, extending from the traditional philanthropy of the upper class to include the growing middle class. Whereas the upper class did not need to rely on public land for their recreation, the growing middle class and the lower classes needed access to land for recreation. Labor unions were edging industry toward providing shorter work hours for laborers thus city dwellers tended to have more time for recreational interests. The subjugation of nature by automobiles and urban development contributed to a growing sense of nostalgia for the lost rural roots of America. Reform movements emerged as the public faced the Industrial Revolution head-on. Among the movements was the so-called City Beautiful movement.

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The City Beautiful movement grew out of this time of reform to address not only architecture but city planning at a time when urban areas were expanding exponentially with little concern for aesthetics or other planning criteria. Advocates of the City Beautiful movement promulgated that beautification would not only provide a more pleasing environment, but that individuals and thus society as a whole, would exhibit greater moral and civic virtues.

The City Beautiful movement's precepts strove to encourage city governments to set aside bountiful land for present and future enjoyment and to build beauty into every development. The movement preached that the incentives for doing so included a better, more affluent society of engaged citizens. There was an agreement that pleasant neighborhoods that included gardens, squares, tree-lined boulevards and parkways or other park-like land, as well as properties overlooking grand vistas and waterscapes, increased real estate value and increased the tax base.

Land use planning had not emerged as a strong feature in the forge-ahead economic development of United States cities in the middle of the nineteenth century. Yet well-established and crowded eastern urban areas had prominent people influenced by the grand beauty of European designed cities, parks and gardens, who demanded and helped to fund, lovely public spaces. Places like New York City, Boston and Washington, D.C. became famous for their parks and landscapes, and the designers of these landscapes found themselves in high demand. There was a sense of competitiveness between cities as they vied for attracting business and residents. This competitive sprit was exemplified by the international events known as the World Expositions.

Designed to promote the latest achievements in industry and technology, as well as to showcase the products and virtues of a region, the expos were meant to inspire the possibilities of creating an aesthetic and healthful city environment. The first were conceived and executed in Europe – London 1851, Paris 1889, London again, and Vienna. Chicago's World's Columbian Exposition of 1893, though not the first expo for the country, was a pivotal event for the United States. Four hundred years after Columbus, the nation was eager to demonstrate its glamour and abilities in comparison with the acknowledged distinction of Europe's far more historic cities. Known as the "White City" due to the extensive use of white paint applied to cover the plaster architectural features, Chicago's expo was a testament to classical Greek and Roman architecture and relied extensively on the elaborate Beaux Arts style, popularized by French schools of architecture. Design guidelines were utilized to create harmonious architectural scale. The highly designed landscape featured the local waterway as an aesthetic component whereas urban rivers and lakes were primarily monopolized by industry and suffered grave environmental consequences. The World's Columbian Exposition put the City Beautiful movement soundly on the map and influenced cities of all sizes across the land to develop beautification programs of their own.

Chicago's Columbian Exposition advanced the field of professional landscape design just as the Progressive Era, in the zeal to outsmart political cronyism, had hatched the trend to hire an outside professional consultant. The City Beautiful married the two and the landscape design field took off. Cities and prominent citizens were anxious to hire experts, like the Olmsteds, to help with urban and estate landscapes. If the city wanted to host an expo, there was even a greater incentive for creating an image of desirability. Such was the case for Portland in

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1903, when John C. Olmsted was commissioned to help the city prepare for the Lewis and Clark Exposition of 1905.

The City Beautiful movement pushed for park planning as part of a national trend toward political and social reform that had grown with the burgeoning of American business, and the swelling population. The influence of this movement went right to the top level of public policy makers. Concern for the conservation of public lands was advanced by President Theodore Roosevelt. While his interests included art (he was an early member of the elite National Arts Club) and general political and commercial accountability, he is credited with championing the conservation of land for public parks. During his time as president, approximately 230 million acres were placed in public protection. His terms in office, between 1901 and 1909, first completing the assassinated William McKinley's three years followed by his own successful four year term, were very instrumental in forming the National Parks and National Monument systems, the U.S. Forest Service, and game and bird refuges. A clear policy of conservation coming from Washington, D.C. helped to foster the state and local park systems we know today. The push to acquire the land for Mount Tabor Park closely corresponds to Teddy Roosevelt's term, and a majority of the land parcels purchased by the city of Portland for Mount Tabor Park and other parks occurred in 1909.

The women's suffrage movement, an important component of the Progressive Era, had a profound effect on park planning. Even without the right to vote, women worked at the local and state levels to promote a common agenda of moral obligations to women and children. Kindergarten and other school programs, awareness of child labor practices and the playground movement came out of these efforts. New Jersey passed the first comprehensive state legislation in 1907 establishing a playground commission. Whereas the City Beautiful movement had emphasized the need for aesthetically, naturalistically designed land separated by space or landscape from the urban environment, a growing number of urban families demanded open space for active recreation.

## **Post World War I: Recreation Movement Continues**

The time between the two Roosevelt presidents, from 1909 to 1933, was pivotal for the nation's evaluation of outdoor recreation. Many parks were established by the first decade of the twentieth century. The population clamored for more park amenities, as well as more parks, but lack of funding, the restrictive atmosphere imposed by World War I and the world wide influenza pandemic, had hampered the development of services on parklands. Nationally, as labor unions and public opinion swayed the labor force toward shorter work hours, people had more leisure time. The predominating urban environments, as opposed to the rural lifestyle, increased the demand by the public for recreational land and facilities. In general, people had more time and more mobility, especially with the private automobile, which also contributed to a declining rate of physical activity.

In 1924 the Federal Government held the National Conference on Outdoor Recreation in Washington, D.C. at the request of President Calvin Coolidge. Three-hundred delegates from one-hundred-twenty-eight national organizations attended. The conference was designed to assist in the formulation of a national policy "to

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coordinate the activities of federal, state, county, municipal and unofficial agencies in the field of outdoor recreation and to promote the development of the recreational resources of the country and stimulate their use." The conference was also to encourage the promotion of conservation and wise administration of the nation's natural resources. This conference was followed two years later with the passage of the Recreation and Public Purposes Act, through Congress, that authorized the Secretary of the Interior to exchange, sell (at low cost) or lease unreserved non-mineral public lands to states, counties and municipalities for the purpose of recreation.

This time of park acquisition was followed by a time of development during the next decade. While the country suffered economic collapse in 1929 and private development languished, public lands benefited. John Olmsted, in his 1903 Report to the Park Board, had noted that economic hard times could be used for good advantage both in the acquisition and development of parks. The stock-market crash of October 1929 was a major turning point for American life on nearly every front. Desperation was a driving force of individuals as well as all levels of government.

### The New Deal: Development of Park Amenities

President Franklin Delano Roosevelt (FDR), who served from 1933 until 1945, during the trying times of the Great Depression and World War II, established the work relief programs of the New Deal. In the face of the desperate depression times of the 1930s, FDR's administration worked to shore-up the economy of the nation by providing jobs for unemployed Americans. By providing funding for public works projects through the Public Works Administration and direct employment through the Works Progress Administration and the Civilian Conservation Corps, the federal government was able to assist states and local governments proceed with developing public amenities. Many parks, including more than 800 state parks, were developed through the direct employment agencies of the New Deal.

The Works Progress Administration, later called the Work Projects Administration, employed 8.5 million people on 1.4 million public projects to improve America's infrastructure, arts, history and culture. The Civilian Conservation Corps, under the Emergency Conservation Work program, put men to work developing recreational facilities in forests and parks, preventing soil erosion, and planting trees. Parks around the country were upgraded and Portland's parks were no exception. Work crews from this era left their mark on Mount Tabor Park, executing Mische's earlier design intentions from the mid-1930s until 1939.

Out of this period emerged principles regarding parks and natural resources and federal laws, such as Public Law 770 1/2 of 1936 that provided for a comprehensive study of parks, parkways, and recreation programs in the United States. Another federal study entitled, "Municipal and County Parks in the United States 1935" included data on every state including 1,216 cities in seventy-seven counties that was to be compared to the 1925-1926 study on recreation facilities. In 1941, a federal document outlining guidelines for the nation's recreation entitled, "A Study of the Park and Recreation Problem in the United States," made strong recommendations that the majority of recreational needs should be the responsibility of state and local governments.

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World War II interrupted the momentum for park planning that had been gained during the 1920s and 1930s. It was not until the mid- to late -1950s that federal efforts pushed forward with the Mission 66 program, spurring once again park planning and development on all government levels. The boom times of the post-war nation encouraged housing developments and a new suburban expansion. Once again, there was much pressure for park land developments as housing and business continued to edge out the rural landscape.

## Early Park Development: The Process in Portland, Oregon

The story of the creation of Mount Tabor Park, which was the largest park in Portland until the 1940s, is an illustration of the way many public parks were conceived. Its establishment took the will and the cooperation of civic-minded and influential individuals including members of the mayor-appointed Park Board, politicians and ultimately voters to give the mandate on funding. Very important in this mix were the outside influences of experts in the field, members of the Olmsted firm, including their former horticulturist, Emanuel Tillman Mische, whose vision and expertise helped manifest the beginnings of John C. Olmsted's park plan for Portland. Mount Tabor Park and Portland's entire park system benefited from the continuity of management style carried on by Mische's assistant, Charles Paul Keyser who was park superintendent until 1949.

A clear policy on publicly owned parkland had not developed nationally but it was in process by the turn of the century. There was a sense of rivalry between cities as policy makers tried to determine how much land was appropriate for parks. Hiring the Olmsted firm and hosting a world's fair helped Portland gain a reputation as a city that invested in planning and parkland. Portland began to get inquiries from city governments around the nation, some wanting to "borrow" the Olmsted report. In May of 1907 a letter from H. A. Shatuck addressed to Portland's Park Commissioners said, "We are in the throes of park agitation here in Boulder."<sup>1</sup> Walter D. Moody, the managing director of the Chicago Plan Commission in 1912, requested the total present park area and the total proposed park area (if any) for a national report on park acreage of leading American cities. Philadelphia, Boulder and Chehalis, Washington made similar inquiries to Portland.<sup>2</sup> Park planning eventually progressed to city planning. In the year 1909, the same year that Mount Tabor Park was pieced together, land use planning emerged as a budding profession. That year the first national conference on city planning was held, Harvard University's first course on city planning was offered, and Wisconsin passed legislation authorizing cities to create planning commissions.

The City Beautiful movement propelled the nation toward park development fueled by expositions like Chicago's in 1893. But expos not only generated models of planning, they also fostered growth in the hosting city as they were extensively advertised and attended by millions of people. Portland's Lewis and Clark Exposition, open from June until October 1905, expanded the city's population and boundaries sizably. Even with design expertise from consultants like Olmsted and planner Edward Bennett, the burgeoning growth made it a challenge to carry the City Beautiful tenets from the fantasy world of the expo to the filthy, crowded streets and waterways of the real urban world. The "White City" and Portland's own exposition of 1905 were artificially produced, short-term fantasies, produced to create wealth for the promoters, as well as for the region and concerns that were featured. The designs and recommendations of the designing consultants seemed farfetched to some government and business leaders. Land use decisions were complicated by the special interests

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of developers and industrialists who held powerful sway over elected politicians. The amounts of park land, the amenities to develop, the numbers of street trees, while looking good in theory, did not always seem attainable or sustainable. Park acquisition and development were closely tied with fickle economic trends as well as voter attitude. Elections, such as the discouraging ones in Portland in 1912 and 1913, proved that citizens were not entirely sold on the City Beautiful's concepts or if they were, they did not want to put their money where their beliefs were.

# **Civic Visionaries Guide Park Development Process**

The city of Portland's effort at deliberate park planning, like other cities, was the culmination of a process. It involved civic conversation and action between city and state government and principal families of influence or people who were closely allied to them, plus hired professionals such as John C. Olmsted, Emanuel T. Mische and later Edward H. Bennett who submitted the "Greater Portland Plan" in 1912. A precedent had been set for municipal ownership when the Water Committee developed the city-owned Bull Run system in 1894. A number of the same civic elite members served as early Park Commissioners and on the Exposition Committee and they were instrumental in helping to initiate and guide the process toward a public park system. A major win for proponents of parks was the amendment of Portland's City Charter by the state legislature in 1899 and the referendum in 1900 to authorize the Portland Park Association and Board of Park Commissioners.

Portland's far-sighted citizens were able to harness the money and vitality of the city and look beyond its borders for talent, true to the trend of their day. Portland Park Commissioner, the Reverend Thomas Lamb Eliot, of the First Unitarian Church, utilized his connection to the influential east coast park movement and he was integral to the foundation of the parks system that Portland enjoys today. Reverend T.L. Eliot paid a visit to the Olmsted offices and set the deal for John Charles Olmsted, also a member of the Unitarian Church, to visit both Portland and Seattle. The Reverend Eliot's relative was Charles Eliot (1859 -1897) whose father, Charles William Eliot, was the president of Harvard College. The junior Eliot was a member of the Olmsted, Olmsted and Elliot landscape architecture firm in Brookline, Massachusetts. Charles Eliot is credited with helping to craft Massachusetts state legislation for the protection of public lands. This eventually led to the legislation that created the Boston Metropolitan Parks System in a large part due to his 1890 piece entitled "Waverly Oaks," a landmark article defending a stand of virgin trees in Belmont, Massachusetts. Charles Eliot greatly influenced the younger John Charles Olmsted, his business partner. In his plan for Portland parks, Olmsted repeatedly reminds Portland of the value of its forestland: "Many of the older cities would now pay very high prices for land covered with the primeval forest which the early inhabitants destroyed and which might once have been obtained for a few dollars an acre," he wrote. Of Mount Tabor, Olmsted said, "It has been sufficiently cleared to open up all the important views from one point or another of it, yet there still survive considerable groves of the original growth of fir trees, including many tall ones, as well as other trees and shrubs."<sup>3</sup> Presently, Mount Tabor Park represents the only sizable, naturalistic forest left in the heart of east side Portland.

While Eliot did the east coast leg-work for orchestrating Olmsted's visit, another member of the Park Commission, Lester Leander Hawkins, bank and electric utility president, escorted Olmsted and his assistant around Portland, including Mount Tabor, in the spring of 1903. Hawkins dreamed of a trail and driveway

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network along the summit and valleys of the west hills from Macleay Park to south Portland. His vision, strengthened by the Olmsted report, has carried through the century. It laid the groundwork for conservationists and preservationists to develop Portland's largest network of trail systems. Nearly half a century later, with the help of a new set of citizens, Hawkins' vision became manifest with an elaborate trail system throughout the west hills. The crowning glory of this system, Forest Park, made official in the 1940s, is a forest reserve of over five-thousand acres that allowed Portland to boast of having one of the largest urban parks in the world. The view of this long, green ridge of parkland running north of the cityscape of Portland's downtown, provides one of the prized sights visible from the west side vista points of Mount Tabor Park.

## Funding and Acquisition: Emanuel Mische Takes the Helm

Early correspondence, coupled with officially produced park reports, helps tell the tale of Portland's difficulties in developing a clear and consistent policy on parks. The Olmsted report of 1903 and follow-up report in 1907 chronicle the indecision that existed in Portland. There was a clear hesitation to commit lands to parks by some interests and politicians. There was an unhesitating group of citizens, and some politicians, that were dedicated to the park effort. In between were the vast number of average voting and tax-paying citizens subject to the pendulum of influences, especially economic concerns. To some, parks posed what was seen as multiple problems including the tying up of potentially more profitable land bases, development and maintenance costs, policing and administration costs, as well as liability risks. Those who did not support parks generally saw these same challenges even with donated park land. To others, parks were absolutely necessary for the health and well-being of a community on all levels, including economic.

Portland's records show that, overall, the city needed strong encouragement from civic sources, in addition to public funding, to acquire and develop parks. A major aid to increasing park acreage in Portland came from the Water Bureau's land holdings, some of which, like Mount Tabor Park, served two roles. These jointly owned and managed properties presented challenges to funding and management. The Olmsted and Mische park reports consistently addressed complicated issues in order to help the politicians and the community sort out priorities and options for acquiring, funding and managing parks.

Though John C. Olmsted had given Portland a thorough evaluation of park priorities in his report of 1903, the city had taken little action on his recommendations. Prior to 1909, Portland's parks were limited in size (approximately 165 acres of parkland in 1900) and most were gifted properties on the west side of the Willamette River (approximately 128 acres west, 37 acres east.) Parks were not dictated by a city-led plan. The Park Commissions Report of 1901 rallied a call for action by the citizens and the city to move forward on park development that led to the visit of John Charles Olmsted in 1903. The City Beautiful movement inspired a civic organization, The Initiative One Hundred, that promoted an integrated park system. Together with Portland's Park Board there was motivation to implement Olmsted's plan for parks.

When in 1906, Mayor Harry Lane took the helm of the Portland Park Board, coupled with support from a December 8, 1906 *Oregonian* piece expounding on the benefits of carefully implementing park design in collaboration with a competent engineer, the tide truly did turn toward creating momentum for park

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development. Mayor Lane asked the Olmsted firm for their advice on securing a park superintendent. John Olmsted recommended Emanuel Mische, but Mische had just started a new job as Madison, Wisconsin's park superintendent. The Park Board hired Arthur D. Monteith instead.

Under Monteith's leadership, the Portland Park Association planned a bond issue in 1907 for \$1,000,000 to carry out the Olmsted plan of 1903. It narrowly passed in June of that year. A challenge to the validity of the bond held up the funds, but \$5,000 was allocated to retain the Olmsted firm again, with the anticipation of the eventual availability of the bond funds. Olmsted's colleague and member of the firm, James Frederick Dawson preceded Olmsted's arrival by three weeks in November 1907. It was Dawson who did much of the foot and paperwork in the complicated process of land value assessment. Olmsted's two-and-a-half weeks were spent on private enterprise with some of Portland's most elite families. For the city of Portland, Olmsted focused on defining boundary descriptions for nine parks and parkways. The Olmsted report, delivered by Dawson, was well received by the Park Board in December of 1907 and provided a roadmap to moving ahead with park acquisitions, though elevated property values limited the buying power of the available funds to approximately one-half of the proposed parklands.

By the time the first installment of the \$1,000,000 bond issue became available for use, Emanuel Mische had replaced Arthur Monteith as Portland's park superintendent. Mische brought to Portland a remarkable range of experience and skill. Born in Syracuse, New York in 1870, his training in horticulture included stints at Arnold Arboretum at Harvard as well as the Royal Botanic Gardens at Kew. He was hired by the Olmsted firm when John Charles and Frederick Law, Jr. began their official partnership in 1898, and stayed on for eight years, becoming a friend and a colleague of the Olmsted family. It was Mische who penned the tribute to John Charles Olmsted in the April 1920 journal, Parks and Recreation. He became editor of a department of this magazine the next year. Mische eventually left the Olmsted firm to become park superintendent of Madison, Wisconsin at the recommendation of John C. Olmsted. On a second Olmsted recommendation, Mische landed the Portland superintendent position in the spring of 1908. Emanuel Mische had worked for a limited salary in Madison and regretted the small salary offered by Portland. The perks of a more suitable climate, a rent-free abode in City Park (negotiated by Olmsted) and the hope for private design work encouraged Mische, acclaimed by the Olmsted's as one of the country's most esteemed horticulturists, to move with his family to Portland. The story of his interactions with Portland's Park Board, City Hall, and the voters illustrate the challenges that were presented to park development, even with a highly capable professional such as Mische. He came to Portland with prior knowledge, gained through the previous visits of John Olmsted, of the concern that the city had for expenditures related to park acquisition and development.

The purchasing and condemning process that resulted in Mount Tabor Park, as well as other east side parks and the west side Terwilliger Boulevard in 1909, stirred up plenty of heated dialog as developing neighborhoods jockeyed for parkland. While many thought that it should be a priority to develop parks, others, like Mayor Joseph Simon, elected in 1909, seemed to believe the opposite. He was against tying up private land for public parks since he felt that Portland was, by its nature, a natural park. This attitude, along with the limitation of accessible funding from the previous bond and the threat of a decreased payroll for the Park Department,

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created difficulties for the new Superintendent Mische. Nonetheless, he went ahead with his design of six parks, including Mount Tabor Park, and a boulevard, as well as attending to his regular duties of supervision.

## East and West Side Dynamics: Portland's Citizen Groups Encourage Park Development

As the west coast of the United States' population burgeoned, Portland's was no exception. Portland's west side, backed up to the west hills, hosted the old establishment of affluent families and their gifted park properties. The broad, relatively flat plain of the east side of the Willamette River, however, was the fastest growing section of the city. By 1915 sixty percent of Portland's population lived on the east side of the river. Old money land speculation deals were building subdivisions on the eastside, such as Ladd's Addition, Laurelhurst and Irvington. Between the developers' interests, the sheer numbers of residents and the citizen clubs, the east side was developing a strong voice for parks and other public services.

This civic movement manifested itself in the style of "push clubs" that were especially active east of the Willamette River. Letters, petitions, and visits to the Park Board from these groups were continuous. The year 1905, the same year of the Lewis and Clark Exposition, push club activity was escalated with petitions and sizable attendance at Park Board meetings. It was in this year that the first mayor, Harry Lane, was elected from east Portland. The mayor was the official chairman of the Park Board. In November 1905, Park Commissioner Lang tried to assure the east side push clubs that though the present park acreage was three- hundred-seventy-five, the Park Board was planning not only east side parks, but a parkway and boulevard system to connect them. He included in his list Sellwood, Rose City, North Albina, Columbia River and also Mount Tabor parks for a total of one-thousand acres. Lang added that the goal was for three-thousand acres of parks and boulevards and of that, five-sixths should be east of the Willamette River. He suggested that the pending \$1,000,000 bond was but a drop in the \$10,000,000 bucket of monies to be found for parks.

Despite these encouraging words and continued agitation, years passed without action by the city to create new parklands. Land prices and population following the 1905 Lewis and Clark Exposition rose exponentially. Just as some people were feeling an urgency to put aside national lands, there was a growing concern that the rural-like qualities of large areas of Portland were rapidly being subdivided and urbanized. Emanuel Mische built a case to the Park Board that it was absolutely essential to acquire certain tracts to be included in the park system, "...some are so essential, both as strong local characteristics, distinctively native and excellent landscape features that to exclude them would be to very seriously impair the quality and value of the system. Such an element in the proposed system is the dual knoll eminence known as Mt. Tabor," he said.

An Oregonian article ran in November 1908 headlining: "Want Park at Mt. Tabor: East siders think ground should be bought now. Committee to appear before park commission today, setting forth wishes of United Push Clubs" The committee wanted action, "...for it has seemed to many citizens that little or no progress is being made toward securing a park at Mount Tabor, or anywhere else."<sup>4</sup> The article alluded to the fact that the City was contemplating two new reservoirs in the park. The east side push clubs had had a design in hand for several years amounting to a minimum of 169 acres.

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Agitation finally yielded results as this March 1909 *Oregonian* piece illustrated, 'Parks to be Bought: Mount Tabor Property Recommended by Boards. Value is over \$300,000. System of reservoirs to be built to be used with new pipeline that will be constructed – Price agreed on is reasonable."<sup>5</sup> It is not surprising that Mount Tabor landowner and owner of the *Oregonian*, Henry Pittock, would deem the price reasonable He and his wife had been paid one of the highest amounts by the city in the scramble to acquire Mount Tabor properties. Having the Water Board responsible for about one quarter of the costs of the land may have helped spur on acquiring additional acres.

The slow acquisition of land dedicated for parks was a source of disappointment for public park supporters and Olmsted, who returned to Portland a number of times between 1903 and 1911. Pressure from citizen groups and the Park Board, coupled with public relations, was pivotal in helping to spur action and get the \$1,000,000 bond measure passed in 1907 that allowed land purchases to commence. Citizen groups were also strong advocators for development money. When finally Mount Tabor Park was beginning to officially materialize, the Mount Tabor Improvement Association passed a resolution claiming that the \$15,000 made available for development of the, "new Williams Park at Mount Tabor... was totally inadequate to do justice to the improvements contemplated on this centrally located and natural park site..."<sup>6</sup> The resolution recommended \$25,000.

Amidst the planning of the park, a controversy was emerging regarding the naming of the park. Mount Tabor was the traditional name of a large portion of the east Portland area, more than twice the size of the present Mount Tabor neighborhood. The Mount Tabor of Palestine (now Israel) is the namesake of the Mount Tabor in Portland, probably bestowed by an early settler in the 1850s. Many churches, businesses and developments referred to Mount Tabor in their names and by the early 1900s the name Mount Tabor was rooted in the city. In April of 1910, an ordinance provided that the, "public park on Mt. Tabor shall be designated as Willams Park in honor of the late George Henry Williams (1823 - 1910.)"<sup>7</sup> Williams had served in national and local politics for half a century including being a U.S. Senator from Oregon, U.S. Attorney General, and the mayor of Portland from 1902 – 1905. Influential citizen input kept the name Williams Park from ever gaining a toe-hold, and the name reverted back to Mount Tabor Park.

## Mount Tabor Park: Acquisition and Development

Prior to the large-scale acquisitions of land to create Mount Tabor Park in 1909, the surrounding community had unofficially used the land as "park" and for hunting and gathering for decades. Deer and bear were hunted according to accounts of early settlers such as the Kelly and the Prettyman families who had large land claims at the base of the butte prior to 1850. A deed dated July 21, 1888 states that Buell and Helen Lamberson dedicated a tract of land to the city as designated "park." This land may have corresponded to the Water Committee and the early reservoirs completed in 1894. John C. Olmsted used the title of Mount Tabor Park in his "Report to the Park Board" of 1903 and he pointed out that the butte was already being used for recreation. This was one of the facts he promulgated to build a case for the city to acquire the land for a park.<sup>8</sup> By the time the city moved ahead with land acquisitions for the park several years later, property prices had soared. A sizable chunk of the money garnered through the bond measure was spent on Mount Tabor Park in 1909. From 1908 through 1910,

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lots of varying sizes were purchased, with a flurry of activity throughout 1909. Property prices paid by the city ranged from \$1 paid to the Commercial Trust Company, to \$37,500 paid to land speculator Henry L. Pittock, owner of the daily newspaper, the *Oregonian*. Some people sold their deeds for \$10, stipulating that the property was only to be used as a public park. A number of cases went to court in condemnation proceedings. The average price paid per deed, if the two extremely high deals are excluded, was approximately \$6,500. Charles Paul Keyser, in his reflections on forty years in the service of Portland's parks, first as Mische's engineer and later as superintendent, said, "In 1909 most of the high ground was still in more or less neglected ownership following a real estate bust of the nineties."<sup>9</sup> By December 1909, the Park Board reported, "When the court proceedings are completed, all the top and side slopes of that high eminence rising out of the east side plain will be public property. The views in the four directions on the compass will ever more be under public control. Nothing short of skyscrapers on contiguous property will ever destroy these views."<sup>10</sup> In a personal report in 1961, Keyser said of Mische's involvement with attaining Mount Tabor Park, "In my estimation making Mt. Tabor a most outstanding feature of our park system was his greatest single achievement, even if he was disappointed in failing to acquire the property fronting on S.E. 60<sup>th</sup> Avenue between Reservoirs #6 and #2, and a more ample margin on the eastern slope."<sup>11</sup>

## Shifting Trends: Active Recreation, Funding Woes, Park Board Abolished

In 1908, Mische began his new job in Portland just in time to face two important changes in park design, the automobile and playgrounds. The automobile was integral to Mische's design of Mount Tabor Park, but it was also the automobile and its potential to do harm to children playing in the streets that helped to prompt the playground movement. Begun in New York City, playgrounds addressed tenement dwelling families with limited access to safe outdoor spaces. In addition, changes in land use and labor laws left children and adults alike with more leisure time. Portland followed the national shift from parks for beauty and passive recreation to an emphasis on active recreation. It was the women of the United States who vociferously lobbied for playgrounds; in Portland, the Play Ground Committee of the People's Institute included the wives of some of the most influential men in the city. Their report to the Park Board in 1907, regarding the new Park Blocks playground, provides valuable insight into Portland's early playground development. A female supervisor, hired by the institute, was responsible for the three months that the facility was open. There were separate girls' and boys' blocks. The average attendance was 40 children of mixed ethnic backgrounds between the ages of 7 and 9 years. Much of the remaining report recites the myriad of park rules per a city ordinance. In May of 1907, the Park Board received a letter from President Theodore Roosevelt as the honorary president of the Playground Association of America, requesting the attendance of the Playground Committee at the first annual meeting of the association in Chicago. Dues ranged from \$1 to \$1000 and members received the magazine, "The Playground." In 1911, the same year that California women gained voting rights (Oregon was the following year), a representative from the Women's Congress addressed the Parks Board regarding creating an exhibit of playground "apparatus" at an exposition to be held at the Armory. Mische was given the authority to act on this recommendation. Mische reported to Mrs. Stella W. Durham in March of 1914, that Portland had twelve playgrounds and he told her, "We spent for playgrounds in 1913, approximately \$25,000."<sup>12</sup>

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The year 1913 saw big changes in Portland's city government as the Parks Board, along with most of the other boards, was abolished. The City Charter was adopted that allowed for a council form of government. This change in July 1913, meant that Superintendent Mische reported to the elected official, Commissioner of Public Works, instead of the appointed Park Board. The Bureau of Parks was created under the authority of the commissioner. It appears that this was an awkward time of transition. In the words of Charles P. Keyser, "He (Mische, ed.) failed to click with the new regime, struggled along bravely for a couple of years longer, and in 1915 stepped down…" Mische was replaced by J.C. Convill, appointed by Commissioner Brewster. Keyser went on to say, "He (Convill, ed.) had been a notable college athlete. His extensive background in sports and savvy of publicity made him especially useful to Brewster who was rather inclined to promoting recreational activities with such appropriations as he could wrangle, until the time would be right to plug for more bond or other capital expenditure." <sup>13</sup>

By this time, the Olmstedian-City Beautiful influence on park planning had begun to shift. Mische and others outside of the political arena hoped to see some of the beautification projects, such as parkways and boulevards outlined in Edward H. Bennett's 1912 "Greater Portland Plan" plan, come to fruition. Though commissioned with money from the "city beautiful fund" established by Mayor Joseph Simon in 1909 during the frenzy of park acquisitions, the Bennett plan's arrival was ill-timed. The new Bureau of Parks pulled away from parks and boulevards for beauty and inspiration and more toward active recreation whose cost and liability could be shared by the developing school system. The national conversation regarding the social benefits of parks had turned its attention more to the value of keeping youth, especially boys, out of trouble with supervised organized sports. The trend centered on recreation centers, and generally smaller parks, featuring sports fields rather than providing inspiration and relaxation within the confines of an aesthetically pleasing, larger park. The new city commissioner echoed this new trend. Visionary superintendents, skilled in horticulture and park design, were not deemed as necessary as maintenance and recreation supervisory personnel. Complicating the parks issues even more was the reluctance of tax-paying citizens to pass the parks' bond measure asking for \$2 million that was brought to the voters and failed in 1912 and 1913.

After the first bond defeat in November of 1912, Mische recommended that a full-scale report be presented to the public as an educational tool and an encouragement to support Portland's parks. Five years of reports were published as the Annual Reports of the Park Board 1908-1912, issued in March 1913. It was an unabashed appeal for funding. The report contained many photographs of Portland's parks and graphs and mapping to illustrate Portland's park deficit in comparison to other cities such as Chicago, Kansas City, Detroit, Cincinnati, San Francisco, Spokane and others. Portland's park acreage, per person, ranked lower than all of those cities. The report emphasized how politically clean the process would be for acquiring parkland. The closing remarks were emphatically pointed along the lines of the precepts of the City Beautiful movement: "Final adinonition is given that our rate of progress has not been commensurate with our material or population growth nor has it been adequate to keep us abreast of a financially or economically wise or proper social betterment requirement. The Board would urge that the citizens take such action on the park project as to prove our readiness and our foresight in rising to our opportunities and by demonstrating our public spirit, enterprise and civic courage assist in taking enviable rank among the most favored cities of the nation."

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Mount Tabor Park was to receive a sizeable portion, \$69,800, of the anticipated bond money to get it in "first class condition." In anticipation of the election, an extensive article appeared in the Oregonian in the late summer entitled, "Mt. Tabor Park Plans Elaborate. Sylvan paths designed. Slow progress." Complaints of the inaccessibility of the park, especially during the wettest months of the year, led Mische to remark, "With a few improvements such as construction of walks, drives, proper drainage and lighting, the park can be converted into a recreation center second to none in Portland." His preliminary drawn plans, not realized, included a large swimming pool, four separate gymnasiums for men, women, boys and girls, playfields, a wading pool for the smallest children and a pergola for climbing plants and other formal landscaping touches to be located at the site of the original modest playground at the only large flat expanse of the park at the south end near the nursery and Reservoir 2. Mische pushed for acquiring all of the flat land at the base of the butte near adjoining roads and close to the residential areas as it was easily accessible to the children and parents of the community. The site also fit with the principle of separation being within the area he had wanted to make more formal and a good distance away from the more forested region of the butte. The original playground is no longer at the southeast site, but one of the three present playgrounds is due east at the southeast corner of the park and two other playgrounds have been constructed over the years. Portland's records, including mapping, are generally sketchy on details regarding playgrounds.

# The End of an Era: Mische Moves On

Mount Tabor never did get the recreation center that Mische designed. (A very similar plan, however, was drawn up when Reservoir 2 was taken off line about sixty years later and the Park Bureau had its own high hopes of finally realizing this long-term recreational goal for the park. Instead the level property was sold to a private developer.) And despite the comprehensive report, the \$2 million was not approved in the June 1913 election.

The defeat of the 1913 bond measure took much of the wind out of the sails of Portland park development and sent a message of dissatisfaction from citizens to the newly formed government. Another byproduct of this bond measure defeat was the gradual loss of Mische. His employment was soon to switch from park superintendent to landscape architect for the parks and finally out of the parks system to follow in the Olmsted's path to private practice with his own landscape architecture firm. Mische did some consulting work with the Park Bureau after the end of his official employment. His influence did live on with Charles P. Keyser, who served as Mische's assistant from 1909 and went on to become Park Superintendent from 1917 until 1949. Keyser deserves much credit for steering the Portland parks down the course set by Olmsted and Mische. Mount Tabor's essential plan of naturalistic forest landscape with the curvilinear road and pathway network was completed and remains in a large part due to these three people's vision.

Although highly dedicated to the city and his work, and extremely qualified, Emanuel T. Mische resigned as superintendent of Portland's park system after only six years. Details of his resignation remain obscure, but it is clear from the records that tensions existed between him and city officials, especially by 1913 when the city abolished the appointed Park Board and established the Park Bureau with the new commission form of government. His outspoken ideas on land acquisition and management, street trees and other civic

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improvements were similar to those of his mentors, the Olmsteds, and though the ideas were influential, they seemed to be at odds with some elected city officials. Like Frederick Law Olmsted, Sr., who established his own private enterprise after soured experiences with city politics, Mische became a consultant in 1914, and worked outside of the park bureau on not only landscape, but larger civic issues concerning conservation.

World War I and the influenza pandemic of 1918-1919 slowed progress on projects as well as record keeping. It wasn't until the early 1920s, under Charles P. Keyser's reign as park superintendent, that substantial progress on Mount Tabor's amenities seemed to take off again with the construction of tennis courts and other active recreational facilities, lighting and comfort stations. Ever continuing was the progression of the drive and path system. Under the supervision of Charles P. Keyser, the 1920s also saw the construction of four comfort stations, two situated near the main entrances, one at the crater and another at the summit, along with a caretaker's house and the erection of eighty-eight concrete single pole lampposts with white glass globes, seemingly the same as those promoted by Mische to the Park Board in 1911. Greenhouses were built in the nursery's maintenance yard. Efforts continued during the 1930s to complete the drives called for in Mische's original plan.

### Criterion C: Mount Tabor Park and the Olmsted Influence

Mount Tabor Park meets the guidelines for Criterion C as a park landscape that retains many elements of Olmsted design principles. Identified as a prime park location on John Charles Olmsted's first visit to Portland in 1903, Olmsted continued to work with the city on land acquisitions, park boundaries and as an advisor to his ex-employee and colleague, Emanuel Tillman Mische, between the years of 1906 through 1911. Mische was hired as Portland's park superintendent, on Olmsted's recommendation, in 1908 and remained in that position until 1914. He then continued a relationship with the city as an independent landscape designer. Mount Tabor Park reflects its original design, crafted by Emanuel Mische in 1911, and illustrates the design principles advanced by the Olmsted firm.

## **Olmsted Landscape Firm: Park Development in the Nation**

With the Progressive Era's emphasis on hiring outside professionals as consultants, the emerging field of landscape design captured the attention of prominent citizens and city governments who wanted to hire well-known landscape designers to help beautify their cities and make them as desirable as possible. Frederick Law Olmsted, Sr.'s participation in the design of New York City's Central Park in the mid-1800s and his, and his namesake son's, affiliation with the 1893 World's Columbian Exposition in Chicago, set his Boston landscape firm at the forefront of landscape design. The Olmsted's, and other known designers, found themselves in high demand by cities, other agencies and elite land owners all over the country entranced with the precepts of the City Beautiful movement. The Olmsted firm included his nephew and step-son, John Charles Olmsted, son, Frederick Law Olmsted, Jr., and Charles Eliot, all extremely influential individuals who touched hundreds of public parks, and public and private institutions and developments across the nation. An "Olmsted Park" became a hallmark of civil society in the United States. John Charles Olmsted was hired as a consultant to Portland and Seattle in 1903 and these cities, like so many other places, have him to thank for some of their

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most beautiful parks. Because of the influence of the Olmsted firm, and the receptivity of the nation to the ideals they espoused, the profession of landscape architecture was conceived at Harvard University (Charles Eliot's father, Charles William Eliot, was president of the university) and this profession in turn sparked the beginnings of urban planning.

The senior Olmsted was a man of the land, trained by experience and the family's appreciation of beautiful, natural places. Frederick Law Olmsted brought to his work as a landscape architect (he helped coin the term) years of experience and world travel. He, like his colleagues and mentors Andrew Jackson Downing and Calvert Vaux, blended social consciousness with land management. Born of American soil, influenced by the magnitude of the American west's landscape, Olmsted helped foster the idea that landscape could play a healing role on a personal as well as a social level. Rebelling against the tight confines of the Old World's formal landscapes that reflected a sense of opulence, his designs spoke more to the democratic society where large beautiful landscapes were available to all citizens regardless of social standing or race. These concepts became imbedded in the City Beautiful movement's message to civic individuals, policy makers and bureaucrats.

Already having been a reporter, covering Civil War issues in the South, Olmsted was able to sway public opinion. His inspirational appeal, written while serving as chairman of the state's commission for Yosemite, called for legislation to keep Yosemite in the public domain. It was entitled, "Yosemite and the Mariposa Grove: A Preliminary Report, 1865." The suppression of this document for over a century, along with the political hassles he encountered with his work on Central Park, could possibly have been the reason why he and his sons chose to work as consultants outside of the bureaucracies and why their commentaries to the bureaus and policy makers warned of the dangers of politicizing irreplaceable landscape resources.

The Olmsteds have had such a profound effect on American landscape design that the adjective "Olmstedian" has been coined to describe open spaces exhibiting their touch. Subject to interpretation, there are some generally agreed upon components of features that the Olmsted firm strove for and that are illustrated by enduring examples of the landscapes that they designed. The National Association for Olmsted Parks has provided a concise overview using what they describe as the "Seven S's " of Olmstedian design principles: scenery, suitability, style, subordination, separation, sanitation, and service. The scenery, even in small or active spaces, provides passages of scenery and indefinite boundaries. Avoidance of specimen planting and hard edges and the utilization of shadow and light help to enhance the sense of space. The suitability of the design is dependent on respecting and making use of the naturally occurring elements of the topography of the space itself. The style of the design is specific to a desired effect. A soothing pastoral effect is achieved with an open expanse of greensward dotted with small bodies of water, groves of trees or scattered individual trees. The abundant sense of the picturesque style is achieved with mass plantings of trees, shrubs, and groundcovers especially on steep slopes where the play of light can impart a sense of mystery. Subordination of every element to the desired effect of the overall design is a hallmark of the Olmsted principles. A thorough separation of differently designed or incompatible areas insures an intact sense of space. Engineering the design to insure sanitation by planning adequate drainage and other considerations into the features so that the space can be easily managed to provide the user with health of body and mind. And lastly, the designed landscape should be of service with utility that meets fundamental social and psychological needs crafted into the design.

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## John Charles Olmsted: Portland Consults

In 1894, Portland had already taken the investment plunge into an efficient public water system that brought pure mountain water down to collect in four grand open reservoirs, two on the east side, on what was to become Mount Tabor Park, and two in one of the earliest gifted park lands, City Park (now Washington Park.) The reservoirs were designed with the harmony of utility and beauty as advocated by the City Beautiful movement. In its continuing quest to get an edge over other developing west coast cities, Portland was busy planning the 1905 Lewis and Clark Exposition. In this time of zeal, park planning and the City Beautiful movement ideals got a substantial push in Portland. As the east coast park and city designers had looked to Europe for inspiration, newly developing western cities depended on the eastern cities not only for inspiration, but expertise.

The Portland Park Association engaged the Olmsted firm to help with the design of the expo grounds and other parklands for the growing city. Though preferring the name association of Frederick Law Olmsted, Jr., it was John C. Olmsted who made the trip to Portland in 1903, the same year that Frederick Law Olmsted, Sr. died. Having lived and worked in the far western regions of the U.S., John Charles was a good, albeit second, choice for Portland and Seattle, who jointly enlisted him in the spring of 1903. Reverend T.L. Eliot made the connection for him in Seattle so that his travel expenses could be shared between the cities and it would be better worth Olmsted's time to have another account.

Portland Park Commissioner Lester Leander Hawkins escorted Olmsted and his assistant from his firm, Percy Jones, to many potential and existing park sites around the region. John Olmsted presented a thorough document to the Park Board commenting on the sites and giving specific recommendations. The team visited Mount Tabor on the afternoon of April 19, 1903.<sup>14</sup> They took photographs and in his report to the Park Board, Olmsted made these remarks regarding the butte known as Mount Tabor:

"There seems to be every reason why a portion, at least, of Mount Tabor should be taken as a public park. It is the only important landscape feature for miles around, and the population in its vicinity is destined to be fairly dense. It is already a good deal resorted to by people for their Sunday and holiday outings, and it will be better known to and more visited by the citizens as time goes on. It has been sufficiently cleared to open up all the important views from one point or another of it, yet there still survive considerable groves of the original growth of fir trees, including many tall ones, as well as other trees and shrubs. There can be but little doubt that public sentiment will cordially support the city government in acquiring considerable land on this prominent and beautiful hill. John C. Olmsted, Report to the Park Board, 1903.

On his subsequent return to Portland, John Olmsted and his colleague Frederick Dawson, developed park acquisition plans and drew up boundaries for some of the parks that had been identified in the 1903 report. Olmsted continued his relationship with Mische over the years that Mische was park superintendent in Portland.

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## Emanuel Tillman Mische: Continuing the Legacy of Olmsted Design in Portland

Portland's park system benefited from John C. Olmsted's visits at the turn of the century and his "Report to the Park Board of 1903" provided valuable guidance to Portland, still relevant today. Crucial also to the integrity of Mount Tabor Park and other historic parks in the system, was the actual planning and planting of the parks by former Olmsted employee, Emanuel Tillman Mische, hired as Portland's parks superintendent in 1908. His credentials were strong, and five years after his resignation from the Portland position in 1914, the Olmsted firm attempted to entice him back. But Mische stayed on in Portland, working on private and public contracts and serving as a civic leader in city and park planning, and as a leader in the budding field of landscape architecture.

The hiring of Emanuel Mische as Portland's park superintendent was controversial, as was his leaving due to uncomfortable political developments. During his six years at the helm of Portland's parks, however, he left an enduring mark with his insightful correspondence to the City of Portland that continues to contribute valuable information and insight regarding long and short range planning of green space. Few individuals could have brought such a prestigious array of training to fill a position. His design and drafting skills obtained from the years at the Olmsted firm, coupled with his strong expertise in horticulture gained from some of the most esteemed horticultural institutions in the world made him one of the prime foundations of Portland's park system.

The Olmsted heritage continued with Charles P. Keyser who had trained under Mische and stayed on as Portland's park supervisor until 1949. Though not much has been recorded regarding Keyser's life, he credited Emanuel Mische with teaching him what he needed to know about parks and park planning. Much of the integrity exhibited in Portland's historic parks is testament to the continuity of management he gave with an eye for the distinctive style originally laid down by Olmsted and Mische.

## Mount Tabor Park: Design and Implementation

After Emanuel Mische was hired as park superintendent and most of the land that was to make up the park had been acquired, his plan and map were unveiled to the public on May 21, 1911 in the Sunday *Oregonian*. True to his tenure with the Olmsted firm, his design relied on key Olmsted design principles. The most formal, elaborate and costly part of his plan addressed the principle of service. With the two large new reservoirs being built on the west side of the park, facing downtown and the majority of Portland's population, Mische wanted to couple water storage with aesthetics by incorporating a large well-lit, waterfall and spray jet scheme utilizing the fall of water between the upper and lower reservoirs. "To contrast this feature satisfactorily will give this park a most interesting possession and the city a uniqueness not met with in any other park in the country," he said. Not naively, he added, "but its cost will be so great and the needs of the parks now are so urgent that we would specifically urge against any attempt to provide for it in the near future." This design feature was never realized, even two years later when once again, the *Oregonian* presented another spread that touted the continuing design process of the park. Mische still sounded hopeful for the cascade scheme and T.W. Tanner, park keeper, helped support the cause by adding, "It is my judgment that power enough could and should be developed by the falling water between the upper and lower reservoirs sufficient to illuminate Mount Tabor and

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its driveways and Mountain Crest. There is a fall of 85 feet, which is sufficient to develop electric illumination of the entire park, which in my judgment would produce a most magnificent effect." Seven decades later, a hydroelectric generating system was installed utilizing the fall of water between Reservoir 5 and 6. A small hydro-generating unit is housed in the inlet Gatehouse of Reservoir 6.

The highly defined nature of the concrete reservoir basins surrounded by wrought iron fences with their distinctive gatehouses, leant a formality to the west side of Mount Tabor Park. Mische attempted to address the idea of separation of the incongruous features of this design with the sylvan feel of the rest of the park. "It is contemplated to provide two approaches at the southwest corner formally as a contrast to the native treatment of the remainder of the park," he said.<sup>15</sup> In keeping with the principle of suitability, his emphasis was on making an already beautiful place, complete with native aesthetic vegetation, simply more accessible to the public. His drive and pathway system, one of the hallmarks of the park, is an excellent example of subordination of features that yield to the overall design, as well as meeting the criteria of suitability. The Oregonian quotes him as saying, "The drives are located with a view to requiring the least possible scarring of the surfaces consistent with agreeable alignment and grade, where the distant views are to be enjoyed from the best vantage points or where the local vegetation or surface configuration pointedly suggest a traverse route. In passing over the drives on the ascent to the crest the vegetation is to be developed for its local offerings, with vistas opened only at prominent points. It is both impractical and ruinous to expect to have continuous or even large and abundant sweeps of distant outlooks without unduly injuring the forest. Such views are reserved for the summit concourse...The drives encircle the park on all sides, the east and west and wind their way to the top, where is located Mountain Crest, at present occupied by the old dwelling built there many years ago," the article went on to sav.<sup>16</sup>

# Mount Tabor Park Design: Shaped by Modes of Accessibility

Two predominating features of Mount Tabor Park bear the mark of Emanuel Mische and the Olmsted influence. One is the peaceful grandeur of the forest and the other is the drive and footpath system. Though the park does have several miles of paved drives and even more in the trail system, they are laid out with a master landscaper's touch and with a sensitivity to the natural terrain. The curvilinear design is easy on the eye and inviting to traverse. Though the drives are unnatural, they fit into the scenery, providing alluring passages. In many places, especially along Woodland Drive on the steep east slope, cut basalt rock blocks, probably quarried on-site, reinforce the east side of the drive and add to the rustic beauty of the scenery. In most places there is a forest buffer between the footpaths and the auto drives, adding to the sense of separation. In the name of serviceability, the pathways allow a myriad of routes to be taken so that regular visitors can walk for twenty minutes or one hundred and twenty minutes and not traverse the same path. Mische, and later his assistant, Keyser, did an excellent job of making the park accessible to an urban population while yet maintaining the rural feel. The drives and paths pass through the landscapes of the park exhibiting pastoral or picturesque qualities in a suitable and subordinate way. The historic drives and original pathways were very well constructed and conform to the design principle of sanitation in their quality engineering. When the drive and path system was complete, Mount Tabor butte could be scaled in a private vehicle, by foot or bicycle for stupendous views of the surrounding countryside; the high, snowy peaks to the east and the north, the

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surrounding developing neighborhoods and the downtown city skyline backed by the green line of hills three miles to the west. This is one of the features of Mount Tabor Park that keeps visitors returning time and time again.

Mount Tabor Park's design paid homage to a new era of the automobile. In 1912 there were 902,000 registered autos in the United States. By 1913 Portland had approximately 6,000 automobiles in use. Automobiles were considered a source of entertainment. In 1907 the Park Blocks children's festival featured automobile rides as a featured entertainment. City planning, spurred on by the City Beautiful movement, called for creating leisure drives. Mische had a grand plan for a parkway running north from Sellwood along the high banks of the Willamette River. This river parkway was to tie into a tree-lined boulevard that would head east, through the Ladd's Addition neighborhood toward Mount Tabor Park where it would continue north to the meadows of the Columbia River Slough. This boulevard had been the vision of Olmsted when he visited Mount Tabor," John C. Olmsted remarked.<sup>17</sup> Though the grand boulevard and parkway system was never realized, much money and effort were expended on the drive system within Mount Tabor Park. Grading and paving were completed in sections over many years and were prime expenditures for the park. The geography of the butte, with a primary summit of 643 feet and three smaller rises, stretched from north and south for over a mile. From east and west it measured almost a mile. The winding lanes, each distinctively named, would encircle the butte carrying visitors to a variety of viewpoints over the three-and-a-half miles of paved drive with a five-percent grade.

Emanuel Mische designed the system of drives for a winding but pleasant auto tour. They were to be graded in such a way as to be enjoyable to drive on, macadamized and illuminated. The width would be wide enough for motorcars or wagons but narrow enough to do minor damage to hillsides and forests. The drives would pass by interesting features and views. Visitors could escape from the sights and sounds of the surrounding city but they could also admire it from a high distance. The route could carry visitors in one entrance and out another.

Mische kept at the driveway projects with any funds he could get. A good portion of the drive projects were constructed at times of economic downturns, following Olmsted's advice in his report of 1903: "...it is far more advantageous to employ common labor for park improvement during hard times either to prevent or to diminish the sufferings of the poor and to get the work done at minimum wages."<sup>18</sup> Mische, in his report to the Park Board in 1912 said, "During the winter of 1911 – 1912 the Council appropriated \$10,000 to give employment to idle men. The funds were set aside for charity purposes but good use, though by reason of the very nature of the method of employment and the class secured it was thoroughly efficient, nevertheless over 8,000 feet of 32-feet wide drive were cleared and partly graded...The drive connects the hilltop with the East Salmon Street Entrance."<sup>19</sup> Other such appropriations followed and included Works Progress Administration contracts from 1935 – 1939 when work progressed on East Tabor Drive (Woodland Drive), to Mische's design specifications, at a cost of \$5,163.

"A system of walks supplement the drives and lead to many charming features it is not desirable to approach by a drive," described Mische of his 1911 plan for Mount Tabor Park. The trail system that he envisioned remains as one of Mount Tabor's park's most cherished attributes. Throughout the park pathways traversed areas

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between the drives. Curvilinear pathways paralleled the curvilinear drives. He even provided access to some of the steepest areas with long flights of concrete stairs, some with more than a hundred steps, such as those that ascended the Mountain Crest. There was a type of path for all visitors from adventurers out for real exertion with a steep climb to those wanting a pleasant walk. The reservoirs themselves would, and still do, provide lighted walkways encircling them for easy strolling. Mische asked that the walkways surrounding the reservoirs be wide enough for pleasurable walking.

## Summit design: Subordination of Elements

At 643 feet, the summit of Mount Tabor provided a grand panorama of the Portland area and the surrounding countryside both far and near when Olmsted and Mische were working with Mount Tabor Park. On Olmsted's visit to Mount Tabor, he suggested, that at a minimum, the twenty or so acres of the summit should be taken to command the views. Debate carried on for years regarding the grand residence at the top of the butte, commonly referred to as the J.H. Smith Residence. Information on this homestead is sketchy and although there are apparently no photographs of it in city records, a sketch does exist from an early real estate brochure.<sup>20</sup> Mische's plan followed the suggestion made in Olmsted's 1903 report, calling for its removal and replacement with a combination shelter, refectory, comfort station and detached bandstand that in his words were, "...all ...to be generally low and rambling and conspicuously modest and subdued in style, materials and color. Other than this the plan intends no masonry construction, such as an overlook tower, large building or other object attractive in itself mayhap, but disturbing in its effect on the beholder as seen amid surroundings of native rural wildness."<sup>21</sup> These designs followed the Olmsted principle of subordination. The residence was apparently converted to a visitor station in 1913, "Upon the crest, the large old residence has been remodeled and fitted for public use by opening rest rooms, nursery, refectory and comfort features. . . an automatic electric control pumping plant for delivering water from the submerged hill top reservoir to the attic tank in the park house is now being installed," Mische reported to the Park Board in 1913.<sup>22</sup>

Two years later the Smith residence was still sitting at the top of the hill and the plans for its removal and replacement with other services still were being contemplated. In 1917, correspondence to the, "…caretaker living on top of the hill in the big house,"<sup>23</sup> thanking them for the opportunity to make baskets, was addressed to the city and forwarded on by Mayor H.R. Albee. Actual demolition of the Smith Residence did finally occur, though the exact date is unknown. A Tudor-style comfort station was built to the west of the summit in the 1920s. True to Mische's vision, Keyser made sure that the comfort station sits down below the summit, in a position of subordination, so that at present the summit and the views are the commanding presence.

Concerts, especially with the municipal band, were an important activity for the parks to host, though not particularly lucrative. Popular outdoor concerts were held in Mount Tabor and other parks during the summer months. In 1913 one concert per month was held during July and August. Possibly these concerts, with attendance of one-thousand or more people, were held at the Mountain Crest Summit where the first public comfort station and refectory were remodeled into the Smith residence. According to the 1915 park report, the long flight of stairs was completed giving "large numbers of visitors" access to the hilltop. By 1917, concert attendance at Mount Tabor Park had more than doubled. Concerts have continued in Mount Tabor Park near

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the area that Mische recommended in the 1913 Report of the Bureau of Parks in what he referred to as "the concert grove on the ridge adjoining Belmont Street." Present concerts are held in the month of July in the crater amphitheater in this vicinity.

# Plantings: A Balance of Native and Non-native Species

Mische was appreciative of the flora in his new Pacific Northwest home. He had also been trained at the hand of people with a deep appreciation of forest preserves. His desire was to keep the natural forest feel of the butte, even reforesting the more gradual western slope,"...where it is now open and the openness severely defined by old property lines. It is both impractical and ruinous to expect to have continuous or even large and abundant sweeps of distant outlooks without unduly injuring the forest. Such views are reserved for the summit concourse," he reported to the Park Board of his plan in 1911.

Emphasis was put on the over-story of tall Douglas-firs as well as the under-story of natural shrubs and wildflowers. Mowing was to be kept to a minimum. Primary maintenance of the landscape of the park was to keep the grandest vistas cleared of trees. In the first *Oregonian* article of 1911 announcing the big, new east side park, Mische was quoted with this description of his vision for the Mount Tabor Park: "Except at the two formal entrances, at the terrace garden and the cascades, only native material is to be used or suffered to remain. Moreover, the undergrowth is at no time to be entirely removed from throughout the park, as has been suggested by private individuals." He continued, "This tract offers an excellent opportunity of displaying the exceptional beauty of our native flora. It requires merely the elimination of some sorts, the addition of others or as a whole controlling nature to the extent of determining how her materials shall be massed and arranged."<sup>24</sup>

His attention to practicality and foresight was evident when he commented, "In addition, native vegetation is always adapted to this region, can be depended upon to be safe, enduring, easily repaired should damage occur, and above all can be maintained more cheaply than exotic or foreign vegetation." <sup>35</sup> A good deal of the continuing attraction of Mount Tabor Park, to both human and animal visitors, is due to the amount of native plants that have been retained in some sections of the park, but non-natives are a historic feature of the park. Over the years, perhaps due to the wide variety of trees and shrubs propagated at the on-site nursery, areas of the park have had non-natives integrated into the landscape. These vicinities are predominantly in sections of the park that have been disturbed for entrances, drives or other types of construction. Mische was sensitive to quickly replanting any areas on the side of drives that were disturbed during grading operations. Likewise, he preferred to move slowly in removing vegetation as the drives were being laid out. "It is better, by far, not to remove anything," he said. Many of the non-native trees and shrubs, including many kinds of pines and hawthorns, are mature and add to the historic significance of Mount Tabor Park.

## Mount Tabor Nursery: Plant Propagation for the Entire City

In the mid-1800s, orchards predominated in the Mount Tabor vicinity. Apples, pears and other fruits were shipped out by steamer and supplied the California boom towns in a lucrative market. Mount Tabor's south side had a gentle slope with a perfect aspect for plant propagation, providing adequate sunlight and drainage. The

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butte rising to the north behind the area, provided a weather buffering element. The elevation was modest, serving the purpose of frost pocket protection. These features appealed to Mische as a fine place to site the nursery that he had called for in his first park report of 1908, a nursery that would serve all the parks and other planting needs of the city.

Though Mische appreciated the native plants of his newly adopted western home, he nevertheless continued his interest in non-native species. Large orders with invoices of over \$2,000 were made to east coast nurseries. Invoices to Mische from the United States Department of Agriculture dating from spring of 1909 list plants that were being sent: two *Syringa amurensis*, five *Clematis recta* and three *Clematis species*. Other records indicate his interest in buying shrubs from local growers and wild diggers, especially rhododendrons. Interestingly, a potato crop was recorded as having been grown in 1916 at the Mount Tabor nursery. <sup>26</sup> Propagation stock was also brought from the nurseries supplying the Vanderbilt's Biltmore Estate in the Appalachian Mountains near Asheville, North Carolina.

There are references to a "fruitectium" being establishing at Mount Tabor for the cultivation of plants from seeds or cuttings for nursery stock.<sup>27</sup> In 1913, Harvard's Arnold Arboretum, Mische's, *alma mater*, sent a gift of five hundred Chinese species to him, probably attributable to Ernest Henry Wilson's two collecting trips to China, most recently in 1910. Among the species sent were rhododendrons, hollies, barberries and rhododendrons. This propagation stock went first to the greenhouse at Columbia Park and then was set out in the nursery at Mount Tabor Park. Mische wanted to use the species to begin an arboretum, an Olmsted ideal for every region in the country. Portland's Hoyt Arboretum, in Washington Park, is a result of Mische's plan and Charles Keyser's management.

The nursery at Mount Tabor Park was an important resource for the planned beautification of the city of Portland. An entry from Park Board records of December 1912 recites, "There are trees now growing in the Mount Tabor Nursery to supply a quantity sufficient to extend planting by about 30-40 miles in the fall of 1913."<sup>28</sup> City residents were petitioning for street trees. Mische had a grand plan for the street trees of Portland, an area that the city had been slow to act on, and this may have been one of the thrusts to create a large nursery at Mount Tabor Park. In his Report to the Park Board of 1911, he opened with strong words, "The condition of the street trees are deplorable."<sup>29</sup> Street trees represented at least a stab at the grand boulevards and parkways he wanted to see established from the Olmsted plan. It was a daunting task to keep up with road building plantings and Portland had not developed a clear policy on who was responsible for street trees. Power lines created problems and although the Park Board was apparently responsible for street trees, they had no jurisdiction over them. Mische gave specific recommendations to the Park Board regarding the size of the median strip and even designed a different theme of trees from around the world for the various quadrants of the city. Responses to infestations of elm beetles and gypsy moths eventually helped to clarify the importance of municipally controlled street trees. Besides street trees, the nursery at Mount Tabor Park also provided trees for other parks. The Oregonian of August 1913 stated that there were 32,000 tree seedlings set out in the nursery at Mount Tabor for supplying all of the parks. Mische continued his advocacy for Portland to become a city of stately trees. He authored an article published in the August 22, 1917, The Evening Telegram about shade trees.

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Giant sequoia conifer trees, like those that grow on the western slope of the Sierra Nevada range in California, were brought to Oregon by pioneers such as A. H. Johnson and W. S. Ladd. The Mount Tabor neighborhood has numerous large sequoia *Sequoiadendron giganteum* trees that probably date back to Mische's time. He ordered twenty "sequoia gigantea" in 20"x 20" boxes. Each sampling was reportedly five to six feet tall and cost \$6 each. They were to be shipped by rail for 51¢ per 100 pounds from the California Nursery Company in Niles, California, in 1910. <sup>30</sup> It is probable that one of these trees is the giant sequoia, a City Heritage Tree, that towers over the east side of Reservoir 6 today.

Probable references to construction of structures in the nursery area appear in reports from various years, such as advertising for a storehouse and shelter to be built in 1915. Evidently greenhouses were in progress at the nursery site in the summer of 1918 when the city council granted a one-month extension to the builder of the greenhouses. Ten years later, Superintendent Keyser introduced plans for a violet house at the "Municipal Nursery."

The nursery area is comprised of planted grounds and a maintenance yard. Buildings are of mixed time periods with suggested dates of construction ranging from pre-1918 with the greenhouse complex that has had various additions, through the years to the 1987 pole barn. Oral reports of the parks bureau personnel recount the current utilization of refurbished old stable buildings where once the horses that pulled the mowers were kept. Records corroborate that there was a stable at Mount Tabor. Records show that a greenhouse was dismantled in between 1916 and 1917. Columbia Park was the site of the first greenhouses and Mische mentions it in his 1913 report in reference to propagation of the newly acquired stock from Arnold Arboretum. Complaints regarding odors emanating from the manure and compost piles in the smaller Columbia Park may have contributed to moving propagation endeavors to the south side of Mount Tabor.

## **Reservoirs: Balancing Naturalistic with Formal Design**

Included in the boundaries of the Mount Tabor Park nomination is the Mount Tabor Park Reservoirs Historic District, which includes the two 1911 reservoirs, Reservoirs 5 and 6, and the one remaining 1894 reservoir, Reservoir 1.<sup>31</sup> Portland's reservoirs in Mount Tabor Park and those in Washington Park, also listed in the National Register, are some of the nations most intact, functioning examples of public works projects from the City Beautiful movement. The reservoirs are defining features of Mount Tabor Park. Besides the period architecture, they provide outstanding panoramas of the surrounding countryside as well as a link to the historical significance of the butte to the development of the city of Portland.

Emanuel T. Mische planned to incorporate the two new 1911 reservoirs into his design for Mount Tabor Park as a formal feature. Frederick Law Olmsted, Jr. had written an article for *American Park and Outdoor Art Association* entitled, "The Relation of Reservoirs to Parks" in 1899, while Mische was working in the Olmsted firm. Olmsted stated that, "In itself, regardless of its outline or setting, a body of water is beautiful and refreshing, and its value to the public is so well recognized that provision is very often made for giving the public access to the enclosure about a reservoir, whence its surface may be seen." <sup>32</sup> The main discussion focused on what he saw as the wasted potential between different municipal organizations in regards to

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reservoir design. In essence he felt that a reservoir in a public park should be designed with cooperation between engineers and landscape designers in order to achieve aesthetics and good value for the taxpayers' investment. In the case of distribution reservoirs, such as the ones at Mount Tabor Park, artificially created with embankments, he suggested keeping to a formal design. The two 1894 reservoirs at Mount Tabor Park followed this precept.

The 1911 reservoirs, constructed when Mische was park superintendent, were also designed to follow a formal theme. Mische attempted to coordinate planning with the Water Board and some of his recommendations were apparently heeded. He paid special attention to the dam face of the Upper Reservoir (Reservoir 5) as this area would be highly visible, illuminated with an open western exposure and a very steep slope. His design called for highlighting the stored water with, as he described it, a "rushing cascade" and "a series of pools…" taking advantage of the drop between them. Gravity pressure could supply several spray jets, adding greatly to the ornamental feature. "To be creditably executed requires considerable massiveness and architectural ornamentation in detail. The lighting must be abundant and some extension work, such as widening the dam and adding balustrades and the like are essential," Mische explained when the *Oregonian* showcased the design in the spring of 1911. To implement this scheme, Mische wanted the Water Board to lay the piping necessary for the cascades when the construction of the reservoirs was undertaken. The cascades scheme was never constructed, probably in a large part due to the lack of funding. According to park reports, as Olmsted had noted in his article, an apparent lack of cooperation did exist between the Water Board and the park superintendent regarding the design of the reservoirs and other park areas.

Mische successfully influenced the design surrounding the reservoirs, such as widening the dam at Reservoir 5 to accommodate the drive across the top that bestows one of the grandest views in the city. Today this view, as well as others on Mount Tabor, are part of the Scenic Resources Protection Plan. The greensward surrounding Reservoir 5 has touches of formality achieved with tree and shrub plantings. He suggested widening the walkway around Reservoir 6, that at present, is one of the most popular exercise and strolling walks in southeast Portland. An unsigned report to the Park Board in 1910 stated, "I have to report that several conferences were had with officials of the Water Board to the end that in constructing the reservoirs at Mt. Tabor there would be a partial carrying out of what would be park plans." As usual, money was a primary concern as, "It has not been contemplated that water funds should be devoted to park construction, but rather that such changes should be made in the purely structural work at this time as would harmonize it with park development whenever the latter is undertaken." In attempting to achieve the design principles of service and sanitation, mention is made of, "a profile and sketch grading plan for the slope between the two new reservoirs." A formal and an informal design for Reservoir 6 were suggested and, "Both propose an ornamental parapet balustrade on the street side of the west walk; Both propose an entrance of some pretension and dignity, with an entrance way rising above the parapet in order to relieve the long, bold sky-line of the parapet."<sup>33</sup> A steep concrete staircase of more than 100 steps climbs up the dam face between Reservoir 6 and Reservoir 5 on the west side of the park instead of Mische's waterfall scheme. A bit of a formal garden is retained with mature shrubs, tree plantings and a lawn area on the top of the dam adjoining the Gatehouse and parapet of Reservoir 1. Concrete steps rise up the south side of the dam face giving access to this area.

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Mount Tabor Park Multnomah County, Oregon

Mische's planning attempted to strike a balance between naturalistic features in a majority of the park with formality at the entrances and in the approximately 20 acres that harbored the reservoirs. The elaborate waterfall, fountains and walkway system that Mische envisioned up the western side of the butte were not realized nor were either of his entrance schemes, in their entirety, advanced for the west side of Reservoir 6. However, his ideas have held influence over the years, if modified. The creation of electricity generated by the drop between Reservoir 5 and 6 did come to pass seven decades later when the Portland Water Bureau developed a generating system between Reservoirs 5 and 6, which apparently met engineering guidelines but did not contribute a feature of beauty to the park as Mische desired. Although not part of the cascading scheme down the dam face, Reservoir 2 and 6 eventually did get the spray jets (fountains) that would spout high into the sky from the middle of their basins, providing a grand amenity and some water purification. Allegedly, the aeration would help to counteract the rectangular shape of the reservoirs that could contribute to water stagnation in the corners.

Mische wanted to utilize the flat land at the southwest base of the butte near the lower 1894 reservoir, for a major recreation center and for, "picnicking and other pastimes amid sylvan and retired surroundings." Picnicking is integrated into Mount Tabor Park but the formal flat area did not get constructed. His Picnic Grove now Picnic Hill, is one of the great areas he designed and is still maintained as a small picnic area with beautiful interior views of Reservoir 5, and glimpses of exterior views.

### **Archeological Summary**

Though there has been involvement of the Federal Energy Regulatory Commission at the Mount Tabor site since the mid-1980s due to the hydro-electric generating plant, there is no official state record of cultural resource surveys conducted at Mount Tabor. Further research has revealed a site yielding artifacts dating from the Late Archaic period, 2,000 years ago to historic contact in the late 1700s, on the flanks of the butte, outside of the present park boundaries. These findings included: a moccasin last, arrowheads and the "Mt. Tabor Bowl." <sup>34</sup> The bowl got its name from its bowl-like form. It was 21 centimeters long and 14 centimeters wide with distinct depressions on the upper and lower surfaces. The outer edge showed evidence of decoration. Speculation was that it had been used as a grinding bowl or metate.<sup>35</sup> Other unconfirmed reports suggest that there are obsidian flakes within the park boundaries. <sup>36</sup>

### Conclusion

Mount Tabor Park is an exemplary representation of a city park developed within the context of the Progressive era and the City Beautiful movement and enhanced with New Deal amenities. The Mount Tabor experience, as called for by Olmsted and Mische, includes the majesty and beauty of mature forest and plantings that yield a sense of stability and mystery. These natural features prevail over subordinated modifications and amenities. The varied terrain and the views yielded, the crater area, and the subtle integration of the buildings and other structures all contribute to make Mount Tabor Park one of the historic treasures of Portland, Oregon.

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#### NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET Section 8 Page 27

<u>Mount Tabor Park</u> <u>Multnomah County, Oregon</u>

Mount Tabor Park is an excellent example of a city park that combines the principal elements that developed during the various movements that shaped American parklands. The recreation movement is represented with tennis courts, jogging and bicycling paths, and horseshoe pits. The playground movement is identified by the three open-air playgrounds. The three remaining reservoirs, with their dignified features and beautiful deep, open water views, provide an outstanding historic resource, a living record of the City Beautiful movement at its finest with their marriage of beauty, utility and the democratic principle of the first municipal service, drinking water. Another element of service, the Mount Tabor Nursery, is important not only to the historic integrity of Mount Tabor Park, but to the entire Portland parks system and, in fact, all city properties, as the continual provider of trees and other plants since it was established early in the park's history.

As defined by the National Association for Olmsted Parks, Mount Tabor Park's design embodies the "Seven S's" of Olmsted design principles: scenery, suitability, style, subordination, separation, sanitation, and service. The park's picturesque scenery provides a sense of passages and indefinite boundaries. The sheer size, nearly 200 acres, as well as the natural softly rugged terrain leave the visitor with a sense of wonder. The temperate rainforest climate nurtures remarkable plant growth, and the towering trees and lush greenery of the understory and grass make at once a soothing and exciting impression. The steep wilder areas are still endowed with seasonal wildflower shows, a rare thing in the midst of the city. The suitable design respected these natural elements and encouraged a "hands-off" policy in much of the park, acknowledging the serviceability of native vegetation for long-term maintenance. Mische's designs, like the Olmsted's, speak to long-term service, and his main aim in Mount Tabor Park was to achieve accessibility. He did so with the path and drive system, so well crafted that they have demanded little maintenance over the years and achieve the goal of not only service but sanitation, as their drainage is well engineered. Mische's thorough respect for the process of constructing without mass destruction set the tone that was followed by Keyser in the years it took to complete the drive and path system. The drives and paths subordinate themselves to the landscape in their position and their grade. Subordination has been used in most of the amenity design, especially of the built features, with the exception of the reservoirs. Their design is one of more formality, and the land around them follows a loosely pastoral theme with the reservoirs and their grassy setting acting as the bodies of water and the greensward. The three reservoirs embody the blending of beauty and utility, and the deep, sparkling water and the romantic period architecture add drama and charm to the park experience. Active recreation is represented at Mount Tabor Park, and although playgrounds, horseshoe pits, tennis courts, basketball and volleyball courts, even a small ball diamond, exist, they do not dominate. These amenities are tucked in here and there, so although the park has experienced, as most open space has, construction of modern features, the landscape allows separation and subordination.

In 1911, Emanuel Mische, Park Superintendent, summed up Mount Tabor Park well when he said to the Park Board, "One of the most pleasing accents of the general landscape of the city is this property, rising with majestic eminence from the broad East Side plain."

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### Notes

<sup>1</sup>City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>2</sup>Ibid.

<sup>3</sup>City of Portland, Annual Report of the Park Board, 1903.

<sup>4</sup><u>The Oregonian</u> November 5, 1908, p. 14.

<sup>5</sup><u>The Oregonian</u> March 30, 1909, p. 16.

<sup>6</sup>City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>7</sup>Ibid.

<sup>8</sup>City of Portland, Annual Report of the Park Board, 1903.

<sup>9</sup>Keyser, Charles Paul. Correspondence to Emily Moltzner, Oregon Geological Society, August, 31, 1961.

<sup>10</sup>City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>11</sup>Keyser, Charles Paul. Correspondence to Emily Moltzner, Oregon Geological Society, August, 31, 1961.

<sup>12</sup> City of Portland, Stanley Parr Archives and Record Center. Council Documents

<sup>13</sup> Keyser, Charles Paul. Correspondence to Emily Moltzner, Oregon Geological Society, August, 31, 1961.

<sup>14</sup> Guzowski, Kenneth James, "Portland's Olmsted Vision (1897-1915): A Study of the Public Landscapes Designed by Emanuel T. Mische in Portland, Oregon." Thesis, University of Oregon, June, 1990.

<sup>15</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>16</sup> <u>The Oregonian</u> May 21, 1911, p. 10.

<sup>17</sup> City of Portland, Annual Report of the Park Board, 1903.

<sup>18</sup> Ibid.

<sup>19</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

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<sup>20</sup> J.H. Smith Residence, Summit of Mt. Tabor. The Hart Land Co., Brochure of Mount Tabor Views. (ca. 1890's, ed.)

<sup>21</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>22</sup> City of Portland, Annual Report of the Bureau of Parks, 1913.

<sup>23</sup> City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>24</sup> <u>The Oregonian</u> May 21, 1911, p. 10.

<sup>25</sup> Ibid.

<sup>26</sup> City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>27</sup> Ibid.

<sup>28</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>29</sup> City of Portland, Annual Reports of the Park Board, 1908 – 1912. March, 1913.

<sup>30</sup> City of Portland, Stanley Parr Archives and Record Center. *Council Documents*.

<sup>31</sup> Anderson Geller, Cascade, "Mount Tabor Reservoirs Historic District, National Register of Historic Places." 2003.

<sup>32</sup> Olmsted, Frederick Law, Jr., "The Relation of Reservoirs to Parks." American Park and Outdoor Art Association, Paper 32. Boston: Rockwell and Churchill Press, 1899.

<sup>33</sup> City of Portland, Stanley Parr Archives and Record Center. Report for Board Meeting, Park Department, January 7, 1910.

<sup>34</sup> City of Portland. "East Buttes, Terraces and Wetlands Conservation Plan," Ordinance number 166572, 1993.

<sup>35</sup> Beals, Herb (ed.), "Screenings," The Oregon Archaeological Society. Vol. 22 No. 7; July, 1973.

<sup>36</sup> City of Portland. "East Buttes, Terraces and Wetlands Conservation Plan," Ordinance number 166572, 1993.

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Mount Tabor Park Multnomah County, Oregon

#### **UTM REFERENCES**

5 <u>10</u> <u>531495</u> <u>5040207</u> Zone Easting Northing

#### **VERBAL BOUNDARY DESCRIPTION**

The nominated property is bounded beginning at S.E. 60<sup>th</sup> Ave. on the west at S.E. Lincoln St. north to S.E. Harrison St. east to the approximate location of S.E. 64<sup>th</sup> Ave. north to S.E. Stephens St. west to S.E. 60<sup>th</sup> Ave. north to approximately S.E. Madison St. east to approximately S.E. 62<sup>th</sup> Ave. north to S.E. Yamhill St. east along the south boundary of S.E. Yamhill St. to approximately S.E. 65<sup>th</sup> Ave. south to S.E. Taylor St. east along the south boundary of S.E. Taylor St. to S.E. 71<sup>st</sup> Ave. south roughly along S.E. 71<sup>st</sup> Ave. to Mountain View Dr. south following the east property boundaries of the west side private residences to approximately S.E. 65<sup>th</sup> Ave south to S.E. Oburt of S.E. Division St west to approximately S.E. 64<sup>th</sup> Ave. north along roughly S.E. 64<sup>th</sup> Ave. to S.E. Lincoln St. west along the north boundary of the street to S.E. 60<sup>th</sup> Ave.

The boundary has some irregularities as shown by the heavy black line on the accompanying map entitled, Mount Tabor Park Boundary Map.

# **BOUNDARY JUSTIFICATION**

The boundary represents the present boundary of Mount Tabor Park. It is roughly the same boundary as the original park plan of 1911\*presented to the Portland Park Board and corresponds to the original park properties purchased between the years of 1888 and 1922, with the exception of the southwest corner of the property bounded roughly by S.E. 64<sup>th</sup> Ave. at S.E. Division St. north to roughly S.E. Caruthers west to S.E. 60<sup>th</sup> Ave. south to S.E. Division St. east to roughly S.E. 64<sup>th</sup> Ave. that was occupied by Reservoir 2 and was sold to a private individual in the 1990's.

\*(Excluding the proposed eastern boundary section. See the Original Plan by Mische 1911)











Figure 8 - Illustrative Master Plan

MOUNT TABOR PARK CITY OF PORTLAND MULTNOMAH COUNTY OREGON MAP OF MASTER PLAN 2000

Exhibit J, Page 67 MASTER PLAN





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Exhibit J, Page 71

http://sanborn.umi.com/sanborn/image/fetchimage?state=or&realid\_7560149 HRsaNdoptwhapit960.10

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#### Section

#### Photo List for Mount Tabor Park

The following information applies to all photographs:

Resource: Mount Tabor Park Location: Multnomah County, Oregon Photo date: November, 2003 Negative location: 1934 SE 56<sup>th</sup> Portland, Oregon 97215

View: Mount Tabor Butte looking east from Washington Park Photographer: Cascade Anderson Geller Photo Number: 1

View: Mount Tabor Butte looking east from S.E. Hawthorne Blvd. Photographer: Cascade Anderson Geller Photo Number: 2

View: S.E. Salmon Street Entrance looking east

Photographer: Jeff Lee Photo Number: 3

View: Caretakers House looking southeast north and west elevations Photographer: Kimberly Lakin Photo Number: 4

View: Sweet Briar Vale path at S.E. Salmon St. looking east Photographer: Jeff Lee Photo Number: 5

View: S.E. Salmon St. drive with Sweet Briar Vale crossing looking northwest Photographer: Jeff Lee Photo Number: 6

View: Reservoir Loop Drive switchback north of Reservoir 5 looking north Photographer: Jeff Lee Photo Number: 7

View: Upper path around Reservoir 5 looking west Photographer: Jeff Lee Photo Number: 8

View: Looking southwest from Reservoir 5 viewpoint at Reservoir 6, hawthorn grove & sequoia tree Photographer: Jeff Lee Photo Number: 9 View: Top of Sweet Briar Vale path & steps to Picnic Hill Photographer: Jeff Lee Photo Number: 10 View: Picnic Grove Summit looking southwest toward Reservoir 5 Photographer: Jeff Lee Photo Number: 11

View: Volcanic crater core & throat from amphitheater looking west Photographer: Jeff Lee Photo Number: 12

View: Crater Amphitheater & Stage looking north Photographer: Jeff Lee Photo Number: 13

View: Crater Amphitheater Stage rear entrance looking east (Maintenance Building & Office in background) Photographer: Jeff Lee Photo Number: 14

View: Crater Comfort Station looking north at south elevation Photographer: Kimberly Lakin Photo Number: 15

View: N.E. 69<sup>th</sup> Ave. Entrance stairs looking southwest Photographer: Cascade Anderson Geller Photo Number: 16

View: N.E. Entrance Comfort Station looking southwest east & north elevations Photographer: Cascade Anderson Geller Photo Number: 17

View: Summit Comfort Station looking west east elevation Photographer: Kimberly Lakin Photo Number: 18

View: Mountain Crest Summit north end big leaf maple grove looking northeast Photographer: Cascade Anderson Geller Photo Number: 19

View: Mountain Crest Summit south end east stairs to Harvey W. Scott statue Photographer: Cascade Anderson Geller Photo Number: 20

View: Harvey W. Scott statue looking west Photographer: Cascade Anderson Geller Photo Number: 21

View: East Tabor Drive viewpoint Mt. Hood, Boring Lava Buttes, east Portland looking east Photographer: Cascade Anderson Geller Photo Number: 22

# Mount Tabor Park Multnomah County, Oregon

View: East Tabor Drive basalt rock retaining wall looking northwest Photographer: Cascade Anderson Geller Photo Number: 23

View: S.E. Harrison St. Entrance Drive looking west Photographer: Cascade Anderson Geller Photo Number: 24

View: From north path above Reservoir 1 looking south Photographer: Jeff Lee Photo Number: 25

View: S.E. Harrison Drive switchback at Water Bureau Entrance looking southeast Photographer: Jeff Lee Photo Number: 26

View: Water Bureau Service Drive approach to Reservoir 6 southeast side looking northwest Photographer: Jeff Lee Photo Number: 27

View: Tennis Courts northeast side Reservoir 6 looking south Photographer: Jeff Lee Photo Number: 28

View: S.E. Lincoln St. Entrance at Nursery looking northeast Photographer: Jeff lee Photo Number: 29

View: Mount Tabor Yard from Nursery looking south Photographer: Cascade Anderson Geller Photo Number: 30

View: Mount Tabor Yard looking northeast Photographer: Kimberly Lakin Photo Number: 31

View: Office (Horticultural Services Building) looking northeast south & west elevations Photographer: Kimberly Lakin Photo Number: 32

View: Administrative Building & Additions looking east west elevation Photographer: Kimberly Lakin Photo Number: 33

View: Mechanical Offices (Community Gardens) looking northeast south and west elevations Photographer: Kimberly Lakin Photo Number: 34

View: Nursery finger looking northeast Photographer: Cascade Anderson Geller Photo Number: 35





LU 23-088549 HR DM, Exhibit A.10










































LU 23-088549 HR DM, Exhibit A.10





























1.4

## LU 23-088549 HR DM, Exhibit A.10

















LU 23-088549 HR DM, Exhibit A.10














































#### 549 HR DM, Exhibit A.10





























MOUNT TABOR PARK MULTNOMAH COUNTY OREGON LU 23-088549<sup>STADILEY</sup> ABRARCHIVES/RECORD CENTER CRATER AMPHITHEATER AUGUST 16 1953





December 28, 2022

Carmen Rubio, Commissioner City of Portland Portland Bureau of Parks and Recreation

# RE: EMERGENCY DECLARATION FOR LIGHT POLE REPLACEMENT AND RELATED WORK AT MULTIPLE PARK PROPERTIES

After an accident related to the light pole in which a park visitor tied a hammock to a light pole, PP&R initiated a structural engineering evaluation of the light poles in the subject park and on November 21, 2022 received a final report from KPFF Engineering - a third-party structural engineer- which concluded that:

"...due to the inadequacy of the pole connection to the foundation to withstand code based lateral loads, we believe these poles represent a life safety hazard and should be removed as soon as possible."

2022-11-18 Irving Park Light Pole Failure 10022200554 100 Structural Assessment (1).pdf

Furthermore, park lighting performs a vital safety function in parks and removal without replacement could create, at a minimum, the perception of new safety hazards.

McKinstry Essention, LLC, recently performed similar work at several parks and many of the impacted parks were already within scope of a planned amendment of that Energy Savings Performance Contract. Additionally, the project management, sub-contracting to certified firms, and Guaranteed Maximum Price approach of the contracting method on this complex, multi-site work is necessary due to PP&R's limited capacity.

The estimated total cost of work including previously expected scope is \$23 million. This would cover less than 15% of all PP&R properties requiring lighting replacements in the next 5 – 10 years, with the remainder being less urgent and subject to full-and-open competition upon funding. The original contract to

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



Sustaining a healthy park and recreation system to make Portland a great place to live, work, and play. LU 23-088549 HR DM, Exhibit A.10 McKinstry Essention, LLC was awarded after competition amongst qualified service providers.

This event meets the emergency criteria identified in PCC533.130 and ORS Chapter 297A-Public Contracting – General provisions as follows:

- A. The immediate work need could not have been foreseen prior to receipt of the third-party engineering evaluation for the light poles on November 21, 2022.
- B. If the subject light poles are left unaddressed, there is a life safety risk posed by these poles for the community and the staff and it is an unacceptable risk.
- C. Immediate action is required, as removal and replacement of these light poles exceeds the capacity of in-house staff.
- D. The work is within the contract scope of a previous competitively bid solicitation, and it is reasonable to award this work under that contract by amendment, given the immediate danger to the public.

Lauren Digitally signed by Lauren McGuire McGuire 10:39:34 -08'00'

From: Lauren McGuire, Assets and Development Division Manager

Approved: Biko Taylor, Chief Procurement Officer

Approved: Carmen Rubio, Commissioner

Approved: Adena Long, Director

## **USEFUL LIFE EXAMPLES**

Capital Asset Administrative Procedures FIN 6.11.03

The useful life indicated below is a general listing and not an exhaustive list of the capital assets used by the City. Alternative periods are acceptable if it properly corresponds with the length of period the asset is expected to be usable for the purposes it was acquired.

The Accounting Division can provide additional guidance to City bureaus upon request.

	Useful Life
Land	Not depreciable
Land Improvements	20-Year Life
Buildings & Building Improvements	50-Year Life
Equipment	5-Year Life
Infrastructure	50-Year Life
	Permanent/Indefinite land use elements - Not Depreciable
Land Rights	Depreciable Land Use Rights - Depreciated over the length of use period
Capital Lease, Equipment & Building	5-Year Life
Software Implementation Costs	5-Year Life

### CAPITAL ASSET CLASSIFICATIONS

A more detailed asset listing can be found below:

First Digit	Asset Class
1	Land
2	Land Improvements
3	Buildings & Building Improvements
4	Equipment
5	Infrastructure
6	Land Rights
7	Capital Lease, Equipment & Building
8	Software Implementation Costs

Second Digit	Useful Life
А	03
В	05
С	07
D	08
E	10
F	15
G	20
Н	25
Ι	30
J	33
К	40
L	50
Μ	67
Ν	75
0	77
Р	100
Z	0

Description	Useful Life (years)	Asset Coding
Aeration Tank Modification	50	5L01
Aerator	15	4F01
Aerial Truck	15	4F02
Air Compressor	10	4E01
Air Cooling Systems	25	5H01
Air Rights	0	6Z06
Ambulance	8	4D01
Amplifier	10	4E02
Analytical Balance	15	4F03
Analyzer	15	4F04
Antenna	10	4E03
Anvil	15	4F05
Appliance	10	4E49
ARC Welder	15	4F06
Asbestos Removal	33	3J01
Asphalt Heater	20	4G01
Auditorium Construction	33	3J02
Auditorium Improvements	33	3J03
Backflow Prevention Valves	50	5L02
Backhoe	8	4D02
Base Station	15	4F07
Battery Charger	15	4F08
Bending Machine	15	4F09
Binding Machine	15	4F10
Bleacher	20	4G02
Blower	10	4E04
Boathouse	20	3G04
Boring Machine	15	4F11
Bridge (Park)	25	2H01
Building	50	3L01
Building Alteration	50	3L02
Bursting Machine	15	4F12
Bus	10	4E05
Calibrator	10	4E06
Camera	15	4F13
Capital Lease, Building	5	7B01
Capital Lease, Equipment	5	7B02
Card Access Control	15	4F14
Cardio scope	10	4E07

Description	Useful Life (years)	Asset Coding
Cart	15	4F47
Centrifuge	10	4E08
Chemical Truck	15	4F15
Chipper	10	4E09
Chlorination/Ammonia Treatment	50	5L03
Chromatograph	20	4G03
Clamshell Bucket	20	4G04
Club House	33	3J04
Colorimeter	15	4F16
Communication System	10	4E10
Communication Tower	20	5G01
Community Center	33	3J05
Community Policing Facility	50	3L03
Computer Hardware	5	4B01
Concrete	50	2L01
Construction Equipment	15	4F17
Copy Machine	5	4B02
Copy Rights	5	8B01
Crane	15	4F18
Crusher	15	4F19
Dams & Improvements	50	5L04
Data Collector	10	4E11
Data Logger	10	4E12
Defibrillator	10	4E13
Detective Device (Vehicle)	10	4E14
Developing Machining	15	4F20
Disinfection Equipment	20	5G02
Distillation Apparatus	15	4F21
Distribution Mains, Cast Iron,	67	5M01
Drafting Machining	15	4F22
Drainage	50	2L02
Drinking Fountains	75	5N01
Dump Truck	15	4F23
Easement	0	6Z01
Elevator	20	3G01
		4G05
Engraver	15	4F24
Excavator	10	4E15
Exercise Equipment	5	4B10

Description	Useful Life (years)	Asset Coding
Fencing	20	2G01
Fire Boat	20	4G06
Fire Engine (Pumper)	20	4G07
Fire Station	50	3L04
Fire Truck (Ladder)	20	4G08
Flooring	25	3H01
Folding Machine	15	4F25
Fountain	20	2G02
Full-Size Pickup	10	4E16
Furnace	20	4G09
Furnishings	15	4F26
Garage	33	3J06
Generating	50	5L05
Generating Foundation	100	5P01
Generator	10	4E48
Golf Course Development	50	2L03
Grader	10	4E17
Groundwater Collection Mains	67	5M02
Hoist	20	4G10
Hostage Phone	10	4E18
Humidgraph	10	4E19
HVAC	20	3G02
Hydrants	77	5O01
Improvements	33	5J01
Indoor Tennis Facility	25	3H02
Interphone System	10	4E20
Irrigation System	10	4E21
	20	2G03
Land	0	1Z01
Land Scaping	20	2G04
Lathe	15	4F27
Lift System	15	4F46
Lighting	33	2J01
Listening System	10	4E22
Loader	15	4F28
Mains	67	5M03
Maintenance Building	33	3J07
Meters	30	5101
Microfilmer	15	4F29

Description	Useful Life (years)	Asset Coding
Microscope	20	4G11
Milling Machine	15	4F30
Mineral Rights	0	6Z03
Mini-Pickup	8	4D03
Mobile Data Computer/Terminal	5	4B03
Mobile Radio	10	4E23
Motor Home	15	4F31
Motorcycle	3	4A01
Mower	10	4E24
Mug Shot Computer	10	4E25
Multiplexor	10	4E26
Mural	20	4G12
Network Interconnect	5	4B04
Orchestra Pit, Lighting	10	3E01
Oscilloscope	15	4F32
Other, 100-Year Life	100	4P99
Other, 10-Year Life	10	4E99
Other, 15-Year Life	15	4F99
Other, 20-Year Life	20	4G99
Other, 25-Year Life	25	4H99
Other, 30-Year Life	30	4199
Other, 33-Year Life	33	4J99
Other, 3-Year Life	3	4A99
Other, 40-Year Life	40	4K99
Other, 50-Year Life	50	4L99
Other, 5-Year Life	5	4B99
Other, 67-Year Life	67	4M99
Other, 75-Year Life	75	4N99
Other, 77-Year Life	77	4099
Other, 7-Year Life	7	4C99
Other, 8-Year Life	8	4D99
Painting	20	4G13
Parking Lot	20	2G07
Patents	5	8B04
Patrol Boat	15	4F33
Paving	20	2G05
Photograph	20	4G14
Photographic Lens	15	4F34
Piano	20	4G15

Description	Useful Life (years)	Asset Coding
Picnic Facilities	25	2H02
Plant/Pump Station Machinery	20	5G06
Play Ground	33	2J02
Plow	20	4G16
Police Precinct	50	3L05
Pool	25	2H03
Power Shovel	15	4F35
Power Unit	10	4E27
Powerhouse Structure	100	5P02
Printing Press	15	4F36
Pruning System	10	4E28
Public Safety Vehicles	7	4C01
Pump	10	4E29
	40	5K01
Pump House-Gas	50	3L06
Pump House-Water	50	3L07
Pump Improvements	15	5F01
Pump Monitoring Equipment	10	5E01
Pump Station	50	5L06
Pump Tanks	33	5J02
Pumping	50	5L07
Pumping Station	50	3L08
Quality Sampling Stations	20	5G03
Raceway	33	2J03
Radar Unit	10	4E30
Radio System	10	4E31
Rare/Historic Treasures	50	4L01
Receiver	10	4E32
Refrigeration Equipment	15	4F37
Refuse Check Station	25	3H03
Rescue Tool	15	4F38
Reservoirs & Improvements	50	5L08
Respirator	15	4F39
Restrooms (Park)	25	3H04
Retaining Wall	20	2G06
Right-of-Way	0	6Z02
Roofing	50	3L09
Root Remover	10	4E33
Rototiller	10	4E34

Description	Useful Life (years)	Asset Coding
Router	15	4F40
ROW/Easement	0	1Z02
Safe	20	4G17
Sand Blasting Machine	10	4E35
Scooter	5	4B05
Sculpture	20	4G18
Security Alarm	20	3G03
Security System	20	5G04
Sedan	8	4D04
Server	5	4B06
Services	40	5K02
Sewer Hookup	50	5L09
Sewer Lines	100	5P03
Sewer System	20	4G19
	100	5P04
Shaking Machine	10	4E36
Shoring	10	4E37
Silver Recovery System	15	4F41
Sludge Disposal	50	5L10
Snow Plow	20	4G20
Software	5	4B07
Software Implementation Costs	5	8B03
Solid Separator	10	4E38
Sports Utility Vehicle (SUV)	8	4D07
Squad Car	3	4A02
Station Wagon	8	4D05
Steel Container	10	4E39
Sterilizer	10	4E40
Structures	50	5L11
Supply Mains, Cast Iron, >16"	67	5M04
Supply Mains, Steel, >16" Diam	67	5M05
Swim Pool Accessories	10	4E41
System Metering Equipment	10	5E02
Tamper	10	4E42
Tank	50	5L12
Tank Improvements	50	5L13
Tape Drive	10	4E43
Telemetry	20	5G05

Description	Useful Life (years)	Asset Coding
Thermal Imaging Camera	5	4B08
Timber Rights	0	6Z05
Tow Truck	15	4F42
Tractor	15	4F43
Trademarks	5	8B02
Trailer	15	4F44
Training Station	50	3L10
Transmitter	10	4E44
Transmitter Building	33	3J08
Treatment Plant	50	5L14
Treatment Plant Modification	50	5L15
Truck, Miscellaneous	15	4F48
Turbine	50	5L16
UPS	5	4B09
Utility Building	33	3J09
Utility Truck	10	4E45
Valves	50	5L17
Van	8	4D06
Vibrator	10	4E46
Water Rights	0	6Z04
Water Vacuum	10	4E47
Winch	15	4F45

## History

Adopted by the Chief Administrative Officer, October 10, 2017



Light Pole Safety Project Frequently Asked Questions Project website: <u>www.portland.gov/lightproject</u> Updated February 21, 2023

- 1. Why are some of the light poles in Portland parks being removed?
  - Portland Parks & Recreation (PP&R) recently evaluated a specific type of light pole in the park system. The process identified a flaw with the anchoring system of 243 poles located in 12 Portland parks. This flawed anchoring system may pose life and safety hazards to the public. PP&R will remove these 243 poles to help ensure the community's safety.
- 2. What is the difference between the light poles being removed and similar looking light poles that are not being removed?
  - The light poles being removed have an anchoring connection which was determined to potentially pose a life and safety hazard. There are light poles that look similar but are not being removed because they have a different type of anchoring connection and are buried in the ground.
- 3. Which parks will have some light poles removed?
  - Colonel Summers Park
  - Irving Park
  - Ladds Circle Park
  - Lair Hill Park
  - Montavilla Park
  - Mt. Scott Park
  - Mt. Tabor Park

- Rose City Golf Course
- Sellwood Park
- Sellwood Riverfront Park
- Woodstock Park
- Wallace Park
- 4. When will light poles be replaced?
  - Currently, PP&R has secured funding to replace all light poles at Irving Park and Mt. Scott Park. At these two parks, the

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PORTLANDPARKS.ORG Commissioner Dan Ryan Director Adena Long



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effort to secure and install light poles is expected to take up to 16 months.

- For the other 10 affected parks, the length of time before light poles are replaced is dependent on securing additional project funding.
- 5. How is this light pole removal and replacement project being funded?
  - PP&R redirected \$5 million in major maintenance funding to remove all light poles that have an anchoring system that may pose life and safety hazards and to start the replacement process. This full replacement of 243 light poles at 12 parks is currently estimated to cost \$15 million.
- 6. Why isn't there enough funding to replace all light poles at this time?
  - Unfortunately, PP&R has a capital repair backlog approaching \$600 million, which the bureau is attempting to address through its <u>Sustainable Future Initiative</u>. The Sustainable Future Initiative is an effort to align equitable service with funding levels for the long term. The light poles being removed represent a fraction of the maintenance backlog.
- 7. What will PP&R do to help mitigate the effects of the light pole removals at 12 City Parks?
  - To help ensure park rules are being met at night, PP&R will prioritize visits by Park Rangers in the affected parks. PP&R is also exploring opportunities to maximize the use of remaining lights to keep affected parks as bright as possible. In addition, Portland Commissioner of Culture & Livability, Dan Ryan has directed PP&R to close affected parks at 10:00 pm.
- 8. Can I attach anything to light poles in City parks?
  - No, do not attach anything to poles. City Code 10.12.100.
# **Denver Parks & Recreation**

# **Trail Lighting Study**



June 2023

**Prepared for:** 



Prepared by:



LIGHTING DESIGN AND ENGINEERING

LU 23-088549 HR DM, Exhibit A.10

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LIGHTING DESIGN AND ENGINEERING

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# **Section 1**

# **Executive Summary**

LU 23-088549 HR DM, Exhibit A.10

## **1 EXECUTIVE SUMMARY**

Denver Parks & Recreation (DPR) requested a study of their current trail lighting system in order to identify their challenges and opportunities, explore the latest lighting and electrical technology available to Denver, and identify how to apply the most current lighting industry standards to DPR trails. This study explored the existing trail lighting, current best practices in outdoor lighting, luminaire products available to DPR, and how ongoing changes in operations and maintenance costs throughout Colorado would impact trail lighting decisions.

As part of this study process, we visited DPR trails in several areas to gather information on their current lighting conditions to compare against their likely usage patterns. Key concerns at this stage were:

- **Safety**: To provide adequate lighting in the locations where it is needed and to improve visibility for greater safety on mixed-use trails for both pedestrians and cyclists.
- Responsible Lighting: To ensure all trail lighting selected is appropriate for the area and considerate of the surrounding properties.
- **Equity**: To improve trail lighting in a more equitable way the prioritizes areas with greater needs using a data-driven approach.
- Cost: To identify the most cost-effective strategies for improvements needed in the DPR trail lighting system.
- **Maintenance**: To identify which lighting strategies and products would be most appropriate for DPR to develop a more durable and resilient lighting and electrical system.



Figure 1-1 – The image on the left shows how the existing lighting along Cherry Creek Trail has no optical control, spilling light in all directions and creating light trespass into natural areas while poorly lighting the trail. The image on the right shows a local example of the type of trail lighting improvement being proposed in this study. The light provided is focused along the path's surface with minimal spill light beyond the trail. This improves visibility for users while minimizing energy consumption and the environmental impacts of outdoor lighting at night.

#### **Trail Lighting Trends**

The trends for trail lighting in other cities comparable to Denver were also explored. Portland, OR, and Montrose, CO were both interviewed to understand the trends they were experiencing and their current strategies in trail lighting. Both cities are experiencing maintenance staffing and funding challenges similar to Denver and are finding that even aging lighting infrastructure that is still functional is becoming difficult and expensive to maintain as components become obsolete. Both



cities were also structuring their trail improvements around addressing community equity issues such as transportation access, light trespass, and darker skies. Of note for DPR is that the City of Montrose, CO has successfully implemented solar-powered lighting for their trails. Portland's Parks & Recreation Department has experienced improved maintenance planning and response times by using a wireless lighting control system for their lights, which they are able to implement due to owning their own lighting.

#### Trail Lighting Design Process and Standards

The typical lighting design process for choosing where a trail should be lit and to what lighting levels is detailed in Sections 3 and 4 to provide a strong understanding of the industry and its processes to the non-lighting professional. The process of warranting is used to examine the conditions of a site and determine whether or not lighting is required and which lighting strategy is necessary or suitable if it is. Conditions used as warrants include:

- Pedestrian activity levels
- Trail types
- Lighting zones
- Land uses/zoning
- Proximity to natural areas
- Whether support is needed for commuters or recreation
- Existing equity concerns or if the area is historically underserved

This type of site analysis combined with national lighting standards allows lighting designers to arrive at a well-grounded proposal where light is only in the right places. This process allows criteria and expectations around lighting to be developed that are tailored for use by an organization such as DPR. The proposed lighting criteria in this study are based on the most recent Illuminating Engineering Society (IES) Recommended Practice for Lighting for People in Outdoor Environments (IES RP-43-22), which provides illumination criteria based on the activity types taking place and the lighting zones that relate to adjacent land uses. Referring to these national standards also helps minimize unnecessary energy consumption and reduce the environmental impact of outdoor lighting.

Trail lighting should be designed to appropriate light levels that consider the adjacent land use and trail usage. The lighting should remain focused on the trail surface instead of surrounding areas, limiting light trespass and light pollution, and dimmed during hours of low usage. Trail lighting should also use warmer colored light sources (lower correlated color temperature (CCT's such as 2200K or less) when near natural areas or sensitive habitats.

The discussions that took place during the course of this study have led DPR to develop an in-house GIS based scoring system to assist them in prioritizing trail lighting investments and applying appropriate lighting strategies. This tool generates a map of lighting recommendations in three categories:

- Continuous Lighting: Lighting along the trail is spaced at a distance that provides illumination that meets criteria for both average light level and uniformity, creating excellent visibility along the entire length of the trail.
- Non-continuous Lighting: Lighting is located at key decision points and provides wayfinding guidance along the trail so that the next light is visible. Non-continuous lighting does not meet uniformity criteria.



 Minimal Lighting: Lighting is provided only at key decision points and areas of safety concern. These minimal lighting locations include trail intersections, crosswalks, under-crossings, trail ingress/egress ramps and stairs, pedestrian bridges, and bridge underdeck.

This new tool and the scoring system being used are discussed in more detail in Section 4.3 and the Final Recommendations.

#### Trail Lighting Study

Table 1-1: Luminaire Options						
Luminaire Name	Photo	Luminaire Specifications	Discussion			
Lithonia Omero		<b>O&amp;M: Denver Parks &amp; Rec</b> Wattage: 75W Lumens: 5454 BUG Rating: B1-U2-G1 Distribution: Type II Mounting Ht: 12'-15'	Use only in high usage urban parks: This luminaire is currently installed at Confluence Park and Central 70 Cover Top Park. While the light quality is good, this luminaire has a high potential for light trespass with no shielding options and the lowest lumen output is too high for many DPR trail applications.			
we-ef RFL530		<b>O&amp;M: Denver Parks &amp; Rec</b> Wattage: 14W Lumens: 1959 BUG Rating: B1-U0-G1 Distribution: Type II Mounting Ht: 12'-15'	<b>Recommended for Trail Lighting:</b> This luminaire has excellent optical design that maximizes spacing along the trail and minimizes light spill beyond the trail. A wider range of color temperatures (2200K – 3000K) is available for providing the appropriate CCT for the surrounding environment.			
Kim Ouro	$\nabla$	<b>O&amp;M: Xcel Energy</b> Wattage: 28.2W Lumens: 2958 BUG Rating: B2-U0-G2 Distribution: Type III Med. Mounting Ht: 12'-15'	<b>Best Xcel-owned Luminaire:</b> This luminaire has a comfortable, low- glare optic, zero uplight, and is the best option currently offered by Xcel Energy. Light distribution and CCT options are limited, and dimming is not yet available from Xcel Energy.			
King Luminaire K118 Acorn		<b>O&amp;M: Xcel Energy</b> Wattage: 40.2W Lumens: 2176 BUG Rating: B1-U3-G2 Distribution: Type IV Med. Mounting Ht: 12'-15'	Not Recommended: This luminaire has too much uplight and spill light beyond the trails, which results in wasted energy and negative impacts to the surrounding environment. This luminaire is not recommended for use along DPR trails.			



As part of this study, two sites were chosen by DPR for more detailed examination and the development of schematic lighting designs and their likely associated costs. Lighting designs were developed for each site to compare four luminaires. Two of the luminaires are options that are available from Xcel Energy (Kim Ouro and King Luminaire K118 Acorn), one is currently owned and maintained by DPR (Lithonia Omero), and one is a new recommendation for high quality trail lighting (by We-ef Lighting).

Each of these luminaries was studied and compared with lighting calculations to determine their effectiveness in meeting lighting criteria for continuous lighting along the path, while minimizing light trespass and light pollution.

#### Trail Lighting Ownership & Maintenance

Currently in Denver, Xcel Energy owns and maintains most of the trail lighting while DPR owns a small amount of their lights themselves. Changing this arrangement presents many challenges and opportunities for DPR. The flat-rate fees currently charged by Xcel Energy are based on a monthly rate that includes energy and maintenance costs. This fee is charged even when the light is not operational. With no proactive identification of outages from Xcel, non-operational lights can be unmaintained for weeks or months without being reported and yet the fees are still charged to the City when there is neither energy being consumed nor maintenance being performed. More information about Xcel Maintenance call response performance can be found in this City of Boulder Street Lighting Memorandum (Study Session Memorandum, 2022).

The Xcel Energy bill for trail lighting is currently paid by DOTI, rather than DPR, so this cost is not currently within DPR's operations budget. Yet this is still a taxpayer-funded cost, paid for by the City's energy office. If DPR is to consider owning and maintaining their own lights, budget will need to be allocated to them for capital improvement projects, energy costs, and either additional maintenance staff or a contractor in order to effectively own and operate this new lighting infrastructure. These questions are addressed in detail through Section 7.

Xcel Energy offers very limited options for trail lighting. There are no options for dimming, controlling light trespass, or warmer color temperature for sensitive areas. To fully implement the goals identified in this Trail Lighting Study, it is highly recommended that DPR take on the ownership and maintenance of their trail lighting system. DPR owning and maintaining their own lighting provides options for improving lighting, limiting light trespass, dimming, and warmer color temperature for sensitive areas.

#### **Cost Analysis**

The cost analysis included in this study in Section 7 uses the existing standard practice for each owner for lighting and electrical installation. This takes into account the differences between Xcel standards and DPR/CCD standards including wiring type (aluminum vs. copper) and electrical metering (non-metered vs. metered).

Considering these current standards, the cost analysis shows that Xcel owned and maintained lighting is less expensive than DPR owned and maintained lighting. This is primarily associated with Xcel Energy using aluminum wiring instead of copper wiring and not installing meters.

If DPR chooses to own and maintain their own trail lighting in the future, changing the current electrical standard to use aluminum wiring and a non-metered, energy-only "ESL" rate will reduce the



cost of electrical installation to be competitive to the cost of installing an Xcel-owned system. The use of aluminum wire would also help reduce the problem of theft of copper wire and the associated downtime of lights while they are repaired.

#### Solar Power for Trail Lighting

Solar power for trail lighting can offer multiple benefits to a city when used in the right locations. The long lengths of trails and their locations in green spaces that are often at greater distances from power sources can make lighting them cost prohibitive. By offsetting the costs and installation time of hardwired electrical systems, the solar power option can be both cost effective and reduce project timelines. However, solar-powered trail lighting is not suitable for all trails and the site suitability would need verification. This study includes equipment comparisons of solar-powered systems to conventional electrical systems in Section 5 and cost analysis as part of Section 7. The key conclusions of this study into solar trail lighting are as follows:

- Solar-powered systems eliminate all conduit, wiring, and need for a connection to a power source.
- When the light poles are spaced at 100-ft or greater, the capital costs of solar are less than those of a conventional hard-wired electrical system.
- Eliminating the conventional electrical system also reduces the costs and time associated with engineering services such as sub-surface utility engineering (SUE), electrical engineering, or applying for Xcel Builder's Call Line (BCL's).
- Solar is most suitable for locations with good hours of access to direct sunlight and without shading or shadowing from trees or near-by buildings.
- Site-by-site analysis is advised to assess the viability of solar for each trail location. Solar lighting manufacturers can provide this service.
- Solar power for underpass tunnels or bridge underdeck lighting is a more involved design process which requires remote solar panels and battery enclosures to feed power to the lighting. More project-specific study would be needed to assess viability of solar for this type of use.
- Solar battery life and eventual disposal should also be considered when evaluating the longterm effectiveness and impacts of solar power for trail lighting in Denver.

This Denver Trail Lighting Study sets up a knowledgebase for DPR to make more informed decisions on their outdoor lighting and electrical improvement options and priorities. The information in this study will support future trail lighting projects in being consistent, reliable, cost effective, and in best prioritizing the needs of Denver.



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# **Section 2**

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# **Background & Purpose**

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# 2 BACKGROUND AND PURPOSE

Denver Parks & Recreation requested Clanton & Associates prepare a study to develop new strategies for lighting DPR's extensive trail network. The main goals of this study were to identify where lighting is warranted on the trails, what trail lighting strategies would best serve Denver, and to help develop a method for prioritizing the locations to implement these lighting improvements.

Key priorities of the study were to determine where to provide lighting, what light level is appropriate, how to reduce or prevent vandalism of luminaires, and what the lighting standard should be for safety and security. Other key concerns were how the trail lighting could impact Denver's ecosystem, how to light trails equitably, and when and where alternative lighting options such as solar may be appropriate.



Figure 2-1 – Denver's Trail Network showing areas with active redesign or expansion underway

Denver Parks and Recreation is continually expanding and improving its trail system throughout the city. Figure 2-1 shows all existing trails as well as trail locations that are being designed, redesigned, or currently constructed. For additional information on planned trail development please see Denver's Parks and Recreation webpage through devergov.com (Parks & Recreation, 2023). Evaluating the



current trail lighting and exploring different lighting strategies is the next step to improve the trail system, increase its hours of use, and increase the overall attractiveness of the trail network.

#### Lighting Study Goals

The goals for improving the lighting throughout the Denver trails system are:

- Encourage use of the trail network for commuting
- Improve visual comfort and wayfinding for trail users
- Improve the perception of safety for trail users
- Minimize negative impacts of lighting on the environment and human health
- Minimize light pollution and light trespass from trail lighting
- Ensure trail lighting is improved throughout Denver in an equitable way
- Ensure luminaire choices are resistant to vandalism, flood waters and extreme weather
- Deter vandalism and other unwanted activities along the trail network
- Minimize luminaire variety and maintain ease of maintenance
- Maximize cost effectiveness of trail lighting

## 2.1 EXISITING CONDITIONS REPORT

An initial Existing Conditions Report was developed to provide a baseline understanding of the challenges and opportunities present in the existing trail lighting. Clanton & Associates visited six key trail locations in Denver during the daytime and nighttime hours. The sites chosen represent a mix of underpasses, trails, bridges, parks, and plazas. The project team made observations of the existing lighting equipment and the quality of the light being provided at each site. Photos were taken to document each site and photometric measurements were taken. These photometric measurements included:

- Illuminance: horizontal and vertical illuminance is the amount of light reaching a surface from a light source, measured in footcandles (FC).
- Luminance: the amount of light reflected from a surface or emitted from a light source that the eye perceives as brightness, measured in candela per square meter (cd/m<sup>2</sup>).



The sites studied were:

**SITE 1**: Common's Park at Highland Bridge over the Platte River

SITE 2: Confluence Park

**SITE 3**: West Harvard Gulch Trail – west of South Platte Drive and south of Evans

**SITE 4**: High Line Canal Trail under I-25

SITE 5: Bible Park – trail connection under Yale Avenue

SITE 6: Cherry Creek Trail – between University Boulevard and South Steele Street

The lighting at each site was assessed and then compared with national criteria for outdoor light levels from ANSI/IES RP-43-22 Recommended Practice for Lighting Exterior Applications. Each site was then placed into one of the following four categories:



Figure 2-2 - Sites Studied

**Exceeds Criteria**: The existing trail lighting exceeded the levels recommended by national ANSI/IES criteria, resulting in lighting that caused glare, light trespass, visual discomfort, and wasted energy. These sites could be described as over-illuminated.

**Meets Criteria**: The existing trail lighting met ANSI/IES criteria and was adequate for all trail users. Visibility was good for performing tasks such as wayfinding, identifying obstructions in the trail, and identifying fellow trail users.

**Below Criteria but Acceptable**: The existing trail lighting levels were below national criteria, but still provided an acceptable visual experience for trail users. The existing lighting was comfortable and adequate for wayfinding.

**Does Not Meet Criteria**: The existing trail lighting was below national criteria and was not adequate for trail user's needs. The light levels could make it difficult to identify the edges of the trail, obstructions in the trail, or to see trail intersections. Lack of uniformity in the lighting could also be causing areas of intense darkness next to areas that are bright, adding further difficulty.





**SITE 1**: The Common's Park site in the downtown area did not meet ANSI/IES criteria.



SITE 2: The Confluence Park site in the downtown area met ANSI/IES criteria.



**SITE 3**: The West Harvard Gulch Trail site studied exceeded ANSI/IES criteria.



SITE 5: The Bible Park site studied did not meet ANSI/IES criteria, but was still comfortable for trail users.



**SITE 4**: The High Line Canal Trail site studied exceeded ANSI/IES criteria.



**SITE 6**: The Cherry Creek Trail site studied did not meet ANSI/IES criteria, but was still comfortable for trail users.

Figure 2-3 – Site photos taken by Clanton & Associates during site visits



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Several initial observations could be made from these sites in relation to DPR's priorities for this study:

**Lighting Quality**: The existing lighting varied significantly throughout the sites studied by the project team. Light levels ranged from completely unlit areas to overlit areas. In some locations lighting was effective at enhancing safety by illuminating trail users, trail intersections, and objects of interest. In other areas, glare, light trespass, and uneven lighting were likely negatively impacting the visual adaptation and experience of trail users.

**Maintenance Concerns**: Several locations showed evidence of damage to lighting equipment. Some lights were not operating at the time of the visit or were being obscured by mature trees. Vandalism and conduit theft were both stated concerns for DPR.

**Equity**: Pedestrian and bike trails provide commuter routes to people who do not have or cannot use cars. Providing multimodal connections from residential spaces to employment centers and to other public spaces is an equity issue. Further analysis is needed to clarify which areas of the trail network should be prioritized according to Denver's Equity Index.

**Ecology**: Where illuminated trails are adjacent to habitat areas like parks or streams, additional consideration will be needed for the impacts of lighting on wildlife. Significant lengths of Denver's regional trails follow urban waterways closely, and many trails pass through parks and other natural areas with flora and fauna that are more sensitive to light trespass at night.

#### 2.2 CURRENT TRAIL USAGE PATTERNS

To complement the information gathered about the trail system during the site visits, Clanton & Associates also studied the data publicly available online through DPR's ongoing trail counter program (Trail Use Data, 2023). These counters are mainly present along the regional trails and along some of the collector trails for now as this program is still expanding. The counters are able to detect users, distinguish pedestrians from cyclists, and report the time of day back to DPR for analysis. Three trails have had counters in place since 2020 and five more trails had one or more counters added in 2022.

Figure 2-4 below shows the locations of each counter currently placed along the trails. At the time of this study, trails with counters include:

- South Platte River Trail (installed Aug. 2020)
- Cherry Creek Trail (installed Aug. 2020)
- Bear Creek Trail (installed Aug. 2020)
- Sand Creek Trail (installed summer 2022)
- Lakewood Gulch Trail (installed summer 2022)
- Weir Gulch Trail (installed summer 2022)
- High Line Canal Trail (installed summer 2022)
- Sanderson Gulch Trail (installed autumn 2022)





Figure 2-4 - Existing Trail Counter Locations

The intent of studying the available trail usage data were to identify any general day vs night and weekday vs weekend differences in the usage patterns. These patterns help show if the trail is being used more for commuting or recreation and how much impact a change in the lighting may have in that area.

The trail counter data examined for this section covers all publicly available data collected in 2022. Some of the trail counters were not present for all of these months or had incomplete data collection, but they have not been excluded as the goal was only to get a sense of average usage.

In 2022 over 5 million trail users were counted. This number includes around 2 million cyclists and 3 million pedestrians. The majority of trail users are on foot, but not by a huge margin.

The online interface was then used to show the average usage during the time ranges of 5 AM to 10 PM for "day" and 10 PM to 5 AM for nighttime hours. These ranges are not intended to reflect natural hours of daylight vs darkness throughout the year, but instead the typical hours of activity in an urban setting. Of the over 5 million trail users counted, over 4 million were counted during the "daytime" range. During the late nighttime range selected, 154K were counted. This number includes a total of 43K cyclists and 111K pedestrians.



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While the amount of daytime traffic, or traffic that would align with commuter behavior and typical evening commercial activity is significantly higher, a rough count of 154K late night trail users is significant.

When we look at a narrower nighttime range of 1 AM through 4 AM the user counts drop significantly. This is the time of night with the least trail activity for every location throughout the entire year. The hours of 12 AM and 5 AM appear more variable in their usage rates. As most of the counters are located on regional or collector trails, this implies the typical local trail would have even less activity. This suggests these hours may be the best choices if a dimming system is considered for DPR's trails. If trail lights were to be dimmed to 50% during these hours it is unlikely there would be enough traffic to be negatively impacted. Over time this would save energy and reduce Denver's light pollution.

When looking at the difference between weekdays and weekends, the weekdays in 2022 show around 2 million pedestrians and 1 million cyclists. The weekends show 777K pedestrians and 773K cyclists. This shows a change from the overall counts and the weekday counts, with the weekends being far more evenly split between pedestrian and cyclist users. This likely reflects the expected shift between commuter-heavy traffic on the weekdays and more people taking part in recreational cycling on the weekends.

While it was not a priority of this trail lighting study, another important factor in trail usage patterns in Denver is seasonal. Winter months have more hours of darkness, and in Denver's climate are prone to sudden inclement weather and lingering ice and snow that can make trails hazardous to safely navigate at night. The online dataset shows the greatest seasonal reduction in trail usage during the months of November, December, January, and February. How much of this reduction could be influenced by improvements in trail lighting could merit further study.

There is a lot of potential for further analysis about lighting needs using the trail counter data. As DPR continues to expand the counter program, more detailed study of commuter preferences, seasonal trail use changes, and opportunities for dimming may be undertaken. More about DPR's next steps for trail lighting analysis is discussed in Section 4-3.

## 2.3 CASE STUDY CITIES

To provide better information and recommendations about current trail lighting strategies suitable for Denver, we reached out to some comparable cities to gather information about their experiences and current trail lighting policies. The cities ultimately interviewed included Portland, Oregon, and Montrose, Colorado. The topics that were discussed most during the interviews were the maintenance challenges and equity concerns of their trail lighting.

#### 2.3.1 PORTLAND, OR

Portland is comparable in population size to Denver with a population of around 650,000. Their local climate is similar to Seattle, mild and rainy compared to Denver. The focus of their trail network has been filling in connectivity gaps for cyclists and pedestrians.

Portland Parks & Recreation is in the process of converting their existing lighting in developed parks to LEDs. In many cases this is a change from aged sodium lights. The new lights increase the City's energy efficiency and are consistent with the current best practices for dark skies, reducing light pollution and light trespass. Portland is committed to pursuing International Dark Sky Association (IDA) standards. The City's feels they benefitted greatly from the advice of their local Audubon



Society on the ecological issues with light pollution during this process. The new luminaires have a color temperature of 3000K and are IDA approved.

An additional benefit of the process of upgrading lights has been performing new lighting analyses. The new pedestrian lighting locations prioritize conflict areas, such as park entrances and intersections. The City has been able to improve the uniformity of their trail lighting and reduce uplight in their parks. Feedback from the public about the new lighting has been positive.

#### Challenges

The existing lights being replaced are very old and required frequent maintenance. The age of the lights was causing difficulty in sourcing replacement parts. Repairing lights is currently part of the workload of the Portland Parks and Recreation electric shop. Their electricians perform a quarterly, nighttime check of City parks. The trail lighting is owned by Parks and Recreation. The local utility does not play an ownership or maintenance role in Portland. Wire theft happens, but lights are not typically damaged.

The new pedestrian lights are controlled by timers or astronomical clocks and the lights operate at the same level from dusk to dawn. However, Portland Parks and Recreation feels the controls offer the flexibility to add dimming capability in the future.

The lights also provide feedback about their operational status. For example, the lights feature realtime fault detection, providing outage alerts that appear on a tablet app. As a result, new lights can communicate directly with their maintenance department rather than the City having to wait for a resident or passer-by to report an outage.



Figure 2-5 - Newly installed LED pedestrian trail lights in Portland, OR.

#### Equity Concerns

Portland Parks and Recreation has performed a system level analysis to determine where to add lighting in a way that prioritizes underserved areas as a determining factor. Specific locations for lighting improvements were then chosen based on available funding. Sites were given an equity score based on demographic factors such as the percent of the population represented by people of color, youth, and people living below the poverty line. This data was used together with community feedback about the needs in their neighborhoods.



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#### Lessons Learned

Portland is using a multi-faceted trail lighting strategy which considers energy efficiency, equity, and dark skies to make decisions. Local partnerships, such as with the Audubon Society, have provided insight into lighting strategies. Lighting controls offer improved response times to maintenance concerns and capability for dimming to further reduce energy consumption. Given Denver also has concerns around maintenance response times and a population invested in improving their environmental impact, there seems to be opportunity for similar strategies to work well for DPR.

#### 2.3.2 MONTROSE, CO

The City of Montrose is located in western Colorado with a population around 20,000 people. Its elevation and climate are very similar to Denver's.

The City has been installing solarpowered trail lighting for the last two years after studying their solar-powered lighting options for around a year. Their transition to solar-powered lighting was made in large part to reduce the time and resources the City was having to spend maintaining underground wiring on existing trail lights.

#### Solar Lighting

Daniel Payne, the Parks and Special Projects Superintendent, said that no equipment has failed in the two years since the solar-powered trail lights have been installed. There has been "hardly anything" to do for the City to maintain the lights.



Figure 2-6 - Solar-powered pedestrian lights installed in Montrose, CO.

The lights installed by Montrose have several vandal-resistant features, such as tempered glass to protect the solar panel, toughened glass to protect the lamp, and vandal resistant hardware to prevent access to the battery enclosure. The lights also have the capability of City-controlled dimming. They operate at 100% after dusk and before dawn but dim to 50% output during late night hours. They are programmable through a remote that Daniel Payne said was easy for the City to use. This also extends the battery charges of their new system.

Montrose found that installing solar-powered lights had about the same cost as installing wired lights. For them the cost benefits of solar have mainly come from greatly reduced maintenance needs after installation.

#### Lessons Learned

Montrose has successfully implemented solar-powered lighting to reduce the required maintenance time and effort spent on aging, wired lighting. The manufacturer of the new solar-powered lights has provided them with hands-on support, and there have been little to no maintenance issues since the lights were installed. As Montrose is another Colorado community with similar weather and infrastructure when compared to the other city contacted, their success suggests the probability for success with solar in Denver is high.



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# **Section 3**

# Warrants & Design Criteria

LU 23-088549 HR DM, Exhibit A.10

# **3 WARRANTS AND DESIGN CRITERIA**

The following section explains the warranting process typically used by lighting professionals for developing a quality lighting design. This mainly concerns how the different characteristics of the land around the trails can influence which lighting strategy is most appropriate. This section also covers how the trail usage counts used by DPR relate to those used by the Illuminating Engineering Society (IES) for determining appropriate trail lighting based on user needs. Also included is an explanation on how utilizing the Lighting zones from the Model Lighting Ordinance (MLO) can provide a more accessible structure for making decisions about what lighting level is appropriate in any given area.

## 3.1 TRAIL LIGHTING WARRANTS

Clanton & Associates is recommending three different trail lighting strategies be developed for use throughout the DPR trail system - Continuous Lighting, Non-Continuous Lighting, and Minimal Trail Lighting.

A lighting design uses the process of warranting to help guide where and how much lighting should be placed on a site. This process examines many factors of a site such as the land use, the activity level after dark, whether there is other existing lighting providing light to the site, proximity to more sensitive ecological areas, among others. These warrants allow for a more granular approach to choosing the appropriate lighting for anywhere in the DPR trail system.

#### Minimal Trail Lighting

Minimal trail lighting would be warranted throughout the system to meet safety needs. Areas that do not provide minimal lighting should be improved. The minimal option for trail lighting would focus only on ensuring conflict zones are adequately lit, where trail users could experience a collision with other users or have difficulty navigating in darkness, rather than lighting significant linear stretches of the trails. Minimal trail lighting is suitable for trails with lower activity levels at night and low density. This option requires the addition or relocation of the fewest luminaires.

#### Design Warrants for Minimal Trail Lighting

- Trails are mainly used during daylight hours or for recreation
- Trails having a low average usage rate after dark
- The adjacent land uses are not active at night
- Trail is greater than 1000' from providing access to a light rail or bus transit station
- Conflict Zones
  - Trail intersections
  - Pedestrian and cyclist bridges
  - Beneath any undercrossing (under bridges or through tunnels)
  - Points of ingress/egress, ramps, and stairs
  - Street crossings
- Areas with heightened environmental concerns

The different conflict zones that occur within the trail system are explained in more detail in Section 3.3.2.

#### Non-Continuous Trail Lighting

In many parts of the Denver trails network, continuous lighting would not be strictly warranted to meet safety and wayfinding needs due to the user activity level at night. For areas of increased ecological



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concern within the city, minimizing outdoor lighting may also be the higher priority over increasing trail usage. How many luminaire would need to be added or relocated may vary significantly between sites.

#### Design Warrants for Non-Continuous Lighting

- Trails with a majority daytime usage and some recreational evening usage
- Trails having a medium average usage rate after dark
- The adjacent land uses are less active in the evening hours
- Trails are around 500' from providing direct access to light rail or bus transit stations
- Areas with heightened environmental concerns
- Trails with many intersections with other major trails or with streets

#### **Continuous Trail Lighting**

Continuous lighting should be provided in areas with higher nighttime usage to provide excellent visibility. When continuous trail lighting is warranted, lighting must meet the appropriate average illuminance and uniformity criteria for the application. The trail would be lit at a spacing of no more than 100' between each luminaire. Spacing between 60' – 100' would be acceptable for continuous lighting. This option provides safe wayfinding for high usage trails, but it does require the addition or relocation of the most luminaires.

#### Design Warrants for Continuous Trail Lighting

- Trails with a higher usage rate after dark
- Trails having a high average usage rate after dark
- The adjacent zoning has higher activity in the evening hours
- Trails within 250' of providing direct access to light rail or bus transit stations
- Trail areas where increasing commuter usage is a key goal
- Areas with heightened safety concerns

## 3.2 PEDESTRIAN ACTIVITY LEVELS

As part of determining what level of lighting is warranted in an outdoor space, the IES provides guidelines on pedestrian volumes. These refer to the total number of pedestrians walking in both directions on a typical block during nighttime hours. These pedestrian classification definitions are per IES RP-8-21 and can be low, medium, or high (IES, 2022). The usage rate guides what level of lighting is appropriate to provide on the path or trail surface. These rates are defined from 0 to 100 users.

As seen through the trail counter data discussed in Section 2.2, the usage rates for many of DPR's trails exceed 100 trail users an hour at night regularly. The regional trails do this most consistently, but the pattern is not strictly determined by trail type. As part of developing a GIS tool (further discussed in Section ##), DPR has developed a range of pedestrian volumes appropriate to the trail system. That range has been matched to their equivalent IES usage categories.

#### Low Usage

The IES defines a low pedestrian usage rate as 10 or fewer pedestrians an hour during hours of darkness. This activity level is expected in suburban parks, low-density residential areas, or semirural areas.



For DPR's trail system a low usage rate would be from anywhere below 100 to around 150 trail users per day.

#### Medium Usage

The IES defines a medium amount of pedestrian traffic to be 10 to 100 pedestrians an hour during hours of darkness. This activity level is expected in downtown office areas, higher density residential, shopping areas, and some industrial areas.

For DPR's trail system a medium usage rate would be from approximately 150 to 450 trail users per day.

#### High Usage

The IES defines a high pedestrian usage rate as over 100 pedestrians an hour during hours of darkness. This activity level is expected in downtown retail areas, near theaters or concert halls, near stadiums, and around major transit stations.

For DPR's trail system a high usage rate would be from approximately 450 to over 700 trail users per day.

#### 3.3 TRAIL TYPOLOGIES & POTENTIAL CONFLICT ZONES

DPR uses several trail typologies to differentiate between the sizes and usage patterns throughout the trail network and to facilitate public communication. These same typologies will be used as a guiding factor for determining the appropriate lighting strategy in each trail section.

Per the Trails - Rules and Etiquette section, the entire trail network has an expected maximum speed of 15 mph. This has extra importance for nighttime visibility as users entering a trail from a park or a larger trail from a smaller one are expected to yield to oncoming users, which can lead to potential conflicts (Trails - Rules and Etiquette, 2023). While many City parks close during nighttime hours, the trail network is available to users 24/7 barring a severe weather or flooding event.

#### **3.3.1 TRAIL TYPOLOGIES**

There are three main trail types in the DPR trail system – regional, collector, or local. More detailed information about these trail types and other additional information can be found in Denver Moves masterplan from 2019 or by accessing the DPR Trails & Bike Network map online (Denver Moves: Pedestrians and Trails, 2019).

#### **Regional Trails**

Regional trails have the highest activity level and are some of the longest continuous routes. They connect many residential areas to employment centers and recreational areas. The regional trails are the South Platte River Trail, Cherry Creek Trail, Sand Creek Regional Greenway, and High Line Canal Trail. These trails are more likely to warrant higher lighting levels due to their usage.

#### **Collector Trails**

These trails link local trails and neighborhoods into the regional trails, providing the connectivity that allows the trails network to be used for transportation needs like commuting instead of just for recreation. They are anywhere from .5 miles to 4 miles in length. These trails vary in their activity level after dark, with some serving commuters and some being used mostly for recreation. They may or may not warrant improved or expanded lighting based on their usage.



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#### Local Trails

These trails primarily connect local parks and residential areas into collector trails or connect a residential area to other land uses. They are less likely to be active after dark except for recreational activity and less likely to warrant an increase in lighting.

#### **3.3.2 POTENTIAL CONFLICT ZONES**

In addition to trail types, the types of potential conflict zones for trail users help inform lighting designers about what light level is appropriate for safety and navigation. The following four conflict zone types are adapted from terminology used in IES RP-43-22 (IES RP-43-22, 2022) and Denver Moves 2019 (Denver Moves: Pedestrians and Trails, 2019).

#### Ingress/Egress Ramps or Stairways

Many ingress or egress points along the trail system involve steps, other grade changes or sharp turns. These present additional navigation challenges for trail users and require greater visibility to traverse safely after dark. Minimal lighting is required in these areas for safety.

#### **Trail Bridges**

Bridges that serve pedestrian and cyclist crossing needs but are fully separated from vehicular traffic have their own national lighting criteria (IES RP-43-22, 2022). The edges of the bridge must be clearly seen at all times as well as the ingress/egress zones. As these bridges are not shared with vehicular traffic, lighting provided by the spill light from street lighting is not an option.

#### Trail Undercrossings

Undercrossing is the term used in the Denver Moves 2019 Plan for any below grade crossing, such as under a roadway deck or through tunnels (Denver Moves: Pedestrians and Trails, 2019). Undercrossings require lighting during daytime and nighttime hours to maintain a safe visibility level for trail users. Transitional lighting when approaching an undercrossing is important, as the interior of a tunnel is brighter at night than its surroundings. This is especially important when the tunnel serves many cyclists, as they are moving faster than pedestrians and have less time to visually adjust.

#### **Street Crossings**

Off-street trails will sometimes need to cross roadways at grade rather than through a separate bridge or undercrossing. These crossings could be included in an intersection or take place through a midblock crossing, especially in areas that are mainly residential with narrower streets. The lighting standards for this type of conflict zone are generally directed by the IES RP-8-21 standards for roadway lighting. The streetscape lighting standards for Denver are defined by Denver's Department of Transportation & Infrastructure (DOTI) in their Street Lighting Design Guidelines & Details (CCD, 2019).

## 3.4 ROLE OF LIGHTING ZONES

The Model Lighting Ordinance (MLO) was developed jointly by the IES and IDA as a municipal planning tool. The document was finalized in 2011. They are also officially defined within the ANSI/IES document *LP-11-20 Environmental Considerations for Outdoor Lighting*. Lighting zones were developed as part of the MLO as a planning strategy similar to other types of overlay zoning commonly used by cities (MLO, 2011).



The strengths of lighting zones for cities lie in how they are defined by the human activity levels expected in their areas and in how they work alongside the existing zoning. This overlay strategy helps municipal organizations to reduce both light pollution and wasted energy from unnecessary lighting, and also ensure their lighting is appropriate for the area. This can reduce complaints from residents about over/underlighting and improve their confidence in being active outdoors in the nighttime hours.

There is no absolute system for the placement of lighting zones in a city. Decisions will need to be made on the characteristics of an area and consensus reached on what the goals for the usage of that area are. The ultimate lighting zone designation should be based on the outdoor environment DPR wants to achieve for a site, not on the current existing conditions.

Lighting zones are most effective when they complement existing land use zoning. Each lighting zone designation is defined below with their typical associated land uses:

#### LZ-0

Lighting Zone 0, or No Ambient Light, is appropriate for areas where permanent outdoor lighting is not expected and not intended to be installed in the future. Nighttime human activity is sparse and people expect and are adapted to darkness. Flora and fauna could be seriously impacted by small amounts of additional lighting.

Typical application of this zone is for natural areas, protected wilderness, conservation areas, or rural countryside. This lighting zone is not appropriate for use within the City of Denver, but may apply in adjacent areas.

#### LZ-1

Lighting Zone 1, or Low Ambient Light, is appropriate for developed areas within a natural environment and areas of human activity that are inherently dark at night. The vision of people in these areas is adapted to the low light levels, and they do not expect to see electric lighting except where absolutely necessary.

This lighting zone would be appropriate for single-family and duplex communities, business parks, commercial or industrial areas with limited nighttime activities.

#### LZ-2

Lighting Zone 2, or Moderate Ambient Light, is appropriate for areas with some elevated level of human activity in the evenings and night. The vision of people in these areas is usually adapted to moderate light levels and they expect there to be some lighting present.

This lighting zone would be appropriate for multifamily residential, schools, churches, hospitals, hotels/motels, outdoor sales, evening recreational and playing fields.

#### *LZ-3*

Lighting Zone 3, or Moderately High Ambient Light, is appropriate for high levels of human activity in the evenings and night. Human vision will be well adapted to the presence of lighting and it will be expected throughout these areas.



This lighting zone would be appropriate for downtown business districts, retail, restaurants, bars, nighttime active industrial areas, high use recreational and playing fields, gas stations and car dealerships.

#### LZ-4

Lighting Zone 4, or Very High Ambient Light, should only be used for special cases for high intensity entertainment districts, and is never intended for use as a default lighting zone. Human vision will be well adapted to lighting in these areas.

This lighting zone would be appropriate for locations such as Times Square in New York City or the Las Vegas Strip. It does not apply to anywhere within the City of Denver.

#### B.U.G. Ratings

The B.U.G. Rating system (Backlight, Uplight, and Glare) was developed as part of the MLO to help communicate outdoor luminaire performance. Backlight refers to light falling behind the luminaire. Any backlight may be undesirable for a trail or some backlight may be a benefit depending on the land use contexts along the trail. Uplight refers to light shining above the horizontal plane. It is undesirable due to the potential for glare and the negative impacts on sky quality and the environment. The lowest U value possible is typically the goal. As the main purpose of trail lighting is to light the trail surfaces and users, any uplight is generally wasted energy. Glare refers to light coming from the luminaire at any angle above 60°. This can be very uncomfortable in the eyes of trail users or could lead to light spilling too far in front of the luminaire.

Table 3-1: Typical BUG Ratings for Lighting Zones						
Lighting Zone	Associated Land Uses	Typical BUG Ratings				
		Backlight	Uplight	Glare		
LZ-0	NA in Denver City Limits	-	U0	-		
LZ-1	Natural parks, residential, lower intensity commercial	B1	U1	G1		
LZ-2	Most commercial, some industrial, some urban residential	B2	U2	G2		
LZ-3	Downtown, some commercial, special event	B2	U2	G2		
LZ-4	Not Recommended in Denver	B2	U2	G2		

The information shown in the above table has been modified from the original Model Lighting Ordinance to be most relevant to DPR's needs in selecting trail luminaires.

### 3.5 ROLE OF ADJACENT LAND USES

The land use along a trail route and other adjacent land uses are key factors in determining the appropriate lighting strategy for a trail as it directly correlates to the number of pedestrians and cyclists who will be using the trail during nighttime hours. Areas of increased trail usage at night often accompany more intense land uses and will warrant additional lighting, whereas areas that typically



do not have much traffic after dark and have low density zoning will most likely only warrant minimal lighting for safety. These patterns are used to guide which lighting zone is most appropriate for the location. For a better understanding of the intentions for future growth in Denver, please refer to the citywide Blueprint Denver documents and interactive map through denvergov.org (Blueprint Denver, 2019).

Figure 3-1 shows the land use zoning map for Denver with the currently existing, off-street trail network overlaid. This is a quick way to begin studying how much of the trail network may fall into which lighting zone. For trails that have different land uses to each side, it's recommended that the less intensive land use be selected to guide the choice of lighting zone. This better protects residential and open spaces from over lighting.



Figure 3-1 City of Denver Zoning Map with DPR Trails Overlaid

#### **3.5.1 ZONING CONTEXTS IN DENVER**

Denver's zoning is divided into land use contexts that contain sets of similar zones. These contexts have been further simplified below in order to better connect them to the relevant IDA-IES lighting zones throughout this document. For more detailed information on Denver's current zoning, please refer to Denver's Zone District Descriptions and Definitions (Zone Descriptions, 2023). To view the



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current zoning map in greater detail, please visit https://www.denvergov.org/maps/map/zoning (Denver Zoning Map, 2023).

#### Single Family Residential

This land use context is comprised of the two zones Single Unit (SU) and Two Unit (TU). They are shown in Figure 3-1 in yellows. May local and collector trails are located within this land use. The nighttime activity level may be lower in these areas. Light trespass from trail lighting into residential windows is a greater concern.

This land use context is typically associated with Lighting Zone-1.

#### Multi-Family Residential

This land use context is comprised of five multi-family and mixed use zones. They are shown in Figure 3-1 in oranges. Regional and collector trails are often adjacent to these zones. The nighttime activity level is expected to vary significantly by neighborhood.

This land use context is typically associated with Lighting Zone-1 or Lighting Zone-2.

#### Retail/Commercial

This land use context is comprised of eleven commercial and mixed-use zones. They are shown in Figure 3-1 in reds. Significant portions of the regional trails are adjacent to this land use. The activity level of these areas during both daytime and nighttime hours can vary significantly.

This land use context is typically associated with Lighting Zone-2 or Lighting Zone-3.

#### Industrial

This land use context is comprised of four industrial and mixed-use zones. They are shown in Figure 3-1 in purples. Significant portions of the regional trails are adjacent to this land use. The activity level during nighttime hours may vary significantly in these areas.

This land use context is typically associated with Lighting Zone-2 or Lighting Zone-3.

#### Civic/School/Campus

This land use context is comprised of eight zones. They are shown in Figure 3-1 in blues. Trails within this type of zoning will have their own activity pattern according to the specific use and require the appropriate lighting strategy to be chosen on a case by case basis.

This land use may be associated with Lighting Zone-1, Lighting Zone-2, or Lighting Zone-3.

#### **Open Space**

Denver's open space context is comprised of four zones. They are shown in Figure 3-1 in greens. Additional lighting restrictions are often needed with this type of land use in order to avoid causing harm to flora and fauna.

This land use zone is typically associated with Lighting Zone-1 in urban areas.

#### **3.5.2 TRAILS ADJACENT TO RESIDENTAL AREAS**

Trails located in residential areas are typically used for either recreation or for commuting through connections made to larger trails. This activity tends to take place either during daytime hours,



morning and evening commute hours, or in evening hours prior to 11 pm. Many neighborhoods that are predominantly single-family residential expect a lowered activity level during most nighttime hours. Denser residential areas such as multi-family, townhome areas, or mixed residential areas are tolerant of more activity during the nighttime hours.

Areas that are predominantly residential will have people of all ages sleeping at night. This makes light pollution and light trespass from outdoor lighting more likely to be a nuisance and a public health concern. Quality sleep is key to lifelong positive health outcomes. Light trespassing into bedroom windows is just as much of a sleep disturbance as urban noise. For sensitive individuals, it can noticeably disrupt their circadian rhythms, which leads to poorer health outcomes.

Trails passing through residential areas or that are adjacent to a residence should ensure the trail lighting places a high priority on preventing light from spilling beyond the trail. For more detailed information on light trespass, refer to the publicly available IES/IDA Model Lighting Ordinance (IES, 2011).

#### **3.5.3 TRAILS ADJACENT TO EMPLOYMENT CENTERS**

Trails throughout Denver help connect employment centers to residential areas, either through direct connections or by linking the areas to regional transit options. Trails located near employment hubs support the last mile connections commuters need to allow them to forgo a typical private vehicle commute. For some, a trail near their place of employment allows active commuting. When available, active commuting options offer many benefits to public health by incorporating physical activity into a normal part of someone's day. Other benefits include fewer vehicles on the roads, leading to reduced emissions and improved air quality. To better support active commuting on trails throughout the year, trails that connect through major employment centers should take peak commuting hours in the mornings and evenings into account in their lighting strategy choices. Lighting may be needed both earlier and later in the day than on a trail that's main usage is recreational.

Other advantages of trails in employment centers are their usage during the workday. Employees nearby are able to take advantage of their recreational uses. It also provides an alternative method for moving between businesses and making deliveries without the need to get on a roadway. These options benefit any work environment, from the typical office to industrial areas.

#### **3.5.4 TRAILS ADJACENT TO TRANSIT ORIENTED DEVELOPMENTS**

Trails that pass through areas of transit oriented development (TOD) support active commuting and transit ridership for residents in those neighborhoods. TOD neighborhoods typically involve denser residential development and increased access to bus and light rail transit stations, which both support Denver's climate commitments. The ridership of transit systems is often dependent on the quality of last-mile connections between transit stations and destinations, whether that is a home, office, or commercial area. Trails are an important component of these connections.

Several of Denver's regional trails with the highest activity levels currently parallel major transit corridors and connect multiple TOD locations. The graphic shown in Figure 3-2 shows the existing trail system in Denver in green, major transit corridors in red, and the TOD neighborhoods recognized by Denver in black. This map was adapted from the TOD and Transit Corridor Map used in the TOD Strategic Plan from 2014 (TOD Strategic Plan, 2014).





Figure 3-2 – DPR Trails and major transit corridors shown with location of TODs

The proximity of TODs is likely to lead to an increased trail usage rate in these areas even when the land uses surrounding the TOD would otherwise suggest a lower rate. The presence of TODs along a trail will also likely extend the nighttime hours where that trail sees higher activity beyond that seen on trails of comparable size due to more people using them for last mile connections and to access neighborhood destinations. Regional trails are associated with the most TODs, but local and collector trails may not see the drop off in evening usage compared to similar trails in other parts of the system.

Trails that are otherwise sufficiently lit through a minimal lighting strategy may require non-continuous lighting where they pass through a suburban TOD or continuous lighting may be needed in TODs in urban areas despite being mainly residential in use. Transitional lighting levels will need extra attention around TODs in order to preserve the visual comfort of trail users.

#### 3.5.5 NEIGHBORHOOD EQUITY & TRAILS

Commuting by trail can be a personal choice for environmental footprint reduction or personal health reasons, but in disadvantaged areas where the median income is low and car ownership may be unstable or nonexistent in a household involuntarily, trail commuting may be more of a lifeline than a personal choice. It is therefore essential to ensure the trails into and out of these communities are



visually comfortable and easy to navigate for any user, as this can play a role in increasing access to employment.

Trail access for recreational needs in disadvantaged areas is also very important. Local public parks and trails are a crucial form of affordable recreation and improve a neighborhood's sense of community through their shared use. It is also well documented through studies of cortisol levels that exposure to nature reduces stress in the human body. A walk on a local trail offers numerous benefits to the physical and mental health of residents. Access to this amenity is especially important in areas that tend to have lower overall health outcomes.

The following map graphic shows Denver's neighborhoods graded by their scores on the Neighborhood Equity Index (NEI) currently used by DPR. These scores are developed by grading each neighborhood on qualities such as park proximity, household income, and life expectancy (Neighborhood Equity Index, 2020).



Figure 3-3 – Neighborhood Equity Map with overlaid trails and priority areas for lighting design.

The darkest blue is the highest numerical equity score, demonstrating the most need for positive interventions. The lightest areas have the lowest numerical score and need little additional support at this time. When the trail network is overlaid, it reveals that many existing trails are in or near neighborhoods that are struggling. Trail sections that were within higher need neighborhoods, with



scores of 3, 4, or 5 according to the 2020 Neighborhood Equity Index are shown with a greater priority for lighting improvements than those in neighborhoods with less need which score a 1 or 2. Other neighborhoods with the highest equity needs have little or no trail system access at this time for recreation or transportation.

Traditionally, areas with lower median incomes are more likely to have more people who are working on a shift schedule, at night, or during other atypical hours. Ensuring the trails are comfortable for commuter use 24/7 could have a greater positive impact in these areas than other neighborhoods.

This does not mean however that these areas require a higher light level than would be recommended for any other area where usage merits continuous or non-continuous trail lighting in Denver. The areas highlighted as places where trail lighting may be a greater equity priority are intended to show that these neighborhoods may benefit more if they are made a priority for study to see if they are meeting the standards for minimal lighting and for improvements if minimal lighting is not sufficient.

#### **3.5.6 TRAILS ADJACENT TO OPEN SPACES**

Artificial lighting at night can have serious impacts on the flora and fauna in a community, from tiny insects and flowers to large predators and trees. The species we share spaces with, like us, have evolved with the earth's natural solar and lunar cycles. Due to this, the IES recommendation for light levels in many natural areas is that it should not exceed 0.1 footcandles of illuminance (IES RP-43-22, 2022). This is equivalent to the light level cast by a full moon, enough light for most people to navigate safely in a dark environment but not enough to cause significant harm to most species.

Denver is an Urban Bird Treaty City and a participant in the Lights Out program that aims to reduce migratory bird strikes through reduced building lighting (Lights Out Denver, 2023). A light temperature of 3000K is also the current maximum temperature intended for outdoor lighting in the City, though some 4000K is still in use (CCD, 2019). While 4000K is sometimes compared to the temperature of moonlight, in LED sources they can contain disruptive amounts of light in the blue spectrum. For areas that are ecologically sensitive such as riparian buffers, natural waters, or nature preserves, color temperatures lower than 3000K may be preferable. 2700K is becoming much more widely available as a standard outdoor lighting option and the availability of 2200K luminaires is increasing. Both are less disruptive to the environment.

Light trespassing beyond the area intended to be lit, usually the trail's surface, so that it spills into adjacent waterways, into natural landscape areas that are important urban habitats, or onto trees can have significant negative effects on Denver's biodiversity and the ecological sustainability goals of the community. The appropriate amount of light properly aimed and shielded can greatly reduce the negative impacts of outdoor lighting. When the usage of a trail does not justify significant amounts of lighting, it is better for the environment that the most minimal lighting option be used and then dimmed further when it is not needed. Please refer to IES RP-43-22 *Lighting Exterior Applications* for more detailed information on these strategies and their impacts if necessary (IES RP-43-22, 2022).

#### **Effects on Plants**

Plants that are sensitive to photoperiodicity in their flowering, bud dormancy, or leaf senescence behaviors in response to day length may be adversely affected by any amount of illumination they receive from artificial lighting. Most plants need sunlight during the day and darkness at night to



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maintain their health over their full lifespan. Plants have evolved a wide range of photoreceptors that perceive and respond to signals from light in their environment, especially in the ultraviolet, blue, red, and near-infrared regions of the electromagnetic spectrum. Some of the many processes sensitive to light are:

- Seed germination
- Stem elongation
- Leaf expansion
- Flower development
- Fruit development
- Bud dormancy (when leaves stop growing)
- Leaf senescence
- Leaf drop

Landscaping is a significant investment and urban trees are a crucial component in managing urban heat. For a city, fall color and spring flowering are a source of community pride. Lighting in a way that could reduce trees and other urban plants health, appearance, and lifespan needs to be avoided.

#### Effects on Wildlife

Just like the human eye has different spectral distributions of light that help regulate our biological processes and our health, so does most other wildlife on earth. While the sensitivities vary between species, in general the closer an artificial light source is to the daylight spectrum the more wildlife (and people) can be negatively affected by it.

Most small carnivorous mammals are fully nocturnal. Many species that have adapted well to sharing the urban environment with humans are crepuscular, active in the dawn and evening hours. However, any species that (like us) needs to sleep during hours of darkness are just as disturbed by light pollution as urban humans.

Lighting affects wildlife beyond sleeping behaviors. Artificial lighting at night has been shown to disrupt numerous natural patterns in wildlife, including:

- Foraging behavior and increased predation
- Internal biological clocks
  - Can affect mating success, group-mediated anti-predator vigilance, and other lightstimulated behaviors
- Dispersal movements and wildlife corridor use
- Breeding behavior in birds
  - Nest site selection, increased predation, timing of breeding
- Possible support for invasive species (mostly pertains to insects)
- Alteration of territorial behaviors
- Delays and changes in migratory behaviors
- Reductions in populations of nocturnal insects
  - Has a cascade effect on their predators and is detrimental to pollination

A healthy urban ecosystem depends on a variety of insects, birds, reptiles, amphibians, and mammals of all shapes and sizes to sustain itself. Lighting that trespasses from trails and into waterways, forested areas, or other natural spaces throws innumerable natural behaviors and patterns out of balance.



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# **Section** 4

# **Trail Lighting Design**

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## **4 TRAIL LIGHTING DESIGN**

The following section details how the different design factors of land use, trail usage and typology, equity, efforts towards commuter support, and environmental preservation can guide what lighting strategy would be the best fit for any trail area in Denver when generating a lighting design. In addition to the lighting design process, how the latest national standards apply to different trail locations in Denver is explained.

Rather than recommending specific locations for the different lighting strategies at a granular level, this study has led to the ongoing development of a new GIS mapping tool that will be used by DPR to evaluate the best fit lighting strategy throughout the trail network. More about this process is covered in section 4.3.

#### 4.1 TRAIL LIGHTING STANDARDS

This section contains charts adapted from the document ANSI/IES RP-43-22 Lighting Exterior Applications (IES, 2022). This document covers the illuminance levels that are acceptable in any given lighting zone. These charts have been reduced in their level of detail in order to be more relevant to DPR.

Illuminance is the primary lighting metric used for multimodal trails, crosswalks, and bike paths. Illuminance is the amount of light reaching a surface and is measured in units of footcandles (fc). An Average to Minimum ratio is used to evaluate the uniformity of the lighting to identify if there are areas that are too dark in relation to the average light level. The Light Control criteria shown reflect the acceptable BUG ratings for glare and uplight respective to the outdoor land use and the lighting zone in which it's taking place in. The values for LZ-0 and LZ-4 are not included in the charts as they are not recommended for use within Denver at this time.

These criteria are used alongside the pedestrian activity levels, lighting zones, adjacent land uses, and any other necessary criteria to provide the specific measurements adequate for lighting any trail typology in DPR's system.

The following table is adapted for DPR from Table A-3 on page 49 of IES RP-43-22. Most trails in DPR's network are serving both cyclists and pedestrians, making these illuminance values relevant to most trails. They would apply to trails that are lit continuously, non-continuously, or only lit minimally where there are potential conflict points.



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	Table 4-1: IES Standards - Mixed Cycling & Pedestrian Paths							
		Horizonta	Il Illuminance	Light (	Control	Lumens		
Lighting Zones		FC @ FT	Illuminance Ratio Avg:Min	Maximum Glare Rating	Maximum Uplight Rating	Maximum Lumen Output		
170	Lower Limit (avg.)	1.5 @ 0.0	5:1	G2	U2	3200		
LZ-3	Upper limit (avg.)	3 @ 0.0	5:1	G2	U2	4000		
170	Lower Limit (avg.)	0.8 @ 0.0	5:1	G2	U2	2700		
LZ-Z	Upper limit (avg.)	1.5 @ 0.0	5:1	G2	U2	3200		
174	Lower Limit (avg.)	0.4 @ 0.0	5:1	G1	U1	1800		
	Upper limit (avg.)	0.8 @ 0.0	5:1	G1	U1	2700		

The following table is adapted for DPR from Table A-3 on page 39 of IES RP-43-22. Trails that are adjacent to waterfront areas (such as a trail surface located under twenty feet (20') from the water's surface) or that fall within what are generally considered to be riparian areas may need greater consideration for their lighting. They can sometimes offer more wayfinding hazards to their users due to the potential for slips and falls, but they also require more attention be paid to ecological concerns. They would apply to trails that are lit continuously, non-continuously, or only lit minimally where there are potential conflict points.

	Table 4-2: IES Standards - Walking Surfaces Adjacent to Waterfront								
		Horizonta	I Illuminance	Light	Control	Lumens			
Lighting Zones		FC @ FT	Illuminance Ratio Avg:Min	Maximum Glare Rating	Maximum Uplight Rating	Maximum Lumen Output			
17-3	Lower Limit (avg.)	1 @ 0.0	8:1	G2	U2	3200			
LZ-3	Upper limit 3 @ 0.0 (avg.)	8:1	G2	U2	4000				
17-2	Lower Limit (avg.)	1 @ 0.0	8:1	G2	U2	2700			
	Upper limit (avg.)	2 @ 0.0	8:1	G2	U2	3200			
174	Lower Limit (avg.)	0.5 @ 0.0	8:1	G1	U1	1800			
	Upper limit (avg.)	1 @ 0.0	8:1	G1	U1	2700			



The following table is adapted for DPR from Table A-3 on page 40 of IES RP-43-22. Stairs and ramps throughout the trail system pose increased risk of trips, falls, or collisions for trail users. Their lighting is part of a minimal lighting expectation. Their upper and lower acceptable light levels are higher than a typical walking surface.

Table 4-3: IES Standards - Stairs & Ramps							
		Horizont	al Illuminance	Light	t Control	Lumens	
Lighting Zones		FC @ FT	Illuminance Ratio Avg:Min	Maximum Glare Rating	Maximum Uplight Rating	Maximum Lumen Output	
17-3	Lower Limit (avg.)	3 @ 0.0	5:1	G2	U2	3200	
LZ-3	Upper limit (avg.)	4 @ 0.0	5:1	G2	U2	4000	
17-2	Lower Limit (avg.)	2 @ 0.0	5:1	G2	U2	2700	
LZ-2	Upper limit (avg.)	3 @ 0.0	5:1	G2	U2	3200	
LZ-1	Lower Limit (avg.)	1 @ 0.0	5:1	G1	U1	1800	
	Upper limit (avg.)	2 @ 0.0	5:1	G1	U1	2700	

The following table is adapted for DPR from Table A-3 on page 45 of IES RP-43-22. Overpasses that are exclusively for cyclists and pedestrians do not have the same potential for traffic conflicts, but require transitional lighting when approaching stairs, ramps, or ingress/egress points. These standards would apply to overpasses that are lit continuously, non-continuously, or only lit minimally where there are potential conflict points.

	Table 4-4: IES Standards - Pedestrian Overpass								
		Horizont	al Illuminance	Light	t Control	Lumens			
Ligh	ting Zones	FC @ FT	Illuminance Ratio Avg:Min	Maximum Glare Rating	Maximum Uplight Rating	Maximum Lumen Output			
17-3	Lower Limit (avg.)	1.6 @ 0.0	5:1	G2	U2	3200			
	Upper limit (avg.)	3.2 @ 0.0	5:1	G2	U2	4000			
17-2	Lower Limit (avg.)	0.8 @ 0.0	10:1	G2	U2	2700			
	Upper limit (avg.)	1.5 @ 0.0	10:1	G2	U2	3200			
174	Lower Limit (avg.)	0.4 @ 0.0	10:1	G1	U1	1800			
רב <u>ר</u> ו	Upper limit (avg.)	1 @ 0.0	10:1	G1	U1	2700			



The following table is adapted for DPR from Table A-3 page 46 of IES RP-43-22. A pedestrian moving from a bright outdoor space into an underlit or even unlighted tunnel can create an uncomfortable if not dangerous transition while the eye adjusts. This is even more significant for cyclists, who are generally moving at faster speeds and thus have less time to adjust to changes in lighting. Their lighting during the day is part of a minimal lighting expectation. The light levels shown are higher as they only apply to daylight hours.

	Table 4-5: IES Standards - Pedestrian Tunnels (daytime)								
		Horizont	al Illuminance	Light	t Control	Lumens			
Ligh	iting Zones	FC @ FT	Illuminance Ratio Avg:Min	Maximum Glare Rating	Maximum Uplight Rating	Maximum Lumen Output			
17-3	Lower Limit (avg.)	8 @ 0.0	4:1	G2	-	3200			
LZ-3	Upper limit (avg.)	10 @ 0.0	4:1	G2	-	4000			
17-2	Lower Limit (avg.)	8 @ 0.0	4:1	G2	-	2700			
LZ-2	Upper limit (avg.)	10 @ 0.0	4:1	G2	-	3200			
LZ-1	Lower Limit (avg.)	8 @ 0.0	4:1	G1	-	1800			
	Upper limit (avg.)	10 @ 0.0	4:1	G1	-	2700			

The following table is adapted for DPR from Table A-3 on page 47 of IES RP-43-22. A pedestrian tunnel that is lit for daytime needs through the nighttime hours also poses a hazard to any user approaching it. Entering or approaching a brightly lit space from a nighttime environment can lead to discomfort or reduced visibility. The amount of transitional lighting that would be needed to compensate for the daytime light level in a tunnel used at night would be inappropriate for the environment surrounding the trail and lead to light pollution. Their lighting at night is part of a minimal lighting expectation. The light levels listed below are sufficient for nighttime safety and navigation.



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	Table 4-6: Pedestrian Tunnels (nighttime)								
		Horizonta	Illuminance	Light Co	ontrol	Lumens			
Lighting Zones		FC @ FT	Illuminance Ratio Avg:Min	Maximum Glare Rating Rating		Maximum Lumen Output			
17-3	Lower Limit (avg.)	1 @ 0.0	4:1	G2	-	3200			
LZ-3	Upper limit (avg.)	3 @ 0.0	4:1	G2	-	4000			
17-2	Lower Limit (avg.)	1 @ 0.0	4:1	G2	-	2700			
LZ-2	Upper limit (avg.)	2 @ 0.0	4:1	G2	-	3200			
LZ-1	Lower Limit (avg.)	0.5 @ 0.0	4:1	G1	-	1800			
	Upper limit (avg.)	1 @ 0.0	4:1	G1	-	2700			

The glare and illuminance values in all of the above charts are based on national best practices and would apply to any trail, usage pattern, or luminaire option used by DPR. Lighting levels will generally be considered as meeting the criteria if the calculated values are within ten percent (10%) of the criteria, or do not exceed the criteria by more than one and a half times (1.5x).

# 4.2 TRAIL LIGHTING SELECTION PROCESS

This section explains how the warrants from Section 3.1 are used in combination with the IES criteria in the previous section to guide the lighting design process. Before the first luminaire is chosen, these are the questions a lighting designer is looking to answer about their project – how much lighting is warranted, in which locations, for which tasks, and what those light levels should be according to the national best practices that have been developed for those tasks.

For any lighting design the unique needs of the area to be lit and its surrounding context are as involved as the criteria itself, as discussed in Section 3. For Denver's trail system the impact of equity, safety, and the environmental effects of changes to trail lighting are the primary concerns.

Figure 4-1 shows the priority areas a lighting designer would consider based on the Denver Neighborhood Equity Index Map. At a high level, the conflict zones where trails intersect merit minimal lighting despite any other factors they may have around them. Trail sections that were within higher need neighborhoods, with scores of 3, 4, or 5 according to the 2020 Neighborhood Equity Index are shown with a greater priority for lighting improvements than those in neighborhoods with less need which score a 1 or 2 (NEI, 2020). While scores of 3 are not considered high need areas on their own, they would merit more scrutiny in the lighting design process for other factors that may influence their design needs, especially when adjacent to areas scoring 4 or 5.



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Figure 4-1 – Lighting Design Priority Map

The following subsections describe the different approaches needed in developing a lighting design for each of the trail typologies & potential conflict zones discussed in Section 3.3. Typical and more unique lighting design solutions are included with examples of successful and unsuccessful design strategies. Each of these would be connected to their placement in the DPR trail system as meriting the minimal, non-continuous, or continuous lighting appropriate for their type.

#### **Trail Surfaces**

Trails have unique lighting needs depending on their location in a city and their amount of user traffic after dark. Identifying the appropriate Lighting Zone for a site then guides the selection of lighting design criteria, strategy, and luminaire characteristics such as lumen output, color temperature, optical distribution type, and shielding.

The lighting criteria adapted from IES RP-43-22 into table 4-1 for Mixed Cycling & Pedestrian Paths and Table 4-2 for Walking Surfaces Adjacent to Waterfront are the two best sets of national lighting criteria to guide lighting levels on trail surfaces in Denver. The criteria in Table 4-1 would be the default criteria to consult. The criteria in Table 4-2 would be the more suitable option in most trail locations that are near rivers, creaks, ponds, or other natural bodies of water in Denver.



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The priority in lighting trails is to get the minimum amount of light needed to illuminate the surface of the trail as uniformly as is practical while ensuring this light does not spill past the trail surface and into other areas. Trails are generally narrow and may have irregular bends and curves frequently. They are often near natural spaces or close to homes. This makes avoiding light trespass one of the highest priorities in designing lighting for trails. Controlling the glare from trail lighting is also crucial as it allows lower light levels to be used without compromising on visibility. Light temperatures of 2700K or 3000K would both be appropriate CCT's for most trails. A CCT of 2200K may be preferred in areas with heightened ecological sensitivity, such as the presence of endangered species habitat.

A quality trail lighting design would provide the minimal amount of light necessary for user comfort and confidence and confine that lighting only to the trail surface and the users upon it.

A low quality trail lighting design may be lit in a haphazard way so that users are not sure whether an area will be lit or not, or when the next light may appear along their path. It may be overlit so that upon leaving the trail area the user has difficulty seeing, or underlit so their vision is compromised upon entering the trail.

The IES criteria specific to the type of trail surface, the usage rate of the trail, and the land usage contexts around the trail typically lead to three strategies of trail lighting. These are minimal, non-continuous, and continuous.

A minimal level of trail lighting designates the locations along a trail that require lighting in order for a trail user to navigate it safely at night. Once these locations are identified, the surrounding context determines which IES criteria and lighting zone should be used to determine the appropriate light level and uniformity.

A non-continuous level of trail lighting designates which stretches of trail need more than minimal lighting to be comfortable at night, but don't have the activity level or surrounding land uses that would warrant continuous lighting. The goal of non-continuous lighting is that it be spaced so that any trail user is able to easily perceive the next light along the path from the light they are currently nearest. This improves the navigability of the trail and provides reassurance to the user. Once these locations are identified, the surrounding context determines which IES criteria and lighting zone should be used to determine the appropriate light level and uniformity.

A continuous level of trail lighting designates which lengths of the trail should have no perceivable gaps in the lighting. Uniform lighting is expected and activity levels are high enough at night that less lighting would feel uncomfortable for users and lead to more potential conflicts when different groups of users fail to see each other in a timely way. Once these locations are identified, the surrounding context determines which set of IES criteria and which lighting zone should be used to determine the appropriate light level and uniformity.

Each of these lighting strategies has the opportunity to incorporate pedestrian poles, bollards, step lights, railing lights, illuminated outdoor furniture, and other outdoor lighting options to achieve the sufficient amount of lighting for that particular trail. There is also the option to incorporate alternative power sources, part night lighting strategies, dimming, or smart city technologies into trail lighting. While the primary focus of trail lighting is to provide for safe navigation at night for any trail user, there is still plenty of room for creativity in the lighting design that could test new outdoor lighting strategies for a city or simply improve a neighborhoods unique character.



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# Ingress/Egress Locations

Points of ingress or egress along a trail have significant potential for conflicts between users. This could be due to trail users trying to navigate past one another or due to confusion about changes in the direction or grade of the trail itself. Lighting that provides excellent visibility is even more crucial for safety in these areas.

Any point of ingress or egress to a trail such as ramps or stairs will warrant minimal lighting to meet trail users needs for safety and wayfinding. The lighting criteria adapted from IES RP-43-22 into table 4-3 for Stairs & Ramps would apply to this type of potential conflict zone in the DPR trail system.

A quality lighting design for this type of trail condition would provide higher uniformity than for a regular length of trail without losing the necessary contrast. Pedestrian scale post mounted luminaires are spaced to provide the right uniformity for the specific area, but other smaller options such as bollards, step lights, and railing lights are incorporated where they would provide superior visibility to reduce the risk of tripping hazards or collisions. Transitional lighting may also be required, as this kind of use could be isolated or otherwise be located in an area of minimal lighting. Light temperatures of 2700K or 3000K would both be appropriate.

A lower quality lighting design would fail to adequately communicate upcoming turns, make changes in grade like a ramp or steps easily visible, or delineate connections with other trails where other users may be moving quickly in different directions. The lighting provided may be too isolated to keep the eye adapted to the right level of night vision. Smaller scale options for lighting may not manage their glare, reducing visual adaptation further, or they may not take the increased potential for damage or vandalism into account and therefore spend significant amounts of time inoperable.

#### **Bridges**

Bridges that are strictly for pedestrian and cyclist use have unique design needs and some frequent complications to design for. Standard pedestrian luminaires that are mounted on poles are often heavy and must withstand higher wind loading conditions on a bridge than on the ground. Spill light from these luminaires also must be prevented from falling on the waterway or greenspace that is usually below these crossings as this can quickly lead to negative environmental impacts.

Any pedestrian bridge will warrant minimal lighting to meet trail users needs for safety and wayfinding. The lighting criteria adapted from IES RP-43-22 into Table 4-4 for Pedestrian Overpass would apply to this type of potential conflict zone in the DPR trail system.

A quality lighting design for this type of trail condition would provide uniform lighting on the bridge surface and ensure the edges of the space are clearly delineated to any trail user. It would also use the characteristics of the bridge itself as part of the lighting strategy. For example, if there are overhead structures like old rail trusses the lighting could be incorporated overhead, reducing the need for pedestrian scale pole lighting while also featuring local character. Light temperatures of 2700K or 3000K would both be appropriate.

A lower quality lighting design would fail to provide enough uniformity or sufficient illumination to prevent tripping hazards due to elevation changes. These issues would also fail to provide enough visibility to navigate the edges of the bridge safely, especially for anyone elderly or those who otherwise has compromised night vision. Poorly shielded and aimed lighting on bridges also has more potential for negative environmental impacts and general light trespass.



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#### **Under-Crossings**

DPR standards use the term undercrossing for both underdeck lighting and pedestrian tunnels. From a lighting design perspective, both of these uses are very different and have their own distinct needs. However, any trail undercrossing of either type will merit minimal lighting as they have higher potential for navigational conflicts between users.

The lighting criteria adapted from IES RP-43-22 into table 4-5 for Pedestrian Tunnels (daytime) and into Table 4-6 for Pedestrian Tunnels (nighttime) would apply to this type of potential conflict zone in the DPR trail system.

A quality lighting design for this area on a trail would provide transitional lighting levels leading up to the undercrossing so the vision of any user is able to adjust comfortably to the change in their environment whether it is day or night. If the undercrossing is a tunnel, the light level will transition from the thresholds in towards the center of the tunnel so that as the eyes adjusts to the enclosed environment almost no change in illumination is perceived by the user. Light temperatures of 2700K or 3000K would both be appropriate.

An insufficient lighting design would fail to take the time needed by the human eye to adjust to changes in lighting into account. This could lead to undercrossings that feel too dark upon entering them from a bright, daytime environment or that feel too bright upon entering them with dark-adapted vision. Poor designs may also have issues with light trespassing into adjacent areas due to over lighting or insufficient shielding of the light sources.

## Crosswalks

While crosswalks are generally considered more a part of street lighting design, there are often occasions for a trail to need to cross a street at a midblock location in a residential area or to join into a typical crosswalk scenario at a busy intersection. For lighting design guidance on crosswalks, we would refer to the IES document RP-8-22 Lighting for Roadway and Parking Facilities instead of RP-43-22 (IES RP-8-22, 2022). When trail lighting standards take priority, trail crosswalks should be included in the category of minimal lighting. When the trail crossing is going to be incorporated as part of a street lighting design, the standards from the CCD Street Lighting Design Guide will take priority (CCD, 2019). A light temperature of 3000K is likely to be preferred for crosswalks.

A quality lighting design for this type of trail condition would provide adequate light on the crosswalk surface and trail surfaces adjacent to it so the trail user has good visibility. It would also ensure the trail user is illuminated vertically so their location is easy for anyone driving a vehicle to see. Where this is not possible due to site constraints, the trail user should be backlit so their silhouette is easily visible.

An insufficient lighting design would only light a pedestrian crossing from above by placing the luminaires directly over the crosswalk. This makes anyone in the crosswalk difficult for a driver to see, reducing safety. A luminaire with high glare or one which is poorly shielded would also reduce visibility.

# 4.3 DPR GIS SCORING SYSTEM

This insight into the lighting design process, the role of lighting zones, and the adjacent land use and activity patterns is currently being used by the City of Denver's GIS department to help develop a GIS scoring system for DPR to use for trail lighting decisions. This type of scoring and mapping strategy is used for many other applications in Denver, most notably for this study the Neighborhood Equity



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Index (NEI) that was developed in 2020. That map used 8 scoring factors to determine the needs of each neighborhood (NEI, 2020).

The GIS lighting tool being developed will have eight scoring categories that will help DPR determine in a general sense which lighting strategy (minimal, non-continuous, or continuous) is appropriate for which locations. The following chart shows the eight categories being used to score the trails. Each category will be scored with a value of 1 through 5. This allows a maximum total score of 40 and minimum of 8.

	Table 4-7: DPR GIS Analysis Factors									
Scoring Factor	1	2	3	4	5	Data Source				
Average Daily Trail Usage	Avg monthly users < 10,000	10,000- 20,000	20,000- 30,000	30,000- 40,000	<40,000	Trail Counter Estimates				
DPR Equity Index Score	1	2	3	4	5	Equity Index				
Zoning	Single Family ResIndustrialRetailMultifamily/ CommercialMixed Use		Mixed Use	Denver Blueprint						
Density	1 2 3 4 5		5	Equity Index						
Crime	<52	52-94	94-184	184-315	315+	Crime Rate per 1,000 pop by nbhd (DPD)				
Distance from River/Wetlands	m ds<50'		>250'	Near (US wetlands mapping)						
Distance to Rail Transit Station	>2 mi	1-2mi	.5-1mi	.255mi	<.25 mi	Near (RTD Rail Stations)				
Park Available within 10 min.	1 to 2	3 to 4	5-6	7-8	9-10	2500' buffer SD Park Land				

In general, a score of 15 or below would mean the trail area merits only minimal lighting. A score between 16 and 20 would mean non-continuous lighting is likely the most appropriate choice. A score of 21 or higher would mean continuous lighting is likely needed. DPR can use this GIS tool as a starting point whenever a trail area is being examined for lighting improvements. Each of the eight categories used for the scoring system aligns with the design factors discussed in Section 3.2.

The scoring factor for average daily trail usage coordinates with the high-medium-low trail usage system used by the IES. Lower daily usage rates will receive a lower score while high usage will receive a higher score as higher activity trails are more likely to warrant continuous lighting.



The five DPR Equity Index score categories are incorporated into this analysis tool to assist in locating lighting improvements in a more equitable way. A score of 1 reflects low equity need and a score of 5 indicates high need in that area.

The land use contexts in Denver have each been given a scoring factor that reflects their intensity of use and likely pedestrian and cyclist activity level during nighttime hours. Single Family Residential and Industrial uses have low scores as they should not be very busy at night. Urban Mixed Use in areas such as downtown Denver has the highest score.

The scores for population density are intended to reflect the likely usage rate of the trail in those areas. For example, a low population density area will receive a lower score, which will lend itself to more minimal lighting. High population density areas will have a higher score and merit more lighting.

The scores for the impact of crime on trail lighting needs reflect the crime rate per 1,000 individuals in an area. This will help identify parts of the trail system where visibility into the surrounding area for trail users is a safety priority.

The scoring factor for a trail's proximity to waterways or wetlands addresses both how much light should be near these more delicate ecological areas and allows DPR to see where a CCT below 3000K should be considered. A score of 1 or 2 in this category should lead to lower CCT's being considered for trail and park lighting in order to avoid negative ecological effects, as well as greater priority for any dimming options.

The scoring factor for proximity to transit stations reflects the gradual increase in trail users the closer the are to a transit station. This is in line with trails often having the role in transportation systems as "last mile" connections. The further a trail is from a transit stop the lower the scoring factor becomes.

The category for a trail's proximity to park spaces is intended to factor in the effects park activities and travel to and from park resources has on the usage of surrounding trails. If a trail can reach many parks, it is likely to see more usage throughout the day and later into the evening and would receive a higher score.

This tool will allow DPR to provide a data-based starting point for proposed updates to any trail's lighting that is based on sound lighting design principles. Like the City's other GIS tools, it will be able to facilitate analysis, communication, and map development. While each trail lighting update will still require verification by DPR that the scoring system has correctly taken the site's context and future needs into account, this tool provides a much better in-house ease of use tool for Denver that is grounded in current best practices for outdoor lighting design.



# **Section 5**

# Luminaire & Equipment Specifications

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# **5 LUMINAIRE & EQUIPMENT SPECIFICATIONS**

This section covers standard electrical and solar powered lighting systems, the pros and cons of solar powered alternatives, and the luminaires and equipment available to Denver Parks and Recreation used in the photometric lighting studies in Section 6. This section also includes key factors for choosing outdoor trail lighting as more luminaire and solar panel options may be available to Denver in the future.

# 5.1 STANDARD POWERED LIGHTING

Luminaires are usually powered through connecting them to the electrical grid in their area upon installation. The typical approach to feeding power to grid-connected luminaires starts with the primary power. An existing transformer near the lighting locations may be used to provide this power, or a new transformer may be placed by the utility. 120V AC is typical. The utility will make the final connection between the transformer and a meter.

After the meter is set up, a circuit breaker panel feeds the various branch feeder circuits with electrical power. From this circuit breaker panel, conduit and wiring extends out to the lighting locations for a typical underground electrical installation. Wires connect the lights to the panel, which is connected through the meter back to the primary power source. Typical billing mechanisms include metered rates and utility-owned flat rates. This process and its costs are familiar to many. Many technologies have been developed to reduce energy consumption and its accompanying costs, such as part-night dimming.

LED light sources are typically installed now. Legacy light sources, such as high-pressure sodium or metal halide are still in use, but they are not often used for new installations. LED lights are already highly efficient and help to reduce energy consumption and the resultant bills.

Solar-powered luminaires can eliminate these energy bills entirely.

# 5.2 SOLAR POWERED LIGHTING

Solar-powered lighting has many advantages related to environmental impact, energy costs, installation costs, and operations and maintenance. Solar-powered lighting uses renewable energy harnessed from the sun, does not consume fossil fuels, and does not produce greenhouse gas emissions. It better supports Denver's climate impact commitments than standard power options can.

Installing solar-powered lighting avoids the material and labor costs of wiring, conduit, splice boxes, a utility meter, and/or a circuit breaker panel. When a small number of luminaires need to be installed, or when existing power sources are not located near the planned lighting locations, solar-powered lighting is successful by having solar panels and batteries installed on each pole. As a result, power generation is located near the loads, time can be saved by avoiding utility mobilization to connect power to the loads, and maintenance of underground wiring can be avoided.

For general maintenance and ongoing operations, a benefit of solar-powered lighting is that it will continue to operate during utility power outages. There is limited conduit to maintain, if any. Many of the panel options are very durable and 5-year manufacturer warranties are now common. Some manufacturers also offer programmable controls that can be used with a remote or with a smartphone.



There are some challenges and disadvantages to incorporating solar-powered lighting into Denver's trail system. Adding these new products will increase the overall product inventory Denver needs to maintain. Another consideration is that although solar-powered systems can operate in power outages, they also cannot rely on utility electric grids for backup when their batteries are depleted. These batteries will eventually require replacement, though the savings on installation costs mean that solar-powered systems still compare favorably to wired systems when battery replacement costs are included. Several of these pros and cons of solar-powered lighting are listed below.

## **Pros of Solar**

- Environmental
  - Uses renewable energy
  - Supports Denver's climate goals
- Cost
  - Avoids the material and labor costs from installing wiring and conduit
- Installation
  - Can be installed on a shorter time . frame
  - . Does not require utility mobilization
  - Works very well when a smaller . number of lights need to be installed
  - Works very well in locations remote from existing power conduit
- Operations and maintenance
  - Many manufacturers' warranty these products and components for several years
  - Manufacturers offer dimming profiles and programmable solar light options
  - . Should continue to operate during most power outages
  - May continue to operate during flooding when solar panels and batteries have been installed above the high water level

# **Cons of Solar**

- Adding new products increases Denver's required equipment inventory
- Batteries will require replacement after a period of time. This varies between equipment options.
- Not suitable for locations where obstructions to direct sunlight exist, such as dense trees and tall buildings
- May not operate every night when there are days with limited sunshine.
  - Even a 99% reliable system will have around 3 days per year when it is not operational.
- Standalone solar systems that are not connected to the state's power grid lack the reliability the grid can provide

Where permanent obstructions like multi-story buildings and mature trees will shade the panel locations, solar-powered systems will have a reduced performance that wired systems would not. When temporary partial shading is present, such as when clouds are passing overhead, this kind of performance reduction is not expected. Solar panels are designed to continue to optimize their power output and are wired to avoid serious power reduction from partial shading. However, solar-powered lights may not operate every night of the year, especially in winter months when daylight hours are at a minimum. This is typically addressed by sizing the panels and batteries to provide sufficient power during the expected winter months in the region, ensuring their year-round operation. Failing to size



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batteries and panels sufficiently, orienting the panels improperly, or overlooking environmental conditions such as extreme temperatures could lead to additional negative experiences. Other environmental conditions that could affect the panels could be dust, debris, or inclement weather. Dust can accumulate on solar panels, but typical rainfall cleans away some of this dust periodically. A study of the impact of dust accumulation on solar panel efficiency found that a site in Commerce City, CO had a one percent annual reduction in efficiency to dust accumulation without any maintenance intervention. (Hicks, 2021)

Solar-powered lighting relies on established technologies and can be a reliable, cost-effective lighting solution. It can also be used to increase the adoption of renewable energy in cities and work towards their climate goals. Solar-powered lighting can be used strategically where existing power sources are not nearby, where access to sunlight is easily available, or wherever electrical costs or trenching are important to avoid. However, considering the site-specific challenges of shadowing and adequate access to sunlight, installing solar-powered lighting universally in any city is impractical.

For the larger goal of reducing greenhouse gas emissions and improving a city's overall climate impact, an alternative strategy could be installing grid-connected lighting but also investing in generating more solar power to the grid itself in other locations. Over time, the amount of non-emitting power sources on the grid can be increased this way even when solar powered luminaires are not a practical option.

# 5.3 EQUIPMENT CRITERIA AND SPECIFICATIONS

All luminaires and equipment used for this lighting study for DPR are described in the following tables. Detailed information is included for four post-top pedestrian luminaire options and two solar power systems. The reasons for their inclusion and the criteria used to select the best options for DPR is also included. Each of these luminaires has their performance evaluated through the schematic designs analyzed in Section 6.

A city-owned wallpack option was also considered briefly for the Cherry Creek site studied in Section 6, but this option was discarded due to site characteristics and its data is not included here. The height of the wall required a mounting height lower than what is intended for the wallpack and didn't allow for the necessity of keeping the luminaire away from potential vandalism. This leads to very poor uniformity for a trail lighting application, with light far too bright directly beneath the wallpack and inappropriate levels of darkness in between. Increasing the amount of wall-packs to address the uniformity quickly led to over lighting.



Figure 5-1 – Kim Ouro Luminaire

For luminaires that would remain owned by Xcel Energy, DPR currently has the option of the Kim Ouro luminaire produced by Current Lighting or the K118 Washington acorn produced by King Luminaire. Both are post-tops for pedestrian areas and are suitable for trail applications.

The Kim Ouro has a clean silhouette and is currently used throughout Denver by Xcel Energy. The advantage of this luminaire choice is its uplight score of zero, which supports



Denver's climate commitments and reduces light trespass into the areas around where it's implemented.



The K118 Washington acorn offers a classic look and is currently used throughout Denver by Xcel Energy. However, it is a poor performer when it comes to uplight and light trespass. The acorn's lack of shielding makes it fundamentally undesirable for cities interested in dark skies. Its light output and visual comfort level may make it suitable for some types of highactivity pedestrian areas, but it is not recommended for general use as trail lighting.

Figure 5-2 – K118 Washington Luminaire

Table 5-1: Luminaire Performance of Xcel-Owned Options									
Luminaire Name	CCT's Available	Wattage	Maximum Lumen Output	BUG Rating	Light Distribution	Mounting Height			
Kim Ouro	3000K	28.2W	2958	B2-U0-G2	Type III Med.	12'-15'			
K118 Acorn	3000K	40.2W	2176	B1-U3-G2	Type IV Med.	12'-15'			

For luminaires that would require being owned and maintained by the City the RFL530-SE produced by We-ef Lighting is recommended as the most suitable choice for any trail lighting applications. The



Omero by Lithonia Lighting is currently in use for some DPS parks and trails but is more suitable for larger areas.

The Lithonia Omero has a simple silhouette similar to the Ouro and would blend well with existing lighting throughout Denver. Despite its shape it has an uplight score of two. The lowest lumen output available is much higher than the other luminaires recommended in this

study. It also produces more spill light into the area around it than the Ouro or We-ef options, and there are no shielding options offered by the manufacturer. This luminaire should only be considered in high activity areas that are not near residential or natural areas and it is not ideal for trails.



The RFL530-SE from we-ef has a more industrial visual character than the other three luminaire options and should blend seamlessly with most streetlighting. It also has an uplight score of zero, as well as low glare. It is available in very narrow lighting distributions that could be an advantage in many trail applications. Additionally, for any we-ef option, a CCT of 2200 can be provided by the company per request. Of these four luminaires, this



makes it a very competitive choice for areas where there is increased ecological sensitivity along the trail.

Table 5-2: Luminaire Performance of Denver-Owned Options									
Luminaire Name	CCT's Available	Wattage	Maximum Lumen Output	BUG Rating	Light Distribution	Mounting Height			
Lithonia Omero	3000K	75W	5454	B1-U2-G1	Type II	12'-15'			
we-ef RFL530	3000K 2700K	14W	1959	B1-U0-G1	Type II Medium	12'-15'			
we-ef RFL530	3000K 2700K	27W	3062	B1-U0-G1	Type II Medium	12'-15'			

The following Table 5-3 lists several performance specifications for seven solar power system options for pedestrian luminaires from seven manufacturers. This serves as a starting point for comparing the options currently on the market and available to DPR. The information shown would be included in a typical cutsheet and is important for understanding how the equipment may perform. Where any information was not included online or in cutsheets for the product there is instead a note to contact the manufacturer directly.

Manufacturers play an instrumental role in sizing a system that will have enough panel wattage and battery energy storage to ensure its year-round operation. The different battery chemistries such as lead acid and lithium ion have different characteristics such as their operating temperatures that are important to understand based on the intended equipment location and will be known by the manufacturer. Many solar panels are currently made with mono-crystalline or poly-crystalline silicon. Mono-crystalline silicon solar cells have higher efficiency than poly-crystalline solar cells, but they have a more expensive manufacturing process that adds to their overall cost. Copper Indium Gallium Diselenide (CIGS) is a thin-film solar cell material, which allows the solar panels to be wrapped around the pole in the Clearworld solar system.

Solar-powered systems for lighting are available in several common configurations. These are:

- Pole-mounted solar panel and battery enclosure:
  - A solar panel or panels are mounted to the luminaire's pole, as well as the battery enclosure
- Panels arranged around the pole:
  - Vertical solar panels are arranged around the pole
- All-in-one:

The solar panel and battery are integrated into the luminaire itself

Pole-mounted solar panels often have the largest panels to gather the largest amount of sunlight and thus provide the greatest amount of power to charge the battery. One drawback is that the panel



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presents a large, flat surface to the wind which can increase the structural requirements for the pole. Panels arranged vertically around the pole can offer better aesthetics along trails as they are much less conspicuous. They can also present less surface area for wind loading. However, the vertical position of the panels is not optimally positioned to absorb the sun, resulting in some decrease in charging. All-in-one systems provide another compact design, but integrating the panel and the battery into the luminaire imposes size constraints that limit power and energy storage. There are also systems that use one solar collection system (i.e., panels, batteries, and electronics) to then power several luminaires. This has the potential to power adjacent lights which are shaded, such as by trees. This option requires additional conduit and wiring to connect multiple luminaires through a solar system, driving up its price.

	Table 5-3: Performance of Solar Power Options									
Solar Panel Manufacturer	System Configuration	Solar Panel Wattage	Solar Panel Material	Battery Energy Storage (Ah)	Battery Chemistry	Lumen Output	System Standard Warranty			
Greenshine	Pole-mounted	110W	Silicon	80	Gel Lead Acid	2,600	5-year			
ClearWorld	Pole-wrapped	260W	CIGS	60	Lithium Ion	6,480	10-year			
Selux	Pole-mounted	110W	Silicon	118	AGM Lead Acid	2,210	5-year			
Sol	Pole-mounted	Contact Mfr.	Silicon	Contact Mfr.	AGM Lead Acid	Up to 12,800	5-year			
First Light	All-in-one	Contact Mfr.	Silicon	Contact Mfr.	LiFEPO4	1,250	Contact Mfr.			
Signify	All-in-one	35W	Silcon	20	LiFEPO4	2,000	5-year			
Ragni	Pole-wrapped	100W	Silicon	Contact Mfr.	LiFEPO4	1,000 – 5,600	Contact Mfr.			

The characteristics in Table 5-3 should remain comparable if other solar-powered options are considered by DPR. The all-in-one systems would require the use of their luminaires. ClearWorld has shown significant flexibility adapting their system to various poles. How flexible the manufacturers can be as far as adapting their systems to different luminaires will vary. Additional options for luminaires and equipment that would work well for DPR's needs may become available now or in the future. The luminaires and the solar equipment specifications in this section comply with the expectations for outdoor lighting currently being used in the City and County of Denver.

#### **General Specifications**

Other general information about luminaires and their warranty expectations that was the most relevant to this trail lighting study are included below in Table 5-4. Please refer to the Street Lighting



Design Guidelines & Details document that Denver produced in 2019 for more detail on luminaire requirements if necessary (CCD, 2019).

Ta	Table 5-4: General Luminaire Specifications							
ltem	Description							
Correlated Color Temperature (CCT)	3000K Maximum in Denver 2700K Suitable in residential areas and parks 2200K Preferred near Open Space, Waterways, Natural Habitat areas							
Color Rendering Index (CRI)	≥70							
Impact Rating (IK)	IK07 acceptable, IK08 suitable for general areas at risk of vandalism, IK10 recommended for lights mounted on walls, underdeck, or other locations with easier access to the luminaire and higher risks of damage							
IP Rating	IP66 or greater							
Luminaire Warranty	10 years minimum on luminaire and components.							
Luminaire Warranty Period	Earliest warranty period allowed shall start on the date of receipt by City.							

In addition to the options DPR has for luminaires and solar-powered systems, there are several control system technologies and strategies suitable for trail lighting. These, like shielding and appropriate light temperatures, play a role in improving light pollution and trespass in cities like Denver. Control strategies for outdoor lighting include dimming systems, astronomical timeclocks, and motion detection.

Dimming reduces the light output of luminaires during the times when it is not needed, such as when trail usage is known to be very low. LED drivers compatible with multiple styles of lighting control systems such as 0-10V dimming, digital multiplex (DMX), or digital addressable lighting interface (DALI) provide flexibility for future changes. 0-10V dimming systems are currently the most common system in the United States. DMX and DALI systems are protocols for sending control signals out to compatible lights.

Timeclocks can be used to change when lights turn on and off throughout the year as sunrise and sunset times change seasonally. This is often done through the use of a photocell added to the luminaire and is common in outdoor lighting.

Motion detection can be used to light trails only when trail users are present. Motion sensors may include cameras, radar, or infrared sensors to detect the activity trail users and either turn on the lights or increase the light level. During research done jointly by Clanton & Associates and Pacific Northwest National Laboratory, motion sensing using infrared sensors was not found to be commercially viable for general outdoor use. Additional motion sensing methods and products may be available but have not been utilized by Clanton & Associates at this time.



# Section

# **Lighting Study Sites**

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# **6 LIGHTING STUDY SITES**

DPR provided two trail sites approximately half a mile in length for to be used to develop schematic lighting designs and analyze their performance against IES criteria and the trail's context. Both trail sites are regional trails near the downtown core of Denver and are generally roughly in parallel to waterways. The first site studied was a section of the South Platte River Regional Trail and the second was a section of the Cherry Creek Regional Trail. Both sites are among the busiest in the trail system, so continuous lighting is recommended for the safety of trail users.

The main factors being studied in this lighting analysis were how well these luminaires were able to meet the necessary criteria for safety and visibility, if the uniformity of the light would be pleasant for all trail users, and how the lighting would impact the environment of the nearby waterways.

# 6.1 SOUTH PLATTE REGIONAL TRAIL

This trail site parallels the South Platte River on the north side of Denver. This area currently has a mix of land uses and several bridges for traffic and rail crossings. Several tall buildings are under construction to the south and east of the trail. This area has been more industrial in the past but it is densifying and further diversifying in its land uses. Trail usage in this area is expected to increase over time.

Special considerations needed for this site are the impacts of lighting at night on the ecological health of the South Platte River. Even small amounts of light on the water's surface can affect the behavior of flora and fauna living in the river. This can contribute to lowered water quality as the aquatic ecosystem becomes unbalanced. Light spilling past the trail surface and into the riparian buffer is also important to avoid as it is detrimental to the habitat of local and migratory species.



Figure 6-1 – South Platte River Regional Trail Study Area

From this half mile area a 500' segment that had the most consistent dimensions and was indicative of the overall character of the site was selected for a more detailed photometric analysis. This portion of the site is seen in Figure 6-2 following.



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Figure 6-2 – South Platte River Regional Trail Study Site

This portion of the study area was then diagramed and used as the basis of a lighting layout to generate calculations of the schematic lighting design's performance. These schematic designs would be the same for an electrical or solar-powered trail lighting system. These calculations show whether the lighting design has sufficient light to safely use the trail after dark, has acceptable uniformity for visual comfort and lighting quality, and if there is over lighting with the design. The calculations also show how much light is trespassing past the trail surface intended to be lit and where that spill light occurs.

The IES criteria used for this study is for the category Mixed Cycling and Pedestrian Paths from Table A-3 on page 49 of IES RP-43-22. The relevant details are included in this report in Table 4-1. This is the most likely set of lighting criteria to be used for any trail in the DPR system, so it was selected over the criteria for Walking Surfaces Adjacent to Waterfront found in Table 4-2, though that set of criteria could also be applied to this site.

As this trail is close to a river, we have applied the criteria for Lighting Zone 1. This is the lowest light level suitable for use within Denver. For denser areas of downtown, the criteria for Lighting Zone 2 may also be appropriate even when near waterways. The lowest criteria suitable for a site is always used as the starting point for a lighting design. Whenever criteria is being chosen at a boundary condition, such as where two different lighting zones will share a boundary or two land uses, it is preferred to select the stricter criteria in order to avoid any issues of light trespass. The lowest criteria suitable for a site is always used as the starting point for a lighting design. These decisions are made on a site-by-site basis by the lighting designer.

The minimum appropriate FC average for this use in LZ1 is 0.4 FC. The maximum appropriate FC average is 0.8 FC for LZ1. For LZ2 this maximum would be 1.5 FC and 0.8 FC would be the minimum. For both zones the appropriate range for uniformity is an average FC to minimum FC of 5:1. This range ensures both enough uniformity and enough contrast is being generated by the trail lighting for good visibility.



# 6.1.1 KIM OURO LUMINAIRE – XCEL-OWNED



This lighting design calculation examined the performance of the Kim Ouro luminaire in lighting a 500' length of regional trail at 100' spacing on center. While a closer spacing could increase uniformity, it is not necessary to meet the criteria and would increase the overall costs. The luminaires are set back from the trail surface 3' per current typical installation guidelines. This section of trail is bordered on one side by riparian shoreline and the other by open space.

#### Luminaire



The Kim Ouro has a clean silhouette and is currently used throughout Denver by Xcel Energy. The advantage of this luminaire choice is its uplight score of zero, which supports Denver's climate commitments and reduces light trespass into areas around where it's implemented.

Performance details for this luminaire can be found in Table 5-1.

# Luminaire Layout and Calculation Grid

The lighting calculation grid shows that the light from this design is relatively uniform along the trail surface and very little light is spilling forward into the riparian buffer. The light reaching the river's surface is very negligible, only measurable along the shoreline. A significant amount of light is falling on the open space buffer where the luminaire is sited, but that may not be a major concern for this site.





## **Calculation Summary Tables**

The following two tables show how this layout performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-1: South Platte Trail - Kim Ouro Luminaire at 100' Spacing						
Statistical Area	Trail Lighting Calculations					
	Criteria					
Trail Pavement Surface	Eavg (fc)	Emax (fc)	Emin (fc)	Eavg/Emin (fc)	Emax/Emin (fc)	
	0.8			5:1		
Trail Surface	0.45 0.9 0.2 2.25 4.5					

This table shows the trail surface itself to be within the criteria being studied. A footcandle average of 0.45 FC is an acceptable amount of illuminance. An FC average of 0.4 is the minimum for this criteria. The uniformity is also in the correct range for the usage expected, so visibility and visual comfort should be good for users.

Table 6-2: South Platte Trail - Kim Ouro Luminaire at 100' Spacing							
Statistical Area		Light Trespass Calculations					
	Criteria						
River & Riparian Buffers	Eavg (fc) 	Emax (fc) 0.1	Emin (fc) 	Eavg/Emin (fc) 	Emax/Emin (fc) 		
Riparian Buffer	0.08	0.3	0	N.A.	N.A.		
Streetside Buffer	0.41	1.1	0.1	4.1	11		
South Platte River Surface	0	0	0	N.A.	N.A.		

This table shows what amount of light in this design that is measurable past the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. This design and luminaire do an excellent job keeping light off the river surface. The light level in the riparian buffer exceeds criteria, but not by a large number and the calculation grid shows that the areas closest to the river that would be the most sensitive to interference from light remain very dark. There is a more significant amount of backlight in the streetside buffer, but in this trail scenario there are no nearby residences to be disturbed so it is a lower priority when considering light trespass.



# 6.1.2 LITHONIA OMERO LUMINAIRE – CITY-OWNED



This lighting design calculation examined the performance of the Lithonia Omero luminaire in lighting a 500' length of regional trail at 100' spacing on center. The luminaires are set back from the trail surface 3' per current typical installation guidelines. This section of trail is bordered on one side by riparian shoreline and the other by open space.

#### Luminaire



The Lithonia Omero has a simple silhouette similar to the Ouro and would blend well with existing lighting in Denver. Despite its shape it has an uplight score of two. It tends to produce more spill light into the area around it more than the Ouro or we-ef options, which is typically a disadvantage for trail lighting.

Performance details for this luminaire can be found in Table 5-2.

# Luminaire Layout and Calculation Grid

The calculation grid shows the light being produced by this design is less even, with noticeable reductions in light levels between the luminaires and brighter levels directly underneath them. There is little light spilling into the riparian buffer. Any light reaching the river's surface appears negligible. There is some light spilling backwards into the streetside buffer, but it is concentrated close by the luminaires.





#### **Calculation Summary Tables**

The following two tables show how this layout with the Omero performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-3: South Platte Trail – Lithonia Omero Luminaire at 100' Spacing							
Statistical Area	Trail Lighting Calculations						
	Criteria						
Trail Pavement Surface	Eavg (fc) 0.8	Emax (fc) 	Emin (fc) 	Eavg/Emin (fc) 5:1	Emax/Emin (fc) 		
Trail Surface	1.44	3.0	0.2	7.2	15		

This table shows the trail surface itself exceeds the selected criteria. A footcandle average of 1.44 FC is too high for the LZ1 criteria. It is also very close to the upper limit for LZ2, which would be 1.5 FC. The uniformity exceeds the requirement for either zone, meaning there would be noticeable changes in the light level between luminaires for trail users.

Table 6-4: South Platte Trail – Lithonia Omero Luminaire at 100' Spacing						
Statistical Area	Light Trespass Calculations					
River & Riparian Buffers	Eavg (fc) 	Emax (fc) 0.1	Emin (fc) 	Eavg/Emin (fc) 	Emax/Emin (fc) 	
Riparian Buffer	0.24	1.9	0	N.A.	N.A.	
Streetside Buffer	0.43	2.0	0.1	4.1	11	
South Platte River Surface	0	0	0	N.A.	N.A.	

This table shows what amount of spill light with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. This design and luminaire do an excellent job keeping light off the river surface. However, the light level in the riparian buffer and streetside buffer both exceed this criteria by a significant amount. This suggests this luminaire may be a better fit for trails with more urbanized surroundings where this spill light could be useful for human activity rather than along a trail through more ecologically sensitive greenspaces.



# 6.1.3 LUMINAIRE WE-EF RFL530



This lighting design calculation examined the performance of the we-ef RFL530 luminaire in lighting a 500' length of regional trail at 100' spacing on center. The luminaires are set back from the trail surface 3' per current typical installation guidelines. This section of trail is bordered on one side by riparian shoreline and the other by open space.

## Luminaire



The RFL530-SE from we-ef has a more industrial visual character than the other three luminaire options and should blend seamlessly with most streetlighting. It also has an uplight score of zero, as well as low glare. It is available in very narrow light distributions that could be an advantage in many trail applications. It's also available in a low CCT of 2200K by request, an advantage in sensitive ecological areas. Performance details for this luminaire can be found in Table 5-2.

## Luminaire Layout and Calculation Grid

The calculation grid shows that the light being produced by this design with the we-ef is very well confined to the trail area. The river and shoreline are very dark. There are some brighter spots directly beneath the luminaires and some backwards spill light, but overall the lighting on the trail appears to be even and sufficient.





#### **Calculation Summary Tables**

The following two tables show how this design using the we-ef performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-5: South Platte Trail – we-ef RFL530 Luminaire at 100' Spacing							
Statistical Area	Trail Lighting Calculations						
	Criteria						
Trail Pavement Surface	Eavg (fc) 0.8	Emax (fc) 	Emin (fc) 	Eavg/Emin (fc) 5:1	Emax/Emin (fc) 		
Trail Surface	1.02	3.4	0.2	5.1	17		

This table shows the trail surface itself to exceed the criteria being studied, but not by as large an amount as some of the other luminaires. A footcandle average of 1.02 FC is still too high for the LZ1 criteria. The uniformity here is 5.1, exactly at the upper limit of this set of criteria. Exceeding the uniformity criteria does not necessarily improve visibility as contrast and shadow are also needed. It is often necessary to adjust the luminaire spacing for the needs of the site once the design is past the schematic stage, making uniformity a slightly lesser concern than light levels at the schematic stage.

Table 6-6: South Platte Trail – we-ef RFL530 Luminaire at 100' Spacing							
Statistical Area		Light Trespass Calculations					
	Criteria						
River & Riparian Buffers	Eavg (fc) 	Emax (fc) 0.1	Emin (fc) 	Eavg/Emin (fc) 	Emax/Emin (fc) 		
Riparian Buffer	0.03	0.2	0	N.A.	N.A.		
Streetside Buffer	0.31	2.7	0	N.A.	N.A.		
South Platte River Surface	0	0	0	N.A.	N.A.		

This table shows what amount of spill light there is with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. This design and luminaire do an excellent job keeping light off the river surface. The light level in the riparian buffer only slightly exceeds criteria and the calculation grid shows that the areas closest to the river that are the most sensitive to light remain very dark. There is a more significant amount of backlight in the streetside buffer, but in this trail scenario there are no nearby residences to be disturbed so it is a lower priority for light trespass.



# 6.2 CHERRY CREEK STUDY SITE

This trail site provided by DPR runs along both sides of Cherry Creek for a significant length of downtown. This area supports a mix of residential and retail land uses, a busy street, community park spaces, and nearby entertainment destinations. It is a lively and diverse area when it comes to land use patterns. The site is also distinctive due to the amount of historic bridges crossing over the trail. Trail usage and general pedestrian activity in this area is high.

Special considerations for this site are the impacts of lighting at night on the ecological health of the Cherry Creek, potential light trespass into nearby residential windows, and how to provide adequate light for both the upper and lower pedestrian paths on the Speer Boulevard side of Cherry Creek.

Even small amounts of light on the water's surface can affect the behavior of flora and fauna living in the river, and efforts to improve the health of the Cherry Creek waterway are ongoing. Light spilling into the water or the riparian buffers on either side of the creek needs to be avoided.

A key design consideration for this site was to reuse the existing concrete footings and spacing of approximately 60' on center that are currently in place. The luminaires there now are older and nearing the end of their service life but their placement has been an important part of the visual character of this trail area. This close of a spacing is not typically necessary to meet the expected uniformity criteria, but it is still within an acceptable range. This spacing is the same on either side of the creek along the top of the channel walls, but the usages of the upper deck pathways on either side are different. To address this issue, the lighting designs use a standard post top for the eastern shore of the trail and a dual-headed option on the western shore. This provides more light for anyone coming to and from the parks on the western side and reduces the potential light trespass into residences along the eastern side of the creek.



Figure 6-3 – Cherry Creek Regional Trail Study Area

From this half mile area a 500' segment that had the most consistent dimensions and was indicative of the overall character of the site was selected for a more detailed photometric analysis. This portion of the site is seen in Figure 6-4 below.





Figure 6-4 – Cherry Creek Regional Trail Study Site

This portion of the study area was then diagramed and used as the basis of a lighting layout with which to generate calculations of the schematic lighting design's performance. These schematic designs would be the same for an electrical or solar-powered trail lighting system. These calculations show whether the lighting design has sufficient light to safely use the trail after dark, has acceptable uniformity for visual comfort and lighting quality, and if there is over lighting with the design. The calculations also show how much light is trespassing past the trail area intended to be lit and where that spill light occurs.

The IES criteria used for this study is for the category Mixed Cycling and Pedestrian Paths from Table A-3 on page 49 of IES RP-43-22. The relevant details are included in this report in Table 4-1. This is the most likely set of lighting criteria to be used for any trail in the DPR system, so it was selected over the criteria for Walking Surfaces Adjacent to Waterfront found in Table 4-2, though that set of criteria could also be applied to this site.

As this trail is very close to a creek, the criteria for Lighting Zone 1 has been applied. This is the lowest light level suitable for use within Denver. For denser areas of downtown, the criteria for Lighting Zone 2 may also be appropriate. The lowest criteria suitable for a site is always used as the starting point for a lighting design. Whenever criteria is being chosen at a boundary condition, such as where two different lighting zones will share a boundary or two land uses, it is preferred to select the stricter criteria in order to avoid any issues of light trespass. The lowest criteria suitable for a site is always used as the starting point for a lighting design. These decisions are made on a site-by-site basis by the lighting designer.

The minimum appropriate FC average for this use in LZ1 is 0.4 FC. The maximum appropriate FC average is 0.8 FC for LZ1. For LZ2 this maximum would be 1.5 FC and 0.8 FC would be the minimum. For both zones the appropriate range for uniformity is an average FC to minimum FC of 5:1. This range ensures both enough uniformity and enough contrast is being generated by the trail lighting for good visibility.



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# 6.2.1 KIM OURO LUMINAIRE – XCEL-OWNED



This lighting design calculation examined the performance of the Kim Ouro luminaire in lighting a 500' length of regional trail at 60' spacing on center on average. This is to reuse the existing footings. The luminaires are set along the existing concrete railing structure that runs on both sides of the trail. Both trails are bordered by riparian shoreline that varies in width on one side.

## Luminaire



The Kim Ouro has a clean silhouette and is currently used throughout Denver by Xcel Energy. The advantage of this luminaire choice is its uplight score of zero, which supports Denver's climate commitments and reduces light trespass into areas around where it's implemented.

Performance details for this luminaire can be found in Table 5-1.

# Luminaire Layout and Calculation Grid

The calculation grid shows that the light being produced by the design is sufficient for both regional trails but is too intense for the upper deck by the park. There is also a significant amount of light spilling down into the creek and riparian buffers.





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#### **Calculation Summary Tables**

The following two tables show how this design using the Kim Ouro performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-7: Cherry Creek Trail – Kim Ouro Luminaire at 60' Spacing							
Statistical Area		Trail Lighting Calculations					
	Criteria						
Trail Pavement Surfaces	Eavg (fc) 0.8	Emax (fc) 	Emin (fc) 	Eavg/Emin (fc) 5:1	Emax/Emin (fc) 		
Trail - East Bank	0.4	0.6	0.2	2.0	3.0		
Trail - West Bank	1.13	1.7	0.6	1.9	2.8		
West Upper Deck	1.68	2.5	1.11	1.5	2.3		

This table shows the east trail surface is right at the lower limit for the criteria being studied but the west trail surface exceeds it for LZ1. The upper deck surface significantly exceeds the criteria. This may imply a higher pole height would be needed here. All three surfaces meet the uniformity criteria and would provide a good visual experience for the user in that regard.

Table 6-8: Cherry Creek Trail Lighting Study – Kim Ouro Luminaire at 60' Spacing							
Statistical Area		Light Trespass Calculations					
	Criteria						
River & Riparian Buffers	Eavg (fc) 	Emax (fc) 0.1	Emin (fc) 	Eavg/Emin (fc) 	Emax/Emin (fc) 		
East Riparian Buffer	.39	0.4	0.3	1.3	1.33		
Cherry Creek Surface	.31	0.6	0.2	1.6	3		
West Riparian Buffer	.71	0.8	.06	1.18	1.33		

This table shows the amount of spill light with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. Both riparian buffers exceed this criteria. Another concerning number is 0.6 FC on the creek's surface. The luminaire locations along the high wall make it more complicated to control the spill light from many luminaires.



# 6.2.2 LITHONIA OMERO LUMINAIRE – CITY-OWNED



This lighting design calculation examined the performance of the Lithonia Omero luminaire in lighting a 500' length of regional trail at 60' spacing on center on average. This is to reuse the existing footings. The luminaires are set along the existing concrete railing structure that runs on both sides of the trail. Both trails are bordered by riparian shoreline that varies in width on one side.

#### Luminaire



The Lithonia Omero has a simple silhouette similar to the Ouro and would blend well with existing lighting in Denver. Despite its shape it has an uplight score of two. It tends to produce more spill light into the area around it more than the Ouro or we-ef options, which is typically a disadvantage for trail lighting.

Performance details for this luminaire can be found in Table 5-2.

## Luminaire Layout and Calculation Grid

The calculation grid shows that the light being produced by the Lithonia Omero with this design is too intense for the needs of this space. The trails are consistently lit over the criteria and so are showing on the grid in orange. There is a significant amount of light spilling into the creek and an excessive amount falling on the riparian buffers.





### **Calculation Summary Tables**

The following two tables show how the layout using the Lithonia Omero performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-9: Cherry Creek Trail – Omero Luminaire at 60' Spacing						
Statistical Area		Trail Lighting Calculations				
		Criteria				
Trail Pavement Surfaces	Eavg (fc) 0.8	Emax (fc) 	Emin (fc) 	Eavg/Emin (fc) 5:1	Emax/Emin (fc) 	
Trail - East Bank	1.87	2.1	1.7	1.1	1.24	
Trail - West Bank	2.19	2.4	1.7	1.29	1.41	
West Upper Deck	3.6	5.7	1.6	2.25	3.56	

This table shows the all the pavement surfaces exceed recommended criteria for LZ1. They also noticeably exceed the 1.5 FC average maximum for LZ2. This may imply a higher pole height would be needed here or a luminaire producing fewer lumens. All three surfaces meet the uniformity criteria and would provide a good visual experience for the user in that regard.

Table 6-10: Cherry Creek Trail – Omero Luminaire at 60' Spacing							
Statistical Area		Light Trespass Calculations					
		Criteria					
River & Riparian Buffers	Eavg (fc) 	Emax (fc) 0.1	Emin (fc) 	Eavg/Emin (fc) 	Emax/Emin (fc) 		
East Riparian Buffer	1.59	1.6	1.2	1.24	1.33		
Cherry Creek Surface	0.47	1.2	0.1	4.7	12		
West Riparian Buffer	1.73	1.8	1.5	1.15	1.2		

This table shows the amount of spill light with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. Both riparian buffers exceed this criteria. Another concerning number is 1.2 FC reaching the creek's surface. The luminaire locations along the high wall make it more complicated to control the spill light from many luminaires.



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# 6.2.3 K118 WASHINGTON ACORN LUMINAIRE - XCEL-OWNED



This lighting design calculation examined the performance of the K118 Washington Acorn luminaire in lighting a 500' length of regional trail at 60' spacing on center on average. This is to reuse the existing footings. The luminaires are set along the existing concrete railing structure that runs on both sides of the trail. Both trails are bordered by riparian shoreline that varies in width on one side.

#### Luminaire



The K118 Washington acorn offers a classic look and is currently used throughout Denver by Xcel Energy. While it is a poor performer when it comes to uplight, its light output can sometimes be appropriate for pedestrian areas, and it is visually comfortable for pedestrians or other trail users.

Performance details for this luminaire can be found in Table 5-1.

## Luminaire Layout and Calculation Grid

The calculation grid shows that the light being produced by this design using the acorn is less intense and in some places is more uniform than that from the Omero. There is a significant amount of light spilling into the riparian buffers. The entire creek is also receiving a low amount of spill light.





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## **Calculation Summary Tables**

The following two tables show how the layout using the K118 Washington acorn performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-11: Cherry Creek Trail – K118 Washington Luminaire at 60' Spacing						
Statistical Area	Trail Lighting Calculations					
	Criteria					
Trail Pavement Surfaces	Eavg (fc) 0.8	Emax (fc) 	Emin (fc) 	Eavg/Emin (fc) 5:1	Emax/Emin (fc) 	
Trail - East Bank	0.54	0.6	0.5	1.08	1.2	
Trail - West Bank	0.59	0.7	0.3	1.97	2.33	
West Upper Deck	.91	1.38	0.52	1.75	2.65	

This table shows the two creek trail surfaces to be within the criteria being studied. The upper deck exceeds the average illuminance criteria slightly at .91 FC. All three surfaces meet the uniformity criteria.

Table 6-12: Cherry Creek Trail – K118 Washington Luminaire at 60' Spacing							
Statistical Area		Light Trespass Calculations					
	Criteria						
River & Riparian Buffers	Eavg (fc) 	Emax (fc) 0.1	Emin (fc) 	Eavg/Emin (fc) 	Emax/Emin (fc) 		
East Riparian Buffer	0.51	0.6	0.4	1.28	1.5		
Cherry Creek Surface	0.35	0.5	0.3	1.23	1.7		
West Riparian Buffer	0.55	0.6	0.5	1.1	1.2		

This table shows the amount of spill light with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. Both riparian buffers exceed this criteria. The average of .35 FC on the creek's surface exceeds this criteria, and the grid shows light is impacting the entire water's surface. Even at the lower levels seen with this luminaire, this is far from ideal. The luminaire locations along the high wall make it more complicated to control the spill light from many luminaires.



## 6.2.4 WE-EF RFL530 LUMINAIRE – CITY-OWNED



This lighting design calculation examined the performance of the we-ef RFL530 luminaire in lighting a 500' length of regional trail at 60' spacing on center on average. This is to reuse the existing footings. The luminaires are set along the existing concrete railing structure that runs on both sides of the trail. Both trails are bordered by riparian shoreline that varies in width on one side.

#### Luminaire



The RFL530-SE from we-ef has a more industrial visual character than the other three luminaire options and should blend seamlessly with most streetlighting. It also has an uplight score of zero, as well as low glare. It is available in very narrow light distributions that could be an advantage in many trail applications. It's also available in a low CCT of 2200K by request, an advantage in sensitive ecological areas. Performance details for this luminaire can be found in Table 5-2.

#### Luminaire Layout and Calculation Grid

The calculation grid shows that the light being produced by the design is well confined to the trail surfaces compared to the Ouro or Omero. There are some areas of increased intensity directly under the luminaires, but they are minimal. There is some spill light into the riparian buffers, but very little light is spilling out onto the creek's surface.




#### **Calculation Summary Tables**

The following two tables shown how the layout using the we-ef luminaire performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-13: Cherry Creek Trail – WE-EF Luminaire at 60' Spacing									
Statistical Area	Statistical Area Trail Lighting Calculations								
			Criteria	3					
Trail Pavement Surfaces	Eavg (fc)Emax (fc)Emin (fc)Eavg/EminEmax/Emin0.85:1								
Trail - East Bank	0.79	0.8	0.7	1.13	1.14				
Trail - West Bank	1.34	1.6	1.0	1.34	1.6				
West Upper Deck	1.53	3.94	0.76	2.0	5.18				

This table shows the trail on the east bank meets criteria. The trail on the west bank exceeds it at 1.34 FC. The upper deck pavement exceeds it at 1.53 FC. This is close to the maximum average footcandle limit of 1.5 FC for LZ2. This may need to be addressed through mounting height. All three surfaces meet the uniformity criteria.

Table 6-14: Cherry Creek Regional Trail – WE-EF Luminaire at 60' Spacing									
Statistical Area	Light Trespass Calculations								
			Criteria	3					
River & Riparian Buffers	Eavg (fc)Emax (fc)Emin (fc)Eavg/EminEma0.1								
East Riparian Buffer	0.22	0.3	0.2	1.1	1.5				
Cherry Creek Surface	0.07	0.2	0	N.A.	N.A.				
West Riparian Buffer	0.4	0.4	0.3	1.33	1.33				

This table shows the amount of spill light with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. Both riparian buffers exceed this criteria, but these numbers are significantly lower compared to the previous luminaire options. There is 0.2 FC reaching the creek surface, but this is also an improvement. The luminaire locations along the high wall makes it more complicated to control spill light with many luminaires. The we-ef luminaire is the best performer for Cherry Creek in this study.



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#### 6.2.5 WEEF RFL530 LUMINAIRE (DUAL WATTAGES) – CITY-OWNED



This lighting design calculation examined the performance of the we-ef RFL530 luminaire in lighting a 500' length of regional trail at 60' spacing on center on average. This is to reuse the existing footings. The luminaires are set along the existing concrete railing structure that runs on both sides of the trail. Both trails are bordered by riparian shoreline that varies in width on one side.

#### Luminaire



The RFL530-SE from we-ef has a more industrial visual character than the other three luminaire options and should blend seamlessly with most streetlighting. It also has an uplight score of zero, as well as low glare. It is available in very narrow light distributions that could be an advantage in many trail applications. It's also available in a low CCT of 2200K by request, an advantage in sensitive ecological areas. Performance details for this luminaire can be found in Table 5-2.

#### Luminaire Layout and Calculation Grid

The calculation grid shows that the light being produced by the design is well confined to the trail surfaces compared to the Ouro or Omero. There are some areas of increased intensity directly under the luminaires, especially on the upper deck where a higher wattage luminaire was selected. There is some spill light into the riparian buffers but very little onto the creek's surface.





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#### **Calculation Summary Tables**

The following two tables show how this layout using we-ef luminaires performs against the selected trail lighting criteria from the IES. These calculations are produced based on the grid seen overlaid on the site, with each point in the grid representing a light level.

Table 6-15: Cherry Creek Trail – WE-EF Dual Wattages Luminaire at 60' Spacing									
Statistical Area	Trail Lighting Calculations								
			Criteria	3					
Trail Pavement Surfaces	Eavg (fc) 0.8	Eavg (fc)Emax (fc)Emin (fc)Eavg/Emi0.85:1							
Trail - East Bank	0.79	0.8	0.7	1.13	1.14				
Trail - West Bank	1.43	1.8	1.1	1.3	1.64				
West Upper Deck	2.29	5.97	1.0	2.29	5.97				

This table shows the trail on the east bank meets criteria. The trail on the west bank exceeds it at 1.43 FC. This slight increase is due to using a higher wattage version of the luminaire oriented towards the upper deck to improve uniformity. The upper deck pavement exceeds it at 2.29 FC. All three surfaces meet the uniformity criteria.

Table 6-16: Cherry Creek Regional Trail Lighting Study – WEEF TII-TIII Luminaire									
Statistical Area	tistical Area Light Trespass Calculations								
			Criteria	3					
River & Riparian Buffers	Eavg (fc) 	Eavg (fc)Emax (fc)Emin (fc)Eavg/EminEma0.1							
East Riparian Buffer	0.2	0.3	0.1	2	3				
Cherry Creek Surface	0.06	0.2	0	N.A.	N.A.				
West Riparian Buffer	0.36	0.4	0.1	3.6	4				

This table shows the amount of spill light with this design that is measurable beyond the trail surfaces. Ideally these areas would not exceed 0.1 FC at night. Both riparian buffers exceed this criteria, but these numbers are lower compared to the previous options. There is 0.2 FC reaching the creek surface, but this is also an improvement. The luminaire locations along the high wall make it more complicated to control the spill light with many luminaires. The we-ef luminaire is the best performer for Cherry Creek in this study.



# **Section 7**

# Electrical Costs Comparisons

# 7 ELECTRICAL COSTS & COMPARISONS

To complement the 500' lighting designs in the previous section, three schematic electrical designs were developed and studied for each half-mile site: a city-owned lighting design, an Xcel-owned lighting design, and a solar-powered lighting design.

The following cost summaries have been prepared using CDOT cost data from the 2022 cost data book as well as from other available data about the current costs of equipment and materials. They represent a reasonable estimate of the material and installation costs it would take to provide continuous lighting along a half-mile section of a trail in Denver. The lighting designs used to develop the cost estimates were either existing at the study site or typical for trail applications.

### 7.1 SOUTH PLATTE STUDY SITE

The schematic lighting design for the South Platte River Trail site includes the costs of pedestrian lighting along the trail and underdeck lighting added beneath existing traffic, rail, or pedestrian bridges. The typical electrical costs expected for these lighting designs are also included.

#### 7.1.1 SHADE ANALYSIS

It is necessary to note that the part of the South Platte River Trail used for the study area is bordered by mature trees, which would cast shade on solar panels mounted at a 20-foot height. There are also existing and planned tall buildings in this area that would also cast deep shade onto solar panels mounted along the trail. The following image shows the results of a shading analysis of one building's impact on this part of the South Platte River Trail. The shaded areas in grey represent the shadows



Figure 7-1 – Shading Analysis

cast by one of the buildings on Arkins Court throughout a winter day, from 9 AM to 3 PM. They were calculated by using the height of the building, the longitude, and the angle of the sun for the date of December 21<sup>st</sup>. The labeled lines indicate the direction of the sun at the given time of day. For example, at 9:00 AM, the sun is shining from the SE and at 3:00 PM, the sun is shining from the SW. The shaded area shows how the shadow from the building will shift position and shade the trail throughout the day. Using a date such as December 21st is a typical approach because the sun angle on that date provides the least amount of direct sun in a year, so a solar system designed for these conditions should work well the rest of the year. The grey area shows that several hundred feet of the trail will be consistently shaded by the nearby building during the day. Additional buildings are expected to be constructed along Arkins Court next to the trail in the future, which will further increase this shading.

This schematic design can therefore be considered as a generalizable example of solar-powered lighting designed with 100' spacing. However, the location is not optimal for solar-powered lighting. Other locations throughout the trail system would be more suitable for implementing solar.



#### 7.1.2 COST ANALYSIS

The following three cost options for the studied site are intended to be representative of the typical prices for labor and materials at the time of this study. While the schematic designs were done using a representative portion of the study site, the cost analysis has been done for the full half-mile length. The full lighting and electrical designs that would be developed before any construction took place could provide more refined cost estimates than the schematic designs used for these estimates.

#### City-Owned Trail Lighting

In addition to luminaire costs, the cost estimate for the city-owned design in the chart below includes copper wiring, the installation of a new meter to feed the lights, and a force account pay item for final connection to the electrical service done by Xcel Energy. These necessities contributed to the city-owned design having the highest cost.

Table 7-1: South Platte Trail City-Owned Costs & Quantities - 100' Spacing									
CDOT PAY ITEM	DESCRIPTION	UNITS	QTY	NOTES		INS UN	STALLED	S	UBTOTAL COST
613-01200	2 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	3230			\$	30	\$	96,900
613-00125	1-1/4 INCH ELECTRICAL CONDUIT	LF	330			\$	38	\$	12,540
613-01125	1-1/4 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	140			\$	32	\$	4,480
613-07002	TYPE TWO PULL BOX	EA	7			\$	2,000	\$	14,000
613-10000	WIRING	LS	1			\$	106,500	\$	106,500
613-13006	LUMINAIRE (LED) (6,000 LUMENS)	EA	26	POST- TOP		\$	2,000	\$	52,000
613-13006	LUMINAIRE (LED) (6,000 LUMENS)	EA	29	WALL		\$	2,000	\$	58,000
613-34150	LIGHT STANDARD METAL 15- FOOT)	EA	26			\$	4,500	\$	117,000
613-40000	CONCRETE FOUNDATION PAD	EA	1			\$	1,700	\$	1,700
613-40010	LIGHT STANDARD FOUNDATION	EA	26			\$	3,000	\$	78,000
613-50109	METER POWER PEDESTAL	EA	1			\$	10,000	\$	10,000
700-70082	F/A FURNISHED & INSTALL ELECTRICAL SERVICE	FA	1			\$	5,000	\$	5,000

TOTAL	\$ 639,520
CONTINGENCY	\$ 83,400
SUBTOTAL	\$ 556,120
foundation, electrical service)	
(conduit, wiring, splice boxes, MPP, MPP	\$ 288,788
OTHER COSTS	
LUMINAIRE COSTS	\$ 350,750

6/22/2023



CLANTON & ASSOCIATES

#### **Xcel-Owned Trail Lighting**

In contrast to the city-owned design, the Xcel-owned option uses aluminum wires, which currently cost significantly less than copper wires. They also invite less wire theft, as they are heavier to maneuver and less popular for resale. The Xcel-owned design also avoids the need to install a meter and a foundation for that meter entirely. These differences led to the Xcel-owned design having a lower cost than the city-owned design, likely by an amount around \$97,000.

Table 7-2: South Platte Trail Xcel-Owned Costs & Quantities - 100' Spacing									
CDOT PAY ITEM	DESCRIPTION	UNITS	QTY	NOTES		INS UN	TALLED IT COST	S	UBTOTAL COST
613-01200	2 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	3230			\$	30	\$	96,900
613-00125	1-1/4 INCH ELECTRICAL CONDUIT	LF	330			\$	38	\$	12,540
613-01125	1-1/4 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	140			\$	32	\$	4,480
613-07002	TYPE TWO PULL BOX	EA	7			\$	2,000	\$	14,000
613-10000	WIRING	LS	1			\$	33,700	\$	33,700
613-13006	LUMINAIRE (LED)(6,000 LUMENS)	EA	26	POST- TOP		\$	2,000	\$	52,000
613-13006	LUMINAIRE (LED)(6,000 LUMENS)	EA	29	WALL		\$	2,000	\$	58,000
613-34150	LIGHT STANDARD METAL 15- FOOT)	EA	26			\$	4,500	\$	117,000
613-40000	CONCRETE FOUNDATION PAD	EA				\$	1,700	\$	-
613-40010	LIGHT STANDARD FOUNDATION	EA	26			\$	3,000	\$	78,000
613-50109	METER POWER PEDESTAL	EA				\$	10,000	\$	-
700-70082	F/A FURNISHED & INSTALL ELECTRICAL SERVICE	FA	1			\$	5,000	\$	5,000

TOTAL	\$ 542,320
CONTINGENCY	\$ 70,700
SUBTOTAL	\$ 471,620
foundation, electrical service)	
(conduit, wiring, splice boxes, MPP, MPP	\$ 191,613
OTHER COSTS	
LUMINAIRE COSTS	\$ 350,750



#### Solar-Powered Trail Lighting

For the South Platte River regional trail, the solar-powered lighting option had the lowest total costs. The lighting related costs are similar to the city-owned and Xcel-owned options. The cost estimate still includes the same amount of luminaires, light standards, and lighting standard foundations. However, the costs of wiring, conduit, and a meter are avoided (except where underdeck lights require a small amount of wire and conduit to connect to solar panels). The reductions in these electrical costs are a significant savings, around \$23,000 cheaper than the upfront costs of Xcel-owned lighting. The cost estimate is detailed in the table below.

Table 7-3: South Platte Trail Solar-Powered Costs & Quantities - 100' Spacing									
CDOT PAY ITEM	DESCRIPTION	UNITS	S QTY NOTES			INSTALLED UNIT COST		S	UBTOTAL COST
613-01200	2 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	350			\$	30	\$	10,500
613-00125	1-1/4 INCH ELECTRICAL CONDUIT	LF	380			\$	38	\$	14,440
613-10000	WIRING	LS	1			\$	2,700	\$	2,700
613-13000	LUMINAIRE (LED)(SPECIAL)	EACH	26	1		\$	2,000	\$	52,000
613-13006	LUMINAIRE (LED)(6,000 LUMENS)	EA	29	WALL		\$	2,000	\$	58,000
613-34150	LIGHT STANDARD METAL 15- FOOT)	EA	26	3		\$	4,500	\$	117,000
613-40010	LIGHT STANDARD FOUNDATION	EACH	26			\$	3,000	\$	78,000
613-50375	SOLAR COLLECTION SYSTEM	EACH	32	2		\$	3,700	\$	118,400

NOTES:	LUMINAIRE COSTS	\$ 350,750
1) INCLUDES THE LUMINAIRE, AND POWER SUPPLY CONNECTION SUPPLIED BY MANUFACTURER.	OTHER COSTS (solar panel, conduit, wiring)	\$ 167,946
2) INCLUDES THE PV SOLAR PANELS AND BATTERIES PROVIDED BY MANUEACTURER	SUBTOTAL	\$ 451,040
3) INCLUDES THE POLE AND ARM ASSEMBLY	CONTINGENCY	\$ 67,700
SUPPLIED BY MANUFACTURER.	TOTAL	\$ 518,740



#### 7.1.3 COST COMPARISONS

The following chart compares the cost estimates for the city-owned, Xcel-owned, and solar-powered schematic designs for the South Platte River Trail. The lighting costs were very similar for all three options due to requiring the same number of luminaires. The Xcel-owned and solar-powered options both had lower electrical costs than the city-owned option due to reducing or eliminating costs of wiring, conduit, and electrical meters.



The energy cost included in the chart uses the Xcel Energy metered street light rate for the cityowned option. It uses the energy-only, flat-rate for the Xcel-owned option. The energy costs are the estimated five-year costs of energy based on the number of pedestrian lights used in the schematic designs.

While solar-powered lighting won't require energy costs, it will necessitate the cost of battery replacements over time. The estimated costs of battery replacements after five years are included in the cost comparison chart. Manufacturers provide expected battery lifetimes and battery warranties which can inform expectations about how long the batteries will last and how often they'll require replacement. The battery operating temperature should also be suited to the climate at the project location. The manufacturers listed in Table 5-3 typically warranty their batteries for 5 or up to10 years. When selecting solar-powered lighting options, take note of these battery characteristics to



understand how often battery replacements will be needed to address diminishing performance. Shorter battery lifetimes may have lower costs but will lead to more frequent replacements and more effort spent replacing batteries. In general, battery costs have been trending downwards but it should be discussed with the manufacturer.

### 7.2 CHERRY CREEK STUDY SITE

The schematic lighting design for the Cherry Creek Regional Trail site includes the costs of pedestrian lighting along the trail and underdeck lighting added beneath existing traffic, rail, or pedestrian bridges. The typical electrical costs expected for these lighting designs are also included.

The Cherry Creek Trail study site has a number of existing characteristics that influenced the lighting design. Concrete walls surround the creek and the trail on both sides. Numerous bridges cross this section of the trail. The existing lighting along the tops of the walls is at a 60' spacing. After initial photometric study, the lighting design chosen used new luminaires at the existing 60' spacing in addition to adding underdeck lights under bridges.

#### 7.2.1 COST ANALYSIS

The following three cost options for the studied site are intended to be representative of the typical prices for labor and materials at the time of this study. While the schematic designs were done using a representative portion of the study site, the cost analysis has been done for the full half-mile length. The full lighting and electrical designs that would be developed before any construction took place could provide more refined cost estimates than the schematic designs used for these estimates.



LIGHTING DESIGN AND ENGINEERING

#### **City-Owned Trail Lighting**

Similar to the city-owned schematic design for the South Platte River Trail, the cost estimate in the chart below includes copper wiring, installation of a new meter to feed the lights, and a force account pay item for final connection to the electrical services provided by Xcel Energy.

Table 7-4: Cherry Creek Trail City-Owned Costs & Quantities - 60' Spacing									
CDOT PAY ITEM	DESCRIPTION	UNITS	INITS QTY NOTES			INSTALLED UNIT COST		SU	BTOTAL COST
613-01200	2 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	4430			\$	30	\$	132,900
613-00125	1-1/4 INCH ELECTRICAL CONDUIT	LF	1040			\$	38	\$	39,520
613-07002	TYPE TWO PULL BOX	EA	3			\$	2,000	\$	6,000
613-10000	WIRING	LS	1			\$	94,300	\$	94,300
613-13006	LUMINAIRE (LED) (6,000 LUMENS)	EA	87	POST- TOP		\$	2,000	\$	174,000
613-13006	LUMINAIRE (LED) (6,000 LUMENS)	EA	52	WALL		\$	2,000	\$	104,000
613-34120	LIGHT STANDARD METAL (12- FOOT)	EA	41			\$	2,000	\$	82,000
613-34122	LIGHT STANDARD METAL (12- FOOT) (2-ARM)	EA	23			\$	2,000	\$	46,000
613-40000	CONCRETE FOUNDATION PAD	EA	2			\$	1,700	\$	3,400
613-40010	LIGHT STANDARD FOUNDATION	EA				\$	3,000	\$	-
613-50109	METER POWER PEDESTAL	EA	2			\$	10,000	\$	20,000
700-70082	F/A FURNISHED & INSTALL ELECTRICAL SERVICE	FA	1			\$	5,000	\$	5,000

TOTAL	\$	813,220
CONTINGENCY	\$	106,100
SUBTOTAL	\$	707,120
service)		
MPP, MPP foundation, electrical	φ	340,200
(conduit, wiring, splice boxes,	¢	346 288
OTHER COSTS		
LUMINAIRE COSTS	\$	466,900



#### **Xcel-Owned Trail Lighting**

The table below shows the Xcel-owned cost estimate for Cherry Creek Trail. The cost estimate uses aluminum wiring (a lower cost compared to copper wiring) and does not include a meter, a meter foundation, or the force account item for the connection to electrical service. These differences led to the Xcel-owned design having a lower cost than the city-owned design, likely by an amount around \$78,000.

Table 7-5: Cherry Creek Trail Xcel-Owned Costs & Quantities - 60' Spacing									
CDOT PAY ITEM	DESCRIPTION	UNITS	QTY	NOTES		INSTALLED UNIT COST		SUBTOTAL COST	
613-01200	2 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	4430			\$	30	\$	132,900
613-00125	1-1/4 INCH ELECTRICAL CONDUIT	LF	1040			\$	38	\$	39,520
613-07002	TYPE TWO PULL BOX	EA	3			\$	2,000	\$	6,000
613-10000	WIRING	LS	1		:	\$	49,800	\$	49,800
613-13006	LUMINAIRE (LED)(6,000 LUMENS)	EA	87	POST- TOP		\$	2,000	\$	174,000
613-13006	LUMINAIRE (LED)(6,000 LUMENS)	EA	52	WALL		\$	2,000	\$	104,000
613-34120	LIGHT STANDARD METAL (12- FOOT)	EA	41		:	\$	2,000	\$	82,000
613-34122	LIGHT STANDARD METAL (12- FOOT) (2-ARM)	EA	23		:	\$	2,000	\$	46,000
613-40000	CONCRETE FOUNDATION PAD	EA				\$	1,700	\$	-
613-40010	LIGHT STANDARD FOUNDATION	EA			1	\$	3,000	\$	-
613-50109	METER POWER PEDESTAL	EA				\$	10,000	\$	-
700-70082	F/A FURNISHED & INSTALL ELECTRICAL SERVICE	FA	1		:	\$	5,000	\$	5,000

TOTAL	\$	735,120
CONTINGENCY	\$	95,900
SUBTOTAL	\$	639,220
service)		
MPP, MPP foundation, electrical	Э	200,203
(conduit, wiring, splice boxes,	¢	260 202
OTHER COSTS		
LUMINAIRE COSTS	\$	466,900



#### Solar-Powered Trail Lighting

The chart below shows the cost estimate for solar-powered lighting along Cherry Creek Trail. At the 60' spacing used in this design, solar-powered lights had the highest estimated cost. The conduit and wiring costs are still much lower than the costs in the City-owned and Xcel-owned designs. However, at this closer spacing, the costs of solar panels, batteries, and their associated electronics (included in the solar collection system pay item) outweigh the reduction in conduit and wiring costs significantly.

If cost savings are the main motivation for using solar-powered lighting on a trail, then solar-powered lighting will be better suited to designs with greater spacing between lights. We would not recommend its use when the spacing needs to be less than 100'.

Table 7-6: Cherry Creek Trail Solar-Powered Costs & Quantities - 60' Spacing									
CDOT PAY ITEM	DESCRIPTION	UNITS	QTY	NOTES		INSTALLED UNIT COST		SUBTOTAL COST	
613-13000	LUMINAIRE (LED)(SPECIAL)	EACH	87	1		\$	2,000	\$	174,000
613-34120	LIGHT STANDARD METAL (12- FOOT)	EA	41	3		\$	1,750	\$	71,750
613-34122	LIGHT STANDARD METAL (12- FOOT) (2-ARM)	EA	23	3		\$	1,750	\$	40,250
613-40010	LIGHT STANDARD FOUNDATION	EACH				\$	3,000	\$	-
613-13006	LUMINAIRE (LED)(6,000 LUMENS)	EA	52	WALL		\$	2,000	\$	104,000
613-01200	2 INCH ELECTRICAL CONDUIT (PLASTIC)	LF	700			\$	30	\$	21,000
613-00125	1-1/4 INCH ELECTRICAL CONDUIT	LF	1040			\$	38	\$	39,520
613-10000	WIRING	LS	1			\$	6,300	\$	6,300
613-50375	SOLAR COLLECTION SYSTEM	EACH	78	2		\$	3,700	\$	288,600

NOTES:	LUMINAIRE COSTS	\$ 448,500
1) INCLUDES THE LUMINAIRE, AND POWER SUPPLY CONNECTION SUPPLIED BY MANUFACTURER. 2) INCLUDES THE PV SOLAR PANELS AND BATTERIES PROVIDED BY THE MANUFACTURER.	OTHER COSTS (solar panel, conduit, wiring)	\$ 384,583
	SUBTOTAL	\$ 745,420
3) INCLUDES THE POLE AND ARM ASSEMBLY	CONTINGENCY	\$ 111,800
SUPPLIED BY MANUFACTURER.	TOTAL	\$ 857,220



LIGHTING DESIGN AND ENGINEERING

#### 7.2.2 COST COMPARISONS

The cost comparison between the city-owned, Xcel-owned, and solar-powered designs for the Cherry Creek Trail study area is shown in the chart below.



The energy cost included in the chart uses the Xcel Energy metered street light rate for the cityowned option. It uses the energy-only, flat-rate for the Xcel-owned option. The energy costs are the estimated five-year costs of energy based on the number of pedestrian lights used in the schematic designs.

While solar-powered lighting won't require energy costs, it will necessitate the cost of battery replacements over time. Manufacturers provide expected battery lifetimes and battery warranties which can inform expectations about how long the batteries will last and how often they'll require replacement. The battery operating temperature should also be suited to the climate at the project location. The manufacturers listed in Table 5-3 typically warranty their batteries for 5 or up to10 years. When selecting solar-powered lighting options, take note of these battery characteristics to understand how often battery replacements will be needed to address diminishing performance. Shorter battery lifetimes may have lower costs but will lead to more frequent replacements and more effort spent replacing batteries. In general, the costs of these batteries have been trending downwards but it should be discussed with the manufacturer.



For the Cherry Creek Trail study area and its unique characteristics, the Xcel-owned option had the lowest cost. This was due to using aluminum wiring (in contrast to the copper wiring used in the city-owned design) and to avoiding the cost of installing an electrical meter. The solar-powered design had the highest cost for this site due to the close spacing of the lights and the high number of solar panels and batteries included in the cost estimate.

#### 7.3 CONCLUSIONS

The solar-powered lighting designs in this comparison merit additional comment. Solar-powered lighting performs best in locations with full access to the sun, ideally with solar panels which can be positioned in the field to tilt towards the equator to optimize their performance. Obstructions between the solar panel and the sun reduce any solar system's performance.

In the northern hemisphere, this would include any buildings or dense trees located south of the site where the solar-powered lighting would be installed. Construction of multi-story buildings is expected south of the South Platte River Trail study area which will limit the applicability of solar-powered lighting for that site. In addition, mature trees surround portions of the trail, also reducing solar system performance. Bridges also cover significant portions of the South Platte River Trail and the Cherry Creek Trail in Downtown Denver. Lighting under bridges can be solar-powered. However, conduit and wiring would be needed to connect underdeck lights out to a solar collection system located next to a bridge. The costs of conduit and wiring to connect solar power to underdeck lighting will reduce the cost-competitiveness of solar compared to city-owned or Xcel-owned lighting.

To demonstrate how this impacts the cost of these systems, the following graphs show the cost of schematic lighting design for a site of the same size as those studied, but ideal for solar powered trail lighting with no major obstructions for southern sunlight or requirement for underdeck lighting.





LIGHTING DESIGN AND ENGINEERING



At 100' spacing the costs of a solar system for DPR remain very similar to the Xcel-owned option.

At 120' spacing the cost savings begin to increase. At the 300' spacing that would be suitable for noncontinuous lighting the savings of solar options become significant.





Overall, in this study the cost estimates for a solar-powered system were equal to or less than the cost estimates for City-owned lights or Xcel-owned lights. This shows that site selection is a crucial part of determining where solar-powered lighting can be best utilized. While solar-powered systems have ecological benefits, their economic benefits are not fully realized unless the site itself is the right fit for solar. Trails that receive direct sunlight, that are unobscured by tall trees and buildings, that merit non-continuous or minimal lighting, and have few bridges requiring underdeck lighting would be good candidates for solar-powered trail lighting. The cost analysis also shows that while city-owned options are consistently more expensive than Xcel-owned, this margin is narrow enough that the other advantages for Denver such as luminaire and maintenance choices may still make it a viable option.



LIGHTING DESIGN AND ENGINEERING

# Section 8

# **Final Recommendations**

LU 23-088549 HR DM, Exhibit A.10

- WHEEL

### 8 FINAL RECOMMENDATIONS

This Denver Trail Lighting Study has set up a knowledgebase for DPR to make more informed decisions on their outdoor lighting and electrical improvement options and priorities. The information contained in this study will support future DPR trail lighting projects in being consistent, reliable, cost effective, and support the development of a GIS mapping tool that will be used to determine which level of lighting and in what location is best for Denver.

#### **Designing Trail Lighting**

The typical lighting design process for choosing where a trail should be lit and to what lighting levels is detailed in Sections 3 and 4 to provide a strong understanding of the industry and its processes to the non-lighting professional. This included the warranting process and how to best utilize national lighting criteria. These sections relate to several of the original five key concerns that began this study, which were safety, responsible lighting practices, equity, costs, and maintenance.

**Safety**: To provide adequate lighting in the locations where it is needed and to improve visibility for greater safety on mixed-use trails for both pedestrians and cyclists.

 Lighting Warrants & Criteria: Sections 3 & 4 of this study provide a process for determining the lighting warrants and criteria that will provide adequate light levels to improve safety throughout the DPR trail system.

**Responsible Lighting**: This key item was to identify what information was needed by DPR to ensure all trail lighting selected is appropriate for the area and considerate of the surrounding properties.

- Responsible Lighting Approach: The trail lighting system should provide just enough light for good visibility, with an appropriate color temperature (CCT) that considers adjacent land uses and only puts light where it is needed and when it is needed.
- Responsible Lighting Strategies: To successfully achieve these goals, quality lighting equipment must be selected that have:
  - Precision Optics: Luminaires with excellent optical control to focus the light on the trail, have low glare and minimize spill light beyond the trail.
  - Appropriate Light Levels: Luminaires with a range of lumen output that result in appropriate light levels that do not exceed lighting criteria.
  - Color Temperature: Luminaires with a range of correlated color temperatures (CCT) to minimize impacts of light on flora and fauna.
  - Dimming Controls: Lighting controls that provide adaptive dimming to reduce light levels at times with lower usage of the trails.
- Solar Power: Using solar power in locations with adequate solar access can be reliable, cost effective and can save significant costs where Non-Continuous or Minimal Lighting is warranted.
  - Solar-powered systems reduce the amount of energy consumed by Denver, reducing the City's environmental impact.



**Equity**: This key item was to improve trail lighting in a more equitable way the prioritizes areas with greater needs using a data-driven approach.

- Equity Score: In collaboration with DPR, Section 4.3 of this study establishes a mapping system that incorporates the existing Denver Neighborhood Equity Index scoring system, adjacent land use, population density, crime rates, distance from public and other factors to help guide the decisions to use Continuous, Non-Continuous or Minimal Lighting strategies for any segment of trail.
- Priority Funding: When possible, funding for trail lighting improvement projects should also consider these Denver Neighborhood Equity Index scores to determine which trails should receive priority funding.

The figure below is an example of the GIS mapping tool being developed by DPR as described in Section 4.3. Several lighting warrants are scored on through five to determine where lighting should be Continuous, Non-Continuous, or Minimal based on multiple factors including trail usage, population density, land use zoning, equity, crime rates, distance to public transit and parks, and distance from rivers and wetlands. Since this scoring system is a new system that will require fine-tuning, it should be used as a starting point for the lighting warrants conversation but not as the determining factor. Adjustments to this scoring system are likely to be needed as DPR evaluates how accurately it is working for individual projects.



Figure 8-1 – Initial output of trail lighting recommendations using DPR's new GIS mapping tool



LIGHTING DESIGN AND ENGINEERING

This initial map shows the recommended areas of continuous lighting in green, non-continuous lighting in orange, and minimum lighting in red. At a glance, the areas suggested align well with the trail type and neighborhoods they are located in. The continued development of this tool is a very exciting improvement for DPR's trail lighting.

#### Trail Lighting Ownership & Maintenance

Currently in Denver, Xcel Energy owns and maintains most of the trail lighting while DPR owns a small amount of their lights themselves. Changing this arrangement presents many challenges and opportunities for DPR. This study has identified the most cost-effective strategies for improvements needed in the DPR trail lighting system and which products would be most appropriate for DPR to develop a more durable and resilient lighting and electrical system.

#### Costs:

- DPR Electrical Standards: The cost analysis in this study is based upon current lighting and electrical standards of Xcel Energy and DPR. While the DPR owned and maintained system shows a higher cost than Xcel Energy, this is mostly due to the higher cost of copper wiring vs. aluminum wiring, and the cost of installing electrical meters. By changing DPR electrical standards to use aluminum wiring and the non-metered, energy-only ESL rate, these costs can be reduced to be competitive with an Xcel-owned trail lighting system.
- Systematic Changes: Since the current Xcel-owned trail lighting costs are paid for by DOTI, not by DPR, the energy and maintenance costs are not currently within the DPR budgets. To successfully implement the changes recommended in this study, there must be a systematic change to shift the trail lighting funding from DOTI to DPR.

#### Maintenance:

- Maintenance Reliability: The current maintenance approach for Xcel-owned lighting is complaint based, resulting in slow response time, and higher costs and monthly payments, even for lights that are non-operational. DPR taking over the ownership of their own lights will reduce costs to the taxpayers while also improving the performance of the lighting system.
- **Staffing or Contracting Maintenance**: For DPR to successfully manage an increased inventory of trail lighting, there must be a commitment by CCD and DPR to plan for and provide funding for either hiring qualified maintenance staff or to manage a lighting maintenance contractor.

This study highly recommends that DPR should take steps to own and maintain more of their own lighting system. This will ultimately give DPR more control over the decisions that are made for their trail lighting including dimming systems, color temperatures, and more suitable luminaires for trail lighting such as the we-ef RFL530.

#### Luminaire Recommendations

Of the luminaire options studied, the use of the King Luminaire K118 Acorn is not recommended for trail lighting and it has been removed from Table 8-1. The we-ef RFL530 is by far the best trail-specific luminaire that was studied and would be DPR's best option should they pursue owning more of their lighting.



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Table 8-1: Luminaire Recommendations						
Luminaire Name	Photo	Luminaire Specifications	Discussion			
we-ef RFL530	1	O&M: Denver Parks & Rec Wattage: 14W Lumens: 1959 BUG Rating: B1-U0-G1 Distribution: Type II Mounting Ht: 12'-15'	<b>Recommended for Trail Lighting:</b> This luminaire has excellent optical design that maximizes spacing along the trail and minimizes light spill beyond the trail. A wider range of color temperatures (2200K – 3000K) is available for providing the appropriate CCT for the surrounding environment.			
Lithonia Omero		O&M: Denver Parks & Rec Wattage: 75W Lumens: 5454 BUG Rating: B1-U2-G1 Distribution: Type II Mounting Ht: 12'-15'	Use only in high usage urban parks: This luminaire is currently installed at Confluence Park and Central 70 Cover Top Park. While the light quality is good, this luminaire has a high potential for light trespass with no shielding options and the high lumen output is too high for many DPR trail applications.			
Kim Ouro	$\nabla$	<b>O&amp;M: Xcel Energy</b> Wattage: 28.2W Lumens: 2958 BUG Rating: B2-U0-G2 Distribution: Type III Med. Mounting Ht: 12'-15'	<b>Best Xcel Luminaire:</b> This luminaire has a comfortable, low- glare optic, zero uplight, and is the best option currently offered by Xcel Energy. Light distribution and CCT options are limited, and dimming is not yet available from Xcel Energy.			

#### Solar Power for Trail Lighting

The solar power options described for the two study areas on the South Platte River trail and on the Cherry Creek trail were intended to provide a realistic scenario for evaluating both the lighting design and electrical options for cost comparison. While these are very useful schematic studies for their purpose, both of these sites presented some challenges that would not occur in many other trail segments and would not be ideal locations for solar-powered systems. However, there are locations throughout the DPR trail network where solar could be beneficial for lighting as well as reducing Denver's environmental impact.

#### Solar Power is not ideal for:

- Bridge underdeck lighting or wall mounted lighting applications, where the solar power must be remotely located and thus still requires conduit to be routed from the solar panels to the lights.
- Areas with significant shadowing from trees or buildings. Shadowing should be evaluated for every project for all seasons to determine the trail has adequate solar access. Planned future buildings or the adjacent zoning to the trail should also be included in any shadowing studies.



6/22/2023 <mark>93</mark>  Locations where pedestrian light poles must be spaced at less than 100-ft to meet lighting criteria or site character. This spacing makes solar no longer a cost-competitive option. This is based on the current costs of solar systems and conventional electrical installation in the Spring of 2023 when this study was performed and may change in the future.

#### Solar Power is feasible, reliable, and cost effective for:

- Locations where there is no significant shadowing from trees or buildings.
- Pedestrian scale light poles that can be spaced at 100-ft or more to meet lighting warrants and criteria.
- Along trail segments where the lighting warrants have recommended either Non-Continuous or Minimal Lighting be used and where light poles may be spaced at 300-ft or more solar power can significantly reduce costs compared to a conventional electrical system.

#### Trail Lighting in Denver

There are many opportunities currently present for DPR to improve their trail lighting. By transitioning to a system where DPR owns and maintains the majority of their trail lighting, options for better trail luminaires like the we-ef RFL530 become available as well as technologies for control systems such as dimming. Solar-powered lighting systems also become a viable option for trail areas that receive the right amount of sunlight and could be very beneficial when minimal light levels are needed in more remote locations.

Even if most of the lighting remains Xcel owned and maintained, the new GIS mapping tool that is being developed can better ensure the right amount of light is being placed in the right locations throughout the trail system, thus improving the equity of the trail system and safety for all users.

As the mapping tool's performance is evaluated, there is also the opportunity to incorporate more of the data being collected through the growing trail counter program and to evaluate how the natural environment in Denver is being impacted by these lighting changes. Many of these improvement opportunities should be able to utilize this study as a reference to get started.



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# **Section 9**

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LIGHTING DESIGN AND ENGINEERING

## APPENDIX 1- FUNDAMENTALS OF LIGHTING DESIGN

Lighting plays a key role in how people perceive the spaces in which they live, work, and play. This is especially true of lighting for outdoor spaces at night. Lighting helps people understand the space they are in by providing visual cues and allows a heightened awareness of their surrounding environment through improved visibility. A good lighting design does this while taking into account the needs of different users of a space and the effects outdoor lighting can have on our environment.

#### A.1 LUMINANCE AND ILLUMINANCE

Creating good visibility with street and public lighting depends on two metrics: illuminance (measured in footcandles – fc) which is the amount of light falling on a surface, and luminance (measured in candela per square meter –  $cd/m^2$ ) which is the amount of light reflecting off a surface toward an observer. Pedestrian areas, such as trails, crosswalks, and sidewalks are usually based on illuminance. The human eye identifies objects at night mostly by the contrast between an object and its background. Sufficient visibility in an off-street trail environment requires sufficient luminance on the trail's surface and vertical illuminance on pedestrians, cyclists, and any other trail users.

#### A.2 GLARE REDUCTION

Glare is caused by excessive or undesirable light entering the eye from a bright light source. Glare can result in discomfort, annoyance, and decreased visibility. The experience of direct glare can happen when a light source is in direct view. The presence of direct glare depends on the intensity of the light source and its contrast with the surrounding environment. While experiencing direct glare the eye has a harder time seeing contrast and details. A lighting system designed solely around the desired lighting level tends to aim more light at higher viewing angles, thus producing more potential for glare. Direct glare can be minimized with careful equipment selection as well as luminaire placement.





Figure 9-1: Example of high glare luminaires (left), example of low glare luminaire (right)

#### A.3 UNIFORMITY VS. CONTRAST

Lighting uniformity refers to the evenness of light. Our eyes are continually adapting to the brightest object in our field of view. Any object lighted to 1/10<sup>th</sup> the level of the immediate surroundings appears noticeably darker. Evenly lit pavement is generally the first indicator of good uniformity in lighting. However, good visibility also requires the clear contrast of an object against its background. An environment with perfectly uniform lighting provides low contrast, which can reduce the overall visibility. High contrast is necessary for good visibility. Uniformity criteria are typically structured in ratios of maximum to minimum light level or average to minimum luminance or illuminance. Contrast is the difference between two adjacent luminance values. To have enough contrast there needs to be a balance between uniform lighting perception and enough contrast to improve visual detection of objects that may be on a surface outdoors at night.

Differences in color also produce a visible contrast even when both objects have similar luminance values, which supports the benefits of using higher color rendering light sources. When the proper balance of uniformity and contrast is achieved, the lighting is more effective at lower overall light levels, reducing over lighting and light pollution (Clanton N, 2014).





Color Contrast: In the photos above, the black and white image shows us that the luminance of the flower and its background are very similar. Only when the colors are rendered does the color contrast of the yellow flower make it highly visible against its background. This demonstrates why outdoor lighting with good color rendering can improve the visibility of objects, even when using the same or lower light levels than what was there before. Further study on the effects of color contrast is needed to fully understand the level of improved visibility of broad-spectrum light sources when used at light levels below the current IES RP-8 recommendations (IES, 2022).

Figure 9-2: Color contrast

#### A.4 ADAPTATION

Adaptation refers to the human eye's ability to adjust its vision between changes in luminance. Our eye will automatically adjust itself to the brightest object in our field of view. Glare from headlights or fixed lighting can negatively affect someone's ability to adapt to a lower surface luminance. This happens to everyone, but especially impacts the elderly. Glare is also especially hard on anyone with cataracts, people with astigmatism, other low-vision issues, and certain neurodivergent groups. Another form of eye adaptation occurs when someone moves from a brightly lighted area to a non-lighted section of a roadway or trail. In these cases, the lighted area should slowly transition to darker light levels to allow for the necessary adaptation time. This makes the transition more comfortable for everyone but is essential to the safety of elderly people and certain other groups to be outdoors at night.

#### A.5 CORRELATED COLOR TEMPERATURE (CCT)

The correlated color temperature (CCT) rating system is a metric that describes how "warm" or "cool" a light source appears to be to the human eye. Light sources with a CCT rating below 3200K are usually considered "warm" and more closely match firelight while those with a CCT at or above 4000K are usually considered "cool" in appearance. Anything in between 3200K and 4000K is typically considered "neutral." See Figure 5-3 for examples of "warm" and "cool" color temperatures.



Temperature*	Description	Traditional Sources	LED Fixture Availability on Market			
1800 K - 2200K	Very warm white, Candle flame, sunset/sunrise	High pressure Sodium	Limited LED fixtures available with few manufacturers/May need to be custom			
2700 K	Warm white	Incandescent lamps	Typical standard LED fixtures available with select manufacturers			
3000 K	Warm white	Halogen lamps, tungsten lamps, warm white compact fluorescents	Typical standard LED fixtures available with most manufacturers			
4000 K	Neutral white, Moonlight	Fluorescent lamps, metal halide lamps	Typical standard LED fixtures available with most manufacturers			
5000 K	Cool white, Horizon Daylight	Fluorescent lamps	Typical standard LED fixtures available with most manufacturers			
5500 – 6500 K	Cool white, Vertical Daylight	Fluorescent lamps, electronic flash	Typical standard LED fixtures available with most manufacturers			
6500 – 9500 K	Very cool white, Overcast Sky	LCD or CRT screen	Limited LED fixtures available with few manufacturers/May need to be custom			
*These temperatures are merely characteristic; considerable variation may be present						

Figure 9-3: Correlated color temperature diagram

#### A.6 COLOR RENDERING AND NIGHTTIME VISIBILITY

The Color Rendering Index (CRI) is the standard metric used to evaluate how well a light source renders the true color of an object. CRI is measured on a scale of 0 to 100, with 100 representing how an object would look under a reference incandescent light source similar to natural daylight. The higher the number, the better the color rendering capacity of the light source. Traditional High-Pressure Sodium ("HPS") streetlights have a very low CRI of approximately 30, making the detection of any color differences difficult. Today's standard LED streetlights are not only significantly more energy efficient, they also have a much higher CRI by default, a value of approximately 70. This improvement increases color detection, visual acuity, and the overall effectiveness of outdoor lighting.

Advancements in LED lighting technologies also allow outdoor lighting to be tuned to a specific correlated color temperature ("CCT") without noticeably reducing the CRI. This technology can be used to reduce the color temperature in environmentally sensitive areas without significantly reducing the CRI, preserving the effectiveness of the lighting system for human needs while reducing the harms of artificial lighting at night.



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LEDs by default emit light across the entire visual spectrum, often considered white light. Many older types of light sources do not do this, instead emitting a much narrower spectrum of light. This means that LEDs appear brighter to the human eye even when the light level is intended to be the same. This often becomes an issue when traditional HPS lights are replaced with LEDs as residents often find the light to be obtrusive. When upgrading to LEDs in residential areas it is essential to take the differences in old and new technologies into account from the start and to have a dimming system to be able to respond to complaints from residents.

Figure 9-4:Color rendering



This car is illuminated by two different light sources. On the left side an LED light source with high color rendering clearly reveals the colors and details of the car. On the right side a lowpressure sodium light with low color rendering distorts the color of the car and the details of the vehicle are not clear to the viewer.

#### A.7 BUG RATINGS

The BUG rating system (Backlight-Uplight-Glare) for luminaires which is defined in IES TM-15-11 (IES, 2015) provides a numerical rating of the luminaire light distribution as it applies to light trespass, uplight, and glare. BUG ratings are defined by the zonal lumen output within the distribution angles of a luminaire. Essentially, a higher BUG rating means that more light is emitted at each angle.



Figure 9-5: BUG Ratings Applied to a Streetscape



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**Backlight (B)** is the amount of light falling behind the luminaire. Too much backlight can result in unwanted light trespass onto adjacent surroundings or into windows. Or sometimes backlight can provide beneficial lighting for sidewalks located behind the amenity zone of a street or for pedestrian areas adjacent to a trail. The quantity of backlight and whether it could be useful needs to be a carefully considered part of any lighting design.

**Uplight (U)** is the amount of light produced in the upper 90 degrees of the luminaire. Low angle uplight (from between 80° to 100°) is the largest cause of sky glow which adversely affects astronomy, smog levels, and the view of the night sky. Higher angle uplight, at angles greater than 100 degrees, is almost always wasted light.

**Glare (G)** can be annoying or even disabling. While higher angles of frontward light allow the light to be cast further from the source, any angle above 63° can cause disability glare and its occurrence therefore should be minimized. Luminaires that have a glare rating greater than G3 have the greatest potential for creating disability glare, which can be dangerous. Luminaires with lower glare ratings (G2 or lower) are preferred.

#### A.8 LIGHT TRESPASS

Light trespass is defined as stray light that crosses a property boundary. Uncontrolled, non-shielded light sources are usually the cause of light trespass. The most noticeable form of light trespass is usually caused by an excessively bright luminaire that is unshielded and thus distributes light outward into the adjacent properties. This quickly becomes a nuisance to the neighbors or the environment. However, even a well-controlled, fully shielded luminaire may cause light trespass if it is not located or oriented properly on a site. Topography can easily lead to this. In cases where the location of a light standard cannot be changed, additional shielding may be necessary to prevent light trespass.



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A luminaire with inappropriate light distribution and poor shielding creates a significant amount of light trespass on a nearby open space.

#### Figure 9-6: Light trespass



A well shielded luminaire with appropriate light distribution provides adequate light for the street with minimal light spill beyond the parking lot.

#### A.9 LIGHT POLLUTION

Light pollution and sky glow are caused by light aimed directly up into the sky and by light reflected up from the ground or other surfaces. Any outdoor lighting will contribute to light pollution. However, it is the direct uplight component of outdoor lighting (rather than the reflected light) that does not contribute anything to useful street-level visibility that is the most objectionable form of light pollution. Unshielded luminaires are the biggest contributors to sky glow. Also, over-lighting even with fully shielded or U0 luminaires, reflects unnecessary light into the atmosphere and adds to the total sky glow. To minimize light pollution, any site must first minimize the overall amount of light. Exterior lighting should be used only where and when it is needed.



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# APPENDIX 2 - GLOSSARY

**Backlight, Uplight, and Glare (BUG) Ratings**: A Luminaire Classification System for Outdoor Luminaires per IES TM-15 that describes the amount of uplight, backlight and glare. The lower the rating (i.e. a 0) equates to the minimal amount of negative impact.

- B = backlight, or the light directed behind the luminaire.
- U = uplight, or the light directed above the horizontal plane from the luminaire.
- G = glare, or the amount of light emitted from the luminaire at the angles known to cause glare.

**Color Rendering Index (CRI)**: This is a metric developed using a scale of 0 to 100 to describe the ability of the light source to render an object's natural colors.

**Continuous Lighting**: An outdoor lighting system made up of regularly spaced luminaires along a trail or street. IES criteria typically defines minimum and maximum illuminance or luminance values and the overall uniformity along the lighted area.

**Correlated Color Temperature (CCT)**: Measured in Kelvin (K). This is the color appearance of the light emitted by a lamp. The CCT rating for a lamp is a measure of the "warmth" or "coolness" of its appearance. In general, fire has a CCT of around 1850K and daylight is around 6000K.

**Glare**: The visual sensation created by luminance (or brightness) that is significantly higher than the surrounding luminance level that the eyes are adapted to. This can cause annoyance and discomfort (discomfort glare), or even a loss in visual performance and visibility (disability glare).

**Illuminance**: Measured in Footcandles (Fc). This is the density of light falling onto a surface. Commonly measured in the horizontal and vertical planes.

**Illuminating Engineering Society (IES)**: The IES strives to improve the lit environment by publishing recommended practices to guide lighting designers, architects, engineers, sales professionals, and researchers. The IES' The Lighting Handbook and Recommended Practices are the current recognized authoritative references on the science and application of lighting.

**Legacy Light Source**: All non-LED light sources including incandescent, halogen, high pressure sodium, low pressure sodium, induction, and fluorescent types.

**Life Cycle Cost**: An economic analysis of an investment that covers all the costs and benefits over the expected life cycle of the equipment or system. Unlike a simple payback analysis, it accounts for maintenance and energy costs even after the system is paid for with projected savings.

**Lifetime**: The life value assigned to a light source. This value is commonly a statistically determined estimated average or the median operational life. For LED sources, it is the average time before the light output has reduced to 70% of its initial light output.

**Light Pollution**: Typically, this is light emitted upwards, either directly from a luminaire or when reflected from a surface, increasing overall skyglow. While the direct light is the largest contributor to light pollution, over-lighting which results in light reflected from the ground also increases this negative environmental impact.

**Light Trespass**: Light spilling past property lines so it falls onto adjacent properties unintentionally. This can be a neighborhood nuisance and a contributor to light pollution.



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Lumen: The measurement of visible light (luminous flux) emitted from a light source.

Luminaire: The complete electrical light unit including light source, housing, optics, and driver.

**Luminance**: Measured in Candela per meter squared (cd/m2). The light source or surface brightness as it is perceived by the human eye.

**Luminous Efficacy**: Measured in Lumens per Watt (Im/W). A measure of luminaire energy efficiency, or the ratio of luminous flux to power consumption.

**Non-Continuous Lighting**: A non-continuous outdoor lighting system that typically lights only conflict areas such as trail intersections, crosswalks, ingress/egress ramps, and other navigational hazards.

**Typology**: The classification of different physical characteristics of a site or area in order to guide design choices.

**Veiling Luminance**: A metric used to evaluate disability glare from a driver or other user of outdoor lit spaces perspectives (L.).

**Warrant**: In lighting design, warrants are the conditions of a site that determine whether or not lighting is required and which lighting strategy is necessary or suitable if so.

Watt (W): A measurement of energy transfer over a unit of time.



LIGHTING DESIGN AND ENGINEERING
United States Department of the Interior National Park Service

# National Register of Historic Places Registration Form

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This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property
historic name Laurelhurst Park other names/site number Ladd Park
2. Location
street & number3554 SE Ankeny Street Inot for publication
city or townPortland vicinity
state Oregon code OR county Multnomah code 051 zip code 97204
3. State/Federal Agency Certification
As the designated authority under the National Historic Preservation Act of 1986, as amended, I hereby certify that this $\underline{X}_{nomination}$ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property $\underline{X}_{nomination}$ does not meet the National Register Criteria. I recommend that this property be considered significant nationally statewide $\underline{x}_{nomination}$ [ See continuation sheet for additional comments.]
Signature of certifying official/ Date Deputy SHPO
Oregon State Historic Preservation Office State or Federal agency and bureau
In my opinion, the property meets does not meet the National Register criteria. ( See continuation sheet for additional comments.)
Signature of commenting or other official Date
State or Federal agency and bureau

4. National Park Service Certification
I, hereby certify that this property is: Chan A. Beak 2/16/0/ entered in the National Register (AMA Beak 2/16/0/ See continuation sheet. See continuation sheet. See continuation sheet. determined not eligible for the Mational Register removed from the National Register
other (explain): 

5. Classification

Ownership of Property (Check as many boxes as apply)

- \_\_\_\_ private
- X public-local
- \_\_\_\_ public-State
- \_\_\_\_ public-Federal

Category of Property (Check only one box)

- \_\_\_\_ building(s)
  - district
- <u>X</u> site
- \_\_\_\_ structure
- \_\_\_ object

Number of Resources within Property

Contributing Noncontributing

1		buildings
1		sites
2	4	structures
	1_	objects
4	5	Total

Number of contributing resources previously listed in the National Register <u>N/A</u>

Name of related multiple property listing (Enter "N/A" if property is not part of a multiple property listing.)

City Beautiful Multiple Property Submission

#### 6. Function or Use

· •

LATE 19<sup>TH</sup> AND 20<sup>TH</sup> CENTURY REVIVALS

Materials (Enter categories from instructions) foundation \_\_\_\_\_\_ roof \_\_\_\_\_\_ walls \_\_\_\_\_\_

other\_\_\_\_\_

Narrative Description (Describe the historic and current condition of the property on one or more continuation sheets.)

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section 7 Page 1

Laurelhurst Park Name of Property Multnomah, Oregon County and State

City Beautiful MPS Name of Multiple Property Listing

### **Description**<sup>1</sup>

Laurelhurst Park contains one contributing building, one contributing site, and two contributing structures. In addition, Laurelhurst Park contains four noncontributing structures and one noncontributing object. The contributing and noncontributing features are listed below with numbers corresponding to the map entitled "Sketch and Boundary Map and Feature Key" found after Section 10 of this document.

- 1. Ankeny Street Comfort Station: contributing building.
- 2. Laurelhurst Park land, defined by its legal boundaries and including Concert Grove, Children's Lawn, Plateau Meadow, Broad Meadow, Picnic Grove, and Rhododendron Hill: contributing site
- 3. Circulation system: contributing structure
- 4. Firwood Lake: contributing structure
- 5. Lighting system: noncontributing structure
- 6. Horseshoe pit court: noncontributing structure
- 7. Boomerang Island: noncontributing structure
- 8. Concrete terraces: noncontributing structures
- 9. Modern sculpture: noncontributing object

Laurelhurst Park marks the southwest corner of Laurelhurst, a 442-acre residential neighborhood located in both southeast and northeast Portland. The 26.81-acre park is bounded on the east by Southeast Thirty-ninth Avenue, the south by Southeast Oak Street, the west by Southeast Thirty-third Avenue, and the north by Southeast Ankeny Street. The northwest border of the park, between Southeast Ash and Ankeny Streets, is heavily wooded and abuts a large parcel of residential property. With the exception of Thirty-ninth Avenue, quiet residential streets surround Laurelhurst Park.

Laurelhurst Park has a roughly triangular footprint; its east end and south side meet at a square angle, while its north side slopes south as it travels westerly, following Ankeny Street's slightly curved alignment. The park's western boundary along Southeast Thirty-third Avenue, which angles to the northeast, forms the "point" of the rough triangle. Because there was little major grading of the site when the park was developed, the topography follows the contours of the surrounding area. Gently rolling hills and intermittent level land contrast with a shallow swale and steep slope at the park's northwest section. The park boundaries are defined by a dense mix of mature deciduous and coniferous trees and large shrubs, obscuring views of the park's interior from points outside the property line. There are thirteen entrances to the park from the surrounding streets: main entrances are located at the corner of Ankeny and Thirty-ninth Streets, at the corner of Thirty-ninth Avenue and Oak Street, along Oak Street, and along Ankeny Street. There is one secondary entrance at Thirty-ninth Street, four at Oak Street, two at Thirty-third Avenue, and two at Ankeny Street.

There are six major sections of land within the park. Emanuel T. Mische, the Olmsted Brothers' long-time horticultural expert who served as Portland's park superintendent and designer from 1908 until 1914, designed Laurelhurst Park to allow for different types of uses within each section. The sections each have their own distinct character and are

<sup>&</sup>lt;sup>1</sup> This description is based on a site visit conducted by Christine Curran on November 10 and November 14, 1999. Sources for this section include a 1910 site plan prepared by Emanuel T. Mische; a 1981 site plan prepared by the Bureau of Parks and Recreation; a series of building plans dating from 1914 and 1915 prepared by architects Whitehouse and Foulihoux; and a Laurelhurst Park tree inventory and plant list obtained from Portland Parks and Recreation, 1999.

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separated from each other by the original concrete footpath system that circulates throughout the park. The sections will not be considered individually as contributing or noncontributing sites. They comprise the site and are therefore considered collectively as a contributing site. However, within some sections, there may be noncontributing elements, for example: the noncontributing modern sculpture located within the contributing Children's Lawn. The park's main circulation system is a contributing structure because it is original and retains its historic integrity. The paths are twelve-feet wide in most areas and paved with asphalt throughout with the exception of a secondary path through Rhododendron Hill. The system includes a stairway that runs between Ankeny Street and the park's interior at the north park boundary. The park's circulation system follows Mische's 1910 plan very closely. Although some secondary paths shown on the plan were never built, all of the main paths actually constructed at Laurelhurst Park are represented on the 1910 plan. The system essentially makes an open loop around the perimeter of the park, starting at the northernmost entrance on Thirty-third Avenue and terminating at the southernmost entrance on Thirty-third Avenue. Offshoots from the loop comprise the bulk of the circulation system, following the curvilinear boundaries of the six different sections of the park. Where paths merged, Mische created triangles that served to prevent shortcutting across the lawn by park visitors. These triangles remain ideal sites to showcase plantings such as Cornelian cherry, mountain laurel, eastern flowering dogwood, and Japanese andromeda. The circulation system was lit in 1915. The lamp standards and fixtures were replaced in the 1960s and again in 1996. Because it is not known if the new structures are placed in the same locations as the original structures and because the existing lamp structures are entirely modern, the lighting system is a noncontributing structure. Picnic tables and benches are scattered throughout the park. Placement and materials of these features have changed over time but do not greatly affect the overall integrity of the park.

The following narrative describes the park's major elements beginning at the north boundary and moving clockwise.

### **Ankeny Street Comfort Station**

In 1914, Portland architects Whitehouse and Foulihoux designed a men's comfort station for Laurelhurst Park. The building is located at the park's northern boundary at the intersection of Laurelhurst Place and Ankeny Street. The building faces Ankeny Street, marking one of the park's main entrances, and currently holds restrooms and the park's administrative office. Because the Ankeny Street Comfort Station retains its historic integrity and appearance, it is a contributing structure.

Clad in green-painted stucco with darker green trim, the one-story, wood-frame building has a cross-gabled plan consisting of prominent, projecting cross-gabled bays at the front (south) and rear (north) facades and hipped-roof wings to the east and west. The building was designed in a simple version of English Cottage, a popular period-revival style at the time. The eaves at the cross-gabled bays display simple vergeboards, while the hipped-roof wings have overhanging boxed eaves. Three steel bollards and a concrete pad and sidewalk mark the approach to the building, which is surrounded by planting beds and mature deciduous trees. The gabled bay at the front facade holds a wood double-leaf front door framed in a simple wood casing. Each leaf has a tongue-and-groove panel surmounted by a four-light window. The door is spanned by a five-light transom. On either side of the main door is a six-light, wood-sash window. The gable of the bay is pierced by a vertical louvered vent. East of the front bay, the hipped-roof wing holds a wood-sash, multi-light window. The west wing holds a double-leaf door with tongue-and-groove panels. West of the doors the front facade continues seamlessly as part of a secondary hipped addition. The addition holds a small wood-sash, multi-light window at the front facade and two modern, single-leaf, metal doors at the west facade. The projecting gabled bay at the south facade faces the interior of Laurelhurst Park. A central double-leaf door is flanked by single-leaf doors in a continuous casing. All the doors have tongue-and-groove panels topped with four-light

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windows. Thick, tapered columns flank the doors. A broad, wood beam surmounts the columns, spanning the distance between them. A series of rafter tails extends from the building to the beam, creating a canopy over the doors. The gable of the bay is pierced by a vertical louvered vent. On either side of the bay, the east and west wings hold woodsash, multi-light windows with simple casings. The west wing addition is slightly recessed at this facade and also holds a wood-sash, multi-light window. A raised concrete patio marks the approach to the south facade. Thick, concrete wing walls ring the patio, framing a wide set of three shallow steps leading from the patio into the park. The east facade of the building is comprised of the end of the east wing. There is a single, off-center, modern metal door at this facade.

Inside the Ankeny Street Comfort Station, the center section, articulated by the gabled bays, contains a recently remodeled Parks and Recreation field office and community meeting room. The hipped-roof wings hold men's and women's restrooms. Interior furnishings are spare, with walls of painted plywood and a floor of concrete.

#### **Concert Grove**

Directly east of the Ankeny Street Comfort Station is the subdivision of the park known as the Concert Grove. The Grove is a gently sloping tract of cultivated lawn that covers the northeast portion of the park. Mische intended to build a music gazebo in the center of the Grove, but money shortages cancelled the plan. Nevertheless, the Grove has historically been the location of musical and theatrical performances, attracting large crowds to the expansive area. Since Mische envisioned a space that would accommodate such crowds, he planned a spare planting program for the Concert Grove. Mische added Douglas fir, linden, and swamp chestnut oak to the mature Douglas firs that already peppered the site in 1913. Most of the trees are scattered at the Grove's perimeter. Modern picnic tables stand in angled groupings at the east and west ends of the Grove.<sup>2</sup>

#### Firwood Lake and the Children's Lawn

The south border of the Concert Grove marks the north edge of the section of the park containing Firwood Lake. This is a large section, covering more than one-third of the east side of the park. Firwood Lake is approximately three feet deep. It is surrounded by a gravel path that circumnavigates its concrete and rock banks. Plantings around the lake are a mix of deciduous and coniferous trees and mature shrubbery planted in clusters, including common hackberry, silktree, sweetgum, fragrant snowbell, bald cypress, and Chinese witch hazel. Bigleaf maple, sugarberry, and Northern red oak are among those plantings that remain from 1913-1914. Boomerang Island stands in the west section of the lake. Constructed in the 1950s, this small island was not part of Mische's original plan; however, a dramatic weeping willow and mature evergreen shrubs contribute appropriately to the lake's picturesque appearance. Shallow concrete terraces at the lake's northwest and east shores provide seating and access to the lake. There are rock stairs and railings at the north shore leading from the path to the lake and stylized railings around the terraces at the east end of the lake. These manmade features were not designed by Mische. They represent efforts during the 1920s and 1930s to improve accessibility to the shore and increase safety in the area immediately surrounding the water. The lake is a contributing structure because it was a principle design element in Mische's original plan. The concrete terraces surrounding the lake are noncontributing structures and Boomerang Island is a noncontributing structure because these elements were not part of the original design.

Northwest of the lake is a small, treeless tract of cultivated lawn known as the Children's Lawn. Surrounded by clusters of ornamental shrubbery and mature trees, this area was designed as an open play field. It remains today as it was

<sup>&</sup>lt;sup>2</sup> Portland (OR) Park Board, Annual Report, 1912 (Portland: The Board, 1913); Laurelhurst Park tree inventory and plant list.

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originally designed, with the exception of a modern metal sculpture placed in the middle of the lawn in the early 1980s. The sculpture is a noncontributing object because it is a modern addition.

#### **Plateau Meadow**

At the south shore of Firwood Lake, the land rises to the hilly, forested southeast corner of the park. Known as Plateau Meadow, this section of the park contains many of the original, old Douglas and grand firs that Mische considered the central design element of Laurelhurst Park. His decision to minimize grading at the park was a result of his respect for the trees and his desire to maintain the grandeur of their appearance. To the grove of firs, Misch added more Douglas and grand firs, swamp chestnut oak, and London planetree. Many of these original trees still stand, although some of the old firs have died of natural causes over the years and been replaced in-kind. Later additions, evergreens and exotics, have contributed to the stunning display of variety at Plateau Meadow. These include dawn redwood, a rare deciduous conifer, giant redwood, Port Orford cedar, Northern red oak, tulip tree, Japanese crabapple, Pacific dogwood, Southern magnolia, Whitcomb flowering cherry, and Katsura tree. Besides the lamp posts along the pathways, manmade features at Plateau Meadow are limited to sparsely scattered benches, single picnic tables, and the twelve-pit, lighted horseshoe court enclosed by a low chain-link fence at the south edge of the park. The horseshoe court is a noncontributing structure because it was not part of Mische's original plan.

#### **Broad Meadow**

A dense swath of large, original camellias marks the transition from Plateau Meadow to Broad Meadow, the park's large center section whose southern boundary parallels Oak Street. Broad Meadow represents Mische's vision to create distinct sections of the park for vigorous activities: "the flatter areas are to be open to games, picnicing, rambling and fiestas." Consequently, Mische planted very little at Broad Meadow, which consists of a wide expanse of cultivated lawn with a level, treeless center surrounded by gentle slopes with dense and varied tree clusters. In 1913, Mische found Douglas and grand fir, Western red cedar, and Western hemlock at the site. He added American beech, tulip tree, heavenly bamboo, and wintersweet, all of which are extant. Subsequent plantings include Pissard plum, Northern red oak, giant sequoia, weeping Japanese cherry, Colorado spruce, and Sassafras. Broad Meadow contains a few scattered picnic tables and benches around its perimeter. It is utilized as a playing field for casual ball games and other team sports, just as Mische had intended when he designed it in 1910.<sup>3</sup>

### **Picnic Grove**

Picnic Grove has a savannah-like character, with open, level spaces scattered with single trees giving way to denser foliage and hilly land at its west end. Approximately half the size of its eastern neighbor, Broad Meadow, Picnic Grove is located between Oak Street to the south and Rhododendron Hill to the north. Picnic Grove is utilized, as originally intended by Mische, as a gathering place for large groups. The area displays long strings of picnic tables on concrete pads at its flat west end. Mische did a great deal of planting in this area to augment the Douglas fir, Western yew, and black walnut that he found there in 1913. European beech, sugar maple, Norway maple, bigleaf maple, coast redwood, giant sequoia, common persimmon, holly, sycamore, and umbrella pine comprise Mische's selections for Picnic Grove. According to the park's planting inventory, this original vegetation is extant.

<sup>&</sup>lt;sup>3</sup> Portland Park Board, Annual Report, 1912; Linda Corbett, Laurelhurst Gardener, interview by Christine Curran, November 10, 1999.

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#### **Rhododendron Hill**

The southern boundary of the area known as Rhododendron Hill meets the northern boundaries of Picnic Grove and Broad Meadow. The steepest section of Rhododendron Hill abuts a large parcel of residential property, marking the park's northern boundary between Ash and Ankeny Streets. Running from the west end of the park to the Ankeny Street Comfort Station, Rhododendron Hill is the largest of the six sections in Laurelhurst Park. Rhododendron Hill is located on either side of the park's northernmost pathway, which begins at Thirty-third Avenue and travels to the Ankeny Street Comfort Station. The paved pathway runs through a steep hillside covered with dense foliage and some of the most diverse plantings in the park. There is a gravel path that runs parallel and below the paved one. This hill contains what Mische described as the "steeper areas" of the park which were to be "devoted to arboreous and shrubby vegetation as an appropriate use of the ground and to add an enriching element and one lessening the cost of maintenance." Mische planted the area profusely with rhododendrons, azaleas, Western hemlock, and Southern and saucer magnolia. The rhododendrons that lend the hill its name are concentrated in the center of the incline around a string of straight-run brick stairs that runs from the base of the hill to Ankeny Street. Although the original log stairs have been replaced with brick, the enormous rhododendrons surrounding them are the original plantings. Subsequent plantings on the densely wooded slope include deodar cedar, border forsythia, Tanyosho pine, paperbark maple, paper birch, paperbark cherry, empress tree, redbud, Devil's Walking Stick, harlequin glorybower, grand fir, goldenchain tree, incense cedar, and red flowering currant. At the base of the hill is a shallow, lawn-covered ravine. This ravine was to have been the site of a brook and pool system originating from Firwood Lake. Mische deliberately planned the brook system for that area, knowing the area was swampy. A lack of funds cancelled construction of the brook and now the ravine holds standing water through much of the winter and spring.

#### Conclusion

The integrity of Laurelhurst Park is excellent. Emanuel Mische's design intent, based on the Olmsted design tradition, is clearly recognizable eighty-nine years after the park's design was conceived. Within the original property boundary, the historic circulation system is still intact, defining the original relationships between the six distinct sections of the park. Today, each section offers the same type of visitor experience and provides the same function for which it was originally intended. Because landscapes are dynamic entities, not all the vegetation called for by Mische in 1913 remains intact. However, many of the natural features that Mische used as principle design elements in his plan for Laurelhurst Park are extant, including portions of the old fir grove and the lake. Mische selected a wide variety of plants for Laurelhurst Park at a time when such horticultural heterogeneity was not commonly seen in Portland. Later alterations for diversity. Many of the plants in Laurelhurst Park are rare, unique to Portland and to the Northwest. Contained within its nearly twenty-seven acres are over one-hundred different varieties of trees and shrubs. The park's only architectural feature, the Ankeny Street Comfort Station, retains its historic appearance and excellent condition. A minor, seamless addition to its west end does not diminish the building's integrity. All these factors contribute to excellent visual continuity and to the strong historical associations evoked by Laurelhurst Park.

#### 8. Statement of Significance

Applicable National Register Criteria	(Mark "x" in one or more boxes f	for the criteria qualifying the property for National	
Register listing)			

- X\_\_\_\_ A Property is associated with events that have made a significant contribution to the broad pattern of our history.
- \_\_\_\_\_ B Property is associated with the lives of persons significant in our past.
- <u>X</u> C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- \_\_\_\_ D Property has yielded, or is likely to yield information important in prehistory or history.

Criteria Considerations (Mark "X" in all the boxes that apply.)

- A owned by a religious institution or used for religious purposes.
- \_\_\_\_\_ B removed from its original location.
- ----- C a birthplace or a grave.
- \_\_\_\_ D a cemetery.
- \_\_\_\_ E a reconstructed building, object, or structure.
- ----- F a commemorative property.
  - G less than 50 years of age or achieved significance within the past 50 years.

Areas of Significance (Enter categories from instructions)

LANDSCAPE ARCHITECTURE

Period of Significance 1910-1915

Significant Dates \_\_\_\_\_1910, 1912

Significant Person (Complete if Criterion B is marked above)

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#### **Statement of Significance**

#### Introduction

Laurelhurst Park in east Portland, Oregon is eligible for the National Register of Historic Places within the area of Landscape Architecture under Criterion A and C because it embodies the design principles of Frederick Law Olmsted, the nation's most influential landscape architect and urban planner. Frederick Law Olmsted's landscape design firm was the first of several such firms to flourish around the turn of the twentieth century as a result of the City Beautiful movement. The City Beautiful movement was one among many social crusades that gained popularity between 1890 and 1917 as a response to the oppressive conditions found in American cities in the wake of the Industrial Revolution. This period of heightened social awareness, known as the Progressive Era, was characterized by reform movements in all areas of American culture, from personal morality, politics, and working conditions to civil engineering, architecture, and recreation. The City Beautiful movement promoted the rational, comprehensively planned built environment as a means for achieving civic aesthetics and social reform. The City Beautiful movement was embraced and interpreted by professionals and laypersons alike; its ideology was practiced in the fields of architecture, landscape architecture, civil engineering, community planning, recreation, and fine art. One of the fundamental components of the City Beautiful movement was the notion of beautifying the urban landscape using deliberate planning practices; its hallmark became the planned park system that stood in sharp contrast to the random and haphazard development that had characterized the physical growth of American cities up to that time.<sup>4</sup>

In 1898, the secretary of Portland, Oregon's newly formed park association began correspondence with Olmsted Brothers, the firm that was founded by Frederick Law Olmsted. In 1903, John C. Olmsted, stepson and nephew of Frederick Law Olmsted and principal of the firm, submitted a plan for a park system in Portland. While the Olmsted firm was not retained to design the system, the Olmsted legacy was manifested in Emanuel T. Mische, the Olmsted Brothers' long-time horticultural expert who served as Portland's park superintendent and designer from 1908 until 1914. Under E. T. Mische, Laurelhurst Park flowered into one of the finest examples of Frederick Law Olmsted's revolutionary treatment of designed landscapes in Portland.<sup>5</sup>

In addition, Laurelhurst Park meets the registration requirements set forth by the City Beautiful Multiple Property Submission prepared by the City of Portland Bureau of Planning in 1999. The park qualifies for listing as a Neighborhood Park that retains integrity of location, design, setting, materials, and association. It is also eligible as a reflection of Olmsted design characteristics and as a part of the Olmsted Plan of 1903. Finally, Laurelhurst Park was acquired or functioning as a park between 1897 and 1949, the City Beautiful Multiple Property Submission's period of significance.

#### John C. Olmsted's 1903 Portland Park Plan

The initiation of correspondence between the secretary of Portland's newly formed park association and the nation's

<sup>&</sup>lt;sup>4</sup> The following narrative on the Olmsted Plan of 1903 and Emanual Mische relied heavily on sections from Kenneth J. Guzowski's master's thesis, "Portland's Olmsted Vision (1897-1915): A Study of the Public Landscapes Designed by Emanuel T. Mische in Portland, Oregon" (master's thesis, University of Oregon, 1990); Guzowski, 9-12, 21-24; Norman T. Newton, *Design on the Land: The Development of Landscape Architecture* (Cambridge, Mass: The Belknap Press of Harvard University Press, 1971), 413-426.

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premiere landscape architecture firm, Olmsted Brothers of Brookline, Massachusetts, marked the genesis of Portland's park system. Encouraged by Portland's strong economy, city leaders in the 1890s actively promoted Portland as the emerging cultural and economic center on the West Coast. With the reformist ideologies of the Progressives at the forefront of the country's collective consciousness, Portland's visionaries set about to cultivate a higher quality of life in the city by improving the built environment. Portland was not alone in its quest for physical order, deliberate planning, and refined aesthetics. The World's Columbian Exposition in Chicago had stimulated the public's interest in civic design in 1893. Several similar fairs followed in other cities and the McMillan Commission's plan of 1901 for the Mall in Washington, D.C. strengthened the current that propelled American cities into a period of unprecedented planning activity at the turn of the century. The Portland Park Association's interest in establishing a comprehensive park system reflected this nationwide trend toward a heightened civic aesthetic known as the City Beautiful movement.<sup>6</sup>

In Portland, the City Beautiful movement found expression initially in the construction of four municipal reservoirs in 1894: two at Mt. Tabor and two at City Park, now known as Washington Park. Surrounded by elaborate fencing, gatehouses, cultivated lawn, and flower beds, the reservoirs represented some of the finest planned landscapes in the city. The development around the reservoirs stood in stark contrast to the city's park land, which at that time consisted of the Park Blocks, a string of twenty blocks in the city's downtown; the Plaza Blocks, two blocks now known as Chapman and Lownsdale Squares, between Southwest Salmon and Madison Streets and Third and Fourth Avenues; Terwilliger Park, south of downtown; City Park, west of downtown; Holladay Park, between Northeast Eleventh and Thirteenth Avenues and Holladay and Multnomah Streets; Columbia Park, off North Willamette Boulevard in north Portland; and Ladd's Addition in southeast Portland. Encompassing less than 200 total acres, Portland's park land was largely unimproved. Encouraged by the investment at the reservoirs and a generous donation of 107 acres of land in northwest Portland by Scotsman Donald Macleay in 1897, civic leaders began to visualize the potential for a municipal park system. Empowered by the national call-to-arms to pursue the "City Beautiful," the city of Portland formed a park association to administer and improve existing parks and to develop a park system.<sup>7</sup>

Negotiations between the Portland Park Association and Olmsted Brothers continued over the following two-and-onehalf years. By the spring of 1903, John C. Olmsted was on his way to the Pacific Northwest to discuss the design of the upcoming Lewis and Clark Exposition and proposed park systems in Portland and Seattle. At the time of Olmsted's visit, Portland park property consisted of just over 200 acres. Olmsted spent several days touring the city and visiting parks. Later that year, he prepared a report to the Park Board "outlining a system of parkways, boulevards and parks for the city of Portland." This preliminary plan became the foundation from which the city's modern park system would eventually develop.<sup>8</sup>

In his report, Olmsted identified locations for thirty-seven park projects encompassed within a proposed system of neighborhood parks, suburban parks, scenic reservations, city squares, parkways, and boulevards. Among the sites

<sup>&</sup>lt;sup>6</sup> City of Portland Bureau of Planning, "The City Beautiful Movement and Civic Planning in Oregon, 1897-1921, Multiple Property Submission," sec. E, pp. 1-13; Leland M. Roth, *A Concise History of American Architecture* (New York: Harper and Row, 1979), 214-218; Newton, 400-412.

<sup>&</sup>lt;sup>7</sup> "The City Beautiful Movement," sec. E, p.12-13. Acquisition dates for the parks are as follows: Park Blocks, 1852-1870; Chapman and Lownsdale Squares, 1852; Terwilliger Park, 1854; City Park, 1871; Holladay Park, 1870; Columbia Park, 1891; Ladd's Addition, 1891; and Macleay Park, 1897. Portland Park Board, *Annual Report*, 1901. Although the city owned the above park properties by 1903, they may or may not have been developed by that time. Terwilliger Park should not be confused with Terwilliger Boulevard, a parkway identified by John C. Olmsted in 1903. Acquisition of land for Terwilliger Boulevard did not begin until 1908. Guzowski, 143-145.

<sup>&</sup>lt;sup>8</sup> City of Portland, "The City Beautiful Movement;" Guzowski, 17.

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Olmsted selected was a portion of an east Portland dairy farm owned by the estate of William S. Ladd. In 1903, the land surrounding the farm was already being subdivided for residential use. Olmsted undoubtedly foresaw the future development of the Ladd farm, as he targeted its swampy, forested southwest section as an ideal setting for a neighborhood park. Eventually known as Laurelhurst Park, the acreage would not be acquired by the city for some time. The extraordinary rise in land values after Portland's Lewis and Clark Exposition of 1905 prevented the Park Board from realizing Olmsted's plan for the Ladd farm or for any of the other thirty-six proposed park sites.<sup>9</sup>

In time, however, the rapid development Portland experienced after the Exposition worked to the advantage of the Olmsted plan. As the population grew, pressure mounted for neighborhood parks and playgrounds in and around expanding residential subdivisions. In 1907, the Portland Park Association planned a bond issue for \$1,000,000 to carry out the Olmsted plan of 1903. The bond issue passed in June and the following month, the Park Board enlisted Olmsted Brothers to prepare a land acquisition analysis for the properties identified in the 1903 plan. Because of the city's rapid growth and concurrent skyrocketing land values, John Olmsted made substantial changes to his 1903 plan. He suggested that the city prioritize its acquisitions, identifying the most important landscapes to be developed. He advised to abandon hopes for connecting parkways on Portland's east side, as the land had become too expensive. Instead, he suggested placing priority on constructing local and neighborhood parks to keep up with the rapid residential growth taking place on the east side. In contrast to Olmsted's 1903 plan, his 1907 acquisition plan found the Park Board in a position to act upon his advice. Between 1908 and 1909, Emanuel Mische led the Park Board in prioritizing park lands and initiating negotiations to acquire them.<sup>10</sup>

#### Emanuel T. Mische and the Portland Park System

Thirty-eight-year-old Emanuel Tillman Mische was at the helm of the Portland Park Department when the first installment of the \$1,000,000 bond issue became available for park land acquisition. Mische had replaced park superintendent Arthur D. Monteith in the spring of 1908 after leaving his position as park superintendent for Madison, Wisconsin. Mische had been recommended for the Portland position by John Olmsted at the time of Monteith's hiring in 1906 but Mische had just started his job in Madison. When the opportunity arose again in 1908, the timing was right. Mische brought to Portland a remarkable range of experience and skill. Born in Syracuse, New York, he attended the Missouri Botanic School before enrolling in the Bussey Institute, the horticulture school of the Arnold Arboretum in Jamaica Plain, Massachusetts, in 1894. Under the influence of such horticulture luminaries as Charles Sargent, Alfred Rehder, Jackson Dawson, and Ernest Henry Wilson, Mische cultivated his skills, focusing on the propagation of seeds, grafting, and cuttings of new plant species from Asia. In 1896, Mische received a scholarship to attend the Royal Botanic Gardens at Kew, England. In 1898, upon his return from Europe, Mische went to work for Olmsted Brothers in Brookline, Massachusetts. Under the tutelage of John Olmsted and Olmsted's half-brother Frederick Law, Jr., Mische learned to draw and design in the Olmsted tradition. Because of his extraordinary horticulture expertise, the Olmsteds encouraged his involvement with projects requiring planting plans. After eight years with Olmsted Brothers, Mische left Brookline for the Madison position.<sup>11</sup>

Emanuel Mische's responsibilities as Portland's park superintendent went above and beyond the routine duties of the position. Mische expanded his responsibilities for the administration of park maintenance and improvements to include

<sup>&</sup>lt;sup>9</sup> Portland Park Board, Report of the Park Board, Portland, Oregon, 1903, with the Report of Messrs. Olmsted Bros., Landscape Architects, Outlining a System of Parkways, Boulevards and Parks for the City of Portland (Portland: The Board, 1903) as described in Guzowski, 54-58.

<sup>&</sup>lt;sup>10</sup> Guzowski, 64-68; Portland Park Board, Annual Report, 1923.

<sup>&</sup>lt;sup>11</sup> Ibid., 97-100.

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the designing and planting of all the city's parks. While his predecessor simply made recommendations for park land acquisition, Mische took an active role in negotiations. Because of his intimate involvement with every aspect of park planning, the parks that were developed during his six-year tenure as park superintendent emerged with a distinct character wholly evocative of Frederick Law Olmsted's finest urban park designs. During his eight years with Olmsted Brothers, Mische had absorbed the philosophies that inspired the work of the Olmsted family; the social responsibility the Olmsteds felt to create restorative landscapes for all classes of people; the creation of designs that resembled the results of natural weathering or biological processes on the land; the use of design techniques that created either a pastoral scene characterized by gently rolling meadows, scattered shade trees, and still bodies of water, or a picturesque scene evoked by lush foliage, rugged terrain, and circuitous paths and streams; the use of circulation systems such as walks and drives so visitors could enjoy the landscape without destroying it; the belief that all buildings and statuary in a park remain secondary to the landscape design; and finally, the importance of the benefits to the human soul of total immersion in scenery. In addition, Mische was heavily influenced by the Olmsted technique of dividing neighborhood parks into sections for different types of uses. John Olmsted mentioned this design approach in 1903 when he suggested to the Portland Park Board, "To make them [neighborhood parks] as attractive and useful as possible it is often best to abandon the attempt to secure simple broad landscape effects and to design them with as many interesting features and useful subdivisions as practicable somewhat as a recreation building is subdivided." Mische utilized all of the design techniques mentioned above when designing new park acquisitions and improving existing parks while he was superintendent.<sup>12</sup>

### The Park Board Takes Possession

By December 1909, Mische had facilitated the acquisition of Mt. Tabor, Kenilworth, Sellwood, and Peninsula parks, and Ladd Park, now known as Laurelhurst. First identified by John Olmsted as part of his 1903 park plan, Ladd Park was further developed on paper when John Olmsted returned to Portland in 1906 to secure private work with William M. Ladd. Ladd's father, William S. Ladd, had been a prominent civic leader in Portland. Founder of the city's first bank and twice mayor of Portland, the elder Ladd had owned and operated Hazel Fern Farm, a 486-acre dairy and livestock concern in east Portland. William S. Ladd died in 1893 and in 1906 the property still belonged to his estate. As Olmsted had suspected three years earlier when he targeted a portion of the farm as an ideal site for a neighborhood park, the property was under extreme development pressure. One year after the Lewis and Clark Exposition, with land values soaring, Ladd's son contacted Olmsted in anticipation of the residential development that was planned for the farm as soon as the estate was settled. According to landscape historian Kenneth J. Guzowski, Olmsted made several preliminary plans for the new subdivision only to learn that his firm would not be employed to finalize the design. Olmsted remarked in a letter to his business partner, Frederick Law, Jr.:

Mr. Ladd's idea is that I should act in consultation with his engineer in determining a few main lines of curved roads only. I thought this rather absurd but did not say so of course. I mean that it did not seem to me possible to determine the main lines without studying all the roads. I dare say it was partly his canny way of saving the cost of a full plan. However I dare say I shall get a fair compensation out of it.<sup>13</sup>

Olmsted's essential plan for the subdivision featured curvilinear streets and emphasized a large neighborhood park at

<sup>&</sup>lt;sup>12</sup> Charles E. Beveridge and Paul Rocheleau, *Frederick Law Olmsted: Designing the American Landscape* (New York: Rizzoli International Publications, Inc., 1995), 33, 38, 43, 50-51; Portland Park Board, *1903 Report* as quoted in Guzowski, 119.

<sup>&</sup>lt;sup>13</sup> "Closely Knit Laurelhurst Clings to Roots," Oregonian, n.d., vertical file at Oregon Historical Society. Subsequent references to the Oregon Historical Society will be abbreviated "OHS;" Olmsted to Olmsted, Dec. 4, 1908, quoted in Guzowski, 63.

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the south end of the development. The plans languished until the settlement of William S. Ladd's estate in 1908 triggered a flurry of property transactions. As soon as their father's estate was settled, William M. Ladd and his brothers formed the Ladd Estate Company to handle the family's land holdings. In 1909, the company deeded Hazel Fern Farm to William M. Ladd, who promptly sold it to the Laurelhurst Company that year for \$2,000,000, the largest sale of vacant land in Portland up to that time. Using Olmsted's plans as a framework, the Laurelhurst Company began planning the subdivision in earnest. In keeping with Olmsted's vision, the Portland Park Association purchased the swampy southwest corner of the property from the Laurelhurst Company in October 1909 for \$92,482.10.<sup>14</sup>

#### A Layout for Laurelhurst

While formulating designs for the parks he acquired in 1909, Mische was particularly challenged by the site at Ladd Park, proposing "a development of strong individuality for the park, one not possible in a similar way in any of the other park properties." At just over thirty acres, the Ladd Park property purchased by the Park Board was slightly larger than was suggested by Olmsted. Mische felt justified in improving on his old friend's recommendation, explaining to the Park Board in 1909, "to confine ourselves to the original recommendation would be to secure practically the swamp alone, whereas the extended taking includes many specimens of the grove of fine old firs and it furthermore allows for providing that district with more reasonable ample and satisfactory park attributes."<sup>15</sup>

Indeed, the grove of old firs at the southeast end of the park became the focal point of the park's design. Mische called the trees "the crowning glory of the park" and he described their role in his plan for Laurelhurst Park, as it was known by then, in the 1912 annual report to the Park Board:

The proposed plan is conceived in the spirit of the trees being the principal local consideration, and the general design and its details are devised to accentuate them and encourage their continued longevity.<sup>16</sup>

Mische planned to emphasize the fir trees by integrating other existing evergreen vegetation at the site into the design and by planting new evergreens and other plants rich in foliage, such as "hollies, mountain laurel, rhododendrons, azaleas, and similar plants known as 'choice,' either for their elegance of foliage, beauty of flower, ornament of fruit, or similar reasons." Mische insisted that "practically all of the material used there is grown in local nurseries," and that his suppliers looked elsewhere only when there was a shortage in local stock or a financial advantage to obtaining a plant from a non-local source. According to Linda Corbett, Laurelhurst's gardener, Mische obtained much of his non-local material from the southeastern United States, which may account for the high mortality rate of many of the original shrubs over time. In addition to the native plants and trees existing at the site, Mische's planting palette at Laurelhurst included Japanese snowbell; sweet viburnum; sweetgum; fragrant snowbell; tupelo; camellia; mountain laurel; Japanese star anise; sakaki; bigleaf, silver, and Norway maple; seven species of magnolia; redwood; fuchsia; heavenly bamboo; sassafras; American (or London) planetree; Chinese photinia; European and American beech; tuliptree; wintersweet; holly; Western hemlock; daphne; hydrangea; five species of rhododendrons; five species of

<sup>&</sup>lt;sup>14</sup> Guzowski, 63; OHS vertical file; Warranty Deed, Laurelhurst Park Historic File, 1909-1972, 27/10 at the Stanley Parr Archives and Records Center, Portland, Oregon. Subsequent references to the Stanley Parr Archives and Records Center will be abbreviated "Portland Archives." <sup>15</sup> Portland Park Board, Annual Report, 1909.

<sup>&</sup>lt;sup>16</sup> Portland Park Board, Annual Report, 1912; Ladd Park's name was changed to Laurelhurst Park by a resolution adopted by the Park Board in July 1912. The same resolution changed City Park's name to Washington Park and Williams Park's name to Mt. Tabor Park. Laurelhurst Park Historic File, 1909-1972, 27/10, Portland Archives.

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boxwoods; ten species of zaleas; three species of linden; gardenia; and common hackberry.<sup>17</sup>

In addition to the grove of fir trees, Mische utilized an existing spring-fed pond at the east side of the site as a principle design element. Mische called for the enlargement and deepening of the pond to create Firwood Lake, which was designed to feed a brook system that emptied out of the lake from its north shore, meandering west to the far end of the park. Mische envisioned intermittent dams creating pools and miniature cascades at several locations along the stream. Picturesque bridges would carry paved walkways over the brook. The details in Mische's design went beyond aesthetics. His extensive knowledge of horticulture and natural systems led Mische to make allowances in his design of the lake to keep it clear of biological growth and prevent stagnation. He calculated the depth of the lake to prevent the growth of aquatic weeds and provided a back-up circulation system, suggesting the use of an artesian well or the city main if the Ladd spring failed to keep the water moving naturally.<sup>18</sup>

Mische's design subdivided the park into six major sections separated by paved walkways. "The flatter areas are to be open to games, picnicing, rambling and fiestas. The steeper areas are to be devoted to arboreous and shrubby vegetation as an appropriate use of the ground and to add an enriching element and one lessening the cost of maintenance." The bucolic names Mische gave to these subdivisions reveal their distinct characteristics: "Concert Grove," "Plateau Meadow," "Broad Meadow," "Picnic Grove," "Rhododendron Hill," and "Children's Lawn." The circuitous walkways that bordered them were "so arranged as to control a tendency toward short cuttings."<sup>19</sup>

Mische's description addressed the issue of buildings and structures in the park, invoking quintessential Olmsted design principles in his insistence that "all building structures coming into vision are to be secondary to the landscape, and with this design a departure therefrom can only be adopted as a sacrifice to park effect and value." Mische proposed to "provide such necessary structures as shelters and comforts, and such minor objects as seats, fountains, light standards, and the like, but never to introduce buildings of conspicuous size, or any dominating a considerable portion of the park."<sup>20</sup>

Mische felt the design of Laurelhurst Park, more than any in the park system, was dictated by the existing vegetation, topography, and natural features at the site. His understanding of the integral character of natural systems was evident in his warning to the Park Board that, with the exception of Macleay Park, "change is nowhere to be regarded with the probability of harm being so surely involved therein as in this one." Mische felt strongly that any major alteration of the topography, such as substantial re-grading or placing structures too close to the grove of fir trees, would cause irreparable harm to the site's most appealing features. From the beginning, Mische considered Laurelhurst Park "a distinctively interior park with views wholly within the tract, and its development recognizes and uses this so as to establish a highly ornate property, self contained and without outward dependence other than for water supply." At Laurelhurst Park, Mische's training at the hands of the Olmsted Brothers is fully recognizable, as he clearly subscribed to the Olmsted conviction that "all rational improvement of grounds is, necessarily, founded on a due attention to the character and situation of the place to be improved."<sup>21</sup>

<sup>&</sup>lt;sup>17</sup> Park Board, Annual Report, 1912, 68-70; original plantings plan linen, 1913, in the collection of the Portland Archives; Linda Corbett interview; letter from E. T. Mische to Paul Murphy, June 19, 1914, Correspondence-Laurelhurst 1914 File 2/8, Portland Archives.

<sup>&</sup>lt;sup>18</sup> Park Board, *Annual Report*, 1912, 68-70.

<sup>&</sup>lt;sup>19</sup> Ibid.; Original plan for Ladd Park, 1910, Portland Archives.

<sup>&</sup>lt;sup>20</sup> Park Board, Annual Report, 1912, 69.

<sup>&</sup>lt;sup>21</sup> Ibid., 70.

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### **Mische's Vision Materialized**

Although Mische designed Laurelhurst Park in 1910, little more than debris clearing happened at the site that year because of funding shortages. At the end of 1911, the site was still unimproved but Mische stated in his annual report to the Park Board a desire to start grading walks and lawns at the park. Construction finally began in 1912 with the sub-grading of walkways, the grading and seeding of lawns, and the installation of log steps; however, financial constraints stalled plans for planting and quashed the construction of a gazebo for the Concert Grove and the installation of the brook and pool system. That year also brought a challenge to one of Mische's principle design elements. Feeling pressure from "local agitation" for a playground in the park, likely from prospective and existing owners in the developing Laurelhurst subdivision, the Park Board insisted that plans be studied for the substitution of the proposed Firwood Lake with a recreation area. The site would include a swimming pool, assembly building, lockers, gymnasium, and an outdoor playground. Mische claimed that because of the "radical changes this entails, if so much as possible of the tree growth is to be preserved, extremely careful and painstaking study on an extended scale is necessary and to date sufficient time to prepare it has not been available." Mische felt strongly that no further improvements be made to Laurelhurst Park until the playground issue was resolved. In addition, the public had failed that year to pass a \$2,000,000 bond issue for park acquisition and improvement. For these reasons, construction did not resume at Laurelhurst Park for three more years.

After the failure of the 1912 bond issue, Mische made a concerted effort to promote the bond for a 1913 election. Even though he had made substantial progress toward realizing Olmsted's 1903 plan, Mische lamented that Portland was still 100 to 600 percent behind other American cities in park development. He spent the year on the local lecture circuit, gathering research, and making presentations in an all-out appeal for his cause. The failure of the bond issue in June 1913 disheartened Mische profoundly. That same year, extensive city charter revisions abolished the Park Board in the process of installing a commission form of government. Although the park superintendent was still the administrative head of the newly established Park Bureau, sources suggest that the restructured government did not share Mische's broad interpretation of the position. He was transferred to the position of landscape architect for the city in August 1914 after continued friction with Commissioner William Brewster. One month later, Mische officially tendered his resignation as park superintendent. Almost immediately upon his resignation, Mische signed a one-year contract with the city to serve as a parks consultant under the new superintendent. James O. Convill, Mische's former assistant. In his capacity as consultant, Mische made recommendations and executed designs for new additions to the Olmsted Plan and prepared detailed improvement and planting plans for existing parks, including Laurelhurst.<sup>23</sup>

It was under Convill's administration and Mische's design and recommendations that activity resumed at Laurelhurst Park in 1915 with the paving of the walkways, the installation of a lighting system, and the erection of a "first-class" restroom facility. With the renewed attention to the park and the continuing development of the residential neighborhood surrounding it, Laurelhurst Park's popularity began to rise dramatically. By that time, the park and neighborhood were accessible by several street car lines: the East Ankeny and Montavilla lines along Glisan, the Rose City and Beaumont lines along Sandy, and the Mount Tabor and Sunnyside cars along Belmont Street. The annual report to the Park Board in 1915 noted that because of its central location, the patronage of the park was "enormous" and that one local band concert drew 32,000 people, "the largest crowd ever assembled in a Portland park for a single

<sup>&</sup>lt;sup>22</sup> Park Board, Annual Report, 1910-1912. Construction took place on a contractual basis. Information was not available regarding the specific firms that undertook the work on Laurelhurst Park.

<sup>&</sup>lt;sup>23</sup> Guzowski, 148-153.

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band concert."24

Regular improvements continued at Laurelhurst Park through 1916, the most significant of which was the enlarging and deepening of the pond at the east end of the park to create Firwood Lake. By 1916 Portland's park system consisted of 1.410 acres, much of it acquired, designed, or improved by Emanual Mische, Mische had described Laurelhurst Park as "one of the most elegant of the park system properties;" it was later reported to have been his favorite. Mische used Laurelhurst to show off his horticultural expertise, taking full advantage of the site to experiment with a wide range of plant varieties that had not been used before in Portland. In 1919, the Pacific Coast Parks Association honored Mische by voting Laurelhurst the most beautiful park in the west.<sup>25</sup>

After Mische's contract with the city of Portland ended, he continued to exert his influence over park decisions through newspaper articles, city council meetings, and as president of the Portland City Club, a position he held from 1922 to 1923. In addition, he pursued private work all over the West Coast, aiding in the developing of Crater Lake Park and contributing to leading contemporary horticulture and landscape magazines. He stayed in Portland until the mid-1920s when he moved to Los Angeles to pursue park work for California State Parks.<sup>26</sup>

#### Laurelhurst's Olmsted Legacy

In August 1917, another of Mische's former assistants, Charles P. Keyser, became the Executive Head of the Park Bureau, a position he retained for thirty-two years. As a result of having worked closely with Emanual Mische for many years, park superintendent Keyser followed a nearly seamless philosophical approach to the maintenance and improvements of Portland's park system. Between 1921 and 1922, Keyser purchased an entire block across Oak Street from Laurelhurst Park to serve as a playground. This strategic acquisition took the pressure off further development at the main park and was a key factor in the retention of the park's design integrity over time. Keyser oversaw the development of the playground throughout the 1920s, installing tennis courts, handball courts, play equipment, a wading pool, a recreation building, and a kitchenette. A real estate inventory listing park and playground features installed between 1925 and 1932 notes the installation of horseshoe courts in 1926, a point confirmed in the 1927 Annual Report, which listed six courts. Although it is unclear whether the horseshoe courts were located at the playground or at the main park, the six courts were likely the first of twelve that currently stand at the south side of the main park. These horseshoe courts represent the only major recreation facility constructed in the park since it was designed in 1910. Charles Keyser continued to facilitate improvements to Laurelhurst Park through the 1920s and 1930s, including the installation of a rock shore, shallow concrete terraces, and railings at Firwood Lake. The 1955 construction of Boomerang Island in the lake was perhaps the most significant alteration to Mische's park design, although it echoes the picturesque character of the rest of the park. The 1950s also saw the original log stairway that led from the north end of the park to Ankeny Street replaced by one constructed of bricks in the identical location. An electric kitchen and restroom facility west of Broad Meadow, built in the 1960s, was removed in 1996. A metal sculpture was placed in the Children's Lawn in the early 1980s.<sup>2</sup>

<sup>&</sup>lt;sup>24</sup> Park Board, Annual Report, 1915.

<sup>&</sup>lt;sup>25</sup> Park Board, Annual Report, 1916; letter from E. T. Mische to Paul Murphy; Linda Corbett, interview; Keith Eggener, Ladd Park National Register Nomination (unsubmitted), 1985, sec. 8, p. 5. Guzowski, 152-158.

<sup>&</sup>lt;sup>27</sup> Warranty Deeds, 1921 and 1922, Laurelhurst Park Historic File, 1909-1972, 27/10, Portland Archives; Real Estate Inventory, Laurelhurst Park Historic File, 1909-1972, 27/10; Eggener, sec. 8, p.5.

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The plantings that Mische so carefully selected for Laurelhurst Park in 1913 and 1914 matured with varying levels of success. The trees fared better over time than the shrubbery, although original examples of both planting types have survived to the present. The grove of old firs that caught Mische's trained eye in 1909 is currently a mix of original and second-growth trees; as the trees reached their natural life span and died, park officials replaced them in-kind. Although some of the plants along the perimeter of the park have been replaced over time, the "wholly interior views" that Mische intended in his design of Laurelhurst Park have been preserved.<sup>28</sup>

The lush surroundings at Laurelhurst Park were chosen year after year as the location for such long-standing Portland traditions as the Rose Festival flower shows and queen coronations. In the 1960s and 1970s, Laurelhurst Park suffered neglect as the surrounding neighborhood experienced a decline in property values and owner-occupied residences. However, the past twenty years have witnessed the re-emergence of the Laurelhurst neighborhood as the elegant subdivision it was designed to be almost ninety years ago. Property values there are among the highest in the city and the welfare of the park and the neighborhood are assured under the watchful eyes of a remarkably active neighborhood association.

Today, Laurelhurst Park remains a physical anchor and cherished amenity for the surrounding neighborhood and a landmark for the city of Portland. The park is eligible for the National Register under Criterion C as perhaps the best example in the Portland park system of the Olmsted design philosophy interpreted by Emanuel T. Mische. It is also eligible for listing under Criterion A for its association with Portland's early park planning, particularly for its inclusion in the Olmsted Plan of 1903. Laurelhurst Park is clearly evocative of the social issues that were at the forefront of the American consciousness at the turn of the twentieth century. The design for Portland's park system by John C. Olmsted reflected the activities of many American cities at that time, as they strove to build a quality of life equal to the economic stability the Industrial Revolution had provided. Through the vision and talents of park superintendent E. T. Mische, the design of Laurelhurst Park embodies the distinct physical characteristics associated with Frederick Law Olmsted and his close associates, who represented the professional pinnacle in landscape design at the height of the City Beautiful movement.

#### **Registration Requirements**

Parks nominated under the Multiple Property Submission, "The City Beautiful Movement and Civic Planning in Portland, Oregon 1897-1921" must meet the following registration requirements:

- 1. Intact example of rural or suburban park, or an urban or neighborhood park
- 2. Exhibits Olmstedian design characteristics
- 3. May have been included in the Olmsted Plan of 1903
- 4. Acquired or functioning as a park between 1897 and 1921 during the period of significance

Laurelhurst Park is an excellent example of park planning in Portland during the height of the City Beautiful movement for the following reasons:

Intact example of urban or neighborhood park. Exceptionally intact after almost ninety years, Laurelhurst Park marks the southwest corner of a distinctive, 442-acre residential subdivision in the city of Portland's inner ring. The park serves both the surrounding neighborhood and the wider metropolitan area. The park is particularly accessible to pedestrians because of its location in a residential neighborhood and its interior circulation system of wide paved

<sup>&</sup>lt;sup>28</sup> Linda Corbett, interview; current plantings list for Laurelhurst Park obtained from Portland Parks and Recreation.

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pathways. A playground adjacent to the park contains a recreation building, tennis courts, a wading pool, and playground equipment.

*Exhibits Olmstedian design characteristics.* As a former employee of Olmsted Brothers, Portland park superintendent Emanuel T. Mische was an accomplished practitioner of the highly distinctive design techniques that characterized Olmsted work. Mische designed Laurelhurst Park as a superior example of such techniques: pastoral scenes characterized by gently rolling meadows, scattered shade trees, and still bodies of water are represented in Laurelhurst Park's Broad Meadow, Picnic Grove, and Firwood Lake; picturesque scenes evoked by lush foliage, rugged terrain, and circuitous paths and streams are found at Rhododendron Hill; the use of circulation systems such as walks and drives so visitors could enjoy the landscape without destroying it is evident throughout the park in the curvilinear pathway network; finally, the Olmsted belief that all buildings and statuary in a park remain secondary to the landscape design is illustrated in the placement and scale of the single building at Laurelhurst Park, the Ankeny Street Comfort Station.

May have been included in the Olmsted Plan of 1903. The current location and approximate footprint of Laurelhurst Park is clearly visible in the Olmsted Plan of 1903.

Acquired or functioning as a park between 1897 and 1921 during the period of significance. Laurelhurst Park was acquired in 1909 at the height of the City Beautiful Movement. It was functioning as a park by 1916.

USDI / NPS Registration Form Laurelhurst Park Multnomah County, Oregon

Cultural Affiliation

Architect/Builder Emanuel Tillman Mische

Narrative Statement of Significance (Explain the significance of the property on one or more continuation sheets.)

#### 9. Major Bibliographical References

(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS)

- preliminary determination of individual listing (36 CFR 67) has been
- requested. previously listed in the National Register
- previously determined eligible by the National Register
- designated a National Historic Landmark

recorded by Historic American Buildings Survey #

\_\_\_\_ recorded by Historic American Engineering Record # \_\_\_\_\_

Primary Location of Additional Data

State Historic Preservation Office

- Other State agency
- Federal agency

X Local government

University

X Other

Name of repository: Oregon Historical Society

### 10. Geographical Data

Acreage of Property 26.81 acres

UTM References (Place additional UTM references on a continuation sheet)

Zone Easting Northing Zone Easting Northing A1\_10 529520 5040895 310 528930 5040610 2<u>10</u> <u>529520</u> <u>5040620</u> <u>4</u><u>10</u> <u>528980</u> <u>5040765</u> See continuation sheet.

Verbal Boundary Description (Describe the boundaries of the property on a continuation sheet.)

Boundary Justification (Explain why the boundaries were selected on a continuation sheet.)

#### **11. Form Prepared By**

name/title	Christine A. Curran, architectural historian		
organization _	SERA Architects, PC	date	November 1999
street & numb	er 123 NW Second Avenue	telepho	one <u>(503) 445-7331</u>
city or town	Portland	state OR	_zip code _ <u>97204</u>

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LU 23-088549 HR DM, Exhibit A.10

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Warranty deed. October 30, 1909. Laurelhurst Park Historic File # 27/10, 1909-1972. Stanley Parr Archives and Records Center, Portland.

Warranty deed. January 27, 1921. Laurelhurst Park Historic File # 27/10, 1909-1972. Stanley Parr Archives and Records Center, Portland.

Warranty deed. January 14, 1922. Laurelhurst Park Historic File # 27/10, 1909-1972. Stanley Parr Archives and Records Center, Portland.

#### **Archival Collections**

Portland Parks and Recreation Archives and Drawing Collection. Stanley Parr Archives and Records Center, Portland.

Vertical Files. Oregon Historical Society, Portland.

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#### **UTM References**

#### **Verbal Boundary Description**

The nominated property is bounded by Southeast Thirty-ninth Street on the east, Southeast Oak Street on the south, Southeast Thirty-third Street on the west, Southeast Ash Street on the northwest, and Southeast Ankeny Street on the north. The boundary is shown as a heavy black line on the accompanying map entitled, "Sketch and Boundary Map, Laurelhurst Park," drawn to a scale of 100 feet to one-half inch.

#### **Boundary Justification**

The boundary represents the original tract of property purchased by the Portland Park Board in 1909.

#### Additional Documentation

Submit the following items with the completed form:

Continuation Sheets

#### Maps

A USGS map (7.5 or 15 minute series) indicating the property's location. A sketch map for historic districts and properties having large acreage or numerous resources.

#### Photographs

Representative black and white photographs of the property.

Additional items (Check with the SHPO or FPO for any additional items)

<sup>2</sup> roperty Owner		
(Complete this item at the request of the SHPO or FP	<b>?O</b> .)	
name City of Portland c/o Park Bureau		
street & number1120 SW 5 <sup>th</sup> Avenue	telephone(503) 823-2223	
city or town Portland	state OR zip code 97204-1914	

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.0. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

**Section** <u>11</u> **Page** <u>19</u>

Laurelhurst Park Name of Property Multnomah, Oregon County and State

City Beautiful MPS Name of Multiple Property Listing

### Index to Photographs

Property: Photographer: Date: Negatives:	Laurelhurst Park, Portland, Multnomah County, Oregon Christine A. Curran, SERA Architects, PC November 7, 1999 SERA Architects, PC 123 NW 2 <sup>nd</sup> Avenue Portland, Oregon 97209
No. 1	Ankeny Street Comfort Station, north facade. View to southeast.
No. 2	Concert Grove. View to northeast.
No. 3	Plateau Meadow. View to southwest.
No. 4	Footpaths between Plateau and Broad Meadows. View to north.
No. 5	General view. View to west.
No. 6	Broad Meadow. View to northwest.
No. 7	Picnic Grove. View to northwest.
No. 8	Ankeny Street Stairs. View to north.
No. 9	Firwood Lake. View to east.

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section 11 Page 20

Laurelhurst Park Name of Property Multnomah, Oregon County and State

City Beautiful MPS Name of Multiple Property Listing



No. 1

Ankeny Street Comfort Station, north façade. View to southeast.



No. 2

Concert Grove. View to northeast.

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section 11 Page 21

Laurelhurst Park Name of Property

City Beautiful MPS Name of Multiple Property Listing



No. 3 Plateau Meadow. View to southwest.

Multnomah, Oregon County and State

OMB No. Exhibit P, Page 28

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section \_\_\_\_\_ Page\_\_\_22\_\_\_

Laurelhurst Park Name of Property Multnomah, Oregon County and State

City Beautiful MPS Name of Multiple Property Listing



No. 4

Footpaths between Plateau and Broad Meadows. View to north.



No. 5 General View. View to west.

OMB No. Exhibit P, Page 29

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section 11 Page 23

Laurelhurst Park Name of Property Multnomah, Oregon County and State

City Beautiful MPS Name of Multiple Property Listing



No. 6 Broad Meadow. View to northwest.



No. 7

Picnic Grove. View to northwest.

LU 23-088549 HR DM, Exhibit A.10

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section 11 Page 24

Laurelhurst Park Name of Property Multnomah, Oregon County and State





No. 8 Ankeny Street Stairs. View to north.



OMB No. Exhibit P, Page 31

United States Department of the Interior National Park Service

# NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

Section 11 Page 25

Laurelhurst Park Name of Property Multnomah, Oregon County and State

City Beautiful MPS Name of Multiple Property Listing

ADDITIONAL DOCUMENTATION: View in Laurelhurst Park, image from Paul C. Murphy, Laurelhurst and its Park (Portland, OR, 1916) 5.



SEPTEMBER, 1916 LAURELHURST AND ITS PARK PAGE 5



Scale: ½" = approximately 100'


















# 10.5 Exhibit P, Page 42 Laurelhurst Park 3-088041 thema 200 regon











# No. 8 Exhibit P, Page 48 Laurelhurst Park U 23-088549 AR DM, Exhibit A. 10 regon





# Dark Skies

Strategies for Reducing Light Pollution in Portland



**AUGUST 2020** 



Astronomers at observatories can see the effects of sky glow from cities hundreds of miles away. Sky glow from the City of Portland is clearly visible from Goldendale Observatory in Goldendale, Washington, 117 miles to the east.

### Best Practices: What the experts recommend

The **International Dark-Sky Association** (IDA) is a leading organization combating light pollution worldwide and their primary goals is "to preserve and protect the nighttime environment and our heritage of dark skies through socially and environmentally responsible outdoor lighting". IDA was founded in 1988 and works with the public, city planners, legislators, lighting manufacturers, parks, and protected areas to provide and implement smart lighting choices. The **Illuminating Engineering Society** (IES) is the recognized technical and educational authority on illumination with a mission to improve the lighted environment by bringing together those with lighting knowledge and translating that knowledge into actions that benefit the public. Established in 1906, the IES membership includes: engineers, architects, designers, educators, students, contractors, distributors, utility personnel, manufacturers, and scientists in 64 countries.

IDA and IES recognize that modern society requires outdoor lighting for a variety of needs, including safety and commerce. To minimize the harmful effects of light pollution, IDA and IES together support the following principles for responsible outdoor lighting:



### REVISED C Exhibit List (Plan Set)

- Exhibit 1 Vicinity Map
- Exhibit 2 Site Boundaries
- Exhibit 3 Light pole locations with Conservation and Scenic Overlays
- Exhibit 4 New Pole and Fixture Schematics (NEW Page 2B)
- Exhibit 5 Illumination Info (photometrics, distribution comparison, etc.)
- Exhibit 6 Scaled Plan Set (SEPARATE UPLOAD)
- Exhibit 7 Permitted landscaping per LU 17-245440 Condition L. and (NEW) approved areas of adjustment (Exhibit C-1 of casefile LU 17-2454400 CU-AD)
- Exhibit 8 Tree Plan (includes Inventory)
- Exhibit 9 Disturbance Area Plan for Replacement Poles (REVISED)
- Exhibit 10 Scaled Construction Plan Set (NEW, SEPARATE UPLOAD)



Exhibit 1, Page 1

# Site Boundaries



Exhibit 2, Page 1





Exhibit 3, Page 1



HEIGHT: WIDTH: MATERIAL:

PANELS: FINISH: LAMPING: VOLTAGE: COLOR TEN

OPTICS: TYPE TYPE

SURGE:

CATALOG TYPE

TYPE

### LUMINAIRE SPECIFICATIONS:

	WILLIAM AND MARY
	16.5/8*
	CAST ALUMINUM ALLOY A.N.S.I.
	356, PER A.S.T.M. B26-95
	PEBBLED ACRYLIC
	POWDER COAT - RIVER TEXTURE GLOSS BLACK 60 WATT LED SYSTEM
	ELECTRONICALLY WIRED FOR 120-277 VOLTS
MP.:	2700K (WARM WHITE)
10:	TYPE III (ASYMMETRIC DISTRIBUTION)
V:	TYPE V (SYMMETRIC DISTRIBUTION) 10kV
0.0	
III:	ALMWMS-LE060-EVX-2G2-27-CR3-YPBP-TR7P-CU
V:	ALMWMS-LE060-EVX-2G2-27-CN5-YPBP-TR7P-CU





BY APPR

S	SCREW WAS STANDARD. REMOVED GFI D.O.										
EMBEDDED FLUTED POLE											
POLE HEIGHT ABOVE GRADE	EMBEDDED DEPTH	OVI P LE	ERALL OLE NGTH	BUTT GROUND LINE DIA MOMENT (ft-lbs)		ULTIMATE GROUND LINE MOMENT (ft-lbs)		LE GHT s)			
12'-2"	5'-0"	1	7'-2"	18"	22,500		1,0	50			
E CONF	IG CODES		"P"	"P" LEVEL POLE CONFIG CODES							
ENTRY	INFO		OPTI	ON CLA	SS	ENTRY	INF	-0			
I				MIX		11E	EVT M	ATCH			
66538E			FINISH		3						
TMP			COLLAR		65850EPA	ROL	JND				
MODFE	NOTE 7		POLE TOP CONFIG.		MOD95						
			STRUCT MOD			MODDCI	ΙΟΛ	F 8			

### SHIPPING ASSEMBLY 2304-010 **BILL OF MATERIAL**

DESCRIPTION

40195EM3PAA - MODIFIED FABRICATED ALUMINUM TENON ASSEMBLY, 2-7/8" O.D. x 3"

1. MIX (11E3I): GRAY NATURAL (EVT MATCH), EXPOSED AGGREGATE FINISH WITH AMERSHIELD ANTI-GRAFFITI COATING.

- ASTM C-595 TYPE 1L GRAY CEMENT
- PROTECTIVE COAT EXPOSED P.C. WIRES AT POLE ENDS.
- 7. MODFE: POLE BOTTOM PREPARATION FOR FREEZING OR CORROSIVE COASTAL ENVIRONMENT; SEE DOCUMENTATION.
- 8. MODDCI: CORROSION INHIBITOR MIX MODIFICATION.
- 9. POLE FULLY PRESTRESSED WITH (8) 7mm ASTM A421 STEEL WIRES.
  10. THE POLE (& IMPLIED TENON TOP ASSEMBLY) DEPICTED ON THIS DRAWING IS
  - DESIGNED TO WITHSTAND THE LOADS IMPARTED BY A SINGLE POST TOP
  - LUMINAIRE (NOT TO EXCEED 1.5 SQ FT EPA & 47 LBS) AS DESIGNED PER THE 2013 AASHTO LTS-6 USING A 90 MPH WIND ZONE (3-SECOND GUSTS) CRITERIA
  - FOR STREET LIGHT POLES. NO TORSIONAL (ARM OR TWIST) LUMINAIRE LOADS ANALYZED. PLEASE CONTACT & ADVISE MANUFACTURER IF INTENDED LOADING

### MATERIAL LIST

BER	DESCRIPTION	ORG	NOTES
)	SHIPPING ASSEMBLY	ANN	
	TAMPER PROOF WRENCH	ANN	1 FOR EVERY 5 POLES

POLE www.amerc	PROD							
PORTLAND PARKS								
PORTLA	AND, OR							
VEO03.7 POLE WITH	TENON	ASSEMBI	_Y					
NTAINS INFORMATION WHICH IS PROI DISCLOSED TO ANYONE WITHOUT TH	PRIETARY TO NA IE PRIOR WRITTE	TIONAL OILWEL	L VARCO. IT SHAL OF NATIONAL OIL	L NOT BE WELL VARCO.				
DATE: 4/6/23	APPR:		DATE:					
ER	REVISION	SHEET		SCALE				
04-010	В	1 (	)F 1	NTS				



		DE	SCF	RIPTIO	N				BY	AP	PR
S	CR	EW WAS ST	ANDA	ARD. RI	EMOVED	GFI			D.O.		
EMBEDDED FLUTED POLE											_
POLE IEIGHT ABOVE GRADE	E	MBEDDED DEPTH	OVI P LEI	VERALL POLE ENGTH DIA ULTIMATE GROUND LINE MOMENT (ft-lbs)		ULTIMATE ROUND LINE MOMENT (ft-lbs)		POLE WEIGH (lbs)	т		
12'-2"		5'-0"	1	7'-2"	18"		22,500		22,500 1,050		
E CONF	IG	CODES	]	"P" LEVEL POLE CONFIG C					ODES	;	
ENTRY		INFO		OPTI	ON CLAS	SS	ENTRY		INFO		
I	I			MIX 11E			11E	EVT MATCH		СН	
66538E			FINISH 3		3						
TMP	IP COLLAR 65850EPA		ROUN	C							
MODFE		NOTE 7		POLE TOP CONFIG. MOD95							
			_	STR	UCT. MC	D	MODDCI		NOTE	8	

### SHIPPING ASSEMBLY 2304-010 **BILL OF MATERIAL**

40195EM3PAA - MODIFIED FABRICATED ALUMINUM TENON ASSEMBLY, 2-7/8" O.D. x 3"

### 1. MIX (11E3I): GRAY NATURAL (EVT MATCH), EXPOSED AGGREGATE FINISH WITH AMERSHIELD ANTI-GRAFFITI COATING.

- 6. PROTECTIVE COAT EXPOSED P.C. WIRES AT POLE ENDS.
- 7. MODFE: POLE BOTTOM PREPARATION FOR FREEZING OR CORROSIVE

  - SINGLE POST TOP LUMINAIRE (NOT TO EXCEED 1.5 SQ FT EPA & 47 LBS)
- AS DESIGNED PER THE 2013 AASHTO LTS-6 USING A 90 MPH WIND ZONE (3-SECOND GUSTS) CRITERIA FOR STREET LIGHT POLES. NO TORSIONAL
- ÀRM OR TWIST) LÚMINAIRE LOADS ANALYZED. PLEASE CONTACT &
- ADVISE MANUFÁCTURER IF INTENDED LOADING EXCEEDS THESE VALUES.

### MATERIAL LIST

BER	DESCRIPTION	ORG	NOTES
)	SHIPPING ASSEMBLY	ANN	
	TAMPER PROOF WRENCH	ANN	1 FOR EVERY 5 POLES

				DATE				
POLE www.ame	PROD							
PORTLAND PARKS								
PORTL	AND, OR	2						
O03.7 POLE WIT		ASSE	MBLY					
DNTAINS INFORMATION WHICH IS PR	OPRIETARY TO NA THE PRIOR WRITTE	TIONAL OILWELI N PERMISSION	L VARCO. IT SHAL OF NATIONAL OIL	L NOT BE WELL VARCO.				
DATE: 4/6/23	APPR:		DATE:					
ER	REVISION	SHEET		SCALE				
04-010	B	<u> </u>	)F_1_	1" = 2'				
LU 23-0	00049 HK	DIVI, EXN	IDILA.TT					

# Installation Steps for a Direct Embedded Ameron™ Concrete Pole



Position pole for pre-wining, Protect pole as described in handling and storage guide, Wire and install juminaire,



Use only synthetic straps. Singla pick point is preferred method of handling. Use double clove hitch to avoid alippage.



Excevete hole to proper depth (plus 6-in, if special backfill is required).



Set pole. Align/plumb. Naintain lension on the pole until compacted to bottom of cable entrance.

# Recommended backfill requirements\*

# Good soil

Compact well-graded sand and gravel, hard clay, or well-graded fine and coarse sand (all drained so that water will not stand).

Une as is for bock Rf.

### \*Based on location review by a qualified civil engineer.

(# 2000 Matternal Office) Verse (4) Mights Reported - CANT-ADA\_MAG\_2003.

# Medium soil

Compact fine send, medium and clay, compact sendy loam, loose coarse send and gravel (all drained so that water will not stand).

### Regebres select backfill—clean, washed send or X-in, minut well-graded gravel.



Use proper backfill, See recommended backfill requirements below, Tamp a 6-in, back to ensure connect setting depth and drainage (if required),



Compact required backfill in two operations. Tamp 9-in. Intervals to bottom of cable entrance. Install underground cable. Check alignment. Finish compaction to a height of 2-in. above grade sloping away from pole to allow proper drainage.

# Poor soil

Soft clay, clay loam, poorly compacted send, or clays containing large amounts of site. Water may stand during wet seeson.

Gen connections earth backfill—mir one part dry coment paneler to 25 parts clean, weahed caud.



# Ameron Concrete Pole Handling Instructions

Ameron<sup>®</sup> poles are made of pre-stressed concreter a lough, elastic, durable material not limited by the properties of low strength, conventionally reinforced concrete. Like many other fabricated structures, Ameron poles are designed to withstand specific service loads and handling loads—with safety factors considered. Loads induced through handling are periaps the ones most easily overlocked, even though only a few simple rules need be ramembered. Attention to the following will minimize damage from handling and storage.

### Storage (See Figs. 1 through 3)

1. Store on durinage placed % of the total length from each end. Location of temporary support points may vary from this rule for both storage and handling. Durinage is idently made from 4×4 fit, pine, or similar wood, which is linkshed enough to have opposite sizes flat and parallel (no lags or branches). The durinage should be in one place for the full width of the stack and be of sufficient thickness as to allow the placing of sings or the investion of foridilt fingers between the invest of poles. Westhered lumber is better than newly cut because the latter may stain the concrete when molisture is present.

 Store on a level surface. If surface is not paved, be certain the ground is solid enough so that the durinage does not uink into it.

3. When poles are stored in more than one layer, each piece of during e must be placed one above the other, so that the weight of the poles above is transmitted directly downward through the during e and does not induce bending stresses in the poles.

4. Distribution poles should be studied no higher than nine layers and smaller poles no higher than 12 layers.

5. Each succeeding layer of poles should be placed with the tips in the opposite direction of the layer below.

Poles should be aligned so that the tips in each layer form a straight line normal to the center line of the poles.

7. Pince wedges on the during generat to the poles to prevent their rolling.

4. Do not step on the cantilevered tips of small poles in storage.

 Hundle poles with reasonable care so as to avoid dropping or otherwise striking them against each other or other hard, solid objects.

# Handling

### (See Fig. 4)

 In lifting the pole from a single pick-up point, use either a choker sling or a loop sling with one complete extra turn around the pole just above the balance point.

When lifting the pole using two pick-up points from a single hook, a choice-type attachment should be used on the pole.

Poles with a polished or textured surface should be handled with a nylon or other non-metallic sling.
 For these poles, fingers of a forkift should be fitted with protective covers.

4. When using a forklift to handle poles, always use softeners on the fork times. Also, always use wedges to prevent poles from rolling.





Total pole count: 88

# Existing product - Specs

# Existing lamp information used for calculation

Brand	Philips Lighting	Bulb Finish	Clear
Product Line	Ceramalux	Bulb Technology	High Pressure Sodium
Model Number	SON 150W E39 ED75 CL SL/12	Average Rated Life (hr)	24000
Energy Used	150 Watts	Length (in)	7.75
Base	Mogul (E39)	Diameter (in)	2.938
Bulb Shape	ED-23 1/2	Ballast Code	S55
Bulb Color	Warm White	Contains Mercury (Hg)	Yes
CRI	17	GE	44043 - LU150/55
Color Temperature (Kelvin)	2100	Osram Sylvania	67516 - LU150/55
Brightness (Lumens)	16000	Not For Sale In	WA



Existing pole details:

Pole height: 12'-2"

Lamp lumen distribution used for calculation - T5 type optic

06/21/2023

# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215

(E) Decorative Post-top luminaire

Exhibit 5, Page 1

Portland Parks Photometrics **P25** INC

LU 23-088549 HR DM, Exhibit A.11

MT TABOR - EXISTING CONDITION



# Existing product - Approximate calculation

MT. TABOR - EXISTING POLE APPROX. CALC							
Label	Units	Avg	Max	Min	Uniformity Ratio		
Walkway	Fc	0.31	5.2	0.0	N.A.		
Walkway 2	Fc	0.28	5.3	0.0	N.A.		

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.





# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



CONDITION

EXISTING

TABOR -

 $\leq$ 





# Existing product - Approximate calculation

### MT. TABOR - EXISTING POLE APPROX. CALC

Label	Units	Avg	Max	Min	Uniformity Ratio			
Walkway	Fc	0.31	5.2	0.0	N.A.			
Walkway 2	Fc	0.28	5.3	0.0	N.A.			

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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



CONDITION

EXISTING

TABOR -

M



# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215

# Existing product - Approximate calculation

MT. TABOR - EXISTING POLE APPROX. CALC							
Label	Units	Avg	Max	Min	Uniformity Ratio		
Walkway	Fc	0.31	5.2	0.0	N.A.		
Walkway 2	Fc	0.28	5.3	0.0	N.A.		

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

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3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

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### LIGHTING LEVEL (FC) LEGEND Range > = 0 To<= 0 > = 0.1 To<= 0.3 > = 0.4 To<= 0.7 > = 0.8 To<= 1 > = 1.1 To<= 100

06/21/2023



Please note that the drawing is not to scale and is for illustrative purposes only.



CONDITION

TABOR - EXISTING

M



# Existing product - Approximate calculation

# MT. TABOR - EXISTING POLE APPROX. CALC

WIT. TABOR - EXISTING FOLE AFFROX. GALO							
Label	Units	Avg	Max	Min	Uniformity Ratio		
Walkway	Fc	0.31	5.2	0.0	N.A.		
Walkway 2	Fc	0.28	5.3	0.0	N.A.		

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

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2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

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### LIGHTING LEVEL (FC) LEGEND



Please note that the drawing is not to scale and is for illustrative purposes only.

# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215





CONDITION

EXISTING

TABOR -

M





# New LED product - Specs

Decorative Post-top:



Spring City - William and Mary Post-top fixture ALMWMS-LE060-EVX-2G2-27-[OPTIC]-YPBP-CU



Optics used for calculation - T3, T5 type

Decorative Post-top luminaire # T3 Poles: 74, # T5 Poles: 14 Pole height: 12'-2"

06/21/2023









MT. TABOR - 1-1 REPLACEMENT APPROX. CALC					
Label	Units	Avg	Max	Min	Uniformity Ratio
Walkway	Fc	0.45	2.6	0.0	N.A.
Walkway 2	Fc	0.41	2.5	0.0	N.A.

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

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2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacturer's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



### Exhibit 5, Page 7

(1-1 REPLACEMENT) FIXTURE LED TABOR - NEW Σ



MT. TABOR - 1-1 REPLACEMENT APPROX. CALC					
Label	Units	Avg	Max	Min	Uniformity Ratio
Walkway	Fc	0.45	2.6	0.0	N.A.
Walkway 2	Fc	0.41	2.5	0.0	N.A.

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

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# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



### Exhibit 5, Page 8

TABOR - NEW LED FIXTURE (1-1 REPLACEMENT) Σ



MT. TABOR - 1-1 REPLACEMENT APPROX. CALC					
Label	Units	Avg	Max	Min	Uniformity Ratio
Walkway	Fc	0.45	2.6	0.0	N.A.
Walkway 2	Fc	0.41	2.5	0.0	N.A.

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF 2. Ground reflectance was assumed to be 0.15.

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4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.



# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



TABOR - NEW LED FIXTURE (1-1 REPLACEMENT) Σ



MT. TABOR - 1-1 REPLACEMENT APPROX. CALC					
Label	Units	Avg	Max	Min	Uniformity Ratio
Walkway	Fc	0.45	2.6	0.0	N.A.
Walkway 2	Fc	0.41	2.5	0.0	N.A.

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF 2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.

### LIGHTING LEVEL (FC) LEGEND



# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



TABOR - NEW LED FIXTURE (1-1 REPLACEMENT) Σ



# Portland Parks Photometrics | P25 INC

# Comparison of Existing and Proposed Distribution Diagrams

The new T3 type lights (to be located in the SE Taylor right-of-way) will greatly reduce the amount of light spill on adjacent properties compared to the existing T5 type lights. The distribution graphs show the total quantity of light emitted (lumens) by the fixture at various angles. Using the two views we can determine the location of maximum illumination; the blue line shows the maximum vertical lumens (section view) and the red line shows maximum horizontal lumens (plan view):

- For new Type 3 fixture, maximum illumination occurs when you are looking up at 20° angle and standing 75° to the side.
  - For a new fixture on a 12' pole, this would put us about 38' away from the pole. This would make a brighter light dimmer at a distance.
- The max illumination of 2148 for the old fixture is when you are looking up at a 55° angle and standing 55° to the side.
  - For an old fixture on a 12' pole, this would put us about 15' away from the pole. This closer distance would make a dimmer light seem brighter.

Despite the old fixture producing less lumens, by having the light shine closer it ends up being nearly twice as bright as new fixture. Being an omnidirectional fixture, this creates brighter spots all around the pole vs the new directional fixtures.



Figure 1. Light Spill from existing T5 fixture



Figure 2. Light Spill from proposed new T3 fixture
	$\left( \right)$	LU 17-245440 CU AD CONDITIONS OF APPROVAL	CONDITIONS OF APPROVAL
		<u>Condition A</u> : As part of the building <i>permit</i> application submittal, the following development-related conditions (B through L) must be noted on each of the four required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE - Case File LU 17-245440 CU AD." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED." <i>Response:</i> Condition is met on Zoning Compliance Page.	<u>Condition A</u> : As part of the building permit application submittal, conditions (B through I) must be noted on each of the 4 required numbered set of plans. The sheet on which this information apper COMPLIANCE PAGE - Case File LU 17-158467HRM." All require represented on the site plan, landscape, or other required plan a
		<u>Condition B</u> : At the Upper Nursery, a 15-foot-deep L3 high-screen landscape buffer will be installed outside of the decorative steel fence on the west side of the enclosed area; and a S-foot-deep L3 high- screen landscape buffer, minus the tree requirement, will be installed outside of the decorative steel fence along the north side of the enclosed area landscaping (Exhibit C.4). The landscaping will extend the length of the fenced area. One break in the landscaping up to 20 feet wide will be permitted to provide vehicle access into the Upper Nursery development area. The installation of any required landscaping may be deferred during the summer or winter months to the next planting season, but never for more than six months. All required landscaping must be installed prior to final inspection for the building or other permits required for the Upper Nursery development. <i>Response:</i> Condition is met on Plan Sheets L3.3 and L3.4	Response: Condition is met on Zoning Compliance Page, and re Condition B: At the time of building permit submittal, a signed C www.portlandoregon.gov/bds/article/623658 must be submitted to the Design. Response: A signed Certificate of Compliance form is included
PLOTTED FROM:		<u>Condition C</u> : The two temporary modular buildings within the Yard, approved through building permits 16- 113354 CO and 16—113360 CO, must either be removed or brought into conformance with the requirements of the Stormwater Management Manual within three years of the original certificate of occupancy for these buildings (end date of January 31, 2020). <i>Response:</i> The offsite stormwater management fee was paid to BDS (Reference BDS receipt number 2307687) on February 14, 2020, thus satisfying compliance with Condition C.	<u>Condition C</u> : The two temporary modular buildings within the Ya 16-113354 CO and 16-113360 CO, must either be removed, or I requirements of the Stormwater Management Manual (SWMM) certificate of occupancy for these buildings (end date of January <i>Response</i> : The offsite stormwater management fee was paid to 2307687) on February 14, 2020, thus satisfying compliance with
) BY:		<u>Condition D</u> : The trees identified for tree protection in Exhibits C.34, C.35, and C.36 are required to be preserved to Title 11 specifications throughout all related building or other permits required to carry out the work approved herein. <i>Response:</i> Condition is met on Plan Sheets L0.00 through L0.09 <u>Condition E</u> : A landscape buffer will be provided on the east side of the multi-use path that is at least eight feet wide and planted to the L3 high-screen standard between the path and the proposed decorative steel fence. This landscape buffer will extend from the southern property line up approximately 250 linear feet to the north, where the proposed landscaping widens to more than this 8-foot minimum. The required trees on the east side of the multi-use path will be planted such that they are staggered with the existing row of trees on the adjacent property to the west.	<u>Condition D</u> : All trees, structures and fences must be located at sanitary sewer pipe. BES will allow shrubs and shallow-rooted ve the event of future construction, maintenance, or other sewerage sewer crossing this site, the property owner will be responsible for as a result of said work with landscaping matching landscape pla <i>Response:</i> Condition is met on plan C302. Landscape area is u maintenance activities.
:13 PM PLOTTED		Response: Condition is met on Plan Sheets L3.0. <u>Condition F</u> : Prior to building permit issuance for the multi-use path, Applicant will provide evidence of a recorded easement allowing PP&R access to a 5-foot-wide strip of land on the eastern edge of 6323 SE DIVi5ion Street, running from the Division Street right-of-way north some 290 linear feet. This easement will allow PP&R to remove the existing fence, build a new or relocated fence, and plant and maintain plantings in the area. Within this 5-foot-wide easement area, the existing fence must be removed; the eastern four feet must be planted as shown on landscape plan L3.00; and any new or relocated fence must be installed in the western one foot of the easement area.	<u>Condition E</u> : Prior to building or other permit issuance for the mu a 24-foot-wide public access easement for a multi-use path that Sherman and SE Division Street in general alignment with SE 64 <i>Response:</i> Easement work is underway and will be resolved by <u>Condition F</u> : Prior to installation of the art pieces, an approved en- be obtained.
ED ON: <b>4/14/2020 12:52</b>		<i>Condition G</i> : If an additional drive aisle is allowed off of SE 64th Avenue for access to the Upper Nursery through the current Historic Resource Review 17-158467 HRM, any one of the existing dirt or gravel vehicle access points on SE 64 h Avenue or within the first 100 feet of the southern Park entrance will be closed, so that the total number of vehicle access points from SE Sherman Street north 700 feet, is limited to four. The drive aisle will be closed as part of the building permit approving development in the Upper Nursery area. <i>Response:</i> Condition is met on demolition plans, Sheets C0.50.	Response: PP&R is coordinating the permits with PBOT. Permit are finalized. Noted on Sheets ART1.0 & ART1.1 <u>Condition G</u> : The public art in the three noted locations along the by the Regional Arts & Culture Council (RACC) and installed prio certificate of occupancy, or sooner. <i>Response</i> : PP&R has coordinated public art through RACC. Pro to certificate of occupancy. Noted on Sheets ART1.0 & ART1.1
РГОТТ		Condition H:Maintain the landscaping buffer between the western tennis courts and the west property line to the L3 standard for trees and shrubs into perpetuity. Response: The landscape buffer between the western tennis courts and the property line is within Mt Tabor Park and will be maintained by PP&R staff into the future. Pending response from City. Condition I: Prior to issuance of a building permit for the new Maintenance Building, Applicant shall remove damaged plantings and supplement current healthy landscape plantings in the curbed landscape islands within and directly south of the Caldera Parking Lot to match the original 1999 landscape plan, as shown on Exhibit H.14p. The installation of any required landscaping may be deferred during the summer or winter months to the next planting season, but never for more than six months. All required landscaping must be installed prior to final inspection. Response: Reference Exhibit A - L3.21.	<u>Condition H</u> : Public art or significant landscaping will be installed Parks, near the intersection of SE Lincoln Street and SE 65th Av the next phase of the Parks Master Plan implementation. <i>Response:</i> The landscape buffer between the western tennis con Tabor Park and will be maintained by PP&R staff into the future. <u>Condition I</u> : Railings at the bridge shall be similar to, but simpler for the Mt. Tabor Park stairway. The railings shall be painted, rat
		<u>Condition J</u> : In the event of future construction, maintenance, or other sewerage system activities on the Bureau of Environmental Services sanitary sewer crossing this site, the property owner will be responsible for replacing any vegetation removed as a result of said work with landscaping matching landscape plans L3.00 and L3.10. <i>Response:</i> Future construction activities related to conditions of approval are not currently planned. PP&R management team will be informed of the condition. <u>Condition K</u> : In the reduced buffer area between the new maintenance building and the west property line/SE 64t' Avenue right-of-way between the south end of SE Sherman Street and the north end of SE Grant Street, the LI standard for trees and groundcover will be met, and a minimum of 25 shrubs will be planted (Exhibits H.14j and H.14k). <i>Response:</i> This condition is met on Sheets L3.2.	harmonizes with the neighboring landscaping, and need not be the <i>Response:</i> This condition is met on plan sheets A5.13. <u>Condition J:</u> No field changes allowed. <u>Response:</u> No field changes will be made.
/ING\$FILE\$		Condition L: Prior to building or other permit issuance for the multi-use path, Applicant must provide a 20- foot-wide public access easement for a multi-use path that is a minimum of 12-feet wide between SE Sherman and SE Division Street in general alignment with SE 64th Avenue. <i>Response:</i> Easement work is underway and will be resolved by permit issuance.	F
DRAW	$\backslash$		





ΡL	ANT S	CHEDULE	
KEY		BOTANICAL NAME	COMMON NAME
TRE ACM, ALRU MASU PRP, QURU ZSVO	E: 4 5 6 4 1 5	ACER MACROPHYLLUM ALNUS RUBRA MALUS 'SNOUDRIFT' PRUNUS PADUS QUERCUS RUBRA ZELKOVA SERATA 'VILLAGE GREEN'	BIGLEAF MAPLE RED ALDER SNOWDRIFT CRABAPPLE EUROPEAN BIRD CHERRY RED OAK VILLAGE GREEN ZELKOVA
		DAPHNE ODORA HYDRANGEA MACROPHYLLA 'PINK ELF' POLYSTICHUM MUNITUM RHODODENDRON 'CHRISTMAS CHEER' RHODODENDRON 'CREAM CREST' RHODODENDRON 'ELIZABETH' RHODODENDRON 'BUMPO PINK' RHODODENDRON 'GUMPO PINK' RHODODENDRON 'SCARLET WONDER' ROSA 'RED MEIDILAND' SARCOCOCCA HOKERANA HUMILIS SARCOCOCCA RUSCIFOLIA SKIMMIA JAPONICA SPIRAEA NIPPONICA 'SNOUMOUND' YIBURNUM TINUS 'COMPACTA'	WINTER DAPHNE PINK ELF HYDRANGEA SWORD FERN CHRISTMAS CHEER RHOD. CREAM CREST RHODODENDRO DORA AMATEIS RHODODENDRON PINK GUMPO AZALEA MARS RHODODENDRON SCARLET WONDER RHOD. RED MEIDILAND ROSE CREEPING SARCOCOCCA FRAGRANT SARCOCOCCA JAPANESE SKIMMIA SNOUMOUND SPIRAEA DWARF LAURUSTINUS
GRC	DUNDCO	VER6:	
		ARCTOSTAPHYLOS UVA-URSI	KINNIKINNICK
		FRAGARIA CHILOENSIS	WILD STRAWBERRY
		GERANIUM MACRORRHIZUM 'BEVENS'	BEVENS GERANIUM
		MAHONIA REPENS	CREEPING MAHONIA
000000		NARCISSUS 'GOLDEN SPUR'	GOLDEN SPUR DAFFODIL
		ROSA 'ROBIN RED BREAST'	ROBIN RED BREAST ROSE
		ROSA 'SNOW ON THE HEATHER'	- SNOW ON THE HEATHER ROSE
		TYPE 1 SEED, SEE SPECIFICATIONS.	33.700.020, Conformance With LU 17-2454 Review and Adjustment Review, Condition or issuance of the new Maintenance Building b damaged plantings and supplement current plantings in the curbed landscape islands wi the Caldera Parking Lot to match the origina- beaum are built in U. The instellation of
NO	TES		may be deferred during the summer or winte planting season, but never for more than 6 n landscaping must be installed prior to final in
1)	SEE CO	VER SHEET FOR GENERAL NOTES.	······
2	GRADE AND SEE	SMOOTH ALL AREAS DISTURBED BY CONS ED WITH TYPE I SEED MIXTURE, SEE SPEC	STRUCTION NOT SCHEDULED FOR
3)	QUANTITI AS DRAI	IES INDICATED ARE FOR THE CONVENIENC UN.	E OF THE CONTRACTOR ONLY. IN
4)	PROVIDI BY OWNE	E SMOOTH FLOWING TRANSITIONS BETWEEN ER'S REPRESENTATIVE PRIOR TO PLANTIN	N PLANT MATERIALS. LOCATE PL IG.
5	ADD BA FOR DIS	RK MULCH TO EXISTING SHRUB AREAS DI TURBED SHRUB AREAS, TYPICAL.	STURBED BY CONSTRUCTION. PR
6	OWNER'S	REPRESENTATIVE TO LOCATE PLANTS IN	RESTROOM AREA FOR INSTALLA
T	PROVIDI AUTOMA	E TEMPORARY WATERING TO ALL NEW PL, TIC IRRIGATION UNTIL FINAL ACCEPTANCE	ANT MATERIAL LOCATED IN AREA . SEE SPECIFICATIONS.
8	STAKE A	ALL TREE LOCATIONS IN FIELD FOR OWNER	R'S REPRESENTATIVE TO ADJUST
٩	WHERE F	ROSES ARE PLANTED INDIVIDUALLY, MINIM	1UM PLANTING PIT TO BE 24"×24">
10	SEE SHE	ET LI.I FOR ADDITIVE ALTERNATE PLANT	MATERIAL.
		NOT IN CONTRACT, W	/ORK BY OWNER

				E	xhik	it 7, Page 2
	City Of Portland	PORT & Recreation	LAND	PA RK	S	
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	NOTE: IF SHEET SIZE NOT 22" × 35", SCALE IS INCORRECT.	Portl	and	Park		
	NORTH		2	21		
			<b>~</b> .'	50		



VWING: \$FILE\$

PLOT

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0 5 10 20 SCALE: 1" = 20'-

SZE/CONDITIGNA/SPACING*112*       REVIEWED FOR       -1/2"       QQD*       AS SHOWN       SMALL TREE       -1/2"       CAL       AS SHOWN       SMALL TREE       Date:       O9/24/21       Project#       2       GAL:       CONT.       AS SHOWN       6-8'	Exhibit 7, Page 3 POR TL AND PARKS & RECRE ATION HealthyParks, HealthyPortland
ALL TREES AND SHRUBS INDICATED TO SHALL BE ADJUSTED TO BEST FIT EXISTING CIENTLY CLEANED OF ROCK, DEBRIS, AND ENCE TO EDGE OF WALK TO REMAIN.	Image: Solution of the second sector     Image: Solution of the second sector       Image: Solution of the second sector     Nick Fish, Commissioner - Adena Long, Director       Image: Solution of the sector     Nick Fish, Commissioner - Adena Long, Director       Image: Solution of the sector     Nick Fish, Commissioner - Adena Long, Director       Image: Solution of the sector     Nick Fish, Commissioner - Adena Long, Director       Image: Solution of the sector     Nick Fish, Commissioner - Adena Long, Director       Image: Solution of the sector     Nick Taboor Park Tennis Court Screening       Image: Solution of the sector     Profilend, Oregon       Image: Date: July 29, 2020     SCALE: as shown       Image: Date: July 29, 2020     SCALE: as shown
40 NOTE: SCALE INDICATED ON DRAWING IS CORRECT IF DRAWING BORDER IS 22" X 34".	LR1.00





TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species	Common Name	DBH Size	TreeNo Genus species	Common Name DBH Size	whibit 8 Page 2
1 Liriodendron tulipifera tuliptree	4.4 L	63 Thuja plicata western redcedar	10 L	125 Styphnolobium	Japanese pagoda tree, Chinese	3.6 M	187 Pseudotsuga menziesii	Douglas-fir 33.7 L	
2 Cryptomeria japonica Japanese cedar	10.4 M	64 Seguoia sempervirens coast redwood	29.3 L	japonicum syn.			188 Zelkova serrata	Japanese zelkova 10 M	
3 Pinus strobus eastern white pine	10.6 L	65 Calocedrus decurrens incense cedar	35 L	Sophora Japonica		40.0 M	189 Pseudotsuga menziesii	Douglas-fir 36.7 L	
4 Picea smithiana Himalayan spruce	6 L	66 Quercus palustris pin oak	3.1 L	126 Cladrastis kentukea	American yellowwood	12.9 M	190 Pseudotsuga menziesii	Douglas-fir 27.9 L	
5 Prunus serrulata Japanese flowering cherry	2.9 S	67 Prunus serrulata Japanese flowering ch	erry 2.8 S	127 Calocedrus decurrens		30 L 12.0 S	191 Pseudotsuga menziesii	Douglas-fir 41.1 L	
6 Prunus serrulata Japanese flowering cherry	30 S	68 Prunus serrulata Japanese flowering ch	erry 34 S	120 Maius spp. 129 Sequoiadendron		13.7 3	192 Fagus sylvatica	European beech 25 L	
7 Prunus serrulata Japanese flowering cherry	26.5 S	69 Picea smithiana Himalayan spruce	6 L	giganteum	giant sequola	11.0 L	193 Pseudotsuga menziesii	Douglas-fir 47.2 L	
8 Prunus serrulata Japanese flowering cherry	6.7 S	70 Prunus serrulata Japanese flowering ch	erry 22.5 S	130 Malus fusca	Pacific crabapple	14 S	194 Pseudotsuga menziesii	Douglas-fir 35.9 L	
9 Prunus serrulata Japanese flowering cherry	4.3 S	71 Pinus ponderosa ponderosa pine	15.8 L	131 Picea pungens	Colorado blue spruce	31.4 L	195 Pseudotsuga menziesii	Douglas-fir 36.1 L	
10 Prunus serrulata Japanese flowering cherry	28.6 S	72 Sequoia sempervirens coast redwood	24.3 L	132 Crataegus monogyna	English hawthorn, common	24.4 S	196 Prunus cerasifera	flowering plum 4.9 S	
11 Gymnocladus dioica Kentucky coffeetree	3.2 L	73 Pseudotsuga menziesii Douglas-fir	11.2 L	133 Crataegus monogyna	English hawthorn, common	12.5 S	197 Pseudotsuga menziesii	Douglas-fir 31.7 L	15
12 Prunus serrulata Japanese flowering cherry	14.4 S	74 Pinus ponderosa ponderosa pine	12.3 L	134 Crataegus monogyna	English hawthorn, common	19.5 S	198 Pseudotsuga menziesii	Douglas-fir 31 L	
13 Pterocarya spp. wingnut	3.2 S	75 Chamaecyparis obtusa Hinoki falsecypress	6 L	135 Pyrus calleryana	flowering pear	6.1 M	199 Pseudotsuga menziesii	Douglas-fir 42.9 L	
14 Pseudotsuga menziesii Douglas-IIr	13.9 L	76 Chamaecyparis oblusa Hinoki falsecypress	o L	136 Acer macrophyllum	bigleaf maple	15.5 L	200 Cornus nuttailli	Pacific dogwood 4.8 M	
16 Proudotsuga monziosii Douglas fir	10.0 L	77 Crataegus monogyna English hawthorn, con 79 Acor davidii	70 5	137 Populus nigra	black poplar, Lombardy poplar	13.6 L	201 Pseudotsuga menziesii	Douglas-III 50.2 L	
17 Acer heldreichii Balkan manle	13.5 L 11.6 M	79 Carpinus betulus European bornbeam	12.5 M	138 Ostrya virginiana	American hophornbeam	2.7 M	202 Fseudotsuga menziesii 1	western redcedar 1.3 L	—
18 Thuia plicata western redcedar	13.6	80 Thuia plicata western redcedar	8 1	139 Crataegus monogyna	English hawthorn, common	13 S	204 Pseudotsuga menziesii	Douglas-fir 45.3	
19 Chamaecyparis obtusa Hinoki falsecypress	6 L	81 Calocedrus decurrens incense cedar	25 L	140 Pseudotsuga menziesii		48.8 L	205 Pseudotsuga menziesii	Douglas-fir 44.1 L	
20 Carpinus betulus European hornbeam	12 M	82 Calocedrus decurrens incense cedar	25 L	141 Inuja piicata	western reacedar	4.9 L	206 Prunus sargentii	Sargent's cherry 3.4 S	
21 Thuja plicata western redcedar	8 L	83 Acer platanoides Norway maple	3.8 M	142 Acel saccharum	sugar mapie	4.9 L	207 Zelkova serrata	Japanese zelkova 13.7 M	
22 Abies grandis x Leuteneggeri hybrid fir	23.8 S	84 Acer macrophyllum bigleaf maple	1.7 L	giganteum	giant sequola	77 L	208 Zelkova serrata	Japanese zelkova 10.1 M	
concolor		85 Tilia tomentosa silver linden	63.9 L	144 Cedrus deodara	deodar cedar	37.8 L	209 Zelkova serrata	Japanese zelkova 12.5 M	
23 Sequoia sempervirens coast redwood	24.6 L	86 Crataegus monogyna English hawthorn, com	mon 20.4 S	145 Cedrus deodara	deodar cedar	40.7 L	210 Pseudotsuga menziesii	Douglas-fir 24.7 L	a
24 Thuja plicata western redcedar	23.2 L	87 Sequoiadendron giant sequoia	1 L	146 Sequoiadendron	giant sequoia	22.4 L	211 Pseudotsuga menziesii	Douglas-fir 34.4 L	
25 Acer campestre hedge maple	5 M	giganteum		giganteum			212 Pseudotsuga menziesii	Douglas-fir 47.4 L	( (
26 Tilia tomentosa silver linden	40.5 L	88 Cedrus deodara deodar cedar	23 L	147 Sequoiadendron	giant sequoia	31.6 L	213 Pseudotsuga menziesii	Douglas-fir 30.8 L	
27 Acer macrophyllum bigleaf maple	1.5 L	89 Cedrus deodara deodar cedar	31 L	148 Cedrus deodara	deodar cedar	21.6	214 Zelkova serrata	Japanese zelkova 10.5 M	
28 Acer macrophyllum bigleaf maple	1.7 L	90 Cedrus deodara deodar cedar	31.9 L	149 Cedrus deodara	deodar cedar	21.0 L 31 I	215 Pseudotsuga menziesii	Douglas-fir 21.8 L	al al
29 Crataegus monogyna English nawthorn, common	16 5	91 Crataegus monogyna English hawthorn com	mon 17.5 S	150 Crataegus monogyna	English hawthorn, common	11 S	216 Quercus rubra	northern red oak 30.2 L	
30 Cedius deodara deodar cedar	39.2 L	92 Clataegus monogyna English hawtholfi, con 92 Beaudotsuga monziosii, Douglas fir	54 I	151 Cedrus deodara	deodar cedar	26.2 L	217 Pseudotsuga menziesii	Douglas-fir 45.9 L	. <u>e</u>
32 Cedrus deodara deodar cedar	22.7 S	93 Pseudolsuga menziesii Dougias-mi	12.5 S	152 Malus spp.	ornamental crabapple	15.8 S	218 Acer platanoides	Norway maple 14.3 M	<b>11</b> ab
32 Crataequis monogyna English hawthorn common	33 L 117 S	94 Maius spp. Ornamental Gabappie	12.5 S 7 M	153 Crataegus monogyna	English hawthorn, common	10.8 S	219 Pseudotsuga menziesii	Douglas-fir 33.9 L	
34 Cedrus deodara deodar cedar	35.7 1	96 Crataegus monogyna English hawthorn com	7 M mon 15 S	154 Crataegus monogyna	English hawthorn, common	11 S	220 Pseudotsuga menziesii	Douglas-fir 69.4 L	
35 Crataegus monogyna English hawthorn, common	18.3 S	97 Pseudotsuga menziesii Douglas-fir	28.8 L	155 Crataegus monogyna	English hawthorn, common	18.5 S	221 Pseudotsuga menziesii	Douglas-fir 23 L	
36 Sequoiadendron giant sequoia	26 L	98 Malus spp. ornamental crabapple	10.1 S	156 Populus nigra	black poplar, Lombardy poplar	17.7 L	222 Pseudotsuga menziesii	Douglas-IIF 38.4 L	
giganteum		99 Pseudotsuga menziesii Douglas-fir	41.2 L	157 Crataegus monogyna	English hawthorn, common	11.8 S	223 Pseudoisuga menziesii	London plane tree 11.2	
37 Cedrus deodara deodar cedar	41.1 L	100 Pseudotsuga menziesii Douglas-fir	23.5 L	158 Pseudotsuga menziesii	i Douglas-fir	44.5 L	224 Flatalius X acentolia	Douglas-fir 32.7 L	
38 Acer macrophyllum bigleaf maple	36.7 L	101 Prunus serrulata Japanese flowering ch	erry 32.4 S	159 Ostrya virginiana	American hophornbeam	2.5 M	226 Pseudotsuga menziesii	Douglas-fir 37.4 L	
39 Crataegus monogyna English hawthorn, common	14.3 S	102 Crataegus monogyna English hawthorn, com	mon 21.2 S	160 Pseudotsuga menziesii	i Douglas-fir	40.6 L	227 Thuia plicata	western redcedar 3	
40 Salix spp. willow	19 M	103 Prunus serrulata Japanese flowering ch	erry 2.1 S	161 Pseudotsuga menziesii	i Douglas-fir	56.8 L	228 Pseudotsuga menziesii	Douglas-fir 37.1 L	
41 Pseudotsuga menziesii Douglas-fir	36 L	104 Prunus serrulata Japanese flowering ch	erry 28.7 S	162 Acer macrophyllum	bigleaf maple	28.8 L	229 Fagus sylvatica	European beech 11 L	
42 Crataegus monogyna English hawthorn, common	25.7 S	105 Prunus serrulata Japanese flowering ch	erry 26 S	163 Pseudotsuga menziesii	i Douglas-fir	37.3 L	230 Pseudotsuga menziesii	Douglas-fir 49.2 L	
4.3 Crataegus monogyna English hawthorn, common	19.8 S	106 Gymnocladus dioica Kentucky coffeetree	8.3 L	164 Crataegus monogyna	English hawthorn, common	13.6 S	231 Prunus sargentii	Sargent's cherry 5.7 S	
44 Malus spp. ornamental crabapple	12.4 S	107 Prunus serrulata Japanese flowering ch	erry 25.2 S	165 Crataegus monogyna	English hawthorn, common	13.1 S	232 Fagus sylvatica	European beech 20.5 L	
45 Crataegus monogyna Englisn hawthorn, common	15.5 S	108 Pinus ponderosa ponderosa pine	17.3 L	167 Crataegus monogyna	English hawthorn, common	19.9 S	233 Pseudotsuga menziesii	Douglas-fir 48.7 L	
46 Liquidambal stylacilida sweetgum	13 171	109 Prunus serrulata Japanese flowering ch	erry 34.5 S	167 Crataegus monogyna		20.2 5	234 Pseudotsuga menziesii	Douglas-fir 33 L	
48 Ouercus palustris pin oak	23.2 3 33 I	110 Pinus ponderosa ponderosa pine	17.6 L	169 Pseudotsuga monogyna	i Douglas-fir	10.3 S 34 I	235 Pseudotsuga menziesii	Douglas-fir 35 L	
49 Prunus serrulata lananese flowering cherry	28.2 \$	111 Pterocarya spp. wingnut	2.1 S	170 Crataeous monogyna	English hawthorn common	18.2 S	236 Pseudotsuga menziesii	Douglas-fir 30.5 L	
50 Prunus serrulata Japanese flowering cherry	20.2 S	112 Pseudotsuga menziesii Douglas-fir	1 L	170 Crataegus monogyna	English hawthorn, common	18.2 S	237 Pseudotsuga menziesii	Douglas-fir 31.6 L	
51 Prunus serrulata Japanese flowering cherry	28.6 S	114 Decudatours manziesii Develar fin	3.5 5	172 Crataeaus monogyna	English hawthorn, common	13.2 S	238 Pseudotsuga menziesii	Douglas-fir 43.8 L	
52 Gymnocladus dioica Kentucky coffeetree	7.6 L	114 Pseudotsuga menziesii Douglas-fir	1.2 L	173 Crataeaus monogyna	English hawthorn, common	20.4 S	239 Pseudotsuga menziesii	Douglas-fir 33.9 L	
53 Prunus serrulata Japanese flowering cherry	14.7 S	giganteum	32.3 L	174 Crataegus monogyna	English hawthorn, common	13.1 S	240 Pseudotsuga menziesii	Douglas-fir 40.7 L	
54 Alnus rubra red alder	12.9 M	116 Sequoiadendron giant sequoia	30.8 L	175 Pyrus communis	European pear (including	8.1 M	241 Pseudotsuga menziesii	Douglas-fir 28.6 L	
55 Pseudotsuga menziesii Douglas-fir	1.2 L	giganteum		176 Pseudotsuga menziesii	i Douglas-fir	41.3 L	242 Pseudotsuga menziesii	Douglas-tir 47 L	
56 Styrax japonicus Japanese snowbell	4 S	117 Pseudotsuga menziesii Douglas-fir	15.3 L	177 Pseudotsuga menziesii	i Douglas-fir	37.6 L	243 Pseudotsuga menziesii	Douglas-fir 20.9 L	
57 Sequoiadendron giant sequoia	29 L	118 Chamaecyparis obtusa Hinoki falsecypress	4.2 L	178 Pseudotsuga menziesii	i Douglas-fir	34.9 L	244 Pseudotsuga menziesii	Douglas fir 20.0	
giganteum		119 Thuja plicata western redcedar	10.8 L	179 Pseudotsuga menziesii	i Douglas-fir	46.1 L	240 Pseudotsuga menziesi	Douglas fir 10.5	
58 Pinus ponderosa ponderosa pine	14.1 L	120 Chamaecyparis obtusa Hinoki falsecypress	5 L	180 Prunus sargentii	Sargent's cherry	9.6 S	240 Pseudotsuga menziesii	Douglas-fir 51.5 L	
59 Chamaecyparis obtusa Hinoki falsecypress	6 L	121 Picea pungens Colorado blue spruce	5.3 L	181 Pseudotsuga menziesii	i Douglas-fir	44.2 L	247 Eseudotsuga menziesii	Douglas-fir 20 I	
60 Picea smithiana Himalayan spruce	7.5 L	122 Acer davidii snakebark maple	9.2 S	182 Prunus sargentii	Sargent's cherry	2.5 S	249 Acer macronhvllum	bigleaf maple 9 I	
62 Acor davidii snakobark maple	ວ.Ծ ຽ ວຼວ ເ	123 Pillus pulderosa ponderosa pine	25.1 L	183 Prunus sargentii	Sargent's cherry	6 S	250 Acer palmatum	Japanese maple 8.1 S	
	0.0 0	124 Lagus sylvatica EULOPEALI DEECN	14 L	184 Pseudotsuga menziesii	i Douglas-fir	49.2 L		LU 23-088549 HR DM, E	khibit A.11

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TreeNo Genus species Common Name	DBH Size	TreeNo Genus species	Common Name	DBH Size	TreeNc	o Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size E	khibit 8, Page 3
251 Platanus x acerifolia London plane tree	19.5 L	315 Alnus rubra	red alder	11.6 M	379	Pseudotsuga menziesii Douglas-fir	51.4 L	443 Pseudotsuga menziesii Douglas-fir	33.3 L	
252 Pseudotsuga menziesii Douglas-fir	25.7 L	316 Pseudotsuga menziesi	i Douglas-fir	27.7 L	380	Pseudotsuga menziesii Douglas-fir	40.9 L	444 Pseudotsuga menziesii Douglas-fir	46.3 L	
253 Tsuga heterophylla western hemlock	4.3 L	317 Pseudotsuga menziesi	i Douglas-fir	27.9 L	381	Pseudotsuga menziesii Douglas-fir	32.5 L	445 Pseudotsuga menziesii Douglas-fir	27.3 L	
254 Pseudotsuga menziesii Douglas-fir	39 L	318 Pseudotsuga menziesi	i Douglas-fir	42.1 L	382	Pseudotsuga menziesii Douglas-fir	52.3 L	446 Quercus garryana Oregon white oak	2.4 L	
255 Malus spp. ornamental crabapple	8.2 S	319 Pseudotsuga menziesi	i Douglas-fir	33.4 L	383	Pseudotsuga menziesii Douglas-fir	44.1 L	447 Pseudotsuga menziesii Douglas-fir	25.9 L	
256 Pseudotsuga menziesii Douglas-fir	31.6	320 Pseudotsuga menziesi	i Douglas-fir	34.1 L	384	Pseudotsuga menziesii Douglas-fir	37.1	448 Pseudotsuga menziesii Douglas-fir	35.4 L	
257 Ouercus rubra northern red oak	15.4	321 Calocedrus decurrens	incense cedar	88 1	385	Pseudotsuga menziesii Douglas-fir	39 1	449 Pseudotsuga menziesii Douglas-fir	43.3	
259 Decudetsuga monziesii Douglas fir	20 0 1	322 Tsuga beterophylla	western hemlock	27.7	206	Psoudotsuga monziosii Douglas fir	62 I	450 - Decudotsuga monziosii - Douglas fir	43.3 L	
250 Pseudotsuga menziesii Douglas-III	30.0 L	322 Thuis plicate		27.7 L	200	Patula pandula	05 L	450 Fseudotsuga menziesii Douglas fir	41.7 L	
259 Pseudotsuga menziesii Douglas-Iir	35.4 L			12.9 L	387	Betula pendula European white birch	8.5 IVI	451 Pseudotsuga menziesii Douglas-Iir	60.3 L	
260 Pseudotsuga menziesii Douglas-fir	32.2 L	324 Sorbus aucuparia	European mountain ash	16.3 S	388	Malus spp. ornamental crabapple	7.1 S	452 Pseudotsuga menziesii Douglas-fir	7.4 L	
261 Pseudotsuga menziesii Douglas-fir	27.7 L	325 Pseudotsuga menziesii	i Douglas-fir	39.7 L	389	Pseudotsuga menziesii Douglas-fir	41 L	453 Pseudotsuga menziesii Douglas-fir	31.6 L	
262 Pseudotsuga menziesii Douglas-fir	53 L	326 Pseudotsuga menziesi	i Douglas-fir	39.7 L	390	Pseudotsuga menziesii Douglas-fir	43.5 L	454 Pseudotsuga menziesii Douglas-fir	40.6 L	
263 Pseudotsuga menziesii Douglas-fir	44.7 L	327 Pseudotsuga menziesi	i Douglas-fir	39.1 L	391	Pseudotsuga menziesii Douglas-fir	41.3 L	455 Crataegus monogyna English hawthorn, common	17.5 S	
264 Pseudotsuga menziesii Douglas-fir	44.2 L	328 Sorbus aucuparia	European mountain ash	9.8 S	392	Quercus rubra northern red oak	22.1 L	456 Pseudotsuga menziesii Douglas-fir	39.9 L	
265 Pseudotsuga menziesii Douglas-fir	30 L	329 Pseudotsuga menziesi	i Douglas-fir	50 L	393	Malus spp. ornamental crabapple	9.5 S	457 Pseudotsuga menziesii Douglas-fir	34.2 L	
266 Pseudotsuga menziesii Douglas-fir	35.9 L	330 Acer macrophyllum	bigleaf maple	48 L	394	Fagus sylvatica European beech	22.6 L	458 Pseudotsuga menziesii Douglas-fir	54 L	
267 Pseudotsuga menziesii Douglas-fir	40.8 L	331 Pseudotsuga menziesi <sup>7</sup>	i Douglas-fir	39.3 L	395	Juglans regia English walnut	9.4 L	459 Pseudotsuga menziesii Douglas-fir	21.7 L	
268 Pseudotsuga menziesii Douglas-fir	30.2 L	332 Pseudotsuga menziesi	i Douglas-fir	28.2 L	396	Fagus sylvatica European beech	17.6 L	460 Pseudotsuga menziesii Douglas-fir	54.8 L	0
269 Pseudotsuga menziesii Douglas-fir	36.2 L	333 Pseudotsuga menziesi	i Douglas-fir	39.8 L	397	Fagus sylvatica European beech	13.4 L	461 Pseudotsuga menziesii Douglas-fir	50.3 L	
270 Pseudotsuga menziesii Douglas-fir	36.3 L	334 Acer macrophyllum	bigleaf maple	56.5 L	398	Pseudotsuga menziesii Douglas-fir	40 L	462 Picea pungens Colorado blue spruce	10 L	<u>ت</u>
271 Pseudotsuga menziesii Douglas-fir	1.7 L	335 Pseudotsuga menziesi	i Douglas-fir	38.8 L	399	Pseudotsuga menziesii Douglas-fir	29.1 L	463 Pseudotsuga menziesii Douglas-fir	44.9 L	
272 Pseudotsuga menziesii Douglas-fir	47.5 L	336 Pseudotsuga menziesi	i Douglas-fir	27.5 L	400	Betula pendula European white birch	15.1 M	464 Pseudotsuga menziesii Douglas-fir	29.2 L	
273 Pseudotsuga menziesii Douglas-fir	47.3	337 Pseudotsuga menziesi	i Douglas-fir	50.4	401	Betula pendula European white birch	23.7 M	465 Pseudotsuga menziesii Douglas-fir	39.9	
274 Pseudotsuga monziosii Douglas fir	34.6	338 Pseudotsuga menziosi	i Douglas-fir	21 1	402	Pseudotsuga menziesii Douglas-fir	55 1 I	466 Pseudotsuga menziesii Douglas-fir	27.4	
274 Pseudotsuga menziesii Douglas-III	34.0 L	220 Psoudotsuga monziosi	i Douglas fir	2.1 L 20.7 L	402	Psoudotsuga monziosii Douglas fir	22.4 L	460 Fiseudotsuga menziesii Douglas-III	27.4 L	
275 Pseudotsuga menziesii Dougias-mi	20.9 L	240 Decudotsuga menziesi		30.7 L	403		23.4 L	407 Escudotsuga menziesii Douglas-III	40 L	
276 Maius spp. Ornamental crabappie	5.2 5		E II I I I II	30.0 L	404	Acel circinatum vine maple	9.2 3	468 Pseudotsuga menziesii Dougias-iii	55.1 L	<u> </u>
277 Pseudotsuga menziesii Douglas-tir	26 L	341 Crataegus monogyna	English nawthorn, common	7.1 S	405	Pseudotsuga menziesii Douglas-IIr	30.2 L	469 Prunus avium bird cherry	15.7 M	
278 Pseudotsuga menziesii Douglas-fir	41.9 L	342 Pseudotsuga menziesii	Douglas-fir	39.5 L	406	Pseudotsuga menziesii Douglas-fir	23.2 L	470 Pseudotsuga menziesii Douglas-fir	29.6 L	
279 Betula papyrifera paper birch	5.7 M	343 Pseudotsuga menziesii	i Douglas-fir	50.6 L	407	Prunus avium bird cherry	11.6 M	471 Pseudotsuga menziesii Douglas-fir	44.2 L	a a
280 Malus fusca Pacific crabapple	6.9 S	344 Pseudotsuga menziesi	i Douglas-fir	24.5 L	408	Pseudotsuga menziesii Douglas-fir	35.4 L	472 Pseudotsuga menziesii Douglas-fir	30.8 L	
281 Pseudotsuga menziesii Douglas-fir	37.6 L	345 Pseudotsuga menziesi	i Douglas-fir	40.5 L	409	Prunus serrula paperbark cherry, birchbark	17 S	473 Pseudotsuga menziesii Douglas-fir	59.5 L	<u> </u>
282 Tsuga heterophylla western hemlock	34.2 L	346 Pseudotsuga menziesi	i Douglas-fir	40.4 L	410	Prunus serrula paperbark cherry, birchbark	22.3 S	474 Pseudotsuga menziesii Douglas-fir	49.2 L	
283 Alnus rubra red alder	12 M	347 Pseudotsuga menziesi	i Douglas-fir	37.4 L	411	Prunus serrula paperbark cherry, birchbark	19.3 S	475 Pseudotsuga menziesii Douglas-fir	35.3 L	
284 Pseudotsuga menziesii Douglas-fir	29.7 L	348 Pseudotsuga menziesi <sup>7</sup>	i Douglas-fir	31.4 L	412	Pseudotsuga menziesii Douglas-fir	40.6 L	476 Acer macrophyllum bigleaf maple	27.8 L	
285 Pseudotsuga menziesii Douglas-fir	35.8 L	349 Pseudotsuga menziesi	i Douglas-fir	48 L	413	Pseudotsuga menziesii Douglas-fir	38.4 L	477 Pseudotsuga menziesii Douglas-fir	45.7 L	
286 Pseudotsuga menziesii Douglas-fir	27.6 L	350 Picea pungens	Colorado blue spruce	7.7 L	414	Pseudotsuga menziesii Douglas-fir	33.3 L	478 Pseudotsuga menziesii Douglas-fir	55.1 L	
287 Pseudotsuga menziesii Douglas-fir	42.9 L	351 Pseudotsuga menziesi	i Douglas-fir	45 L	415	Pseudotsuga menziesii Douglas-fir	35.7 L	479 Pseudotsuga menziesii Douglas-fir	30.9 L	
288 Fagus grandifolia American beech	41.9 L	352 Malus spp.	ornamental crabapple	9.6 S	416	Pseudotsuga menziesii Douglas-fir	51.4 L	480 Pseudotsuga menziesii Douglas-fir	41.9 L	
289 Pseudotsuga menziesii Douglas-fir	23.7 L	353 Pseudotsuga menziesi	i Douglas-fir	39 L	417	Malus spp. ornamental crabapple	9 S	481 Pseudotsuga menziesii Douglas-fir	39 L	
290 Pseudotsuga menziesii Douglas-fir	36.7 L	354 Betula pendula	European white birch	17.7 M	418	Pseudotsuga menziesii Douglas-fir	35.4 L	482 Pseudotsuga menziesii Douglas-fir	37.4 L	
291 Pseudotsuga menziesii Douglas-fir	32.6	355 Pseudotsuga menziesi	i Douglas-fir	45.9 I	419	Prunus serrulata lananese flowering cherry	9.8 5	483 Pseudotsuga menziesii Douglas-fir	53.2	
292 Pseudotsuga menziesii Douglas-fir	45.9 1	356 Betula pendula	European white birch	15.7 M	420	Picea abies Norway spruce	19 1	484 Pseudotsuga menziesii Douglas fir	35.7 L	
202 Recudotsuga monziosii Douglas fir	46.0 L	257 Recudetsuga monziesi	i Douglas fir	27.2	420	Dicoa abios Norway spruce	1/5	495 Decudetsuga menziesii Douglas fir	20.4 I	
275 Fiseudotsuga menziesii Douglas-III	40.7 L	259 Decudotsuga menziesi		37.3 L	421	Potula pondula European white hireh	14.5 L	405 Pseudotsuga menziesii Douglas-III	30.0 L	
294 Pseudotsuga menziesii Douglas-III	50.4 L	350 Pseudotsuga menziesi		33.0 L	422	Deculateuro magnicii Deculat fin	20.0 IVI	486 Pseudotsuga menziesii Douglas-III	27.4 L	
295 Pseudotsuga menziesii Douglas-fir	25.8 L	359 Pseudotsuga menziesi			423	Pseudotsuga menziesii Dougias-iir	45 L	487 Pseudolsuga menziesii Douglas-fir	28.0 L	
270 Pseudoisuga menziesii Douglas-fir	34.3 L	360 Pseudotsuga menziesii		28.4 L	424	Pseudotsuga menziesii Dougias-fir	35.4 L	488 Pseudolsuga menziesii Douglas-fir	51.3 L	
297 Pseudotsuga menziesii Douglas-fir	38.1 L	361 Pseudotsuga menziesii	i Douglas-fir	45.2 L	425	Pseudotsuga menziesii Douglas-fir	38.8 L	489 Pseudotsuga menziesii Douglas-fir	32 L	
298 Pseudotsuga menziesii Douglas-fir	37.3 L	362 Pseudotsuga menziesii	Douglas-tir	36.1 L	426	Pseudotsuga menziesii Douglas-fir	43.1 L	490 Pseudotsuga menziesii Douglas-fir	22 L	
299 Pseudotsuga menziesii Douglas-fir	34.2 L	363 Pseudotsuga menziesi	i Douglas-fir	30.5 L	427	Pseudotsuga menziesii Douglas-fir	26.5 L	491 Pseudotsuga menziesii Douglas-fir	58 L	
300 Pseudotsuga menziesii Douglas-fir	36.4 L	364 Pseudotsuga menziesi	i Douglas-fir	41.9 L	428	Pseudotsuga menziesii Douglas-fir	45.9 L	492 Pseudotsuga menziesii Douglas-fir	33 L	
301 Pseudotsuga menziesii Douglas-fir	31.7 L	365 Magnolia spp.	magnolia	13.1 S	429	Pseudotsuga menziesii Douglas-fir	42.6 L	493 Pseudotsuga menziesii Douglas-fir	26.8 L	
302 Pseudotsuga menziesii Douglas-fir	54.4 L	366 Picea abies	Norway spruce	15.7 L	430	Pseudotsuga menziesii Douglas-fir	25.8 L	494 Acer macrophyllum bigleaf maple	56.3 L	
303 Pseudotsuga menziesii Douglas-fir	40.1 L	367 Picea abies	Norway spruce	17.9 L	431	Pseudotsuga menziesii Douglas-fir	41.1 L	495 Pseudotsuga menziesii Douglas-fir	26.2 L	
304 Pseudotsuga menziesii Douglas-fir	34.5 L	368 Pseudotsuga menziesi	i Douglas-fir	56.4 L	432	Acer macrophyllum bigleaf maple	11.3 L	496 Pseudotsuga menziesii Douglas-fir	19 L	
305 Tsuga heterophylla western hemlock	29.4 L	369 Pseudotsuga menziesi	i Douglas-fir	50.5 L	433	Pseudotsuga menziesii Douglas-fir	37.3 L	497 Pseudotsuga menziesii Douglas-fir	46.4 L	
306 Pseudotsuga menziesii Douglas-fir	26.5 L	370 Malus spp.	ornamental crabapple	6.6 S	434	Pseudotsuga menziesii Douglas-fir	24.6 L	498 Acer macrophyllum bigleaf maple	34.8 L	
307 Pseudotsuga menziesii Douglas-fir	23 L	371 Acer macrophyllum	bigleaf maple	39.8 L	435	Pseudotsuga menziesii Douglas-fir	34.3 L	499 Pseudotsuga menziesii Douglas-fir	34.7 L	
308 Pseudotsuga menziesii Douglas-fir	29.8 L	372 Acer macrophvllum	bigleaf maple	37.1 L	436	Acer macrophyllum bigleaf maple	5.3 L	500 Pseudotsuga menziesii Douglas-fir	49.8 L	
309 Malus spp ornamental crabapple	56 S	373 Pseudotsuga menziesi	i Douglas-fir	32.9	437	Pseudotsuga menziesii Douglas-fir	20.1	501 Pseudotsuga menziesii Douglas-fir	52.6	
310 Malus spp. ornamental crabapple	4.4 5	374 Pseudotsuga menziesi	i Douglas-fir	30.9	438	Acer macrophyllum bigleaf maple	52.4 I	502 Pseudotsuga menziesii Douglas-fir	36.7	
311 Pseudotsuga menziesii Douglas-fir	28.9 1	375 Magnolia con	magnolia	73 \$	130	Acer macronhyllum bigleaf maple	41 1	503 Pseudotsuga monziesii Douglas fir	30.8	
312 Peaudotsuga menziosii Douglas fir	20.7 L 3/ I	276 Decudateura man-tt	i Douglas fir	1.5 5	437	Decidotsuga menziosii Douglas fir	+ı ∟ 280 I	503 r seudotsuga manziasii Douglas fir	30.0 L	
	34 L	370 rseudoisuga menziesii	i Douglas-III	47.4 L	440		∠0.7 L	504 rseudolsuga menziesii Douglas-Iir	21.1 L	
313 Pseudotsuga menziesii Douglas-fir	32 L	311 Pseudotsuga menziesii		50.8 L	441	rseudotsuga menziesii Douglas-fir	ວ/.Ծ L	SUS Acer macrophylium bigleat maple	00./ L	
314 Pseudotsuga menziesii Douglas-fir	41.2 L	378 Pseudotsuga menziesi	i Douglas-tir	49 L	442	Pseudotsuga menziesii Douglas-fir	51 L	506 Pseudotsuga menziesii Douglas-fir		
								LU 23-0883	HUNI, E	ALIINICA. LI

TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species C	Common Name DBH Size	Exhibit 8. Page 4
507 Pseudotsuga menziesii Douglas-fir	30.5	570 Pseudotsuga menziesii Douglas-fir	32.1 1	633 Pseudotsuga menziesii Douglas-fir	24.3	696 Pseudotsuga menziesii D	)ouglas-fir 42.9	
EQ0 Decudetougo menziceli Deuglas fir	21.4 L	E71 Decudetauga menziesii Deuglas fir	02.1 L	424 Fravinus latifalia Oragon ash	0.4 M	407 Dobinia proudoacacia bi		
508 Pseudotsuga menziesii Dougias-III	31.4 L	571 Pseudotsuga menziesii Douglas-III	37.0 L	634 Flaxinus latifolia Oregon ash	9.4 IVI	697 Robinia pseudoacacia bi		
509 Pseudotsuga menziesii Douglas-fir	58 L	572 Pseudotsuga menziesii Douglas-fir	25.1 L	635 Pseudotsuga menziesii Douglas-fir	34.9 L	698 Robinia pseudoacacia bl	black locust 7.5 M	
510 Pseudotsuga menziesii Douglas-fir	20.2 L	573 Pseudotsuga menziesii Douglas-fir	31.4 L	636 Pseudotsuga menziesii Douglas-fir	39.6 L	699 Pseudotsuga menziesii D	Douglas-fir 52.8 L	
511 Pseudotsuga menziesii Douglas-fir	30 L	574 Pseudotsuga menziesii Douglas-fir	20.2 L	637 Pseudotsuga menziesii Douglas-fir	40.2 L	700 Thuja plicata w	vestern redcedar 33.7 L	
512 Pseudotsuga menziesii Douglas-fir	49.8	575 Crataegus monogyna English hawthorn, common	14.3 S	638 Pseudotsuga menziesii Douglas-fir	39.8 L	701 Pseudotsuga menziesii D	Douglas-fir 37.5 L	
512 Providetsuga menziosii Douglas fir	21.6	576 Decudatsuga menziesii Douglas-fir	28.5	630 Depudatsura manziasii Douralas fir	31.0 1	702 Pseudotsuga menziesii D	)ouglas-fir 35.7	
	31.0 L		20.0 L		31.7 L	702 Provideterra manufacti D		
514 Pseudotsuga menziesii Douglas-fir	22.1 L	577 Acer macrophyllum bigleaf maple	5.8 L	640 Pseudotsuga menziesii Douglas-fir	39.2 L	703 Pseudotsuga menziesii D	Jougias-Tir 37.2 L	
515 Pseudotsuga menziesii Douglas-fir	27.2 L	578 Pseudotsuga menziesii Douglas-fir	18.1 L	641 Pseudotsuga menziesii Douglas-fir	40.2 L	704 Pseudotsuga menziesii D	Douglas-fir 45.8 L	
516 Pseudotsuga menziesii Douglas-fir	22.2 L	579 Pseudotsuga menziesii Douglas-fir	40 L	642 Pseudotsuga menziesii Douglas-fir	50.9 L	705 Cornus spp. de	logwood 1.5 S	
517 Pseudotsuga menziesii Douglas-fir	33.7 L	580 Pseudotsuga menziesii Douglas-fir	24.3 L	643 Acer macrophyllum bigleaf maple	46.7 L	706 Acer macrophyllum bi	pigleaf maple 7.9 L	
518 Pseudotsuga menziesii Douglas-fir	30.1	581 Pseudotsuga menziesii Douglas-fir	32.7	644 Prunus cerasifera flowering num	11 1 S	707 Pseudotsuga menziesii D	Ouglas-fir 41.4	
E10 Decudetauga menziesii Deuglas fir	22.2	E92 Decudateuga manziacii Dauglas fir	20 / 1	64E Decudateura manziacii Deuralas fir	12.4	709 Decudetsuga monziesii D	Douglas fir 21.4	
519 Pseudotsuga menziesii Douglas-mi	33.2 L		30.4 L		43.0 L			
520 Pseudotsuga menziesii Douglas-fir	27.4 L	583 Pseudotsuga menziesii Douglas-fir	36.4 L	646 Acer macrophyllum bigleaf maple	36.9 L	709 Pseudotsuga menziesii D	Douglas-fir 25.8 L	
521 Pseudotsuga menziesii Douglas-fir	35 L	584 Pseudotsuga menziesii Douglas-fir	35.5 L	647 Acer macrophyllum bigleaf maple	22.8 L	710 Pseudotsuga menziesii D	Douglas-fir 44.4 L	
522 Pseudotsuga menziesii Douglas-fir	17.3 L	585 Pseudotsuga menziesii Douglas-fir	29.2 L	648 Acer macrophyllum bigleaf maple	18 L	711 Pseudotsuga menziesii D	Douglas-fir 38.9 L	
523 Pseudotsuga menziesii Douglas-fir	40.3 L	586 Pseudotsuga menziesii Douglas-fir	32.1 L	649 Ulmus x elm hybrid	10 L	712 Pseudotsuga menziesii D	Douglas-fir 29.4 L	
524 Pseudotsuga menziesii Douglas-fir	42.2	587 Pseudotsuga menziesii Douglas-fir	38.4	650 Liquidambar styraciflua, sweetqum	75 M	713 Pseudotsuga menziesii D	)ouglas-fir 29.4 l	
E2E Decudetauga menzicali Douglas fir	72.2 L	507 Pacudotauga menzicali Douglas fir	30.4 L	451 Decudetsuga menziocii Deuglas fir	47.0	714 Acor circinatum		
525 Pseudotsuga menziesii Douglas-IIr	37.2 L	588 Pseudotsuga menziesii Douglas-fir	39.2 L	651 Pseudolsuga menziesii Dougias-iii	47.8 L	714 Acel circinatum Vi	Ine maple 6.2 S	ΙΨ
526 Pseudotsuga menziesii Douglas-fir	34.8 L	589 Pseudotsuga menziesii Douglas-fir	34.1 L	652 Prunus serrulata Japanese flowering cherry	23 S	715 Pseudotsuga menziesii D	Jougias-tir 33.7 L	
527 Pseudotsuga menziesii Douglas-fir	23.4 L	590 Pseudotsuga menziesii Douglas-fir	24.6 L	653 Pseudotsuga menziesii Douglas-fir	45.2 L	716 Pseudotsuga menziesii D	Douglas-fir 29.9 L	
528 Pseudotsuga menziesii Douglas-fir	33.3 L	591 Pseudotsuga menziesii Douglas-fir	27.4 L	654 Prunus serrulata Japanese flowering cherry	25 S	717 Pseudotsuga menziesii D	Douglas-fir 47.3 L	
529 Pseudotsuga menziesii Douglas-fir	35.1 I	592 Pseudotsuga menziesii Douglas-fir	27.3 L	655 Pseudotsuga menziesii Douglas-fir	32 L	718 Platanus x acerifolia	ondon plane tree 9.6 L	
E20 Decudetsuga menziesii Deuglas fir	22.4	592 Providetsuga monziesii Douglas fir	20.2	656 Decudatsuga monziosii Douglas fir	22 1	710 Platanus v acerifolia I d	ondon plane tree 1/1 1	
	22.0 L		27.2 L		52 L	717 Hatanus Acemola Et		
531 Pseudotsuga menziesii Douglas-fir	35.5 L	594 Pseudotsuga menziesii Douglas-tir	39 L	657 Pseudotsuga menziesii Dougias-tir	62.1 L	720 Pseudotsuga menziesii D	Jouglas-IIr 48.7 L	
532 Pseudotsuga menziesii Douglas-fir	33.1 L	595 Pseudotsuga menziesii Douglas-fir	36.6 L	658 Pyrus communis European pear (including	17.9 M	721 Acer macrophyllum bi	bigleaf maple 22.7 L	
533 Pseudotsuga menziesii Douglas-fir	43.6 L	596 Pseudotsuga menziesii Douglas-fir	22.4 L	659 Prunus serrulata Japanese flowering cherry	8 S	722 Acer macrophyllum bi	bigleaf maple 28 L	
534 Pseudotsuga menziesii Douglas-fir	20.2 L	597 Pseudotsuga menziesii Douglas-fir	43.8 L	660 Pseudotsuga menziesii Douglas-fir	48.2 L	723 Pseudotsuga menziesii D	Douglas-fir 59.3 L	
535 Pseudotsuga menziesii Douglas-fir	22.2 L	598 Pseudotsuga menziesii Douglas-fir	30 L	661 Sequoiadendron giant sequoia	24.5 L	724 Pseudotsuga menziesii D	Douglas-fir 48.9 L	
536 Pseudotsuga menziesii Douglas-fir	10.8	599 Pseudotsuga menziesii Douglas-fir	22.7	giganteum		725 Quercus coccinea so	carlet oak 9.8 l	
	40.0 L	600 Decudetauga manziasii Deuglas fir	22.7 L	662 Thuja plicata western redcedar	33.1 L			
537 Pseudotsuga menziesii Douglas-IIr	29.1 L	600 Pseudotsuga menziesii Douglas-ni	35.8 L	663 Depudatsura menziesii Douglas fir	27.0 1	726 Acel macrophylium bi		
538 Pseudotsuga menziesii Douglas-fir	27.8 L	601 Pseudotsuga menziesii Douglas-fir	35.1 L		27.7 L	727 Liquidambar styraciflua sv	weetgum 7 M	ab ab
539 Pseudotsuga menziesii Douglas-fir	28.5 L	602 Pseudotsuga menziesii Douglas-fir	34 L	564 Prunus serrulata Japanese nowering cherry	17.7 5	728 Pseudotsuga menziesii D	Douglas-fir 40.5 L	≥ ⊬
540 Pseudotsuga menziesii Douglas-fir	25.7 L	603 Pseudotsuga menziesii Douglas-fir	16.3 L	665 Prunus serrulata Japanese flowering cherry	27.4 S	729 Pseudotsuga menziesii D	Douglas-fir 45 L	
541 Pseudotsuga menziesii Douglas-fir	26.7 L	604 Pseudotsuga menziesii Douglas-fir	18.5 L	666 Amelanchier spp. serviceberry	2.5 S	730 Prunus serrulata Ja	apanese flowering cherry 21.3 S	
542 Pseudotsuga menziesii Douglas-fir	36 1	605 Pseudotsuga menziesii Douglas-fir	23	667 Pseudotsuga menziesii Douglas-fir	51.9 L	731 Pseudotsuga menziesii D	)ouglas-fir 54 l	
E42 Pacudotsuga menziceli Douglas fir	10.0 L	(0) Decudetauga manziasii Deuglas fir	20 L	668 Amelanchier spp. serviceberry	1.6 S	722 Decudetsuga menziesii D		
543 Pseudotsuga menziesii Douglas-III	18.8 L	606 Pseudotsuga menziesii Dougias-ni	38.8 L	669 Pseudotsuga menziesii Douglas-fir	37.1 1	732 Pseudotsuga menziesii D		
544 Pseudotsuga menziesii Douglas-fir	43.6 L	607 Pseudotsuga menziesii Douglas-fir	30.4 L	(70 Decudetauga menziacii Deuglas fir	37.1 L	733 Pseudotsuga menziesii D	Douglas-fir 25.5 L	
545 Pseudotsuga menziesii Douglas-fir	28.3 L	608 Pseudotsuga menziesii Douglas-fir	37.3 L		40.4 L	734 Magnolia spp. m	nagnolia 20 S	
546 Pseudotsuga menziesii Douglas-fir	27.4 L	609 Pseudotsuga menziesii Douglas-fir	3.9 L	671 Pseudotsuga menziesii Douglas-fir	36.7 L	735 Robinia pseudoacacia bl	black locust 7.5 M	
547 Pseudotsuga menziesii Douglas-fir	23.8 L	610 Pseudotsuga menziesii Douglas-fir	40.6 L	672 Pseudotsuga menziesii Douglas-fir	38.1 L	736 Pseudotsuga menziesii D	Douglas-fir 41.8 L	
548 Pseudotsuga menziesii Douglas-fir	33.5	611 Pseudotsuga menziesii Douglas-fir	33.2 L	673 Pseudotsuga menziesii Douglas-fir	30.1 L	737 Pseudotsuga menziesii D	Douglas-fir 52 L	
E40 Decudateuga monziacii Douglas fir	10.4	612 Broudetsuga menziesii Deuglas fir	20 1	674 Pseudotsuga menziesii Douglas-fir	26.7 L	738 Pseudotsuga menziesii D	)ouglas-fir 48.2	
	17.0 L		20 L	675 Pseudotsuga menziesii Douglas-fir	1.1 L	730 Posudotougo monziosii D		
550 Pseudotsuga menziesii Douglas-fir	31.2 L	oris Acer circinatum vine maple	5.Z S	676 Arbutus menziesii Dacific madrone	- 1 M	739 Pseudotsuga menziesii D	700yias-111 39.0 L	
551 Pseudotsuga menziesii Douglas-fir	34.7 L	614 Pseudotsuga menziesii Douglas-fir	37.8 L		- IVI	740 Pseudotsuga menziesii D	Jougias-tir 32.9 L	
552 Pseudotsuga menziesii Douglas-fir	43.8 L	615 Pseudotsuga menziesii Douglas-fir	31 L	orr Pseudolsuga menziesii Douglas-Tir	52.9 L	741 Pseudotsuga menziesii D	Douglas-fir 31.7 L	
553 Pseudotsuga menziesii Douglas-fir	26.7 L	616 Pseudotsuga menziesii Douglas-fir	37.8 L	678 Pseudotsuga menziesii Douglas-fir	44.3 L	742 Pseudotsuga menziesii D	Douglas-fir 40.4 L	
554 Pseudotsuga menziesii Douglas-fir	34.7 L	617 Pseudotsuga menziesii Douglas-fir	28.7 L	679 Pseudotsuga menziesii Douglas-fir	31.7 L	743 Acer macrophyllum bi	bigleaf maple 6.1 L	
555 Pseudotsuga menziesii Douglas-fir	25.3	618 Pseudotsuga menziesii Douglas-fir	34.2 1	680 Pseudotsuga menziesii Douglas-fir	33.1 L	744 Pseudotsuga menziesii D	)ouglas-fir 34.4 l	
EE/ Decudetauga menziaali Deuglas fir	23.3 L	410 Decudetsuga menziesii Deuglas fir	27.4 L	681 Pseudotsuga menziesii Douglas-fir	47.1 L	74E Sorbus queuparia		
556 Pseudotsuga menziesii Douglas-III	1/./ L		27.0 L	682 Pseudotsuga menziesii Douglas-fir	23.5	745 Sorbus aucuparia El		
557 Pseudotsuga menziesii Douglas-fir	25.8 L	620 Pseudotsuga menziesii Douglas-fir	34.5 L	(02 Decudetauga manziacii Douglas fir	20.0 L	746 Pseudotsuga menziesii D	Douglas-fir 50.7 L	
558 Pseudotsuga menziesii Douglas-fir	40.4 L	621 Pseudotsuga menziesii Douglas-fir	29.2 L	683 Pseudolsuga menziesii Dougias-iii	29.2 L	747 Pseudotsuga menziesii D	Douglas-fir 31.1 L	
559 Pseudotsuga menziesii Douglas-fir	21.7 L	622 Pseudotsuga menziesii Douglas-fir	35.1 L	684 Pinus sylvestris Scots pine	15.5 L	748 Pseudotsuga menziesii D	Douglas-fir 46.4 L	
560 Pseudotsuga menziesii Douglas-fir	42.7 L	623 Acer circinatum vine maple	5.3 S	685 Cupressus nootkatensis Alaska yellow-cedar	17.5 M	749 Pseudotsuga menziesii D	Douglas-fir 34.6 L	
561 Pseudotsuga menziesii Douglas-fir	37 1 I	624 Pseudotsuga menziesii Douglas-fir	36.9 1	syn. Xanthocyparis		750 Acer circinatum vi	vine maple 6.3 S	
562 Decudatsuga monziasii Douglas fir	31.0 1	625 Degudatsuga monziasii Douglas fir	40 L	nootkatensis		751 Pseudotsuga monziosii D	)ouglas_fir 21 / 1	
	07.0 L		40 L	686 Pseudotsuga menziesii Douglas-fir	53.8 L			
503 Pseudotsuga menziesii Douglas-fir	27.2 L	ozo Pseudotsuga menziesii Douglas-fir	34.6 L	687 Acer macrophyllum bigleaf maple	35 L	152 Pseudotsuga menziesii D	oougias-iir 48.4 L	
564 Pseudotsuga menziesii Douglas-fir	29.9 L	627 Pseudotsuga menziesii Douglas-fir	43.3 L	688 Pseudotsuga menziesii Douglas-fir	28.8 L	753 Acer circinatum vi	vine maple 6.2 S	
565 Pseudotsuga menziesii Douglas-fir	24.6 L	628 Pseudotsuga menziesii Douglas-fir	31.6 L	689 Crataegus monogyna English hawthorn, common	22.6 S	754 Pseudotsuga menziesii D	Douglas-fir 22.5 L	
566 Pseudotsuga menziesii Douglas-fir	23.4 L	629 Pseudotsuga menziesii Douglas-fir	48.4 L	690 Pseudotsuga menziesii Douglas-fir	54.3	755 Pseudotsuga menziesii D	Douglas-fir 43.7 L	
567 Pseudotsuga menziesii Douglas-fir	36.8	630 Pseudotsuga menziesii Douglas-fir	32.2 I	401 Decudateura manzicali Douglas-III	41.7 L	756 Fraxinus latifolia O	Dregon ash 79 M	
568 Decudatsuga monziasii Douglas fir	20 5 1	631 Pseudotsuga menziesii Douglas fir	24.2	071 Pseudotsuga menziesii Douglas-TIP	41./ L	757 Decudateura manziacii D		
	20.0 L		27.2 L	692 Pseudotsuga menziesii Douglas-fir	58.9 L		2009/03-111 40.1 L	
567 Pseudotsuga menziesii Douglas-fir	41 L	032 Pseudotsuga menziesii Douglas-fir	2.1 L	693 Pseudotsuga menziesii Douglas-fir	62.1 L	758 Pseudotsuga menziesii D	Douglas-TIP 33.7 L	
				694 Prunus serrulata Japanese flowering cherry	8.9 S	759 Pseudotsuga menziesii D	Douglas-fir 35.6 L	
							LU 23-088549 HR DM. E	-xhibit A 11

No.         No. <th>TraceNa Common and inc.</th> <th></th> <th>Tranka Commenciation Commence Name</th> <th></th> <th>Tranka Campanaian Campanan Nama</th> <th></th> <th>Tree No. Commencies</th> <th>One and the second seco</th> <th></th> <th>uhihit O. Dana F</th>	TraceNa Common and inc.		Tranka Commenciation Commence Name		Tranka Campanaian Campanan Nama		Tree No. Commencies	One and the second seco		uhihit O. Dana F
Image: Solution of the second of the seco	740 Decudetaria montionii Devides fir	DBH Size	Common Name     Security and a species     Common Name	DBH Size	PreeNo Genus species Common Name	DBH Size	Olde Decudateura manziaci	Common Name	DBH SIZE E	KNIDIT 8, Page 5
	760 Pseudotsuga menziesii Douglas-Iir	56.4 L	822 Pseudotsuga menziesii Douglas-Ili	3.7 L	884 Pseudotsuga menziesii Douglas-Iir	51.6 L	946 Pseudotsuga menziesi	i Douglas-IIr	26 L	
No.         No. <td>761 Pseudotsuga menziesii Douglas-Iir</td> <td>48.6 L</td> <td>diganteum</td> <td>35 L</td> <td>885 Liriodendron tulipitera tulipitee</td> <td>9.5 L</td> <td>947 Pseudotsuga menziesi</td> <td>i Douglas-IIr</td> <td>36.4 L</td> <td></td>	761 Pseudotsuga menziesii Douglas-Iir	48.6 L	diganteum	35 L	885 Liriodendron tulipitera tulipitee	9.5 L	947 Pseudotsuga menziesi	i Douglas-IIr	36.4 L	
Market         Value         Value <t< td=""><td>762 Pseudotsuga menziesii Douglas-III</td><td>40.2 L</td><td>824 Seguoiadendron giant seguoia</td><td>28.8 L</td><td>886 Pseudotsuga menziesii Douglas-III</td><td>31.3 L 35.3 I</td><td>948 Pseudotsuga menziesi</td><td>blue Atlas codar</td><td>37.3 L</td><td></td></t<>	762 Pseudotsuga menziesii Douglas-III	40.2 L	824 Seguoiadendron giant seguoia	28.8 L	886 Pseudotsuga menziesii Douglas-III	31.3 L 35.3 I	948 Pseudotsuga menziesi	blue Atlas codar	37.3 L	
model         matrix         matrix </td <td>giganteum</td> <td>3.7 L</td> <td>giganteum</td> <td></td> <td>887 Pseudolsuga menziesii Dougias-iii</td> <td>25.2 L</td> <td>'Glauca'</td> <td>Diue Atlas cedai</td> <td>34.8 L</td> <td></td>	giganteum	3.7 L	giganteum		887 Pseudolsuga menziesii Dougias-iii	25.2 L	'Glauca'	Diue Atlas cedai	34.8 L	
is         is<	764 Acer macrophyllum bigleaf maple	39.1 L	825 Pseudotsuga menziesii Douglas-fir	26.6 L	hippocastanum	20 L	950 Pseudotsuga menziesi	i Douglas-fir	34.2 L	
Dist         Dist <thdis< th="">         Dist         Dist         D</thdis<>	765 Acer macrophyllum bigleaf maple	32 L	826 Pseudotsuga menziesii Douglas-fir	37.3 L	889 Tilia tomentosa silver linden	39.6 L	951 Chamaecyparis	Port Orford cedar	35 L	
Dist         Dist <thdis< th="">         Dist         Dist         D</thdis<>	766 Prunus cerasifera flowering plum	19.7 S	827 Pseudotsuga menziesii Douglas-fir	40 L	890 Juglans nigra black walnut	38.4 L	lawsoniana			
	767 Acer macrophyllum bigleaf maple	29 L	828 Pseudotsuga menziesii Douglas-fir	9.5 L	891 Pseudotsuga menziesii Douglas-fir	33.5 L	952 Pseudotsuga menziesi	i Douglas-fir	30.6 L	
10         Number of Market         Market method         Market method <td>768 Sequoia sempervirens coast redwood</td> <td>31 L</td> <td>829 Pseudotsuga menziesii Douglas-fir</td> <td>30.1 L</td> <td>892 Pseudotsuga menziesii Douglas-fir</td> <td>33 L</td> <td>953 Pseudotsuga menziesi</td> <td>i Douglas-fir</td> <td>30.4 L</td> <td></td>	768 Sequoia sempervirens coast redwood	31 L	829 Pseudotsuga menziesii Douglas-fir	30.1 L	892 Pseudotsuga menziesii Douglas-fir	33 L	953 Pseudotsuga menziesi	i Douglas-fir	30.4 L	
	769 Pseudotsuga menziesii Douglas-fir	50.7 L	830 Pseudotsuga menziesii Douglas-fir	23.5 L	893 Pseudotsuga menziesii Douglas-fir	52 L	954 Pseudotsuga menziesi	i Douglas-fir	49.5 L	
10       Mathematical Society	770 Pseudotsuga menziesii Douglas-fir	44.6 L	831 Pseudotsuga menziesii Douglas-fir	30.9 L	894 Pseudotsuga menziesii Douglas-fir	16.3 L	955 Pseudotsuga menziesi	i Douglas-fir	30.4 L	
200       Maximum       Apple Max       Apple Max <t< td=""><td>771 Liquidambar styraciflua sweetgum</td><td>6.7 M</td><td>832 Pseudotsuga menziesii Douglas-fir</td><td>41 L</td><td>895 Pseudotsuga menziesii Douglas-fir</td><td>31.3 L</td><td>956 Pseudotsuga menziesi</td><td>i Douglas-fir</td><td>19.6 L</td><td></td></t<>	771 Liquidambar styraciflua sweetgum	6.7 M	832 Pseudotsuga menziesii Douglas-fir	41 L	895 Pseudotsuga menziesii Douglas-fir	31.3 L	956 Pseudotsuga menziesi	i Douglas-fir	19.6 L	
10         10        10        10         10 <td>772 Pseudotsuga menziesii Douglas-fir</td> <td>42.2 L</td> <td>833 Pseudotsuga menziesii Douglas-fir</td> <td>43.5 L</td> <td>896 Pseudotsuga menziesii Douglas-fir</td> <td>42.6 L</td> <td>957 Pseudotsuga menziesi</td> <td>i Douglas-fir</td> <td>27.8 L</td> <td>l O</td>	772 Pseudotsuga menziesii Douglas-fir	42.2 L	833 Pseudotsuga menziesii Douglas-fir	43.5 L	896 Pseudotsuga menziesii Douglas-fir	42.6 L	957 Pseudotsuga menziesi	i Douglas-fir	27.8 L	l O
11         12<	773 Prunus serrulata Japanese flowering cherry	18 S	834 Aesculus common horsechestnut	35.4 L	897 Pseudotsuga menziesii Douglas-fir	48.9 L	958 Pseudotsuga menziesi	i Douglas-fir	29.5 L	
19         10         10000         1000         1000        100	774 Pseudotsuga menziesii Douglas-fir	36.9 L	nippocastanum	20 F M	898 Pinus ponderosa ponderosa pine	4.6 L	959 Pseudotsuga menziesi	i Douglas-fir	41.4 L	
10         10<	775 Prunus serrulata Japanese flowering cherry	20.5 S	924 Acer magraphyllum biologf manlo	20.3 10	899 Pinus ponderosa ponderosa pine	3.8 L	960 Cornus nuttallii	Pacific dogwood	4.7 M	
Image       Image <th< td=""><td>776 Pseudotsuga menziesii Douglas-fir</td><td>36.6 L</td><td>927 - Decudateura manziasii - Dauralas fir</td><td>32.0 L</td><td>900 Pinus ponderosa ponderosa pine</td><td>2 L</td><td>961 Pseudotsuga menziesi</td><td>i Douglas-fir</td><td>26.5 L</td><td></td></th<>	776 Pseudotsuga menziesii Douglas-fir	36.6 L	927 - Decudateura manziasii - Dauralas fir	32.0 L	900 Pinus ponderosa ponderosa pine	2 L	961 Pseudotsuga menziesi	i Douglas-fir	26.5 L	
10         10<	777 Pseudotsuga menziesii Douglas-fir	46.5 L	838 - Deudotsuga menziesii - Douglas-fir	31.1 L 37.2 I	901 Pseudotsuga menziesii Douglas-fir	39.4 L	962 Pinus ponderosa	ponderosa pine	3.9 L	Ū Ū
10         10<	778 Robinia pseudoacacia black locust	7.5 M	830 - Decudotsuga menziesii - Douglas-fir	2/ 3 I	902 Pseudotsuga menziesii Douglas-fir	37.4 L	963 Pseudotsuga menziesi	i Douglas-fir	33.5 L	
10         10         1	779 Robinia pseudoacacia black locust	7.5 M	840 Pseudotsuga menziesii Douglas-fir	24.5 L 31.0 I	903 Pseudotsuga menziesii Douglas-fir	34.8 L	964 Pseudotsuga menziesi	i Douglas-fir	41.4 L	
11         11         11         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10         2         10        10        10        10<	780 Pseudotsuga menziesii Douglas-fir	2.1 L	841 Pseudotsuga menziesii Douglas fir	34.3 I	904 Pseudotsuga menziesii Douglas-fir	35 L	965 Pseudotsuga menziesi	i Douglas-fir	25.7 L	
	781 Prunus serrulata Japanese flowering cherry	14.8 S	842 Pseudotsuga menziesii Douglas-fir	24.4	905 Acer macrophyllum bigleaf maple	31.8 L	966 Pseudotsuga menziesi	i Douglas-fir	34 L	
10         10         10         1	782 Pseudotsuga menziesii Douglas-fir	51 L	843 Pseudotsuga menziesii Douglas-fir	44 I	906 Pseudotsuga menziesii Douglas-fir	30.8 L	967 Pseudotsuga menziesi	i Douglas-fir	29.5 L	a
10         100        100         100         100	783 Amelanchier spp. serviceberry	1.6 S	844 Abies grandis grand fir	12.4	907 Juglans nigra black walnut	41.1 L	968 Pseudotsuga menziesi	i Douglas-fir	17.4 L	
200       Mackagemention       Desploy       21       L       L       L       Mackagemention       Desploy       C       C       Mackagemention       Desploy       C       L       Mackagemention       Desploy       C       L       Mackagemention       Desploy       C       L       Mackagemention       Desploy       C       Mackagemention       Desploy       Des	784 Cornus spp. dogwood	1.3 S	845 Pseudotsuga menziesii Douglas-fir	39.4	908 Chamaecyparis obtusa Hinoki falsecypress	18.2 L	969 Pseudotsuga menziesi	i Douglas-fir	33.5 L	ε
modulog method         logischer         das 1         umber description         logischer         20         L         Modulog method         logischer         20         <	785 Pseudotsuga menziesii Douglas-fir	38.4 L	846 Pseudotsuga menziesii Douglas-fir	29.4 L	909 Pseudotsuga menziesii Douglas-fir	22.1 L	970 Pseudotsuga menziesi	i Douglas-fir	38.5 L	
Image: Note in the second se	786 Pseudotsuga menziesii Douglas-fir	45.2 L	847 Pseudotsuga menziesii Douglas-fir	37.3 L	910 Pseudotsuga menziesii Douglas-fir	42.9 L	971 Pseudotsuga menziesi	i Douglas-fir	27.5 L	
Image: marging and marg	787 Pseudotsuga menziesii Douglas-fir	34.9 L	848 Acer macrophyllum bigleaf maple	11.4 L	911 Pseudotsuga menziesii Douglas-fir	3.9 L	972 Pseudotsuga menziesi	i Douglas-IIr	29 L 26 L	ge ge
ml         ml<	788 Pseudotsuga menziesii Douglas-fir	35.1 L	849 Pseudotsuga menziesii Douglas-fir	24.9 L	912 Pseudotsuga menziesii Douglas-fir	32.2 L	973 Pseudotsuga menziesi	i Douglas-IIr	36 L	
No         Modelsys methic         Ougles for         No         L         No         Prodelsys methic         Ougles for         No         No        No        No        No<	789 Pseudotsuga menziesii Douglas-fir	35.3 L	850 Pseudotsuga menziesii Douglas-fir	43.5 L	913 Pseudotsuga menziesii Douglas-fir	14.7 L	974 Pseudotsuga menziesi	i Douglas-III	33.9 L	U U
$\gamma_{10}$ <	790 Pseudotsuga menziesii Douglas-fir	35.3 L	851 Pseudotsuga menziesii Douglas-fir	40 L	914 Pseudotsuga menziesii Douglas-fir	34.6 L	975 Pseudotsuga menziesi	i Douglas-III	32.7 L	
Matrix         Matrix<	791 Pseudotsuga menziesii Douglas-fir	19.5 L	852 Pseudotsuga menziesii Douglas-fir	39.2 L	915 Pseudotsuga menziesii Douglas-fir	39.5 L	970 Pseudotsuga menziesi 977 Acor macrophyllum	bigloof monlo	40 L 11.2 L	
Mache age         Mache age <t< td=""><td>792 Pseudotsuga menziesii Douglas-fir</td><td>37.1 L</td><td>853 Pseudotsuga menziesii Douglas-fir</td><td>41.1 L</td><td>916 Pinus ponderosa ponderosa pine</td><td>2.8 L</td><td>977 Acel Inacrophylium 079 Psoudotsuga monziosi</td><td>i Douglas fir</td><td>11.3 L 0.7 I</td><td></td></t<>	792 Pseudotsuga menziesii Douglas-fir	37.1 L	853 Pseudotsuga menziesii Douglas-fir	41.1 L	916 Pinus ponderosa ponderosa pine	2.8 L	977 Acel Inacrophylium 079 Psoudotsuga monziosi	i Douglas fir	11.3 L 0.7 I	
visit         visit <th< td=""><td>793 Pseudotsuga menziesii Douglas-fir</td><td>37.1 L</td><td>854 Quercus palustris pin oak</td><td>19.9 L</td><td>917 Pseudotsuga menziesii Douglas-fir</td><td>26.8 L</td><td>970 Pseudotsuga menziesi</td><td>i Douglas-fir</td><td>7.7 L 32 I</td><td></td></th<>	793 Pseudotsuga menziesii Douglas-fir	37.1 L	854 Quercus palustris pin oak	19.9 L	917 Pseudotsuga menziesii Douglas-fir	26.8 L	970 Pseudotsuga menziesi	i Douglas-fir	7.7 L 32 I	
mode signamentalie              mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie              mode signamentalie             mode signamentalie             mode signamentalie              mode signamentalie             mode signamentalie              mode signamentalie             mode signamentalie             mode signamentalie             mode signamentalie             mode signamenalie             mode signamental	794 Abies grandis grand fir	12.4 L	855 Pseudotsuga menziesii Douglas-fir	27.4 L	918 Pseudotsuga menziesii Douglas-fir	44.9 L	979 Pseudotsuga menziesi	i Douglas-fir	32 L 24.6 L	
Main         Main <th< td=""><td>795 Pseudotsuga menziesii Douglas-fir</td><td>68.6 L</td><td>856 Pseudotsuga menziesii Douglas-fir</td><td>27.6 L</td><td>919 Pseudotsuga menziesii Douglas-fir</td><td>37.3 L</td><td>981 Pseudotsuga menziesi</td><td>i Douglas-fir</td><td>29.3 L</td><td></td></th<>	795 Pseudotsuga menziesii Douglas-fir	68.6 L	856 Pseudotsuga menziesii Douglas-fir	27.6 L	919 Pseudotsuga menziesii Douglas-fir	37.3 L	981 Pseudotsuga menziesi	i Douglas-fir	29.3 L	
M         M         M         L         M         L         M         L         M         L         M         L         L         M         L         L         M         L         L         M         L         L         M         L         L         M         L         L         M         L         L         M	796 Pseudotsuga menziesii Douglas-fir	48.1 L	857 Pseudotsuga menziesii Douglas-fir	32.6 L	920 Fraxinus latifolia Oregon ash	26.4 M	982 Pseudotsuga menziesi	i Douglas-fir	29.8	
mm         mm<	797 Pseudotsuga menziesii Douglas-fir	33.4 L	858 Pseudotsuga menziesii Douglas-fir	39.2 L	921 Pseudotsuga menziesii Douglas-fir	42 L	983 Pseudotsuga menziesi	i Douglas-fir	26.4	
main         main <th< td=""><td>798 Pseudotsuga menziesii Douglas-fir</td><td>34.3 L</td><td>859 Acer macrophyllum bigleaf maple</td><td>26.6 L</td><td>922 Pseudotsuga menziesii Douglas-tir</td><td>22.3 L</td><td>984 Pseudotsuga menziesi</td><td>i Douglas-fir</td><td>28 1</td><td></td></th<>	798 Pseudotsuga menziesii Douglas-fir	34.3 L	859 Acer macrophyllum bigleaf maple	26.6 L	922 Pseudotsuga menziesii Douglas-tir	22.3 L	984 Pseudotsuga menziesi	i Douglas-fir	28 1	
bit         bit<         bit< <td>799 Pseudotsuga menziesii Douglas-fir</td> <td>46.4 L</td> <td>860 Pseudotsuga menziesii Douglas-fir</td> <td>45.6 L</td> <td>923 Pseudotsuga menziesii Douglas-tir</td> <td>27.3 L</td> <td>985 Pseudotsuga menziesi</td> <td>i Douglas-fir</td> <td>37.7</td> <td></td>	799 Pseudotsuga menziesii Douglas-fir	46.4 L	860 Pseudotsuga menziesii Douglas-fir	45.6 L	923 Pseudotsuga menziesii Douglas-tir	27.3 L	985 Pseudotsuga menziesi	i Douglas-fir	37.7	
and         analysis         Constraint	800 Pseudotsuga menziesii Douglas-III	17.1 L	861 Pseudotsuga menziesii Douglas-fir	36.9 L	924 Acel macrophyllum bigleal maple	7.7 L	986 Pseudotsuga menziesi	i Douglas-fir	26.9 L	
000000000000000000000000000000000000	801 Pseudotsuga menziesii Douglas-III	14.1 L	862 Pinus nigra Austrian black pine	15 L	925 Pseudolsuga menziesii Douglas-III	43.8 L	987 Sorbus aucuparia	European mountain ash	3.5 S	
bit         bit<	802 Pseudotsuga menziesii Douglas-III	27.8 L	863 Pseudotsuga menziesii Douglas-fir	20 L	926 Quercus rubra Horthern red oak	36.4 L	988 Pseudotsuga menziesi	i Douglas-fir	27.5 L	
Image: 1         Decode digit: 1 <thdecode 1<="" digit:="" th="">         Decode digit: 1         <thdecode 1<="" digit:="" th="">         Decode digit: 1<td>804 Pseudotsuga menziesii Douglas-fir</td><td>30 L 33.2 I</td><td>864 Pseudotsuga menziesii Douglas-fir</td><td>47.9 L</td><td>928 Decudoteura menziesii Douglas-fir</td><td>24.5 L</td><td>989 Quercus rubra</td><td>northern red oak</td><td>43.6 L</td><td></td></thdecode></thdecode>	804 Pseudotsuga menziesii Douglas-fir	30 L 33.2 I	864 Pseudotsuga menziesii Douglas-fir	47.9 L	928 Decudoteura menziesii Douglas-fir	24.5 L	989 Quercus rubra	northern red oak	43.6 L	
bic         bic <td>805 Sequela sempervirens coast redwood</td> <td>33.2 L</td> <td>865 Pseudotsuga menziesii Douglas-fir</td> <td>22.8 L</td> <td>920 Pseudotsuga menziesii Douglas-iii</td> <td>10.5 L 37.5 I</td> <td>990 Pseudotsuga menziesi</td> <td>i Douglas-fir</td> <td>42.7 L</td> <td></td>	805 Sequela sempervirens coast redwood	33.2 L	865 Pseudotsuga menziesii Douglas-fir	22.8 L	920 Pseudotsuga menziesii Douglas-iii	10.5 L 37.5 I	990 Pseudotsuga menziesi	i Douglas-fir	42.7 L	
bick         bick <th< td=""><td>806 Acer macronhyllum bigleaf manle</td><td>41.1 L 65 l</td><td>866 Acer macrophyllum bigleaf maple</td><td>1.2 L</td><td>930 Quercus garryana Oregon white oak</td><td>38.0 I</td><td>991 Pseudotsuga menziesi</td><td>i Douglas-fir</td><td>31.3 L</td><td></td></th<>	806 Acer macronhyllum bigleaf manle	41.1 L 65 l	866 Acer macrophyllum bigleaf maple	1.2 L	930 Quercus garryana Oregon white oak	38.0 I	991 Pseudotsuga menziesi	i Douglas-fir	31.3 L	
No         No<	807 Pseudotsuga menziesii Douglas-fir	34 I	867 Pseudotsuga menziesii Douglas-fir	69.5 L	931 Umbellularia californica. Oregon myrtle	29 I	992 Pseudotsuga menziesi	i Douglas-fir	21 L	
1000         1000 <th< td=""><td>808 Pseudotsuga menziesii Douglas-fir</td><td>11 1</td><td>868 Pseudotsuga menziesii Douglas-fir</td><td>38.1 L</td><td>932 Chamaecynaris obtusa Hinoki falsecynress</td><td>2, 2</td><td>993 Fagus sylvatica</td><td>European beech</td><td>11.6 L</td><td></td></th<>	808 Pseudotsuga menziesii Douglas-fir	11 1	868 Pseudotsuga menziesii Douglas-fir	38.1 L	932 Chamaecynaris obtusa Hinoki falsecynress	2, 2	993 Fagus sylvatica	European beech	11.6 L	
10         10<	809 Pseudotsuga menziesii Douglas-fir	38.8 1	869 Pseudotsuga menziesii Douglas-fir	47.8 L	933 Pseudotsuga menziesii Douglas-fir	49.3	994 Cedrus deodara	deodar cedar	35 L	
Nature         Nature<	810 Pseudotsuga menziesii Douglas-fir	33.9 I	870 Pseudotsuga menziesii Douglas-fir	43.9 L	934 Pseudotsuga menziesii Douglas-fir	33.7 L	995 Ulmus americana	American elm	43.4 L	
Alexal algendation         State algendation	811 Acer macrophyllum bigleaf maple	34.8	871 Pseudotsuga menziesii Douglas-fir	41.5 L	935 Pseudotsuga menziesii Douglas-fir	38.7 L	996 Pseudotsuga menziesi	i Douglas-fir	31 L	
ignate       873       Crategus monogona       Englis hawthorn, common       12.4       S       973       Pacudotsuga menziesi       Douglas-fir       63.3       L       989       Pseudotsuga menziesi       Douglas-fir       27.1       L         R13       Pseudotsuga menziesi       Douglas-fir       36.7       L       873       Pseudotsuga menziesi       Douglas-fir       51.1       L       999       Pseudotsuga menziesi       Douglas-fir       33.4       L         R14       Pseudotsuga menziesi       Douglas-fir       15.5       L       876       Pseudotsuga menziesi       Douglas-fir       33.5       L       1000       Pseudotsuga menziesi       Douglas-fir       33.4       L         R15       Pseudotsuga menziesi       Douglas-fir       15.5       L       876       Pseudotsuga menziesi       Douglas-fir       33.5       L       1000       Pseudotsuga menziesi       Douglas-fir       33.4       L         R16       Pseudotsuga menziesi       Douglas-fir       40.7       Pseudotsuga menziesi       Douglas-fir       6.8       M       1002       Jugars nigra       Bouglas-fir       30.1       L         R17       Pseudotsuga menziesi       Douglas-fir       4.8       Pseudotsuga menziesi       Douglas-f	812 Sequoiadendron giant seguoia	11.2 L	872 Pseudotsuga menziesii Douglas-fir	6.9 L	936 Pseudotsuga menziesii Doualas-fir	45.1 L	997 Pseudotsuga menziesi	i Douglas-fir	34.2 L	
813       9 seudotsuga menziesi       0 ouglas-fir       61.7       0 seudotsuga menziesi       0 ouglas-fir       33.4       L         814       9 seudotsuga menziesi       0 ouglas-fir       45.2       L       87       9 seudotsuga menziesi       0 ouglas-fir       33.5       L       100       9 seudotsuga menziesi       0 ouglas-fir       33.4       L         816       9 seudotsuga menziesi       0 ouglas-fir       45.5       L       870       9 seudotsuga menziesi       0 ouglas-fir       33.5       L       100       P seudotsuga menziesi       0 ouglas-fir       33.4       L         816       9 seudotsuga menziesi       0 ouglas-fir       45.5       L       870       9 seudotsuga menziesi       0 ouglas-fir       33.5       L       100       P seudotsuga menziesi       0 ouglas-fir       33.4       L         816       P seudotsuga menziesi       0 ouglas-fir       45.5       L       870       9 seudotsuga menziesi       0 ouglas-fir       33.5       L       100       P seudotsuga menziesi       0 ouglas-fir       33.6       L       100       P seudotsuga menziesi       0 ouglas-fir       33.6       L       100       P seudotsuga menziesi       0 ouglas-fir       33.6       L       100       P seudotsuga menziesi	giganteum		873 Crataegus monogyna English hawthorn, common	12.4 S	937 Pseudotsuga menziesii Douglas-fir	36.3 L	998 Pseudotsuga menziesi	i Douglas-fir	27 L	
814       9seudotsuga menziesi       Douglas-fir       42.       875       9seudotsuga menziesi       Douglas-fir       32.8       L       999       Pseudotsuga menziesi       Douglas-fir       1000       Pseudotsuga menziesi       Douglas-fir       27.8       L         815       Pseudotsuga menziesi       Douglas-fir       15.5       L       876       Pseudotsuga menziesi       Douglas-fir       40.7       L       999       Pseudotsuga menziesi       Douglas-fir       1000       Pseudotsuga menziesi       Douglas-fir       13.2       M         816       Pseudotsuga menziesi       Douglas-fir       40.5       L       876       Pseudotsuga menziesi       Douglas-fir       45.8       L       1000       Pseudotsuga menziesi       Douglas-fir       13.2       M         817       Pseudotsuga menziesi       Douglas-fir       41.8       R       M       M       M       M       M       L       L       M	813 Pseudotsuga menziesii Douglas-fir	36.7 L	874 Pseudotsuga menziesii Douglas-fir	31.1 L	938 Pseudotsuga menziesii Doualas-fir	5.1 L	999 Pseudotsuga menziesi	i Douglas-fir	33.4 L	
815       9seudotsuga menziesi       Douglas-fir       15.       1       87.       9seudotsuga menziesi       Douglas-fir       40.7       1       94.0       Acer macrophyllum       biglaf maple       6       1       1001       Prunus avium       bird cherry       13.2       M         816       Pseudotsuga menziesi       Douglas-fir       40.5       1       87.0       Pseudotsuga menziesi       Douglas-fir       33.5       1       94.0       Acer macrophyllum       biglaf maple       6       1       1001       Prunus avium       bird cherry       13.2       M         810       Pseudotsuga menziesi       Douglas-fir       8.1       1       6.7       8.7       9.6       Acer macrophyllum       biglaf maple       6.7       10.0       Prunus avium       bird cherry       13.2       M         810       Douglas-fir       8.1       1       6.7       8.7       9.6       Acer macrophyllum       biglaf maple       6.7       10.0       Prunus avium       bird cherry       13.2       M         810       Douglas-fir       8.1       10.0       8.7       10.0       Prunus avium       bird cherry       10.1       Lew mathemaple       10.1       Lew math       Maple       Lew mathemaple <td>814 Pseudotsuga menziesii Douglas-fir</td> <td>45.2 L</td> <td>875 Pseudotsuga menziesii Douglas-fir</td> <td>32.8 L</td> <td>939 Pseudotsuga menziesii Douglas-fir</td> <td>33.5 L</td> <td>1000 Pseudotsuga menziesi</td> <td>i Douglas-fir</td> <td>27.8 L</td> <td></td>	814 Pseudotsuga menziesii Douglas-fir	45.2 L	875 Pseudotsuga menziesii Douglas-fir	32.8 L	939 Pseudotsuga menziesii Douglas-fir	33.5 L	1000 Pseudotsuga menziesi	i Douglas-fir	27.8 L	
816       9seudotsuga menziesi       Douglas-fir       40.5       L       877       9seudotsuga menziesi       Douglas-fir       33.5       L       941       Frazinus latifolia       Oregon ash       16.8       M       1002       Juglas nigra       black walnut       24       L         817       Pseudotsuga menziesi       Douglas-fir       8.1       L       878       Crategus monogon       English hawthorn, common       30       S       941       Frazinus latifolia       Oregon ash       16.8       M       1002       Juglas nigra       black walnut       24       L         818       Pseudotsuga menziesi       Douglas-fir       24.6       L       879       Pseudotsuga menziesi       Douglas-fir       34.5       L       1003       Pseudotsuga menziesi       Douglas-fir       30.1       L         819       Acer rubrum       red maple       4.1       M       80       Pseudotsuga menziesi       Douglas-fir       28       L       1005       Sorbus aucuparia       European monutain ash       29.8       S         820       Pseudotsuga menziesi       Douglas-fir       33.3       L       945       Quercus garryana       Oregon white oak       0.3       L       1006       Cornus nuttalliii       Pseud	815 Pseudotsuga menziesii Douglas-fir	15.5 L	876 Pseudotsuga menziesii Douglas-fir	40.7 L	940 Acer macrophyllum bigleaf maple	6 L	1001 Prunus avium	bird cherry	13.2 M	
817       Pseudotsuga menziesi       Douglas-fir       8.1       L       878       Crataegus monogona       English hawthorn, common       30       S       942       Pseudotsuga menziesi       Douglas-fir       1003       Pseudotsuga menziesi       Douglas-fir       31.5       L       1003       Pseudotsuga menziesi       Douglas-fir       31.6       L       L       Seudotsuga menziesi       Douglas-fir       34.5       L       1003       Pseudotsuga menziesi       Douglas-fir       34.5       L       1003	816 Pseudotsuga menziesii Douglas-fir	40.5 L	877 Pseudotsuga menziesii Douglas-fir	33.5 L	941 Fraxinus latifolia Oregon ash	16.8 M	1002 Juglans nigra	black walnut	24 L	
818       Pseudotsuga menziesi       Douglas-fir       24.6       L       879       Pseudotsuga menziesi       Douglas-fir       32.8       L       943       Fraxinus latifolia       Oregon ash       16.8       M       1004       Tsuga heterophylla       western hemlock       29.1       L         819       Acer rubrum       red maple       4.1       M       800       Pseudotsuga menziesi       Douglas-fir       43.3       L       943       Fraxinus latifolia       Oregon ash       16.8       M       1005       Sorbus aucuparia       European mountain ash       29.8       S         820       Pseudotsuga menziesi       Douglas-fir       46.7       L       882       Pseudotsuga menziesi       Douglas-fir       28       L       1006       Cornus nuttallii       Pacific dogwood       5.9       M         820       Pseudotsuga menziesi       Douglas-fir       3.3       L       943       Fraxinus latifolia       Oregon white oak       0.3       L       1006       Cornus nuttallii       Pacific dogwood       5.9       M         820       Pseudotsuga menziesi       Douglas-fir       3.3       L       943       Fraxinus latifolia       Oregon white oak       0.3       L       1007       Fraxinus latifolia	817 Pseudotsuga menziesii Douglas-fir	8.1 L	878 Crataegus monogyna English hawthorn, common	30 S	942 Pseudotsuga menziesii Douglas-fir	34.5 L	1003 Pseudotsuga menziesi	i Douglas-fir	30.1 L	
819       Acer rubrum       red maple       4.1       M       880       Pseudotsuga menziesi       Douglas-fir       43.3       L       944       Pseudotsuga menziesi       Douglas-fir       1005       Sorbus aucuparia       European mountain ash       29.8       S         820       Pseudotsuga menziesi       Douglas-fir       46.7       L       881       Pseudotsuga menziesi       Douglas-fir       43.5       L       944       Pseudotsuga menziesi       Douglas-fir       1005       Sorbus aucuparia       European mountain ash       29.8       S         820       Pseudotsuga menziesi       Douglas-fir       43.5       L       944       Pseudotsuga menziesi       Douglas-fir       1005       Sorbus aucuparia       European mountain ash       29.8       S         820       Pseudotsuga menziesi       Douglas-fir       43.5       L       944       Pseudotsuga menziesi       Douglas-fir       1006       Cornus nuttallii       Pacific dogwood       5.9       M         821       Pseudotsuga menziesi       Douglas-fir       33.3       L       945       Quercus garryana       Oregon white oak       0.3       L       1007       Fraxinus latifolia       Oregon ash       39.4       M         823       Pseudotsuga menzies	818 Pseudotsuga menziesii Douglas-fir	24.6 L	879 Pseudotsuga menziesii Douglas-fir	32.8 L	943 Fraxinus latifolia Oregon ash	16.8 M	1004 Tsuga heterophylla	western hemlock	29.1 L	
820       Pseudotsuga menziesi       Douglas-fir       46.7       L       881       Pseudotsuga menziesi       Douglas-fir       43.5       L       945       Quercus garryana       Oregon white oak       0.3       L       1006       Cornus nuttallii       Pacific dogwood       5.9       M         821       Pseudotsuga menziesi       Douglas-fir       36.3       L       882       Pseudotsuga menziesi       Douglas-fir       33.3       L       1007       Fraxinus latifolia       Oregon ash       39.4       M         821       Pseudotsuga menziesi       Douglas-fir       30.3       L       1007       Fraxinus latifolia       Oregon ash       39.4       M         820       Pseudotsuga menziesi       Douglas-fir       30.3       L       1008       common hopsed: 25-0088549 <sup>3</sup> HR       DM. Exhibit A.11	819 Acer rubrum red maple	4.1 M	880 Pseudotsuga menziesii Douglas-fir	43.3 L	944 Pseudotsuga menziesii Douglas-fir	28 L	1005 Sorbus aucuparia	European mountain ash	29.8 S	
821 Pseudotsuga menziesii Douglas-fir       36.3 L       822 Pseudotsuga menziesii Douglas-rir       33.3 L       1007 Fraxinus latifolia       Oregon ash       39.4 M         883 Pseudotsuga menziesii Douglas-fir       30.3 L       1008       common horegot 23-088549 <sup>3</sup> AR DM, Exhibit A.11	820 Pseudotsuga menziesii Douglas-fir	46.7 L	881 Pseudotsuga menziesii Douglas-fir	43.5 L	945 Quercus garryana Oregon white oak	0.3 L	1006 Cornus nuttallii	Pacific dogwood	5.9 M	
<sup>883</sup> Pseudotsuga menziesii Dougias-tir 30.3 L 1008 common horsachosta 23-088549 <sup>3</sup> HR DM, Exhibit A.11	821 Pseudotsuga menziesii Douglas-fir	36.3 L	882 Pseudotsuga menziesii Douglas-fir	33.3 L			1007 Fraxinus latifolia	Oregon ash	39.4 M	
			oos rseudolsuga menziesii Douglas-Tir	3U.3 L			1008	common horsechestrud 885	49 <sup>3</sup> HR DM, E	hibit A.11

TreeNo	Genus species	Common Name	DBH	Size	TreeNo	Genus species	Common Nam
1009	Aesculus	common horsechestnut	25.5	L	1048	Pseudotsuga menziesii	Douglas-fir
	hippocastanum				1049	Juglans nigra	black walnut
1010	Celtis occidentalis	common hackberry	17	Μ	1050	Aesculus	common horsec
1011	Amelanchier spp.	serviceberry	2.1	S		hippocastanum	
1012	Prunus cerasifera	flowering plum	16.2	S	1051	Pseudotsuga menziesii	Douglas-fir
1013	Juglans nigra	black walnut	45.3	L	1052	Pseudotsuga menziesii	Douglas-fir
1014	Quercus garryana	Oregon white oak	0.3	L	1053	Pseudotsuga menziesii	Douglas-fir
1015	Quercus garryana	Oregon white oak	0.3	L	1054	Pseudotsuga menziesii	Douglas-fir
1016	Platanus x acerifolia	London plane tree	16.6	L	1055	Pseudotsuga menziesii	Douglas-fir
1017	Amelanchier spp.	serviceberry	1.3	S	1056	Ilex aquifolium	English holly
1018	Pseudotsuga menziesii	Douglas-fir	25.8	L	1057	Pseudotsuga menziesii	Douglas-fir
1019	Juglans nigra	black walnut	45.7	L	1058	Acer macrophyllum	bigleaf maple
1020	Aesculus	common horsechestnut	20.5	L	1059	Acer circinatum	vine maple
	hippocastanum				1060	Pseudotsuga menziesii	Douglas-fir
1021	Pseudotsuga menziesii	Douglas-fir	33.3	L	1061	Pseudotsuga menziesii	Douglas-fir
1022	Aesculus	common horsechestnut	21.8	L	1062	Acer platanoides	Norway maple
1022	Psoudotsuga monziosii	Douglas fir	20.0		1063	Fagus grandifolia	American beech
1023	Pseudotsuga menziesii	Douglas-III	30.0 2E 4	L 1	1064	Quercus rubra	northern red oa
1024	Pseudotsuga menziesii	Douglas-III Douglas fir	20.4	L	1065	Prunus serrulata	Japanese flower
1025	Pseudotsuga menziesii	Douglas-III Douglas fir	30 25	L	1066	Aesculus	common horsec
1020		Douyids-III	20 10 1	L		hippocastanum	
1027	hippocastanum	continuit noi sechestnut	10.1	L	1067	Pseudotsuga menziesii	Douglas-fir
1028	Aesculus	common horsechestnut	21.6	L	1068	Pseudotsuga menziesii	Douglas-fir
	hippocastanum				1069	Pseudotsuga menziesii	Douglas-fir
1029	Pseudotsuga menziesii	Douglas-fir	33.9	L	1070	Pseudotsuga menziesii	Douglas-fir
1030	Acer macrophyllum	bigleaf maple	3.4	L	1071	Aesculus	common horsec
1031	Pseudotsuga menziesii	Douglas-fir	29.3	L	1070		Develop fin
1032	Pseudotsuga menziesii	Douglas-fir	31.7	L	1072	Pseudotsuga menziesii	Douglas-fir
1033	Pseudotsuga menziesii	Douglas-fir	16	L	1073	Pseudotsuga menziesii	Douglas-fir
1034	Pseudotsuga menziesii	Douglas-fir	33.8	L	1074	Metasequoia	dawn redwood
1035	Pseudotsuga menziesii	Douglas-fir	27.2	L	1075	Prunus cerasifera	flowering plum
1036	Pseudotsuga menziesii	Douglas-fir	25.5	L	1076	Pseudotsuga menziesii	Douglas-fir
1037	Pseudotsuga menziesii	Douglas-fir	28.1	L	1077	Pseudotsuga menziesii	Douglas-fir
1038	Thuja plicata	western redcedar	5	L	1078	Pseudotsuga menziesii	Douglas-fir
1039	Crataegus monogyna	English hawthorn, common	17	S	1070	Pseudotsuga menziesii	Douglas-fir
1040	Liquidambar styraciflua	sweetgum	34.6	Μ	1080	Prunus corasifora	flowering nlum
1041	Thuja plicata	western redcedar	12.5	L	1000	Prunus cerasifera	flowering plum
1042	Thuja plicata	western redcedar	11.7	L	1001	Cratagous monogyna	English hawthor
1043	Quercus garryana	Oregon white oak	0.3	L	1002	Psoudotsuga monziosii	Douglas fir
1044	Quercus rubra	northern red oak	42.9	L	1003	Cratagous monoguna	English hawthar
1045	Prunus serrulata	Japanese flowering cherry	9.3	S	1004		cinglisti tidwitiOf
1046	Platanus x acerifolia	London plane tree	18.9	L	1000	Amelanchier spp.	serviceberry
1047	Pseudotsuna menziesii	Douglas-fir	33 5	-	1086	Ameianchier spp.	serviceberry
	i soudotsaga menzicsii		00.0	-			

(	Common Name	DBH	Size	TreeNo	Genus species	Common Name	DBH	Size	Exhibit 8, Page 6
	Douglas-fir	34.6	L	1087	Pseudotsuga menziesii	Douglas-fir	15	L	
k	black walnut	41.5	L	1088	Thuja plicata	western redcedar	11.3	L	
C	common horsechestnut	28.7	L	1089	Prunus serrulata	Japanese flowering cherry	10.4	S	
				1090	Prunus serrulata	Japanese flowering cherry	11.2	S	
	Douglas-fir	32.3	L	1091	Pseudotsuga menziesii	Douglas-fir	25.5	L	
	Douglas-fir	28.6	L	1092	Juglans nigra	black walnut	36.8	L	
	Douglas-fir	56.1	L	1093	Aesculus	common horsechestnut	22.7	L	
	Douglas-fir	29	L		hippocastanum				O
0	Douglas-fir	43.4	L	1094	Pseudotsuga menziesii	Douglas-fir	32.8	L	Jt
E	English holly	11.4	Μ	1095	Pseudotsuga menziesii	Douglas-fir	20.5	L	e
	Douglas-fir	37.8	L	1096	Pseudotsuga menziesii	Douglas-fir	24.8	L	
k	bigleaf maple	22.9	L	1097	Pseudotsuga menziesii	Douglas-fir	33.5	L	
٧	vine maple	6.3	S	1098	Pseudotsuga menziesii	Douglas-fir	27.8	L	
6	Douglas-fir	28.3	L	1099	Pseudotsuga menziesii	Douglas-fir	26.7	L	
C	Douglas-fir	36.5	L	1100	Pseudotsuga menziesii	Douglas-fir	36.9	L	Ľ
Ν	Jorway maple	21.7	Μ	1101	Pinus sylvestris	Scots pine	7.8	L	
ŀ	American beech	24.9	L	1102	Pseudotsuga menziesii	Douglas-fir	38.5	L	
r	northern red oak	28.5	L	1103	Pseudotsuga menziesii	Douglas-fir	28.2	L	้อ
J	apanese flowering cherry	9.5	S	1104	Pseudotsuga menziesii	Douglas-fir	46.4	L	
C	common horsechestnut	28.3	L	1105	Pseudotsuga menziesii	Douglas-fir	37.3	L	
				1106	Pseudotsuga menziesii	Douglas-fir	19.3	L	5 5
0	Douglas-fir	39.4	L	1107	Pseudotsuga menziesii	Douglas-fir	27.8	L	age
E	Douglas-fir	31.2	L	1108	Pseudotsuga menziesii	Douglas-fir	35	L	
E	Douglas-fir	29	L	1109	Pseudotsuga menziesii	Douglas-fir	38.2	L	ble
E	Douglas-fir	24.7	L	1110	Acer negundo	box elder	8.3	L	$ \geq \stackrel{\circ}{\vdash}$
C	common horsechestnut	27.2	L	1111	Acer macrophyllum	bigleaf maple	22.3	L	
		00 F		1112	Pseudotsuga menziesii	Douglas-fir	24	L	
		29.5	L	1113	Acer macrophyllum	bigleaf maple	21.9	L	
L	Jougias-fir	26.1	L	1114	Chamaecyparis	Port Orford cedar	25.7	L	
C	lawn redwood	16.4	L		lawsoniana				
f	lowering plum	10 5	S	1115	Acer macrophyllum	bigleaf maple	22.5	L	
Г	)ouglas-fir	32.9	U U	1116	Acer macrophyllum	bigleaf maple	28.1	L	
	)ouglas-fir	21.2	1	1117	Acer macrophyllum	bigleaf maple	11.7	L	
	)ouglas-fir	43.5	1	1118	Acer macrophyllum	bigleaf maple	12.6	L	
с с Г	)ouglas-fir	30.1	1	1119	Acer macrophyllum	bigleaf maple	15.2	L	
f		10.3	S	1120	Acer macrophyllum	bigleaf maple	36	L	
י f	lowering plum	15	S	1121	Acer macrophyllum	bigleaf maple	22.5	L	
F	English hawthorn, common	20.3	S	1122	Acer macrophyllum	bigleaf maple	13.4	L	
с   Г	)ouglas-fir	20.0 45 2	J	1123	Acer macrophyllum	bigleaf maple	21.4	L	
- L	alish hawthorn common	40.0 10.0	C C						
C C	arviceherry	1.6	5						
2	erviceberry	1.0 2.2	5						
3	CIVICEDEN Y	2.2	3						







Exhibit 9, Page 3







Hello David,

We appreciate your high standards for our parks! We worked hard to find suitable replacement poles and fixtures, as keeping the design and style of the lighting in our historic parks is really important to us.

Unfortunately all of PP&R's recent projects have faced escalating construction costs. In this case, light poles and their concrete foundations must first be removed before new poles can be installed. Both installation and removal require the use of special equipment to handle the weight of the poles (approximately 1200 pounds each). For the entire city-wide project, which will replace 278 light poles, the total budget is \$11,500,000.

This results in about \$41,400 per pole. In additional to materials, budgets also cover labor and "soft costs" like permitting fees. Based off of current project documentation, the design-build amount (\$32,500) per pole consists of:

- \$8,200 to remove an existing pole and their base (252 existing poles)
- \$25,100 for the new poles (278 new poles)

This project is an investment in our parks and reflects PP&R's commitment to safety. PP&R is balancing budgetary constraints with appropriate lighting design at each park. Although additional lighting will be added to Montavilla and Mt Scott Parks, new poles are only being installed where doing so will improve safety in our parks. The new fixtures are 66% more energy efficient and provide total energy savings of 61% even with additional poles being installed. Over time, the improved energy efficiency provided by the new lighting is expected to result will result in both energy and cost savings.

Thanks again for giving us your feedback on the project.

**Carine Arendes, AICP** (she/her/hers) <u>Why do I list my pronouns?</u> City Parks Planner | Asset and Development Division 503-679-0826 (mobile) Monday – Friday, 9:00 am – 5:30 pm <u>Carine.Arendes@portlandoregon.gov</u> <u>portland.gov/parks</u> I use a large font for accessibility. Learn <u>how to make your Outlook emails</u> accessible for people with disabilities.

From: Jeffreys, Grace <<u>Grace.Jeffreys@portlandoregon.gov</u>>
Sent: Thursday, January 4, 2024 3:14 PM
To: Horner, Brett <<u>Brett.Horner@portlandoregon.gov</u>>
Subject: FW: Case file LU 23-088549 HR DM

FYI: RE: Case file LU 23-088549 HR DM

Hello David,

I will share your comments of support for the designs with the applicants and the Landmarks Commission.

You will need to reach out to applicant directly with questions about the cost of the work: Brett Horner, Parks and Trails Planning Manager, <u>Brett.Horner@portlandoregon.gov</u>, 971-409-3518

**Grace Jeffreys** (she/her) City Planner II – Urban Design Land Use Services Division, Design and Historic Resource Review Team

From: David Kaplan <<u>kaplan.pdx@gmail.com</u>>
Sent: Thursday, January 4, 2024 11:35 AM
To: Jeffreys, Grace <<u>Grace.Jeffreys@portlandoregon.gov</u>>
Subject: Case file LU 23-088549 HR DM

Mt. Tabor lights PC # 23-047200

Commissioners,

I was very skeptical when I first heard that all of the historic park lamp posts were declared a hazard after an ill-advised attempted nap in a hammock. I feared that the Parks Bureau would replace the lighting with cheaper modern fixtures.

I raised the concerns with Friends of Mt. Tabor Park and several civic agencies (including Landmarks

and SHPO), citing the language of the Historic District listing with the National Park Service.

I am happy to see that the Parks Bureau has chosen a replacement design that closely resembles the original posts and lanterns. Today, I visited Colonel Summers Park to see the new fixtures. They are beautiful.

My only question is how these installations can be so expensive. My calculations based on the project budget for parks citywide show a unit cost of about \$74,000. I am not an engineer or architect, but that seems to be a pretty big figure. A high level breakdown of these cost elements would be of interest.

Again, I am very pleased at the proposed replacement lighting in the park, and urge approval by the commission.

David Kaplan 7110 SE Main St. Portland, Oregon 97215 Hi Jesse,

Thanks for your interest and support for Mt. Tabor Park – it's a great park! As you noticed, one of the park's defining features is the lighted system of roads, stairs, and pathways. Many of the light poles in the current system are outdated and are beyond their expected lifespan; some may be a hundred years old!

Safety concerns about how the light poles were installed means we do have to replace them. Our website has more information about the <u>light pole safety</u> <u>project</u> that will result in new light poles in 11 parks city-wide. However, the replacements for our historic parks have been very carefully chosen to match the old ones in style, design, and materials. Even the decorative metal strapping at the top of the poles is included (see attached comparison photos).

The light safety project will replace the gaps that currently exist in the Mt. Tabor Park system and will ensure that every light pole in the system provides safe, well-lit access to the park for the next 100 years.

Thanks again for your interest in our project.

**Carine Arendes, AICP** (she/her/hers) <u>Why do I list my pronouns?</u> City Parks Planner | Asset and Development Division 503-679-0826 (mobile) Monday – Friday, 9:00 am – 5:30 pm <u>Carine.Arendes@portlandoregon.gov</u> <u>portland.gov/parks</u> I use a large font for accessibility. Learn <u>how to make your Outlook emails</u> <u>accessible</u> for people with disabilities. From: Jeffreys, Grace <<u>Grace.Jeffreys@portlandoregon.gov</u>>
Sent: Wednesday, January 3, 2024 8:08 AM
To: Horner, Brett <<u>Brett.Horner@portlandoregon.gov</u>>
Subject: FW: Mt. Tabor Light Pole Proposal

Good morning, Brett. Please find below an email encouraging preservation of the historic light posts at Mt Tabor.

**Grace Jeffreys** (she/her) City Planner II – Urban Design Land Use Services Division, Design and Historic Resource Review Team

From: Jeffreys, Grace
Sent: Wednesday, January 3, 2024 8:07 AM
To: Powell, Jesse (he/him) <<u>Jesse.Powell@providence.org</u>>
Subject: RE: Mt. Tabor Light Pole Proposal

Hi Jesse,

Thank you for your comments regarding preserving the historic light posts at Mt Tabor. I will share with the applicant and the Landmarks Commission. Grace

**Grace Jeffreys** (she/her) City Planner II – Urban Design Land Use Services Division, Design and Historic Resource Review Team

From: Powell, Jesse (he/him) <Jesse.Powell@providence.org>
Sent: Tuesday, January 2, 2024 10:17 PM
To: Jeffreys, Grace <Grace.Jeffreys@portlandoregon.gov>
Subject: Mt. Tabor Light Pole Proposal

Hello,

I recently became aware of the proposal to remove the historic lighting from Mt Tabor Park. I am a long-time resident of the Mt Tabor neighborhood and visit the park almost every day for exercise and recreation. I am VEHEMENTLY opposed to the removal of the historic light posts. They provide a wonderful charm and character to the park. I was so sad when the post on the upper forest trail was replaced. Removing all of them would be almost as tragic as removing a mature Douglas Fir tree from the park. That money should be devoted to GOOD causes for the city, not the destruction of historic architecture. Please please don't do this.

Jesse Powell

This message is intended for the sole use of the addressee, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the addressee you are hereby notified that you may not use, copy, disclose, or distribute to

anyone the message or any information contained in the message. If you have received this message in error, please immediately advise the sender by reply email and delete this message.



For Zoning Code in Effect Post October 1, 2022

ZONING 🖗

THIS SITE LIES WITHIN THE: MOUNT TABOR PARK HISTORIC DIST Site

Also Owned Parcels

Historic District

 $\triangle$  Historic Landmark

File No.	LU 23 - 088549 HR DM
1/4 Section	3136-37,3236-37
Scale	1 inch =800 feet
State ID	1S2E05 100
Exhibit	B Sep 28, 2023

### REVISED C Exhibit List (Plan Set)

- Exhibit 1 Vicinity Map
- Exhibit 2 Site Boundaries
- Exhibit 3 Light pole locations with Conservation and Scenic Overlays
- Exhibit 4 New Pole and Fixture Schematics (NEW Page 2B)
- Exhibit 5 Illumination Info (photometrics, distribution comparison, etc.)
- Exhibit 6 Scaled Plan Set (SEPARATE UPLOAD)
- Exhibit 7 Permitted landscaping per LU 17-245440 Condition L. and (NEW) approved areas of adjustment (Exhibit C-1 of casefile LU 17-2454400 CU-AD)
- Exhibit 8 Tree Plan (includes Inventory)
- Exhibit 9 Disturbance Area Plan for Replacement Poles (REVISED)
- Exhibit 10 Scaled Construction Plan Set (NEW, SEPARATE UPLOAD)





Date *Approved*
City of Portland
Bureau of Development Services
Planner
1-25-2024
* This approval applies only to the reviews requested and is subject to all
conditions of approval. Additional zoning requirements may apply.

### Site Boundaries



Date *Approved*
City of Portland
Bureau of Development Services
Planner
1-25-2024
* This approval applies only to the reviews requested and is subject to all
conditions of approval. Additional zoning requirements may apply.





Date *Approved*
City of Portland
Bureau of Development Services
Planner
1-25-2024
* This approval applies only to the reviews requested and is subject to all
conditions of approval. Additional zoning requirements may apply.



HEIGHT: WIDTH: MATERIAL:

PANELS: FINISH: LAMPING: VOLTAGE: COLOR TEN

OPTICS: TYPE TYPE

SURGE:

CATALOG TYPE

TYPE

#### LUMINAIRE SPECIFICATIONS:

	WILLIAM AND MARY
	26 1/8"
	16 5/8"
	CAST ALUMINUM ALLOY A.N.S.I.
	356, PER A.S.T.M. B26-95
	PEBBLED ACRYLIC
	POWDER COAT - RIVER TEXTURE GLOSS BLACK
	60 WATT LED SYSTEM
	ELECTRONICALLY WIRED FOR 120-277 VOLTS
MP.:	2700K (WARM WHITE)
HI:	TYPE III (ASYMMETRIC DISTRIBUTION)
V:	TYPE V (SYMMETRIC DISTRIBUTION)
	10kV
0.0	
III:	ALMWMS-LE060-EVX-2G2-27-CR3-YPBP-TR7P-CU
V:	ALMWMS-LE060-EVX-2G2-27-CN5-YPBP-TR7P-CU



Date *Approved*
City of Portland
Bureau of Development Services
Planner
* This approval applies only to the reviews requested and is subject to all
conditions of approval. Additional zoning requirements may apply.



SCREW WAS STANDARD. REMOVED GFI D.O.							
EMBEDDED FLUTED POLE							
POLE HEIGHT ABOVE GRADE EMBEDDED DEPTH OVERALL DEPTH OVERALL POLE LENGTH BUTT DIA BUTT DIA ULTIMATE GROUND LINE MOMENT (ft-lbs)							
12'-2"         5'-0"         17'-2"         18"         22,500         1,050							
E CONFIG CODES "P" LEVEL POLE CONFIG CODES							
ENTRY INFO OPTION CLASS ENTRY INFO							
I MIX 11E EVT MATCH							
66538E FINISH 3							
TMP COLLAR 65850EPA ROUND							
MODFE NOTE 7 POLE TOP CONFIG. MOD95							
STRUCT. MOD MODDCI NOTE 8							

#### SHIPPING ASSEMBLY 2304-010 **BILL OF MATERIAL**

40195EM3PAA - MODIFIED FABRICATED ALUMINUM TENON ASSEMBLY, 2-7/8" O.D. x 3"

1. MIX (11E3I): GRAY NATURAL (EVT MATCH), EXPOSED AGGREGATE FINISH WITH AMERSHIELD ANTI-GRAFFITI COATING.

ASTM C-595 TYPE 1L GRAY CEMENT

PROTECTIVE COAT EXPOSED P.C. WIRES AT POLE ENDS.

7. MODFE: POLE BOTTOM PREPARATION FOR FREEZING OR CORROSIVE COASTAL ENVIRONMENT; SEE DOCUMENTATION.

8. MODDCI: CORROSION INHIBITOR MIX MODIFICATION.

9. POLE FULLY PRESTRESSED WITH (8) 7mm ASTM A421 STEEL WIRES.
 10. THE POLE (& IMPLIED TENON TOP ASSEMBLY) DEPICTED ON THIS DRAWING IS

DESIGNED TO WITHSTAND THE LOADS IMPARTED BY A SINGLE POST TOP

LUMINAIRE (NOT TO EXCEED 1.5 SQ FT EPA & 47 LBS) AS DESIGNED PER THE 2013 AASHTO LTS-6 USING A 90 MPH WIND ZONE (3-SECOND GUSTS) CRITERIA FOR STREET LIGHT POLES. NO TORSIONAL (ARM OR TWIST) LUMINAIRE LOADS ANALYZED. PLEASE CONTACT & ADVISE MANUFACTURER IF INTENDED LOADING

MATERIAL LIST						
BER	DESCRIPTION	ORG	NOTES			
0	SHIPPING ASSEMBLY	ANN				
	TAMPER PROOF WRENCH	ANN	1 FOR EVERY 5 POLES			

	N POLE	PROD						
PORTLAND PARKS								
	PORTLA							
VE	2003.7 POLE WITH	1 IENON	ASSEMBL	_Y				
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ER		REVISION	SHEET		SCALE			
<u>04</u>	-010	В	1 (	DF 1	NTS			



DESCRIPTION									BY	AP	PR
S	SCREW WAS STANDARD. REMOVED GFI D.O.										
EMBEDDED FLUTED POLE											
POLE IEIGHT EMBEDDED ABOVE DEPTH GRADE		OVI P LE	ERALL OLE NGTH	BUTT DIA	ULTIMATE GROUND LINE MOMENT (ft-lbs)		POLE WEIGHT (lbs)				
12'-2"		5'-0"	1	7'-2"	18"		22,500		2,500 1,050		]
E CONF	IG	CODES	1	"P"	LEVEL	PO	E CONFIG	6 C	ODES	6	
ENTRY		INFO		OPTION CLASS E			ENTRY		INFO		
I		1	MIX 11E		11E	E	VT MAT	СН			
66538E			FINISH		3						
TMP			COLLAR		65850EPA		ROUN	C			
MODFE NOTE 7			POLE TOP CONFIG.		G. MOD95						
· · · · · ·				STR	UCT. MC	D	MODDCI	Γ	NOTE	8	

#### SHIPPING ASSEMBLY 2304-010 **BILL OF MATERIAL**

40195EM3PAA - MODIFIED FABRICATED ALUMINUM TENON ASSEMBLY, 2-7/8" O.D. x 3"

#### 1. MIX (11E3I): GRAY NATURAL (EVT MATCH), EXPOSED AGGREGATE FINISH WITH AMERSHIELD ANTI-GRAFFITI COATING.

- 7. MODFE: POLE BOTTOM PREPARATION FOR FREEZING OR CORROSIVE

  - SINGLE POST TOP LUMINAIRE (NOT TO EXCEED 1.5 SQ FT EPA & 47 LBS)
- AS DESIGNED PER THE 2013 AASHTO LTS-6 USING A 90 MPH WIND ZONE (3-SECOND GUSTS) CRITERIA FOR STREET LIGHT POLES. NO TORSIONAL
- ÀRM OR TWIST) LÚMINAIRE LOADS ANALYZED. PLEASE CONTACT &
- ADVISE MANUFÁCTURER IF INTENDED LOADING EXCEEDS THESE VALUES.

#### MATERIAL LIST

BER	DESCRIPTION	ORG	NOTES
)	SHIPPING ASSEMBLY	ANN	
	TAMPER PROOF WRENCH	ANN	1 FOR EVERY 5 POLES

					DATE			
	DN POLE	PROD						
	PORTLAND PARKS							
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	DATE: 4/6/23	APPR:		DATE:				
ER		REVISION	SHEET		SCALE			
04	-010	В	1 (	<u>)F 1</u>	1" = 2'			
LU 23-088549 HR DM, Exhibit C.7								

# Installation Steps for a Direct Embedded Ameron™ Concrete Pole



Position pole for pre-wining, Protect pole es described in handling and storage guide, Wire and install juminaire,



Use only synthetic straps. Singla pick point is preferred method of handling. Use double clove hitch to avoid alippage.



Excevete hole to proper depth (plus 6-in, if special backfill is required).



Set pole. Align/plumb. Naintain lension on the pole until compacted to bottom of cable entrance.

### **Recommended backfill requirements\***

### Good soil

Compact well-graded sand and gravel, hard clay, or well-graded fine and coarse sand (all drained so that water will not stand).

Une as is for bock Rf.

#### \*Based on location review by a qualified civil engineer.

(# 2000 Matternal Office) Verse (4) Mights Reported - CANT-ADA\_MAG\_2003.

### Medium soil

Compact fine send, medium and clay, compact sendy loam, loose coarse send and gravel (all drained so that water will not stand).

#### Regebres select backfill—clean, washed send or X-in, minut well-graded gravel.



Use proper backfill, See recommended backfill requirements below, Tamp a 6-in, back to ensure connect setting depth and drainage (if required),



Compact required backfill in two operations. Tamp 9-in. Intervals to bottom of cable entrance. Install underground cable. Check alignment. Finish compaction to a height of 2-in. above grade sloping away from pole to allow proper drainage.

### Poor soil

Soft clay, clay loam, poorly compacted send, or clays containing large amounts of site. Water may stand during wet seeson.

Gen connections earth backfill—mir one part dry coment paneler to 25 parts clean, weahed caud.



# Ameron Concrete Pole Handling Instructions

Ameron<sup>®</sup> poles are made of pre-stressed concrete: a lough, elastic, durable material not limited by the properties of low strength, conventionally reinforced concrete. Like many other fabricated structures, Ameron poles are designed to withstand specific service loads and handling loads—with safety factors considered. Loads induced through handling are periaps the ones most easily overlocked, even though only a few simple rules need be ramembered. Attention to the following will minimize damage from handling and storage.

### Storage (See Figs. 1 through 3)

1. Store on durinage placed % of the total length from each end. Location of temporary support points may vary from this rule for both storage and handling. Durinage is idently made from 4×4 fit, pine, or similar wood, which is linkshed enough to have opposite sizes flat and parallel (no lags or branches). The durinage should be in one place for the full width of the stack and be of sufficient thickness as to allow the placing of sings or the investion of foridilt fingers between the invest of poles. Westhered lumber is better than newly cut because the latter may stain the concrete when molisture is present.

 Store on a level surface. If surface is not paved, be certain the ground is solid enough so that the durinage does not uink into it.

3. When poles are stared in more than one layer, each piece of during e must be placed one above the other, so that the weight of the poles above is transmitted directly downward through the during e and does not induce bending stresses in the poles.

4. Distribution poles should be studied no higher than nine layers and smaller poles no higher than 12 layers.

5. Each succeeding layer of poles should be placed with the tips in the opposite direction of the layer below.

Poles should be aligned so that the tips in each layer form a straight line normal to the center line of the poles.

7. Pince wedges on the during generat to the poles to prevent their rolling.

4. Do not step on the cantilevered tips of small poles in storage.

 Hundle poles with reasonable care so as to avoid dropping or otherwise striking them against each other or other hard, solid objects.

# Handling

#### (See Fig. 4)

 In lifting the pole from a single pick-up point, use either a choker sling or a loop sling with one complete extra turn around the pole just above the balance point.

When lifting the pole using two pick-up points from a single hook, a choice-type attachment should be used on the pole.

 Poles with a polished or textured surface should be handled with a nylon or other non-metall For these poles, fingers of a forkift should be fitted with protective covers.

When using a forkilit to handle poles, siways use softeners on the fork times. Also, siways use to prevent poles from rolling.





Total pole count: 88

# Existing product - Specs

### Existing lamp information used for calculation

Brand	Philips Lighting	Bulb Finish	Clear
Product Line	Ceramalux	Bulb Technology	High Pressure Sodium
Model Number	SON 150W E39 ED75 CL SL/12	Average Rated Life (hr)	24000
Energy Used	150 Watts	Length (in)	7.75
Base	Mogul (E39)	Diameter (in)	2.938
Bulb Shape	ED-23 1/2	Ballast Code	S55
Bulb Color	Warm White	Contains Mercury (Hg)	Yes
CRI	17	GE	44043 - LU150/55
Color Temperature (Kelvin)	2100	Osram Sylvania	67516 - LU150/55
Brightness (Lumens)	16000	Not For Sale In	WA



Existing pole details:

Lamp lumen distribution used for calculation - T5 type optic

# Portland Parks Photometrics

06/21/2023

# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215

**(E) Decorative Post-top luminaire** Pole height: 12'-2"

MT TABOR - EXISTING CONDITION





# Existing product - Approximate calculation

MT. TABOR - EXISTING POLE APPROX. CALC							
Label	Units	Avg	Max	Min	Uniformity Ratio		
Walkway	Fc	0.31	5.2	0.0	N.A.		
Walkway 2	Fc	0.28	5.3	0.0	N.A.		

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacturer's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.





# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



# LU 23-088549 HR DM, Exhibit C.10

CONDITION

EXISTING

TABOR -





# Existing product - Approximate calculation

#### MT. TABOR - EXISTING POLE APPROX, CALC

Label	Units	Avg	Max	Min	Uniformity Ratio	
Walkway	Fc	0.31	5.2	0.0	N.A.	
Walkway 2	Fc	0.28	5.3	0.0	N.A.	

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.



# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



# LU 23-088549 HR DM, Exhibit C.11

CONDITION

EXISTING

TABOR -



# Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215

# Existing product - Approximate calculation

### MT. TABOR - EXISTING POLE APPROX. CALC

Label	Units	Avg	Max	Min	Uniformity Ratio	
Walkway	Fc	0.31	5.2	0.0	N.A.	
Walkway 2	Fc	0.28	5.3	0.0	N.A.	

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF 2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.

#### LIGHTING LEVEL (FC) LEGEND Range > = 0 To<= 0 > = 0.1 To<= 0.3 > = 0.4 To<= 0.7 > = 0.8 To<= 1 > = 1.1 To<= 100



Please note that the drawing is not to scale and is for illustrative purposes only.

# Portland Parks Photometrics

06/21/2023





# LU 23-088549 HR DM, Exhibit C.12

CONDITION

EXISTING

TABOR -



# Existing product - Approximate calculation

# MT. TABOR - EXISTING POLE APPROX. CALC

Label	Units	Avg	Max	Min	Uniformity Ratio
Walkway	Fc	0.31	5.2	0.0	N.A.
Walkway 2	Fc	0.28	5.3	0.0	N.A.

A Light Loss Factor (LLF) of **0.40** was used to account for light loss due to ballast factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

### Note:

1. Lighting calculations were performed at 0'-0" AFF.

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.

#### LIGHTING LEVEL (FC) LEGEND



Please note that the drawing is not to scale and is for illustrative purposes only.

# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215





# LU 23-088549 HR DM, Exhibit C.13

CONDITION

EXISTING

TABOR -




## New LED product - Specs

Decorative Post-top:



Spring City - William and Mary Post-top fixture ALMWMS-LE060-EVX-2G2-27-[OPTIC]-YPBP-CU



Optics used for calculation - T3, T5 type

**Decorative Post-top luminaire** # T3 Poles: 74, # T5 Poles: 14 Pole height: 12'-2"

# Portland Parks Photometrics

06/21/2023









MT. TABOR - 1-1 REPLACEMENT APPROX. CALC									
Label	Units Avg M		Max	Min	Uniformity Ratio				
Walkway	Fc	0.45	2.6	0.0	N.A.				
Walkway 2	Fc	0.41	2.5	0.0	N.A.				

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

#### Note:

1. Lighting calculations were performed at 0'-0" AFF

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacturer's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.



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# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215





### LU 23-088549 HR DM, Exhibit C.15

(1-1 REPLACEMENT)

FIXTURE

LED

TABOR - NEW

Σ



MT. TABOR - 1-1 REPLACEMENT APPROX. CALC								
Label	Units	Avg	Max	Min	Uniformity Ratio			
Walkway	Fc	0.45	2.6	0.0	N.A.			
Walkway 2	Fc	0.41	2.5	0.0	N.A.			

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

#### Note:

1. Lighting calculations were performed at 0'-0" AFF 2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacture's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.





# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



### LU 23-088549 HR DM, Exhibit C.16

TABOR - NEW LED FIXTURE (1-1 REPLACEMENT)

Σ



MT. TABOR - 1-1 REPLACEMENT APPROX. CALC									
Label	Units Avg Mo		Max	Min	Uniformity Ratio				
Walkway	Fc	0.45	2.6	0.0	N.A.				
Walkway 2	Fc	0.41	2.5	0.0	N.A.				

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

#### Note:

1. Lighting calculations were performed at 0'-0" AFF 2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacturer's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.



# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



### LU 23-088549 HR DM, Exhibit C.17

TABOR - NEW LED FIXTURE (1-1 REPLACEMENT)

Σ



MT. TABOR - 1-1 REPLACEMENT APPROX. CALC									
Label	Units Avg Mo		Max	Min	Uniformity Ratio				
Walkway	Fc	0.45	2.6	0.0	N.A.				
Walkway 2	Fc	0.41	2.5	0.0	N.A.				

A Light Loss Factor (LLF) of **0.75** was used to account for light loss due to driver factor, ambient fixture temperature, supply voltage variation, fixture surface depreciation, optical factor, lamp lumen depreciation (LLD), luminaire dirt depreciation (LDD), lamp burnouts and room surface dirt depreciation.

#### Note:

1. Lighting calculations were performed at 0'-0" AFF

2. Ground reflectance was assumed to be 0.15.

3. This lighting plan represents illumination levels calculated from lab data taken under controlled conditions in accordance with the Illuminating Engineering Society (IES) approved methods. Actual performance of any manufacturer's luminaires may vary due to changes in electrical voltage, tolerance in lamps/ LEDs and other variable field conditions.

4. Calculations do not include obstructions such as landscaping, buildings. curbs and/or any other architectural elements unless noted. This drawings is for photometric evaluation purposes only and should not be used as a construction document or as a final document for ordering products.

#### LIGHTING LEVEL (FC) LEGEND



# Portland Parks Photometrics

### Mt Tabor Park SE 60th Ave &, SE Salmon St, Portland, OR 97215



Please note that the drawing is not to scale and is for illustrative purposes only.



### LU 23-088549 HR DM, Exhibit C.18

TABOR - NEW LED FIXTURE (1-1 REPLACEMENT)

 $\leq$ 



MT TABOR PARK - NEW LED FIXTURE (1-1 REPLACEMENT)

#### Comparison of Existing and Proposed Distribution Diagrams

The new T3 type lights (to be located in the SE Taylor right-of-way) will greatly reduce the amount of light spill on adjacent properties compared to the existing T5 type lights. The distribution graphs show the total quantity of light emitted (lumens) by the fixture at various angles. Using the two views we can determine the location of maximum illumination; the blue line shows the maximum vertical lumens (section view) and the red line shows maximum horizontal lumens (plan view):

- For new Type 3 fixture, maximum illumination occurs when you are looking up at 20° angle and standing 75° to the side.
  - For a new fixture on a 12' pole, this would put us about 38' away from the pole. This would make a brighter light dimmer at a distance.
- The max illumination of 2148 for the old fixture is when you are looking up at a 55° angle and standing 55° to the side.
  - For an old fixture on a 12' pole, this would put us about 15' away from the pole. This closer distance would make a dimmer light seem brighter.

Despite the old fixture producing less lumens, by having the light shine closer it ends up being nearly twice as bright as new fixture. Being an omnidirectional fixture, this creates brighter spots all around the pole vs the new directional fixtures.



Figure 1. Light Spill from existing T5 fixture



Figure 2. Light Spill from proposed new T3 fixture



	$\left( \right)$	LU 17-245440 CU AD CONDITIONS OF APPROVAL	CONDITIONS OF APPROVAL
		<u>Condition A</u> : As part of the building <i>permit</i> application submittal, the following development-related conditions (B through L) must be noted on each of the four required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE - Case File LU 17-245440 CU AD." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED." <i>Response:</i> Condition is met on Zoning Compliance Page.	<u>Condition A</u> : As part of the building permit application submittal, conditions (B through I) must be noted on each of the 4 required numbered set of plans. The sheet on which this information apper COMPLIANCE PAGE - Case File LU 17-158467HRM." All require represented on the site plan, landscape, or other required plan a
		<u>Condition B</u> : At the Upper Nursery, a 15-foot-deep L3 high-screen landscape buffer will be installed outside of the decorative steel fence on the west side of the enclosed area; and a S-foot-deep L3 high- screen landscape buffer, minus the tree requirement, will be installed outside of the decorative steel fence along the north side of the enclosed area landscaping (Exhibit C.4). The landscaping will extend the length of the fenced area. One break in the landscaping up to 20 feet wide will be permitted to provide vehicle access into the Upper Nursery development area. The installation of any required landscaping may be deferred during the summer or winter months to the next planting season, but never for more than six months. All required landscaping must be installed prior to final inspection for the building or other permits required for the Upper Nursery development. <i>Response:</i> Condition is met on Plan Sheets L3.3 and L3.4	Response: Condition is met on Zoning Compliance Page, and re Condition B: At the time of building permit submittal, a signed C www.portlandoregon.gov/bds/article/623658 must be submitted to the Design. Response: A signed Certificate of Compliance form is included
PLOTTED FROM:		<u>Condition C</u> : The two temporary modular buildings within the Yard, approved through building permits 16- 113354 CO and 16—113360 CO, must either be removed or brought into conformance with the requirements of the Stormwater Management Manual within three years of the original certificate of occupancy for these buildings (end date of January 31, 2020). <i>Response:</i> The offsite stormwater management fee was paid to BDS (Reference BDS receipt number 2307687) on February 14, 2020, thus satisfying compliance with Condition C.	<u>Condition C</u> : The two temporary modular buildings within the Ya 16-113354 CO and 16-113360 CO, must either be removed, or I requirements of the Stormwater Management Manual (SWMM) certificate of occupancy for these buildings (end date of January <i>Response</i> : The offsite stormwater management fee was paid to 2307687) on February 14, 2020, thus satisfying compliance with
) BY:		<u>Condition D</u> : The trees identified for tree protection in Exhibits C.34, C.35, and C.36 are required to be preserved to Title 11 specifications throughout all related building or other permits required to carry out the work approved herein. <i>Response:</i> Condition is met on Plan Sheets L0.00 through L0.09 <u>Condition E</u> : A landscape buffer will be provided on the east side of the multi-use path that is at least eight feet wide and planted to the L3 high-screen standard between the path and the proposed decorative steel fence. This landscape buffer will extend from the southern property line up approximately 250 linear feet to the north, where the proposed landscaping widens to more than this 8-foot minimum. The required trees on the east side of the multi-use path will be planted such that they are staggered with the existing row of trees on the adjacent property to the west.	<u>Condition D</u> : All trees, structures and fences must be located at sanitary sewer pipe. BES will allow shrubs and shallow-rooted ve the event of future construction, maintenance, or other sewerage sewer crossing this site, the property owner will be responsible for as a result of said work with landscaping matching landscape pla <i>Response:</i> Condition is met on plan C302. Landscape area is u maintenance activities.
:13 PM PLOTTED		Response: Condition is met on Plan Sheets L3.0. <u>Condition F</u> : Prior to building permit issuance for the multi-use path, Applicant will provide evidence of a recorded easement allowing PP&R access to a 5-foot-wide strip of land on the eastern edge of 6323 SE DIVi5ion Street, running from the Division Street right-of-way north some 290 linear feet. This easement will allow PP&R to remove the existing fence, build a new or relocated fence, and plant and maintain plantings in the area. Within this 5-foot-wide easement area, the existing fence must be removed; the eastern four feet must be planted as shown on landscape plan L3.00; and any new or relocated fence must be installed in the western one foot of the easement area.	<u>Condition E</u> : Prior to building or other permit issuance for the multiplication a 24-foot-wide public access easement for a multi-use path that Sherman and SE Division Street in general alignment with SE 64 <i>Response:</i> Easement work is underway and will be resolved by <u>Condition F</u> : Prior to installation of the art pieces, an approved enbe obtained.
ED ON: <b>4/14/2020 12:52</b>		<i>Condition G</i> : If an additional drive aisle is allowed off of SE 64th Avenue for access to the Upper Nursery through the current Historic Resource Review 17-158467 HRM, any one of the existing dirt or gravel vehicle access points on SE 64 h Avenue or within the first 100 feet of the southern Park entrance will be closed, so that the total number of vehicle access points from SE Sherman Street north 700 feet, is limited to four. The drive aisle will be closed as part of the building permit approving development in the Upper Nursery area. <i>Response:</i> Condition is met on demolition plans, Sheets C0.50.	Response: PP&R is coordinating the permits with PBOT. Permit are finalized. Noted on Sheets ART1.0 & ART1.1 <u>Condition G</u> : The public art in the three noted locations along the by the Regional Arts & Culture Council (RACC) and installed prior certificate of occupancy, or sooner. <i>Response</i> : PP&R has coordinated public art through RACC. Pro- to certificate of occupancy. Noted on Sheets ART1.0 & ART1.1
РГОТТ		Condition H:Maintain the landscaping buffer between the western tennis courts and the west property line to the L3 standard for trees and shrubs into perpetuity. Response: The landscape buffer between the western tennis courts and the property line is within Mt Tabor Park and will be maintained by PP&R staff into the future. Pending response from City. Condition I: Prior to issuance of a building permit for the new Maintenance Building, Applicant shall remove damaged plantings and supplement current healthy landscape plantings in the curbed landscape islands within and directly south of the Caldera Parking Lot to match the original 1999 landscape plan, as shown on Exhibit H.14p. The installation of any required landscaping may be deferred during the summer or winter months to the next planting season, but never for more than six months. All required landscaping must be installed prior to final inspection. Response: Reference Exhibit A - L3.21.	<u>Condition H</u> : Public art or significant landscaping will be installed Parks, near the intersection of SE Lincoln Street and SE 65th Av the next phase of the Parks Master Plan implementation. <i>Response:</i> The landscape buffer between the western tennis con Tabor Park and will be maintained by PP&R staff into the future. <u>Condition I</u> : Railings at the bridge shall be similar to, but simpler for the Mt. Tabor Park stairway. The railings shall be painted, rat
		<u>Condition J</u> : In the event of future construction, maintenance, or other sewerage system activities on the Bureau of Environmental Services sanitary sewer crossing this site, the property owner will be responsible for replacing any vegetation removed as a result of said work with landscaping matching landscape plans L3.00 and L3.10. <i>Response:</i> Future construction activities related to conditions of approval are not currently planned. PP&R management team will be informed of the condition. <u>Condition K</u> : In the reduced buffer area between the new maintenance building and the west property line/SE 64t' Avenue right-of-way between the south end of SE Sherman Street and the north end of SE Grant Street, the LI standard for trees and groundcover will be met, and a minimum of 25 shrubs will be planted (Exhibits H.14j and H.14k). <i>Response:</i> This condition is met on Sheets L3.2.	harmonizes with the neighboring landscaping, and need not be the <i>Response:</i> This condition is met on plan sheets A5.13. <u>Condition J:</u> No field changes allowed. <u>Response:</u> No field changes will be made.
/ING\$FILE\$		Condition L: Prior to building or other permit issuance for the multi-use path, Applicant must provide a 20- foot-wide public access easement for a multi-use path that is a minimum of 12-feet wide between SE Sherman and SE Division Street in general alignment with SE 64th Avenue. <i>Response:</i> Easement work is underway and will be resolved by permit issuance.	F
DRAW	7		





PLANT	SCHEDULE	
KEY	BOTANICAL NAME	COMMON NAME
TREE: ACMA ALRU MASD PRPA QURU ZSVG	ACER MACROPHYLLUM ALNUS RUBRA MALUS 'SNOWDRIFT' PRUNUS PADUS QUERCUS RUBRA ZELKOVA SERATA 'VILLAGE GREEN'	BIGLEAF MAPLE RED ALDER SNOWDRIFT CRABAPPLE EUROPEAN BIRD CHERRY RED OAK VILLAGE GREEN ZELKOVA
B: H APPY U A H	DAPHNE ODORA HYDRANGEA MACROPHYLLA 'PINK ELF' POLYSTICHUM MUNITUM RHODODENDRON 'CHRISTMAS CHEER' RHODODENDRON 'DORA AMATEIS' RHODODENDRON 'BLIZABETH' RHODODENDRON 'GUMTOO PINK' RHODODENDRON 'GUMTOO PINK' RHODODENDRON 'SCARLET WONDER' ROSA 'RED MEIDILAND' SARCOCOCCA HOCKERANA HUMILIS SARCOCOCCA HOCKERANA HUMILIS SARCOCOCCA HOCKERANA HUMILIS SARCOCOCCA RUSCIFOLIA SKIMMIA JAPONICA SPIRAEA NIPPONICA 'SNOWMOUND' VIBURNUM TINUS 'COMPACTA'	WINTER DAPHNE PINK ELF HYDRANGEA SWORD FERN CHRISTMAS CHEER RHOD. CREAM CREST RHODODENDF DORA AMATEIS RHODODENDRON PINK GUMPO AZALEA MARS RHODODENDRON SCARLET WONDER RHOD. RED MEIDILAND ROSE CREEPING SARCOCOCCA FRAGRANT SARCOCOCCA JAPANESE SKIMMIA SNOWMOUND SPIRAEA DWARF LAURUSTINUS
GROUNDC	OVERS:	
	ARCTOSTAPHYLOS UVA-URSI	KINNIKINNICK
	FRAGARIA CHILOENSIS	WILD STRAWBERRY
	GERANIUM MACRORRHIZUM 'BEVENS'	BEVENS GERANIUM
	MAHONIA REPENS	CREEPING MAHONIA
	NARCISSUS 'GOLDEN SPUR'	GOLDEN SPUR DAFFODIL
	ROSA 'ROBIN RED BREAST'	ROBIN RED BREAST ROSE
	ROSA 'SNOW ON THE HEATHER'	~ \$NOW ON THE HEATHER ROSE
	TYPE 1 SEED, SEE SPECIFICATIONS.	33.700.020, Conformance With LU 17-24 Review and Adjustment Review, Conditi issuance of the new Maintenance Buildin damaged plantings and supplement curre plantings in the curbed landscape island the Caldera Parking Lot to match the orig shown on Exhibit H.14p. The installation may be defared during the summer or w
NOTES	{	planting season, but never for more than landscaping must be installed prior to fina
) SEE CO	OVER SHEET FOR GENERAL NOTES.	
2 GRADE AND SI	E SMOOTH ALL AREAS DISTURBED BY CON EED WITH TYPE I SEED MIXTURE, SEE SPEC	STRUCTION NOT SCHEDULED FO
3 QUANTI AS DR	ITIES INDICATED ARE FOR THE CONVENIENC AWN.	CE OF THE CONTRACTOR ONLY.
4 PROVID	DE 6MOOTH FLOWING TRANSITIONS BETWEEN NER'S REPRESENTATIVE PRIOR TO PLANTIN	N PLANT MATERIALS. LOCATE F NG.
5 ADD E FOR D	BARK MULCH TO EXISTING SHRUB AREAS DI ISTURBED SHRUB AREAS, TYPICAL.	STURBED BY CONSTRUCTION. F
6 OWNER	"S REPRESENTATIVE TO LOCATE PLANTS IN	RESTROOM AREA FOR INSTAL
T PROVID	DE TEMPORARY WATERING TO ALL NEW PL ATIC IRRIGATION UNTIL FINAL ACCEPTANCE	ANT MATERIAL LOCATED IN AR 5. SEE SPECIFICATIONS.
8 STAKE	ALL TREE LOCATIONS IN FIELD FOR OWNER	R'S REPRESENTATIVE TO ADJUS
9 WHERE	ROSES ARE PLANTED INDIVIDUALLY, MININ	1UM PLANTING PIT TO BE 24"×24
SEE SH	HEET LI.I FOR ADDITIVE ALTERNATE PLANT	MATERIAL.
		VORK BY OWNER









TreeN	o Genus species	Common Name	DBH Siz	э Т	reeNo Genus species	Common Name	DBH 10	Size	TreeNo	Genus species	Common Name	DBH	Size	TreeNo	Genus species	Common Name	DBH Size	
2		lananese cedar	4.4 L 10.4 M		64 Sequoia sempervirens		10 29 3	L	125	japonicum syn.	Japanese pagoda tree, chinese	3.0	IVI	187	Zelkova serrata	lananese zelkova	33.7 L 10 M	
3	Pinus strobus	eastern white pine	10.4 M		65 Calocedrus decurrens	incense cedar	35	L		Sophora japonica				189	Pseudotsuga menziesii	Douglas-fir	36.7 L	
4	Picea smithiana	Himalayan spruce	6 L		66 Quercus palustris	pin oak	3.1	L	126	Cladrastis kentukea	American yellowwood	12.9	Μ	190	Pseudotsuga menziesii	Douglas-fir	27.9 L	
5	Prunus serrulata	Japanese flowering cherry	2.9 S		67 Prunus serrulata	Japanese flowering cherry	2.8	S	127	Calocedrus decurrens	incense cedar	30	L	191	Pseudotsuga menziesii	Douglas-fir	41.1 L	
6	Prunus serrulata	Japanese flowering cherry	30 S		68 Prunus serrulata	Japanese flowering cherry	34	S	128	Malus spp.	ornamental crabapple	13.9	S	192	Fagus sylvatica	European beech	25 L	
7	Prunus serrulata	Japanese flowering cherry	26.5 S		69 Picea smithiana	Himalayan spruce	6	L	129	Sequoiadendron	giant sequoia	11.8	L	193	Pseudotsuga menziesii	Douglas-fir	47.2 L	
8	Prunus serrulata	Japanese flowering cherry	6.7 S		70 Prunus serrulata	Japanese flowering cherry	22.5	S	130	Malus fusca	Pacific crabapple	14	s	194	Pseudotsuga menziesii	Douglas-fir	35.9 L	
9	Prunus serrulata	Japanese flowering cherry	4.3 S		71 Pinus ponderosa	ponderosa pine	15.8	L	130	Picea pungens	Colorado blue spruce	31.4	L	195	Pseudotsuga menziesii	Douglas-fir	36.1 L	$\mathbf{r}$
10	Prunus serrulata	Japanese flowering cherry	28.6 S		72 Sequoia sempervirens	coast redwood	24.3	L	132	Crataegus monogyna	English hawthorn, common	24.4	S	196	Prunus cerasifera	flowering plum	4.9 S	
11	Gymnocladus dioica	Kentucky coffeetree	3.2 L		73 Pseudotsuga menziesi	ii Douglas-fir	11.2	L	133	Crataegus monogyna	English hawthorn, common	12.5	S	197	Pseudotsuga menziesii	Douglas-fir	31.7 L	0
12	Prunus serrulata	Japanese flowering cherry	14.4 S		74 Pinus ponderosa	ponderosa pine	12.3	L	134	Crataegus monogyna	English hawthorn, common	19.5	S	198	Pseudotsuga menziesii	Douglas-fir	31 L	t
13	Pterocarya spp.	wingnut	3.2 S		75 Chamaecyparis obtusa	a Hinoki falsecypress	6	L	135	Pyrus calleryana	flowering pear	6.1	Μ	199	Pseudotsuga menziesii	Douglas-fir	42.9 L	
14	Pseudotsuga menziesii	Douglas-fir	13.9 L		76 Chamaecyparis obtusa	a Hinoki falsecypress	6	L	136	Acer macrophyllum	bigleaf maple	15.5	L	200	Cornus nuttallii	Pacific dogwood	4.8 M	VE
15	Pseudotsuga menziesii	Douglas-fir	15.8 L		77 Crataegus monogyna	English hawthorn, common	0.5	S	137	Populus nigra	black poplar, Lombardy poplar	13.6	L	201	Pseudotsuga menziesii	Douglas-fir	50.2 L	
16	Pseudotsuga menziesii	Douglas-fir	13.3 L		78 Acer davidii	snakebark maple	7.8	S	138	Ostrya virginiana	American hophornbeam	2.7	Μ	202	Pseudotsuga menziesii	Douglas-fir	48.3 L	
17	Acer heldreichii	Balkan maple	11.6 M		79 Carpinus betulus	European hornbeam	12.5	Μ	139	Crataegus monogyna	English hawthorn, common	13	S	203	Thuja plicata	western redcedar	1.3 L	
18	Thuja plicata	western redcedar	13.6 L		80 Thuja plicata	western redcedar	8	L	140	Pseudotsuga menziesii	Douglas-fir	48.8	L	204	Pseudotsuga menziesii	Douglas-fir	45.3 L	<b>O</b>
19	Chamaecyparis obtusa	Hinoki falsecypress	6 L		81 Calocedrus decurrens	incense cedar	25	L	141	Thuja plicata	western redcedar	4.9	L	205	Pseudotsuga menziesii	Douglas-fir	44.1 L	Û.
20	Carpinus betulus	European hornbeam	12 M		82 Calocedrus decurrens	incense cedar	25	L	142	Acer saccharum	sugar maple	4.9	L	206	Prunus sargentii	Sargent's cherry	3.4 S	
21	l huja plicata	western redcedar	8 L		83 Acer platanoides	Norway maple	3.8	M	143	Sequoiadendron	giant sequoia	99	L	207	Zelkova serrata	Japanese zelkova	13.7 M	1
22	Ables grandis x	Leuteneggeri hybrid fir	23.8 S		84 Acer macrophyllum	bigleaf maple	1.7	L		giganteum	1 - 1 1	07.0		208	Zelkova serrata	Japanese zelkova	10.1 M	$\mathbf{x}$
23	Sequoia sempervirens	coast redwood	24.6		85 Filia tomentosa	silver linden	63.9	L	144	Cedrus deodara	deodar cedar	37.8	L	209	Zelkova serrata	Japanese zelkova	12.5 M	
24	Thuia plicata	western redcedar	23.2 L		86 Crataegus monogyna	English nawthorn, common	20.4	5	145	Cedrus deodara	deodar cedar	40.7	L	210	Pseudotsuga menziesii	Douglas-fir	24.7 L	
25	Acer campestre	hedge maple	5 M		aiganteum	giant sequoia	1	L	146	giganteum	giant sequoia	22.4	L	211	Pseudotsuga menziesii	Douglas-fir	34.4 L	
26	Tilia tomentosa	silver linden	40.5 L		88 Cedrus deodara	deodar cedar	23	L	147	Sequoiadendron	giant seguoia	31.6	L	212	Pseudotsuga menziesii	Douglas-IIr	47.4 L	5
27	Acer macrophyllum	bigleaf maple	1.5 L		89 Cedrus deodara	deodar cedar	31	L		giganteum	3			213	Zelkeve eerrete		30.8 L	O ~
28	Acer macrophyllum	bigleaf maple	1.7 L		90 Cedrus deodara	deodar cedar	31.9	L	148	Cedrus deodara	deodar cedar	21.6	L	214	Zeikova serrata	Douglas fir	10.5 M	
29	Crataegus monogyna	English hawthorn, common	16 S		91 Crataegus monogyna	English hawthorn, common	17.5	S	149	Cedrus deodara	deodar cedar	31	L	215		Douglas-III	21.8 L	ag ag
30	Cedrus deodara	deodar cedar	39.2 L		92 Crataegus monogyna	English hawthorn, common	13	S	150	Crataegus monogyna	English hawthorn, common	11	S	210	Quercus rubra	Douglas fir	30.2 L	
31	Crataegus monogyna	English hawthorn, common	22.7 S		93 Pseudotsuga menziesi	ii Douglas-fir	5.4	L	151	Cedrus deodara	deodar cedar	26.2	L	217		Norway maple	43.7 L 14.3 M	
32	Cedrus deodara	deodar cedar	33 L		94 Malus spp.	ornamental crabapple	12.5	S	152	Malus spp.	ornamental crabapple	15.8	S	210	Acei platarioides Pseudotsuga menziesii	Norway maple	33 Q I	
33	Crataegus monogyna	English hawthorn, common	11.7 S		95 Prunus avium	bird cherry	7	Μ	153	Crataegus monogyna	English hawthorn, common	10.8	S	220	Pseudotsuga menziesii	Douglas-fir	69.4 L	
34	Cedrus deodara	deodar cedar	35.7 L		96 Crataegus monogyna	English hawthorn, common	15	S	154	Crataegus monogyna	English hawthorn, common	11	S	221	Pseudotsuga menziesii	Douglas-fir	23 L	
35	Crataegus monogyna	English hawthorn, common	18.3 S		97 Pseudotsuga menziesi	íi Douglas-fir	28.8	L	155	Crataegus monogyna	English hawthorn, common	18.5	S	222	Pseudotsuga menziesii	Douglas-fir	38.4 L	
36	Sequoiadendron	giant sequoia	26 L		98 Malus spp.	ornamental crabapple	10.1	S	156	Populus nigra	black poplar, Lombardy poplar	17.7	L	223	Pseudotsuga menziesii	Douglas-fir	36.8 L	
	giganteum				99 Pseudotsuga menziesi	ii Douglas-fir	41.2	L	157	Crataegus monogyna	English hawthorn, common	11.8	S	224	Platanus x acerifolia	London plane tree	11.2 L	
37	Cedrus deodara	deodar cedar	41.1 L		100 Pseudotsuga menziesi	ii Douglas-fir	23.5	L	158	Pseudotsuga menziesii	Douglas-fir	44.5	L	225	Pseudotsuga menziesii	Douglas-fir	32.7 L	
38	Acer macrophyllum	bigleaf maple	36.7 L		101 Prunus serrulata	Japanese flowering cherry	32.4	S	159	Ostrya virginiana	American hophornbeam	2.5	M	226	Pseudotsuga menziesii	Douglas-fir	37.4 L	
39	Crataegus monogyna	English hawthorn, common	14.3 S		102 Crataegus monogyna	English hawthorn, common	21.2	S	160	Pseudotsuga menziesii	Douglas-fir	40.6	L	227	Thuja plicata	western redcedar	3 L	
40	Salix spp.	WIIIOW	19 M		103 Prunus serrulata	Japanese flowering cherry	2.1	S	161	Pseudotsuga menziesii	Douglas-Tir	56.8	L	228	Pseudotsuga menziesii	Douglas-fir	37.1 L	
41	Pseudotsuga menziesii	Douglas-Tir	36 L		104 Prunus serrulata	Japanese flowering cherry	28.7	S	162	Acer macrophyllum	bigleat maple	28.8	L	229	Fagus sylvatica	European beech	11 L	
42		English hawthorn, common	20.7 S		105 Prunus serrulata	Japanese flowering cherry	26	S	103	Crataggie monogyna	English howthern, common	37.3	L c	230	Pseudotsuga menziesii	Douglas-fir	49.2 L	
43	Malus spp	ergiish hawthorn, common	19.8 5		106 Gymnocladus dioica	Kentucky coffeetree	8.3	L	104	Crataegus monogyna	English hawthorn, common	13.0	S	231	Prunus sargentii	Sargent's cherry	5.7 S	
44	rialius spp.		12.4 J		107 Prunus serrulata	Japanese flowering cherry	25.2	S	100		English hawthorn, common	10.0	s s	232	Fagus sylvatica	European beech	20.5 L	
45	Liquidambar styraciflua	sweetrum	13.0 S		108 Pinus ponderosa	ponderosa pine	17.3	L	167		English hawthorn, common	20.2	S	233	Pseudotsuga menziesii	Douglas-fir	48.7 L	
40	Prunus serrulata	lananese flowering cherry	13 IVI 23.2 S		109 Prunus serrulata	Japanese flowering cherry	34.5	S	162		English hawthorn, common	10.2	S	234	Pseudotsuga menziesii	Douglas-fir	33 L	
48	Quercus palustris	nin oak	23.2 J		110 Pinus ponderosa	ponderosa pine	17.6	L	160	Pseudotsuga menziesii	Douglas-fir	34	J	235	Pseudotsuga menziesii	Douglas-fir	35 L	
49	Prunus serrulata	Japanese flowering cherry	28.2 S		111 Pterocarya spp.	wingnut	2.1	5	107	Crataequs monogyna	English hawthorn common	18.2	S	236	Pseudotsuga menziesii	Douglas-fir	30.5 L	
50	Prunus serrulata	Japanese flowering cherry	22.7 S		112 Pseudotsuga menziesi	I Douglas-fir	1	L	170	Crataegus monogyna	English hawthorn, common	18.2	S	237	Pseudotsuga menziesii	Douglas-fir	31.6 L	
51	Prunus serrulata	Japanese flowering cherry	28.6 S		113 Pterocarya spp.	wingnut	3.5	5	172	Crataegus monogyna	English hawthorn, common	13.2	s	238	Pseudotsuga menziesii	Douglas-fir	43.8 L	
52	Gymnocladus dioica	Kentucky coffeetree	7.6 L		114 Pseudotsuga menziesi	i Douglas-IIr	1.2	L	173	Crataegus monogyna	English hawthorn, common	20.4	S	239	Pseudotsuga menziesii	Douglas-fir	33.9 L	
53	Prunus serrulata	Japanese flowering cherry	14.7 S		giganteum	giant sequoia	32.3	L	174	Crataegus monogyna	English hawthorn, common	13.1	S	240	Pseudotsuga menziesii	Douglas-fir	40.7 L	
54	Alnus rubra	red alder	12.9 M		116 Seguoiadendron	giant seguoia	30.8	L	175	Pvrus communis	European pear (including	8.1	M	241	Pseudotsuga menziesii	Douglas-fir	28.6 L	
55	Pseudotsuga menziesii	Douglas-fir	1.2 L		giganteum	5			176	Pseudotsuga menziesii	Douglas-fir	41.3	L	242	Pseudotsuga menziesii	Douglas-fir	47 L	
56	Styrax japonicus	Japanese snowbell	4 S		117 Pseudotsuga menziesi	i Douglas-fir	15.3	L	177	Pseudotsuga menziesii	Douglas-fir	37.6	L	243	Pseudotsuga menziesii	Douglas-fir	Date *Approved	*
57	Sequoiadendron	giant seguoia	29 L		118 Chamaecyparis obtusa	a Hinoki falsecypress	4.2	L	178	Pseudotsuga menziesii	Douglas-fir	34.9	L	244	Pseudotsuga menziesii	Douglas-fir	City of Portla	and
	giganteum				119 Thuja plicata	western redcedar	10.8	L	179	Pseudotsuga menziesii	Douglas-fir	46.1	L	245	Pseudotsuga menziesii	Douglas-fir	Bureau of Developm	ent Services
58	Pinus ponderosa	ponderosa pine	14.1 L		120 Chamaecyparis obtusa	a Hinoki falsecypress	5	L	180	Prunus sargentii	Sargent's cherry	9.6	S	246	Pseudotsuga menziesii	Douglas-fir	Planner	
59	Chamaecyparis obtusa	Hinoki falsecypress	6 L		121 Picea pungens	Colorado blue spruce	5.3	L	181	Pseudotsuga menziesii	Douglas-fir	44.2	L	247	Pseudotsuga menziesii	Douglas-fir	1-25-2024	
60	Picea smithiana	Himalayan spruce	7.5 L		122 Acer davidii	snakebark maple	9.2	S	182	Prunus sargentii	Sargent's cherry	2.5	S	248	Pseudotsuga menziesii	Douglas-fir	<ul> <li>This approval applies only to the reviews conditions of approval. Additional zonii</li> </ul>	requested and is subject to all ng requirements may apply.
61	Acer davidii	snakebark maple	5.8 S		123 Pinus ponderosa	ponderosa pine	25.1	L	183	Prunus sargentii	Sargent's cherry	6	S	249	Acer macrophyllum	bigleaf maple	7 L	
62	Acer davidii	snakebark maple	8.3 S		124 Fagus sylvatica	European beech	14	L	184	Pseudotsuga menziesii	Douglas-fir	49.2	L	250	Acer paimatum	Japanese maple	8.1 5	

TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	
251 Platanus x acerifolia London plane tree	19.5 L	315 Alnus rubra red alder	11.6 M	379 Pseudotsuga menziesii Douglas-fir	51.4 L	443 Pseudotsuga menziesii Douglas-fir	33.3 L	
252 Pseudotsuga menziesii Douglas-fir	25.7 L	316 Pseudotsuga menziesii Douglas-fir	27.7 L	380 Pseudotsuga menziesii Douglas-fir	40.9 L	444 Pseudotsuga menziesii Douglas-fir	46.3 L	
253 Tsuga heterophylla western hemlock	4.3 L	317 Pseudotsuga menziesii Douglas-fir	27.9 L	381 Pseudotsuga menziesii Douglas-fir	32.5 L	445 Pseudotsuga menziesii Douglas-fir	27.3 L	
254 Pseudotsuga menziesii Douglas-fir	39 L	318 Pseudotsuga menziesii Douglas-fir	42.1 L	382 Pseudotsuga menziesii Douglas-fir	52.3 L	446 Quercus garryana Oregon white oak	2.4 L	
255 Malus spp. ornamental crabapple	8.2 S	319 Pseudotsuga menziesii Douglas-fir	33.4 L	383 Pseudotsuga menziesii Douglas-fir	44.1 L	447 Pseudotsuga menziesii Douglas-fir	25.9 L	
256 Pseudotsuga menziesii Douglas-fir	31.6 L	320 Pseudotsuga menziesii Douglas-fir	34.1 L	384 Pseudotsuga menziesii Douglas-fir	37.1 L	448 Pseudotsuga menziesii Douglas-fir	35.4 L	
257 Quercus rubra northern red oak	15.4 L	321 Calocedrus decurrens incense cedar	8.8 L	385 Pseudotsuga menziesii Douglas-fir	39 L	449 Pseudotsuga menziesii Douglas-fir	43.3 L	
258 Pseudotsuga menziesii Douglas-fir	38.8 L	322 Tsuga heterophylla western hemlock	27.7 L	386 Pseudotsuga menziesii Douglas-fir	63 L	450 Pseudotsuga menziesii Douglas-fir	41.7 L	
259 Pseudotsuga menziesii Douglas-fir	35.4 L	323 Thuja plicata western redcedar	12.9 L	387 Betula pendula European white birch	8.5 M	451 Pseudotsuga menziesii Douglas-fir	60.3 L	$\mathbf{>}$
260 Pseudotsuga menziesii Douglas-fir	32.2 L	324 Sorbus aucuparia European mountain ash	16.3 S	388 Malus spp. ornamental crabapple	7.1 S	452 Pseudotsuga menziesii Douglas-fir	7.4 L	Ĺ'
261 Pseudotsuga menziesii Douglas-fir	27.7 L	325 Pseudotsuga menziesii Douglas-fir	39.7 L	389 Pseudotsuga menziesii Douglas-fir	41 L	453 Pseudotsuga menziesii Douglas-fir	31.6 L	0
262 Pseudotsuga menziesii Douglas-fir	53 I	326 Pseudotsuga menziesii Douglas-fir	39.7	390 Pseudotsuga menziesii Douglas-fir	43.5	454 Pseudotsuga menziesii Douglas-fir	40.6	Ţ
263 Pseudotsuga menziesii Douglas-fir	44 7	327 Pseudotsuga menziesii Douglas-fir	39.1	391 Pseudotsuga menziesii Douglas-fir	41.3	455 Crataegus monogyna English hawthorn common	17.5 S	
264 Pseudotsuga menziesii Douglas-fir	44.2	328 Sorbus aucuparia European mountain ash	9.8 5	392 Ouercus rubra northern red oak	22.1 1	456 Pseudotsuga menziesii Douglas-fir	39.9	<b>e</b>
265 Pseudotsuga menziesii Douglas-fir	30 1	329 Pseudotsuga menziesii Douglas fir	50 1	393 Malus spn ornamental crahapple	95 5	457 Pseudotsuga menziesii Douglas-fir	34.2	>
266 Pseudotsuga menziesii Douglas fir	35.0 1	320 Acer macronhyllum bigleaf manle	18 L	304 Fagus sylvatica European beech	22.6	458 Pseudotsuga menziesii Douglas fir	54.2 L	
267 Recudotsuga monziosii Douglas fir	10 9 I	221 Psoudotsuga monziosii Douglas fir	40 L	205 Juglans rogia English walnut	22.0 L	450 Psoudotsuga monziosii Douglas fir	21 7 L	—
267 Pseudotsuga menziesii Douglas fir	40.0 L	222 Psoudotsuga monziosii Douglas fir	37.3 L	206 Eagus sylvatica	7.4 L	460 Recudetcuga menziecii Douglas fir	54.9 L	
260 Escudotsuga menziosii Douglas fir	30.∠ L 26.2 I	332 I seudotsuga monziosii Douglas fir	20.2 L	307 Fagus sylvatica European beech	17.0 L	461 Decudotsuga menziocii Douglas fir	50.3 L	ě –
207 Eseculosaya menziacii Dougles fir	JU.∠ L	224 Acor macrophyllum biolocf manual	57.0 L	200 Decudateura manziasii Dauraka fiz	13.4 L	401 For	10 L	L L
270 rseudotsuga menziesii Douglas fir	ວບ.ວ L 17 I	225 Decudetsuga menziosii Deurses fiz	200 L	200 Decudoteura manziasii Dourgias fiz	40 L 201 I	402 Ficea pungens Colorado blue Spruce		
271 rseudotsuga menziceli Douglas-IIr	1.7 L	224 Decudetaura manziesii Dauris fi	30.0 L	400 Potulo popululo	27.1 L	400 rseudotouga manziaali Douglas-IIr	44.7 L	-
272 Pseudotsuga menziesii Douglas-Tir	47.5 L	227 Decudetourge rearrier Decudias-Tir	27.5 L	400 Betula pendula European White birch		404 Pseudotsuga menziesii Douglas-Tir	27.2 L	$\mathbf{X}$
273 Pseudotsuga menziesii Douglas-fir	47.3 L	337 Pseudotsuga menziesii Douglas-fir	5U.4 L	401 Becula pendula European white birch	23./ M	405 Pseudotsuga menziesii Douglas-fir	39.9 L	JL
274 Pseudotsuga menziesii Dougias-fir	34.6 L	338 Pseudotsuga menziesii Douglas-IIr	2.1 L	402 Pseudotsuga menziesii Douglas-Iir	55.1 L	466 Pseudotsuga menziesii Douglas-Iir	27.4 L	
275 Pseudotsuga menziesii Dougias-fir	26.9 L	339 Pseudotsuga menziesii Douglas-IIr	30.7 L	403 Pseudotsuga menziesii Dougias-Iir	23.4 L	467 Pseudotsuga menziesii Douglas-Iir	40 L	
276 Maius spp. ornamental crabappie	5.2 5	340 Pseudotsuga menziesii Douglas-III	30.0 L	404 Acel circinatum vine maple	9.2 5	468 Pseudotsuga menziesii Douglas-Iir	55.1 L	<u> </u>
277 Pseudotsuga menziesii Dougias-fir	26 L	341 Crataegus monogyna English nawthorn, common	7.1 5	405 Pseudotsuga menziesii Douglas-IIr	30.2 L	469 Prunus avium bird cherry	15.7 M	5 O
278 Pseudotsuga menziesii Douglas-Iir	41.9 L	342 Pseudotsuga menziesii Douglas-Iir	39.5 L	406 Pseudotsuga menziesii Dougias-iii	23.2 L	470 Pseudotsuga menziesii Douglas-Iir	29.6 L	
279 Betula papyrilera paper birch	5.7 M	343 Pseudotsuga menziesii Douglas-IIr	50.6 L	407 Prunus avium bird cherry		471 Pseudotsuga menziesii Douglas-fir	44.2 L	ag ag
280 Maius fusca Pacific crabappie	6.9 S	344 Pseudotsuga menziesii Douglas-tir	24.5 L	408 Pseudotsuga menziesii Douglas-fir	35.4 L	472 Pseudotsuga menziesii Douglas-tir	30.8 L	
281 Pseudotsuga menziesii Dougias-fir	37.6 L	345 Pseudotsuga menziesii Douglas-tir	40.5 L	409 Prunus serruia paperbark cherry, birchbark	17 S	473 Pseudotsuga menziesii Douglas-tir	59.5 L	
282 Isuga heterophylia western hemiock	34.2 L	346 Pseudotsuga menziesii Douglas-tir	40.4 L	410 Prunus serrula paperbark cherry, birchbark	22.3 S	474 Pseudotsuga menziesii Douglas-tir	49.2 L	//i
283 Ainus rubra red aider	12 M	347 Pseudotsuga menziesii Douglas-tir	37.4 L	411 Prunus serruia paperbark cherry, birchbark	19.3 5	475 Pseudotsuga menziesii Douglas-tir	35.3 L	$\triangleleft$ $\vdash$
284 Pseudotsuga menziesii Dougias-fir	29.7 L	348 Pseudotsuga menziesii Douglas-tir	31.4 L	412 Pseudotsuga menziesii Douglas-fir	40.6 L	476 Acer macrophyllum bigleat maple	27.8 L	
285 Pseudotsuga menziesii Douglas-fir	35.8 L	349 Pseudotsuga menziesii Dougias-Iir	48 L	413 Pseudotsuga menziesii Douglas-Iir	38.4 L	477 Pseudotsuga menziesii Douglas-fir	45.7 L	
286 Pseudotsuga menziesii Douglas-fir	27.6 L	350 Picea pungens Colorado blue spruce	/./ L	414 Pseudotsuga menziesii Douglas-Iir	33.3 L	478 Pseudotsuga menziesii Douglas-Iir	55.1 L	
287 Pseudotsuga menziesii Douglas-Iir	42.9 L	351 Pseudotsuga menziesii Dougias-Iir	45 L	415 Pseudotsuga menziesii Douglas-IIr	35.7 L	479 Pseudotsuga menziesii Douglas-Iir	30.9 L	
288 Fagus granditolia American beech	41.9 L	352 Maius spp. Ornamental crabappie	9.0 5	416 Pseudotsuga menziesii Dougias-iii	51.4 L	480 Pseudotsuga menziesii Douglas-III	41.9 L	
289 Pseudotsuga menziesii Douglas-IIr	23.7 L	353 Pseudotsuga menziesii Dougias-Iir	39 L	417 Maius spp. ornamental crabappie	9 5	481 Pseudotsuga menziesii Douglas-Iir	39 L	
290 Pseudotsuga menziesii Douglas-Iir	36.7 L	354 Betula pendula European white birch	17.7 IVI	418 Pseudotsuga menziesii Dougias-Iir	35.4 L	482 Pseudotsuga menziesii Douglas-Iir	37.4 L	
291 Pseudotsuga menziesii Douglas-III	32.0 L	355 Pseudotsuga menziesii Douglas-III	40.9 L	419 Plunus seriulata Japanese nowening cherry	9.8 5	483 Pseudotsuga menziesii Douglas-III	03.2 L	
292 Pseudotsuga menziesii Douglas-fir	45.9 L	356 Betula pendula European white birch	15.7 IVI	420 Picea ables Norway spruce	19 L	484 Pseudotsuga menziesii Douglas-Iir	35.7 L	
293 Pseudotsuga menziesii Dougias-fir	46.9 L	357 Pseudotsuga menziesii Douglas-tir	37.3 L	421 Picea ables Norway spruce	14.5 L	485 Pseudotsuga menziesii Douglas-fir	38.6 L	
294 Pseudotsuga menziesii Douglas-fir	50.4 L	358 Pseudotsuga menziesii Douglas-fir	33.8 L	422 Betula pendula European white birch	20.8 M	486 Pseudotsuga menziesii Douglas-fir	27.4 L	
295 Pseudotsuga menziesii Douglas-fir	25.8 L	359 Pseudotsuga menziesii Douglas-fir	10.1 L	423 Pseudotsuga menziesii Douglas-fir	45 L	487 Pseudotsuga menziesii Douglas-fir	28.6 L	
296 Pseudotsuga menziesii Douglas-fir	34.3 L	360 Pseudotsuga menziesii Douglas-fir	28.4 L	424 Pseudotsuga menziesii Douglas-fir	35.4 L	488 Pseudotsuga menziesii Douglas-fir	51.3 L	
297 Pseudotsuga menziesii Douglas-fir	38.1 L	361 Pseudotsuga menziesii Douglas-fir	45.2 L	425 Pseudotsuga menziesii Douglas-fir	38.8 L	489 Pseudotsuga menziesii Douglas-fir	32 L	
298 Pseudotsuga menziesii Douglas-fir	37.3 L	362 Pseudotsuga menziesii Douglas-fir	36.1 L	426 Pseudotsuga menziesii Douglas-fir	43.1 L	490 Pseudotsuga menziesii Douglas-fir	22 L	
299 Pseudotsuga menziesii Douglas-fir	34.2 L	363 Pseudotsuga menziesii Douglas-fir	30.5 L	427 Pseudotsuga menziesii Douglas-fir	26.5 L	491 Pseudotsuga menziesii Douglas-fir	58 L	
300 Pseudotsuga menziesii Douglas-fir	36.4 L	364 Pseudotsuga menziesii Douglas-fir	41.9 L	428 Pseudotsuga menziesii Douglas-fir	45.9 L	492 Pseudotsuga menziesii Douglas-fir	33 L	
301 Pseudotsuga menziesii Douglas-fir	31.7 L	365 Magnolia spp. magnolia	13.1 S	429 Pseudotsuga menziesii Douglas-fir	42.6 L	493 Pseudotsuga menziesii Douglas-fir	26.8 L	
302 Pseudotsuga menziesii Douglas-fir	54.4 L	366 Picea abies Norway spruce	15.7 L	430 Pseudotsuga menziesii Douglas-fir	25.8 L	494 Acer macrophyllum bigleaf maple	56.3 L	
303 Pseudotsuga menziesii Douglas-fir	40.1 L	367 Picea abies Norway spruce	17.9 L	431 Pseudotsuga menziesii Douglas-fir	41.1 L	495 Pseudotsuga menziesii Douglas-fir	26.2 L	
304 Pseudotsuga menziesii Douglas-fir	34.5 L	368 Pseudotsuga menziesii Douglas-fir	56.4 L	432 Acer macrophyllum bigleaf maple	11.3 L	496 Pseudotsuga menziesii Douglas-fir	19 L	
305 Isuga neterophylla western hemlock	29.4 L	309 Pseudotsuga menziesii Douglas-fir	50.5 L	433 Pseudotsuga menziesii Douglas-fir	37.3 L	497 Pseudotsuga menziesii Douglas-fir	46.4 L	
306 Pseudotsuga menziesii Douglas-fir	26.5 L	370 Maius spp. ornamental crabapple	6.6 S	434 Pseudotsuga menziesii Douglas-fir	24.6 L	498 Acer macrophyllum bigleaf maple	34.8 L	
307 Pseudotsuga menziesii Douglas-fir	23 L	371 Acer macrophyllum bigleaf maple	39.8 L	435 Pseudotsuga menziesii Douglas-fir	34.3 L	499 Pseudotsuga menziesii Douglas-fir	34.7 L	
308 Pseudotsuga menziesii Douglas-fir	29.8 L	372 Acer macrophyllum bigleaf maple	37.1 L	436 Acer macrophyllum bigleat maple	5.3 L	500 Pseudotsuga menziesii Douglas-fir	49.8 L	
309 Malus spp. ornamental crabapple	5.6 S	3/3 Pseudotsuga menziesii Douglas-fir	32.9 L	437 Pseudotsuga menziesii Douglas-fir	20.1 L	501 Pseudotsuga menziesii Douglas-fir	52.6 L	
310 Maius spp. ornamental crabapple	4.4 S	374 Pseudotsuga menziesii Douglas-fir	30.9 L	438 Acer macrophyllum bigleat maple	52.4 L	502 Pseudotsuga menziesii Douglas-fir	36.7 L	
212 Decudatoura manziacii Douglas-Tir	∠ö.∀ L	375 Magnolia spp. magnolia	1.3 5	439 Acel maciophyllum bigleat maple	41 L	503 Pseudotsuga menziesii Douglas-fir	3U.8 L	
212 Proudotoura monziosii Douglas fir	ວ4 L 22 I	277 Recudotsuga menziesii. Douglas fir	47.4 L	440 rseudotsuga menziosii Douglas fir	20.7 L	504 Pseudolsuga menziesii Douglas-Tir	21.1 L	
314 Decudotsuga menziosii Dougles fir	ວ∠ L /1.2 I	377 Pseudotsuga monziosii Douglas fir	30.0 L	441 Feduloisuga menziesii Douglas fir	57.0 L 51 l	505 Acel macrophylium biglear maple	55.1 L	
	71.2 L	oro i seudoisuga menziesii Douglas-III	47 L		JI L	550 เวลนนบเวนหลายเยายาราย มาบนหูได้ราย	JJ.1 L	

TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	
507 Pseudotsuga menziesii Douglas-fir	30.5 L	570 Pseudotsuga menziesii Douglas-fir	32.1 L	633 Pseudotsuga menziesii Douglas-fir	24.3 L	696 Pseudotsuga menziesii Douglas-fir	42.9 L	
508 Pseudotsuga menziesii Douglas-fir	31.4 L	571 Pseudotsuga menziesii Douglas-fir	37.6 L	634 Fraxinus latifolia Oregon ash	9.4 M	697 Robinia pseudoacacia black locust	7.5 M	
509 Pseudotsuga menziesii Douglas-fir	58 L	572 Pseudotsuga menziesii Douglas-fir	25.1 L	635 Pseudotsuga menziesii Douglas-fir	34.9 L	698 Robinia pseudoacacia black locust	7.5 M	
510 Pseudotsuga menziesii Douglas-fir	20.2 L	573 Pseudotsuga menziesii Douglas-fir	31.4 L	636 Pseudotsuga menziesii Douglas-fir	39.6 L	699 Pseudotsuga menziesii Douglas-fir	52.8 L	
511 Pseudotsuga menziesii Douglas-fir	30 1	574 Pseudotsuga menziesii Douglas-fir	20.2	637 Pseudotsuga menziesii Douglas-fir	40.2	700 Thuja plicata western redcedar	33.7 L	
512 Pseudotsuga menziesii Douglas-fir	49.8	575 Crataegus monogyna English hawthorn common	14.3 \$	638 Pseudotsuga menziesii Douglas-fir	39.8	701 Pseudotsuga menziesii Douglas-fir	37.5	
512 Pseudotsuga menziesii Douglas-fir	31.6 L	576 Pseudotsuga menziesii Douglas-fir	28.5	639 Pseudotsuga menziesii Douglas fir	31.0 L	702 Pseudotsuga menziesii Douglas-fir	35.7	
514 Psoudotsuga monziosii Douglas fir	22.1 L	577 Acer macronbyllum bigleaf manle	5.8 I	640 Pseudotsuga menziesii Douglas fir	30.2 I	703 Pseudotsuga menziesii Douglas-fir	37.2	
515 Psoudotsuga monziosii Douglas fir	22.1 L	578 Pseudotsuga menziesii Douglas-fir	18.1 L	641 Pseudotsuga menziesii Douglas fir	40.2 L	704 Pseudotsuga menziesii Douglas fir	45.8 L	
515 Fseudotsuga menziesii Douglas-fir	27.2 L	570 Psoudotsuga monziosii Douglas fir	10.1 L	642 Recudotsuga monziosii Douglas fir	40.2 L	705 Corpus spp dogwood	45.0 L	$\widehat{}$
510 Fseudotsuga menziesii Douglas-fir	22.2 L	577 Fiseudotsuga menziesii Douglas fir	40 L	642 Acor macronhyllum bigloaf manlo	16.7 L	706 Acor macrophyllum bigloaf maple	7.0	
517 Pseudotsuga menziesii Douglas-III	33.7 L	500 Fiseudotsuga menziesii Douglas fir	24.3 L	644 Drupus corosifora floworing plum	40.7 L	700 Acel maciophylium biglear maple	1.7 L	t
510 Pseudotsuga menziesii Douglas-III	30.1 L	501 Fseudotsuga menziesii Douglas fir	32.7 L	645 Decudetsuga monziesii Deuglas fir	11.1 3	707 Pseudotsuga menziesii Douglas-III	41.4 L	
519 Pseudotsuga menziesii Douglas-III	33.2 L	582 Pseudotsuga menziesii Douglas-III	30.4 L	645 Pseudotsuga menzesii Dougias-m	43.0 L	700 Pseudotsuga menziasii Douglas-III	31.0 L	С С
520 Pseudotsuga menziesii Douglas-fir	27.4 L	583 Pseudotsuga menziesii Douglas-Iir	36.4 L	646 Acel macrophyllum bigleaf maple	30.9 L	709 Pseudotsuga menziesii Douglas-III	25.8 L	$\mathbf{\tilde{>}}$
521 Pseudotsuga menziesii Douglas-fir	35 L	584 Pseudotsuga menziesii Douglas-tir	35.5 L	647 Acer macrophylium biglear maple	22.8 L	710 Pseudotsuga menziesii Douglas-Iir	44.4 L	
522 Pseudotsuga menziesii Douglas-fir	17.3 L	585 Pseudotsuga menziesii Douglas-fir	29.2 L	648 Acer macrophyllum biglear maple	18 L	711 Pseudotsuga menziesii Douglas-tir	38.9 L	<u> </u>
523 Pseudotsuga menziesii Douglas-fir	40.3 L	586 Pseudotsuga menziesii Douglas-fir	32.1 L	649 UIMUS X eIM hybrid		712 Pseudotsuga menziesii Douglas-fir	29.4 L	
524 Pseudotsuga menziesii Douglas-fir	42.2 L	587 Pseudotsuga menziesii Douglas-fir	38.4 L	650 Liquidambar styraciflua sweetgum	7.5 M	713 Pseudotsuga menziesii Douglas-fir	29.4 L	Û.
525 Pseudotsuga menziesii Douglas-fir	37.2 L	588 Pseudotsuga menziesii Douglas-fir	39.2 L	651 Pseudotsuga menziesii Douglas-fir	47.8 L	/ 14 Acer circinatum vine maple	6.2 S	ĥ
526 Pseudotsuga menziesii Douglas-fir	34.8 L	589 Pseudotsuga menziesii Douglas-fir	34.1 L	652 Prunus serrulata Japanese flowering cherry	23 S	/15 Pseudotsuga menziesii Douglas-fir	33.7 L	<u> </u>
527 Pseudotsuga menziesii Douglas-fir	23.4 L	590 Pseudotsuga menziesii Douglas-fir	24.6 L	653 Pseudotsuga menziesii Douglas-fir	45.2 L	/16 Pseudotsuga menziesii Douglas-fir	29.9 L	1
528 Pseudotsuga menziesii Douglas-fir	33.3 L	591 Pseudotsuga menziesii Douglas-fir	27.4 L	654 Prunus serrulata Japanese flowering cherry	25 S	717 Pseudotsuga menziesii Douglas-fir	47.3 L	$\mathbf{X}$
529 Pseudotsuga menziesii Douglas-fir	35.1 L	592 Pseudotsuga menziesii Douglas-fir	27.3 L	655 Pseudotsuga menziesii Douglas-fir	32 L	718 Platanus x acerifolia London plane tree	9.6 L	
530 Pseudotsuga menziesii Douglas-fir	22.6 L	593 Pseudotsuga menziesii Douglas-fir	29.2 L	656 Pseudotsuga menziesii Douglas-fir	32 L	719 Platanus x acerifolia London plane tree	14.1 L	g
531 Pseudotsuga menziesii Douglas-fir	35.5 L	594 Pseudotsuga menziesii Douglas-fir	39 L	657 Pseudotsuga menziesii Douglas-fir	62.1 L	720 Pseudotsuga menziesii Douglas-fir	48.7 L	<u>а</u>
532 Pseudotsuga menziesii Douglas-fir	33.1 L	595 Pseudotsuga menziesii Douglas-fir	36.6 L	658 Pyrus communis European pear (including	17.9 M	721 Acer macrophyllum bigleaf maple	22.7 L	<u> </u>
533 Pseudotsuga menziesii Douglas-fir	43.6 L	596 Pseudotsuga menziesii Douglas-fir	22.4 L	659 Prunus serrulata Japanese flowering cherry	8 S	722 Acer macrophyllum bigleaf maple	28 L	
534 Pseudotsuga menziesii Douglas-fir	20.2 L	597 Pseudotsuga menziesii Douglas-fir	43.8 L	660 Pseudotsuga menziesii Douglas-fir	48.2 L	723 Pseudotsuga menziesii Douglas-fir	59.3 L	Õ 🖞
535 Pseudotsuga menziesii Douglas-fir	22.2 L	598 Pseudotsuga menziesii Douglas-fir	30 L	661 Sequoiadendron giant sequoia	24.5 L	724 Pseudotsuga menziesii Douglas-fir	48.9 L	
536 Pseudotsuga menziesii Douglas-fir	40.8 L	599 Pseudotsuga menziesii Douglas-fir	22.7 L		00.4	725 Quercus coccinea scarlet oak	9.8 L	
537 Pseudotsuga menziesii Douglas-fir	29.1 L	600 Pseudotsuga menziesii Douglas-fir	35.8 L	662 Thuja plicata western reddedar	33.1 L	726 Acer macrophyllum bigleaf maple	21.7 L	e
538 Pseudotsuga menziesii Douglas-fir	27.8 L	601 Pseudotsuga menziesii Douglas-fir	35.1 L	663 Pseudotsuga menziesii Dougias-iii	27.9 L	727 Liquidambar styraciflua sweetgum	7 M	11 ab
539 Pseudotsuga menziesii Douglas-fir	28.5 L	602 Pseudotsuga menziesii Douglas-fir	34 L	664 Prunus serrulata Japanese flowering cherry	17.7 5	728 Pseudotsuga menziesii Douglas-fir	40.5 L	$\geq$
540 Pseudotsuga menziesii Douglas-fir	25.7 L	603 Pseudotsuga menziesii Douglas-fir	16.3 L	665 Plunus serulata Japanese nowening cherry	27.4 5	729 Pseudotsuga menziesii Douglas-fir	45 L	
541 Pseudotsuga menziesii Douglas-fir	26.7 L	604 Pseudotsuga menziesii Douglas-fir	18.5 L	660 Americancine spp. Serviceberry	2.0 5	730 Prunus serrulata Japanese flowering cherry	21.3 S	
542 Pseudotsuga menziesii Douglas-fir	36 L	605 Pseudotsuga menziesii Douglas-fir	23 L	667 Pseudotsuga menziesii Dougias-m	51.9 L	731 Pseudotsuga menziesii Douglas-fir	54 L	
543 Pseudotsuga menziesii Douglas-fir	18.8 L	606 Pseudotsuga menziesii Douglas-fir	38.8 L	660 Decudetsuga monziesii. Deuglas fir	1.0 3	732 Pseudotsuga menziesii Douglas-fir	50.1 L	
544 Pseudotsuga menziesii Douglas-fir	43.6 L	607 Pseudotsuga menziesii Douglas-fir	30.4 L	670 Decudotsuga monziesii Douglas fir	37.1 L	733 Pseudotsuga menziesii Douglas-fir	25.5 L	
545 Pseudotsuga menziesii Douglas-fir	28.3 L	608 Pseudotsuga menziesii Douglas-fir	37.3 L	471 Decudetsuga menziesii Douglas fir	40.4 L	734 Magnolia spp. magnolia	20 S	
546 Pseudotsuga menziesii Douglas-fir	27.4 L	609 Pseudotsuga menziesii Douglas-fir	3.9 L	671 Pseudotsuga menziesii Douglas-III	30.7 L	735 Robinia pseudoacacia black locust	7.5 M	
547 Pseudotsuga menziesii Douglas-fir	23.8 L	610 Pseudotsuga menziesii Douglas-fir	40.6 L	672 Pseudotsuga menziesii Douglas fir	30.1 L	736 Pseudotsuga menziesii Douglas-fir	41.8 L	
548 Pseudotsuga menziesii Douglas-fir	33.5 L	611 Pseudotsuga menziesii Douglas-fir	33.2 L	67.4 Decudotsuga monziesii Douglas fir	30.1 L	737 Pseudotsuga menziesii Douglas-fir	52 L	
549 Pseudotsuga menziesii Douglas-fir	19.6 L	612 Pseudotsuga menziesii Douglas-fir	28 L	674 Pseudotsuga menziesii Douglas-III	20.7 L	738 Pseudotsuga menziesii Douglas-fir	48.2 L	
550 Pseudotsuga menziesii Douglas-fir	37.2 L	613 Acer circinatum vine maple	5.2 S	675 Pseudolsuga menziesii Dougias-III	1.1 L 1 M	739 Pseudotsuga menziesii Douglas-fir	39.6 L	
551 Pseudotsuga menziesii Douglas-fir	34.7 L	614 Pseudotsuga menziesii Douglas-fir	37.8 L	676 Al butus menziesii Pacific Madione		740 Pseudotsuga menziesii Douglas-fir	32.9 L	
552 Pseudotsuga menziesii Douglas-fir	43.8 L	615 Pseudotsuga menziesii Douglas-fir	31 L	679 Decudateura manziasii Dourstas fiz	02.7 L	741 Pseudotsuga menziesii Douglas-fir	31.7 L	
553 Pseudotsuga menziesii Douglas-fir	26.7 L	616 Pseudotsuga menziesii Douglas-fir	37.8 L	670 Proudotougo manzinsii Dourstan fin	44.3 L	742 Pseudotsuga menziesii Douglas-fir	40.4 L	
554 Pseudotsuga menziesii Douglas-fir	34.7 L	617 Pseudotsuga menziesii Douglas-fir	28.7 L	690 Boundetsuge menziesii Douglas-IIF	31./ L 22.1 i	743 Acer macrophyllum bigleaf maple	6.1 L	
555 Pseudotsuga menziesii Douglas-fir	25.3 L	618 Pseudotsuga menziesii Douglas-fir	34.2 L	491 Decudetauge manafacii Douglas-IIr	33.1 L	744 Pseudotsuga menziesii Douglas-fir	34.4 L	
556 Pseudotsuga menziesii Douglas-fir	17.7 L	619 Pseudotsuga menziesii Douglas-fir	27.6 L	001 Pseudotsuga menziesii Douglas-Tir	47.1 L	745 Sorbus aucuparia European mountain ash	5.3 S	
557 Pseudotsuga menziesii Douglas-fir	25.8 L	620 Pseudotsuga menziesii Douglas-fir	34.5 L	682 Pseudotsuga menziesii Douglas-tir	23.5 L	746 Pseudotsuga menziesii Douglas-fir	50.7 L	
558 Pseudotsuga menziesii Douglas-fir	40.4 L	621 Pseudotsuga menziesii Douglas-fir	29.2 L	683 Pseudotsuga menziesii Douglas-fir	29.2 L	747 Pseudotsuga menziesii Douglas-fir	31.1 L	
559 Pseudotsuga menziesii Douglas-fir	21.7 L	622 Pseudotsuga menziesii Douglas-fir	35.1 L	684 Pinus sylvestris Scots pine	15.5 L	748 Pseudotsuga menziesii Douglas-fir	46.4 L	
560 Pseudotsuga menziesii Douglas-fir	42.7 L	623 Acer circinatum vine maple	5.3 S	685 Cupressus nootkatensis Alaska yellow-cedar	17.5 M	749 Pseudotsuga menziesii Douglas-fir	34.6 L	
561 Pseudotsuga menziesii Douglas-fir	37.1 L	624 Pseudotsuga menziesii Douglas-fir	36.9 L	nootkatensis		750 Acer circinatum vine maple	6.3 S	
562 Pseudotsuga menziesii Douglas-fir	31.8 L	625 Pseudotsuga menziesii Douglas-fir	40 L	686 Pseudotsuga menziesii Douglas-fir	53.8 L	751 Pseudotsuga menziesii Douglas-fir	31.4 L	
563 Pseudotsuga menziesii Douglas-fir	27.2 L	626 Pseudotsuga menziesii Douglas-fir	34.6 L	687 Acer macrophyllum bigleaf maple	35 L	752 Pseudotsuga menziesii Douglas-fir	48.4 L	
564 Pseudotsuga menziesii Douglas-fir	29.9 L	627 Pseudotsuga menziesii Douglas-fir	43.3 L	688 Pseudotsuga menziesii Douglas-fir	28.8 L	753 Acer circinatum vine maple	City of Portlan	d
565 Pseudotsuga menziesii Douglas-fir	24.6 L	628 Pseudotsuga menziesii Douglas-fir	31.6 L	689 Crataegus monogyna English hawthorn, common	22.6 S	754 Pseudotsuga menziesii Douglas-fir	Bureau of Developmen	t Services
566 Pseudotsuga menziesii Douglas-fir	23.4 L	629 Pseudotsuga menziesii Douglas-fir	48.4 L	690 Pseudotsuga menziesii Douglas-fir	54.3 L	755 Pseudotsuga menziesii Douglas-fir	Planner	-
567 Pseudotsuga menziesii Douglas-fir	36.8 L	630 Pseudotsuga menziesii Douglas-fir	32.2 L	691 Pseudotsuga menziesii Douglas-fir	41.7 L	756 Fraxinus latifolia Oregon ash	1-25-2024	
568 Pseudotsuga menziesii Douglas-fir	20.5 L	631 Pseudotsuga menziesii Douglas-fir	24.2 L	692 Pseudotsuga menziesii Douglas-fir	58.9 L	757 Pseudotsuga menziesii Douglas-fir *Thisap	proval applies only to the reviews re	quested and is subject to all
569 Pseudotsuga menziesii Douglas-fir	41 L	632 Pseudotsuga menziesii Douglas-fir	2.7 L	693 Pseudotsuga menziesii Douglas-fir	62.1 L	758 Pseudotsuga menziesii Douglas-fir		гедитетненся тау аррту.
				694 Prunus serrulata Japanese flowering cherry	8.9 S	759 Pseudotsuga menziesii Douglas-fir	35.6 L	
				. 5 5			I	

TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size	TreeNo Genus species Common Name	DBH Size
760 Pseudotsuga menziesii Douglas-fir	56.4 L	822 Pseudotsuga menziesii Douglas-fir	3.7 L	884 Pseudotsuga menziesii Douglas-fir	51.6 L	946 Pseudotsuga menziesii Douglas-fir	26 L
761 Pseudotsuga menziesii Douglas-fir	48.6 I	823 Seguojadendron giant seguoja	35	885 Liriodendron tulipifera tuliptree	9.5	947 Pseudotsuga menziesii Douglas-fir	36.4
762 Pseudotsuga menziesii Douglas-fir	40.2	giganteum	00 2	886 Pseudotsuga menziesii Douglas-fir	51.5	948 Pseudotsuga menziesii Douglas-fir	37.3
762 Fisculation and the security of the securi	40.2 L	824 Seguoiadendron giant seguoia	28.8 L	997 - Decudotsuga monziesii - Deuglas fir	31.3 L	040 Codrus atlantica blue Atlas sodar	24.9
diganteum	3.7 L	giganteum			23.2 L	'Glauca'	54.0 L
764 Acer macronbyllum bigleaf manle	20 1 I	825 Pseudotsuga menziesii Douglas-fir	26.6 L	888 Aesculus common horsechestnut	28 L	050 Pseudotsuga menziesii Douglas fir	34.2
764 Acer macrophyllum bigleaf maple	37.1 L	826 Pseudotsuga menziesii Douglas-fir	37.3 L	000 Tilia tementese silver linden	20.4	0E1 Champoorgania Douglas-III	34.2 L
765 Acer macrophylium biglear maple	32 L	827 Pseudotsuga menziesii Douglas-fir	40 L	889 Filla tomentosa silver linden	39.6 L	951 Chamaecyparis Port Oriord cedar	35 L
766 Prunus cerasifera flowering plum	19.7 S	020 Decudatoria manufacti Decudas-III	40 L	890 Juglans nigra black walnut	38.4 L		20 / 1
767 Acer macrophyllum bigleaf maple	29 L	828 Pseudotsuga menziesii Douglas-Iir	9.5 L	891 Pseudotsuga menziesii Douglas-fir	33.5 L	952 Pseudotsuga menziesii Douglas-IIr	
768 Sequoia sempervirens coast redwood	31 L	829 Pseudotsuga menziesii Douglas-fir	30.1 L	892 Pseudotsuga menziesii Douglas-fir	33 L	953 Pseudotsuga menziesii Douglas-fir	30.4 L
769 Pseudotsuga menziesii Douglas-fir	50.7 L	830 Pseudotsuga menziesii Douglas-fir	23.5 L	893 Pseudotsuga menziesii Douglas-fir	52 L	954 Pseudotsuga menziesii Douglas-fir	49.5 L O
770 Pseudotsuga menziesii Douglas-fir	44.6 L	831 Pseudotsuga menziesii Douglas-fir	30.9 L	894 Pseudotsuga menziesii Douglas-fir	16.3 L	955 Pseudotsuga menziesii Douglas-fir	30.4 L
771 Liquidambar styraciflua sweetgum	6.7 M	832 Pseudotsuga menziesii Douglas-fir	41 L	895 Pseudotsuga menziesii Douglas-fir	31.3 L	956 Pseudotsuga menziesii Douglas-fir	19.6 L
772 Pseudotsuga menziesii Douglas-fir	12.2 1	833 Pseudotsuga menziesii Douglas-fir	43.5 L	896 Pseudotsuga menziesii Douglas-fir	42.6	957 Pseudotsuga menziesii Douglas-fir	27.8 L
772 Prupus sorrulata	10 C	834 Aesculus common horsechestnut	35.4 L	907 - Recudotsuga monziosii - Douglas fir	12.0 L	958 Pseudotsuga menziesii Douglas-fir	29.5 L
773 Prunus serrulata Japanese nowening cherry	18 5	hippocastanum		897 Pseudotsuga menziesii Douglas-m	40.9 L	959 Pseudotsuga menziesii Douglas-fir	
774 Pseudotsuga menziesii Douglas-fir	36.9 L	835 Fraxinus latifolia Oregon ash	20.5 M	898 Pinus ponderosa ponderosa pine	4.6 L	960 Corpus puttallii Pacific dogwood	
775 Prunus serrulata Japanese flowering cherry	20.5 S	836 Acer macrophyllum bigleaf maple	32.5	899 Pinus ponderosa ponderosa pine	3.8 L		4.7 WI
776 Pseudotsuga menziesii Douglas-fir	36.6 L	837 Pseudotsuga menziesii Douglas-fir	31.1	900 Pinus ponderosa ponderosa pine	2 L	901 Pseudotsuga menziesii Dougias-Tir	
777 Pseudotsuga menziesii Douglas-fir	46.5 L	920 Decudateura menziasii Douglas fin	27.0 L	901 Pseudotsuga menziesii Douglas-fir	39.4 L	962 Pinus ponderosa ponderosa pine	$\frac{3.9}{1}$ L $(\bar{0})$
778 Robinia pseudoacacia black locust	7.5 M	030 Pseudotsuga menziesii Douglas-Ili	37.Z L	902 Pseudotsuga menziesii Douglas-fir	37.4 L	963 Pseudotsuga menziesii Douglas-fir	33.5 L
779 Robinia pseudoacacia black locust	7.5 M	839 Pseudotsuga menziesii Douglas-fir	24.3 L	903 Pseudotsuga menziesii Douglas-fir	34.8 L	964 Pseudotsuga menziesii Douglas-fir	41.4 L
780 Pseudotsuga menziesii Douglas-fir	2.1 L	840 Pseudotsuga menziesii Douglas-fir	31.9 L	904 Pseudotsuga menziesii Douglas-fir	35 1	965 Pseudotsuga menziesii Douglas-fir	25.7 L
781 Prunus serrulata Jananese flowering chorey	14.8 5	841 Pseudotsuga menziesii Douglas-fir	34.3 L	905 Acer macrophyllum bigleaf maple	31 8 1	966 Pseudotsuga menziesii Douglas-fir	34 L   🔀
702 Decudateura manaricali Devrata fin	17.0 J	842 Pseudotsuga menziesii Douglas-fir	24.4 L		31.0 L	967 Pseudotsuga menziesii Douglas-fir	29.5 L
782 Pseudotsuga menziesii Dougias-Iir	51 L	843 Pseudotsuga menziesii Douglas-fir	44 L	906 Pseudotsuga menziesii Dougias-Iir	30.8 L	968 Pseudotsuga menziesii Douglas-fir	
783 Amelanchier spp. serviceberry	1.6 S	844 Abies grandis grand fir	12.4 L	907 Juglans nigra black walnut	41.1 L	040 Decudetauga menziesii Deuglas fir	
784 Cornus spp. dogwood	1.3 S	845 Pseudotsuga menziesii Douglas-fir	39.4	908 Chamaecyparis obtusa Hinoki falsecypress	18.2 L		55.5 L
785 Pseudotsuga menziesii Douglas-fir	38.4 L	846 Pseudotsuga menziesii Douglas-fir	20 / 1	909 Pseudotsuga menziesii Douglas-fir	22.1 L	970 Pseudotsuga menziesii Douglas-fir	38.5 L
786 Pseudotsuga menziesii Douglas-fir	45.2 L	047 Decudateura manziasii Douglas fir	27.4 L	910 Pseudotsuga menziesii Douglas-fir	42.9 L	971 Pseudotsuga menziesii Douglas-fir	27.5 L   <b>Q</b> <del>4</del>
787 Pseudotsuga menziesii Douglas-fir	34.9 L	847 Pseudotsuga menziesii Dougias-iii	37.3 L	911 Pseudotsuga menziesii Douglas-fir	3.9 L	972 Pseudotsuga menziesii Douglas-fir	29 L Q Q
788 Pseudotsuga menziesii Douglas-fir	35.1 L	848 Acer macrophyllum bigleaf maple	11.4 L	912 Pseudotsuga menziesii Douglas-fir	32.2 L	973 Pseudotsuga menziesii Douglas-fir	36 L <b>L CO</b> CO
789 Pseudotsuga menziesii Douglas-fir	35.3	849 Pseudotsuga menziesii Douglas-fir	24.9 L	913 Pseudotsuga menziesii Douglas-fir	14.7	974 Pseudotsuga menziesii Douglas-fir	33.9 L
700 Pseudotsuga menziesii Douglas fir	35.3	850 Pseudotsuga menziesii Douglas-fir	43.5 L	014 Pseudotsuga menziesii Douglas-fir	34.6	975 Pseudotsuga menziesii Douglas-fir	32.7 L 🖉
701 Decudetauge menziesii Deuglas fir	10 E	851 Pseudotsuga menziesii Douglas-fir	40 L	015 Decudateura manziasii Douglas fir	34.0 L	976 Pseudotsuga menziesii Douglas-fir	40 L IV ge
791 Pseudotsuga menziesii Douglas-Iir	19.5 L	852 Pseudotsuga menziesii Douglas-fir	39.2 L	915 Pseudotsuga menziesii Douglas-III	39.5 L	977 Acer macrophyllum bigleaf maple	
792 Pseudotsuga menziesii Douglas-fir	37.1 L	853 Pseudotsuga menziesii Douglas-fir	41.1 L	916 Pinus ponderosa ponderosa pine	2.8 L	079 Recudetcuga monziocii Deuglas fir	07
793 Pseudotsuga menziesii Douglas-fir	37.1 L	854 Ouercus palustris pin oak	199	917 Pseudotsuga menziesii Douglas-fir	26.8 L	978 Pseudotsuga menziesii Douglas-iii	7.7 L
794 Abies grandis grand fir	12.4 L	855 Pseudotsuga menziesii Douglas-fir	27 / 1	918 Pseudotsuga menziesii Douglas-fir	44.9 L	979 Pseudotsuga menziesii Douglas-Iir	32 L
795 Pseudotsuga menziesii Douglas-fir	68.6 L	955 Fiseudotsuga menziesii Douglas fir	27.4 L	919 Pseudotsuga menziesii Douglas-fir	37.3 L	980 Pseudotsuga menziesii Douglas-fir	24.6 L
796 Pseudotsuga menziesii Douglas-fir	48.1 L	856 Pseudotsuga menziesii Douglas-III	27.0 L	920 Fraxinus latifolia Oregon ash	26.4 M	981 Pseudotsuga menziesii Douglas-fir	29.3 L
797 Pseudotsuga menziesii Douglas-fir	33.4 L	857 Pseudotsuga menziesii Douglas-fir	32.6 L	921 Pseudotsuga menziesii Douglas-fir	42 L	982 Pseudotsuga menziesii Douglas-fir	29.8 L
798 Pseudotsuga menziesii Douglas-fir	34.3 L	858 Pseudotsuga menziesii Douglas-fir	39.2 L	922 Pseudotsuga menziesii Douglas-fir	22.3 L	983 Pseudotsuga menziesii Douglas-fir	26.4 L
799 Pseudotsuga menziesii Douglas-fir	46.4	859 Acer macrophyllum bigleaf maple	26.6 L	923 Pseudotsuga menziesii Douglas-fir	27.3	984 Pseudotsuga menziesii Douglas-fir	28 L
900 Decudotsuga monziosii Douglas fir	17.1	860 Pseudotsuga menziesii Douglas-fir	45.6 L	024 Acor macronhullum bigloof monto	27.5 L	985 Pseudotsuga menziesii Douglas-fir	37.7 L
	17.1 L	861 Pseudotsuga menziesii Douglas-fir	36.9 L		7.7 L	986 Pseudotsuga menziesii Douglas-fir	26.9
801 Pseudotsuga menziesii Douglas-tir	14.1 L	862 Pinus nigra Austrian black pine	15 L	925 Pseudotsuga menziesii Douglas-tir	43.8 L	997 Sorbus augunaria European mountain ash	25 \$
802 Pseudotsuga menziesii Douglas-fir	27.8 L	863 Pseudotsuga menziesii Douglas-fir	20 L	926 Quercus rubra northern red oak	56.4 L		
803 Pseudotsuga menziesii Douglas-fir	38 L	864 Pseudotsuga menziesii Douglas-fir	479	927 Acer macrophyllum bigleaf maple	24.5 L	988 Pseudotsuga menziesii Douglas-IIr	27.5 L
804 Pseudotsuga menziesii Douglas-fir	33.2 L	865 Degudatsuga monziosii Douglas fir	22 Q I	928 Pseudotsuga menziesii Douglas-fir	16.3 L	989 Quercus rubra northern red oak	43.6 L
805 Sequoia sempervirens coast redwood	41.1 L	000 reductouga menziesi Douglas-III	22.0 L	929 Pseudotsuga menziesii Douglas-fir	37.5 L	990 Pseudotsuga menziesii Douglas-fir	42.7 L
806 Acer macrophyllum bigleaf maple	6.5 L	000 Acel macrophylium biglear maple		930 Quercus garryana Oregon white oak	38.9 L	991 Pseudotsuga menziesii Douglas-fir	31.3 L
807 Pseudotsuga menziesii Douglas-fir	34 L	807 Pseudotsuga menziesii Douglas-fir	69.5 L	931 Umbellularia californica Oregon myrtle	29 L	992 Pseudotsuga menziesii Douglas-fir	21 L
808 Pseudotsuga menziesii Douglas-fir	11 l	868 Pseudotsuga menziesii Douglas-fir	38.1 L	932 Chamaecyparis obtusa Hinoki falsecypress	21.7 I	993 Fagus sylvatica European beech	11.6 L
809 Pseudotsuga menziesii Douglas fir	38.8	869 Pseudotsuga menziesii Douglas-fir	47.8 L	933 Pseudotsuga menziesii Douglas-fir	40 3 I	994 Cedrus deodara deodar cedar	35 L
010 Decudotauga monziosii Douglas-III	22 0 L	870 Pseudotsuga menziesii Douglas-fir	43.9 L	031 Decudateura manziasii Dauglas fir	₹7.5 L 22.7 I	995 Ulmus americana American elm	43.4 L
	33.9 L	871 Pseudotsuga menziesii Douglas-fir	41.5 L	234 reductouga menziesii Douglids-III	33./ L	996 Pseudotsuga menziesii Douglas-fir	31
811 Acer macrophyllum bigleaf maple	34.8 L	872 Pseudotsuga menziesii Douglas-fir	6.9 L	935 Pseudotsuga menziesii Douglas-tir	38.7 L	907 Recudetsuga menziesii Deuglas fir	24.2
812 Sequoiadendron giant sequoia	11.2 L	873 Crataegus monogyna English hawthorn, common	12.4 S	936 Pseudotsuga menziesii Douglas-fir	45.1 L	997 Pseudotsuga menziesii Douglas-iii	34.2 L
	0/ 7	874 Pseudotsuga menziesii Douglas-fir	31.1 1	937 Pseudotsuga menziesii Douglas-fir	36.3 L	998 Pseudotsuga menziesii Douglas-fir	21 L
813 Pseudotsuga menziesii Douglas-fir	36.7 L	975 Decudateura manziasii Douglas fin	22.0 1	938 Pseudotsuga menziesii Douglas-fir	5.1 L	999 Pseudotsuga menziesii Douglas-fir	33.4 L
814 Pseudotsuga menziesii Douglas-fir	45.2 L	070 Pseudotsuga menziesii Douglas-IIr	32.0 L	939 Pseudotsuga menziesii Douglas-fir	33.5 L	1000 Pseudotsuga menziesii Douglas-fir	27.8 L
815 Pseudotsuga menziesii Douglas-fir	15.5 L	876 Pseudotsuga menziesii Douglas-fir	40.7 L	940 Acer macrophyllum bigleaf maple	6 L	1001 Prunus avium bird cherry	Date *Approved*
816 Pseudotsuga menziesii Douglas-fir	40.5 L	877 Pseudotsuga menziesii Douglas-fir	33.5 L	941 Fraxinus latifolia Oregon ash	16.8 M	1002 Juglans nigra black walnut	City of Portland
817 Pseudotsuga menziesii Douglas-fir	8.1 L	878 Crataegus monogyna English hawthorn, common	30 S	942 Pseudotsuga menziesii Douglas-fir	34.5 1	1003 Pseudotsuga menziesii Douglas-fir	Bureau of Development Services
818 Pseudotsuga menziesii Douglas-fir	24.6 l	879 Pseudotsuga menziesii Douglas-fir	32.8 L	042 Fravinus latifalia Oracee est	J4.J L	1004 Tsuga heterophylla western hemlo	Planner
819 Acer rubrum red manle	4.1 M	880 Pseudotsuga menziesii Douglas-fir	43.3 L	943 Fraxinus latifolia Uregon ash	10.8 M	1005 Sorbus aucuparia European mou	1-25-2024
820 Pseudotsuga monziosii Douglos fir	167 I	881 Pseudotsuga menziesii Douglas-fir	43.5 L	944 Pseudotsuga menziesii Douglas-fir	28 L	1006 Cornus nuttallii Desifia dogwoo	pproval applies only to the reviews requested and is subject to all
	40./ L	882 Pseudotsuga menziesii Douglas-fir	33.3	945 Quercus garryana Oregon white oak	0.3 L	1007 Contrastinum Facilità Contrastina de la con	autions of approval. Additional zoning requirements may apply.
×∠1 Pseudotsuga menziesii Douglas-fir	36.3 L	883 Decudateura manziasii Daurias fir	30.2			1007 Fraxinus latifolia Uregon ash	39.4 M
		000 i seudoisuya menziesii Duuyids-III	30.3 L			1008 common horsechestnut	33.2 L
						LU 23-08854	9 HK DM, EXMIDITE (129) PPM PPM Land Use_App Jan di Se App

TreeNo	Genus species	Common Name	DBH	Size	TreeNo	Genus species	Common Name
1009	Aesculus	common horsechestnut	25.5	L	1048	Pseudotsuga menziesii	Douglas-fir
	hippocastanum				1049	Juglans nigra	black walnut
1010	Celtis occidentalis	common hackberry	17	M	1050	Aesculus	common horsechestnut
1011	Amelanchier spp.	serviceberry	2.1	S		hippocastanum	
1012	Prunus cerasifera	flowering plum	16.2	S	1051	Pseudotsuga menziesii	Douglas-fir
1013	Juglans nigra	black walnut	45.3	L	1052	Pseudotsuga menziesii	Douglas-fir
1014	Quercus garryana	Oregon white oak	0.3	L	1053	Pseudotsuga menziesii	Douglas-fir
1015	Quercus garryana	Oregon white oak	0.3	L	1054	Pseudotsuga menziesii	Douglas-fir
1016	Platanus x acerifolia	London plane tree	16.6	L	1055	Pseudotsuga menziesii	Douglas-fir
1017	Amelanchier spp.	serviceberry	1.3	S	1056	Ilex aquifolium	English holly
1018	Pseudotsuga menziesii	Douglas-fir	25.8	L	1057	Pseudotsuga menziesii	Douglas-fir
1019	Juglans nigra	black walnut	45.7	L	1058	Acer macrophyllum	bigleaf maple
1020	Aesculus	common horsechestnut	20.5	L	1059	Acer circinatum	vine maple
1001	nippocastanum	Davida d'a	22.2		1060	Pseudotsuga menziesii	Douglas-fir
1021	Pseudotsuga menziesii	Douglas-fir	33.3	L	1061	Pseudotsuga menziesii	Douglas-fir
1022	Aesculus	common norsecnestnut	21.8	L	1062	Acer platanoides	Norway maple
1023	Pseudotsuga menziesii	Douglas-fir	30.8	I	1063	Fagus grandifolia	American beech
1024	Pseudotsuga menziesii	Douglas-fir	25.4		1064	Quercus rubra	northern red oak
1024	Pseudotsuga menziesii	Douglas-fir	38	L	1065	Prunus serrulata	Japanese flowering cherry
1025	Pseudotsuga menziesii	Douglas-fir	25	L	1066	Aesculus	common horsechestnut
1020		common horsechestnut	18.1	L	40/7	hippocastanum	
1027	hippocastanum	common norsechestnut	10.1	L	1067	Pseudotsuga menziesii	Douglas-fir
1028	Aesculus	common horsechestnut	21.6	L	1068	Pseudotsuga menziesii	Douglas-fir
	hippocastanum				1069	Pseudotsuga menziesii	Douglas-fir
1029	Pseudotsuga menziesii	Douglas-fir	33.9	L	1070	Pseudotsuga menziesii	Douglas-fir
1030	Acer macrophyllum	bigleaf maple	3.4	L	1071	Aesculus	common horsechestnut
1031	Pseudotsuga menziesii	Douglas-fir	29.3	L	1072	Pseudotsuga menziesii	Douglas-fir
1032	Pseudotsuga menziesii	Douglas-fir	31.7	L	1072	Pseudotsuga menziesii	Douglas-fir
1033	Pseudotsuga menziesii	Douglas-fir	16	L	1073	Metaseguloja	dawn redwood
1034	Pseudotsuga menziesii	Douglas-fir	33.8	L	1074	glyptostroboides	dawnredwood
1035	Pseudotsuga menziesii	Douglas-fir	27.2	L	1075	Prunus cerasifera	flowering plum
1036	Pseudotsuga menziesii	Douglas-fir	25.5	L	1076	Pseudotsuga menziesii	Douglas-fir
1037	Pseudotsuga menziesii	Douglas-fir	28.1	L	1077	Pseudotsuga menziesii	Douglas-fir
1038	Thuja plicata	western redcedar	5	L	1078	Pseudotsuga menziesii	Douglas-fir
1039	Crataegus monogyna	English hawthorn, common	17	S	1079	Pseudotsuga menziesii	Douglas-fir
1040	Liquidambar styraciflua	sweetgum	34.6	Μ	1080	Prunus cerasifera	flowering plum
1041	Thuja plicata	western redcedar	12.5	L	1081	Prunus cerasifera	flowering plum
1042	Thuja plicata	western redcedar	11.7	L	1082	Crataegus monogyna	English hawthorn, common
1043	Quercus garryana	Oregon white oak	0.3	L	1083	Pseudotsuga menziesii	Douglas-fir
1044	Quercus rubra	northern red oak	42.9	L	1084	Crataegus monogyna	English hawthorn, common
1045	Prunus serrulata	Japanese flowering cherry	9.3	S	1085	Amelanchier spp.	serviceberry
1046	Platanus x acerifolia	London plane tree	18.9	L	1086	Amelanchier spp.	serviceberry
1047	Pseudotsuga menziesii	Douglas-fir	33.5	L			2

TreeNo	Genus species	Comn
1087	Pseudotsuga menziesii	Dougla
1088	Thuja plicata	wester
1089	Prunus serrulata	Japane
1090	Prunus serrulata	Japane
1091	Pseudotsuga menziesii	Dougla
1092	Juglans nigra	black \
1093	Aesculus hippocastanum	comm
1094	Pseudotsuga menziesii	Dougla
1095	Pseudotsuga menziesii	Dougla
1096	Pseudotsuga menziesii	Dougla
1097	Pseudotsuga menziesii	Dougla
1098	Pseudotsuga menziesii	Dougla
1099	Pseudotsuga menziesii	Dougla
1100	Pseudotsuga menziesii	Dougla
1101	Pinus sylvestris	Scots
1102	Pseudotsuga menziesii	Dougla
1103	Pseudotsuga menziesii	Dougla
1104	Pseudotsuga menziesii	Dougla
1105	Pseudotsuga menziesii	Dougla
1106	Pseudotsuga menziesii	Dougla
1107	Pseudotsuga menziesii	Dougla
1108	Pseudotsuga menziesii	Dougla
1109	Pseudotsuga menziesii	Dougla
1110	Acer negundo	box el
1111	Acer macrophyllum	bigleat
1112	Pseudotsuga menziesii	Dougla
1113	Acer macrophyllum	bigleat
1114	Chamaecyparis Iawsoniana	Port O
1115	Acer macrophyllum	bigleat
1116	Acer macrophyllum	bigleat
1117	Acer macrophyllum	bigleat
1118	Acer macrophyllum	bigleat
1119	Acer macrophyllum	bigleat
1120	Acer macrophyllum	bigleat
1121	Acer macrophyllum	bigleat
1122	Acer macrophyllum	bigleat
1123	Acer macrophyllum	bigleat

DBH Size

L

L

L

L

L

L

34.6

32.3

28.6

29

37.8

22.9

41.5 L

28.7 L

56.1 L

43.4 L

11.4 M

6.3 S

28.3 L

36.5 L

21.7 M

24.9 L

28.5 L

28.3 L

39.4 L

31.2 L

24.7 L

27.2 L

29.5 L

26.1 L

16.4 L

10.5 S

32.9 L

21.2 L

43.5 L

39.1 L

10.3 S

20.3 S

2.2 S

S

L 19.8 S

S

1.5

45.3

1.6

29

S

L

9.5

nmon Name	DBH	Size	
gias-tir	15	L	
tern redcedar	11.3	L	
anese flowering cherry	10.4	S	
anese flowering cherry	11.2	S	
glas-fir	25.5	L	
k walnut	36.8	L	
mon horsechestnut	22.7	L	
glas-fir	32.8	L	tt
glas-fir	20.5	L	
glas-fir	24.8	L	$>$
glas-fir	33.5	L	
glas-fir	27.8	L	
glas-fir	26.7	L	
glas-fir	36.9	L	L. U.
s pine	7.8	L	<del> -</del>
alas-fir	38.5	L	
glas-fir	28.2	L	ar
alas-fir	46.4	-	lä
alas-fir	37.3	-	
alas-fir	10.3	1	
alas-fir	27.8	1	
alas-fir	27.0	1	
glas-fir	38.3		
oldor	0 2		Tat
	0.5		
	22.3		
yids-III	24		
	21.9	L	
Orford cedar	25.7	L	
eaf maple	22.5	L	
eaf maple	28.1	L	
eaf maple	11.7	L	
eaf maple	12.6	L	
eaf maple	15.2	L	
eaf maple	36	L	
eaf maple	22.5	L	
eaf maple	13.4	L	
eaf maple	21.4	L	
	Date	*Approved	d* _
	E Planner	City of Portla Bureau of Developm	and ent Services
* This col	approval applienditions of appro	s only to the reviews	s requested and is subject to all ing requirements may apply.





Ö Exhibit 23-088549 HR DM,



Exhibit ( 23-088549 HR DM,









City of Portland, Oregon Bureau of Development Services Land Use Services

Carmen Rubio, Commissioner Rebecca Esau, Director Phone: (503) 823-7300 TTY: 711 www.portland.gov/bds

Date: December 15, 2023

From: Arthur Graves, Land Use Services 503.865.6517 | Arthur.Graves@portlandoregon.gov

#### **REQUEST FOR RESPONSE**

#### Case File: Pre App:

#### LU 23-088549 HR DM PC # 23-047200

This notice is being sent to all service and technical review agencies for their input on the proposal described below. Neighborhood Associations also receive this advance notice via email. <u>Your timely response, as indicated below, will help the assigned planner determine if</u> <u>applicable approval criteria can be met, or what conditions might be required</u>.

- > The approval criteria are listed below. Although we are interested in any comments you may have, please consider your response in terms of these criteria.
- All agencies are encouraged to use this as an opportunity to inform the applicant of any additional requirements that may be imposed by your agency during building permit phase
   – especially those that would significantly affect the proposal.
- Please note in your response which requirements are specifically associated with the applicable land use review approval criteria, and which requirements you have the independent authority to impose at time of building permits.
- Neighborhood Associations are encouraged to submit comments by the deadline noted below. To comment, you may write to Arthur Graves at 1900 SW Fourth Ave., Suite 4500, Portland, OR 97201. You can also e-mail your comments to me at my e-mail address identified above. After the staff report is published, please submit your comments to the Landmarks Commission at 1900 SW Fourth Ave., Suite 4500, Portland, OR 97201 and fax them to 503.823.5630.

The Bureau of Development Services recommendation will be published ten days before the scheduled hearing date. You will also receive a Notice of Public Hearing for this proposal, with hearing date and time confirmed, mailed twenty days prior to the hearing.

- Please send your response to BDS no later than: January 05, 2024 21 days after the date of this RFR (If I receive comments after this date, I may not have enough time to include them in the staff report).
- > We must publish our report by: January 12, 2024.
- A public hearing before the Landmarks Commission is tentatively scheduled for January 22, 2024

Applicant:	Brett Horner   Portland Parks & Recreation 1210 SW 5th Ave Suite 800   Portland OR 97204 971.409.3518   <u>Brett.Horner@Portlandoregon.gov</u>
Owner:	City Of Portland 1900 SW 4th Ave Ste 7007   Portland, OR 97201-5380
Site Address:	6325 SE DIVISION ST
Legal Description: Tax Account No.: State ID No.: Quarter Section: Neighborhood: Business District: District Coalition: Plan District: Other Descignations:	TL 100 190.32 ACRES, SECTION 05 1S 2E R992050130 1S2E05 00100 3136,3137,3236,3237 Mt. Tabor, contact at contact.MTNA@gmail.com NONE Southeast Uplift, contact at operations@seuplift.org NONE Mount Tabor Barks Historia District, Mount Tabor Bark Baserusian
Case Type: Procedure:	Historic District Historic District OSc, s: Open Space base zone (33.100 Multi-Dwelling Zone) and Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480) HR DM: Historic Resource Review, Demolition Review Type III, with a public hearing before the Landmarks Commission. The decision of the Landmarks Commission can be appealed to City Council.

#### **Proposal:**

Type III Historic Resource Review for the replacement of 88 light poles: 84 within Mt Tabor Park and 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. Replacement poles will be installed in approximately the same location as the current poles.

Historic Resource Review is required because the proposal is for non-exempt development within a historic overlay zone, per Section 33.846.

#### **Approval Criteria:**

In order to be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The applicable approval criteria are:

- *Light Demolition: The four criteria listed under 33.846.080.C*
- Light Installation: 33.846.060.G. Other Approval Criteria

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was filed, provided that the application is complete at the time of filing, or complete within 180 days. This application was filed on September 28, 2023 and determined to be complete on December 07, 2023.

Enclosures: Zoning Map, Site Plan, Details



For Zoning Code in Effect Post October 1, 2022

ZONING 🖗

THIS SITE LIES WITHIN THE: MOUNT TABOR PARK HISTORIC DIST

- Site
- Also Owned Parcels
- Historic District
- $\triangle$  Historic Landmark

File No.	LU 23 - 088549 HR DM		
1/4 Section	3136-37,3236-37		
Scale	1 inch =800 feet		
State ID	1S2E05 100		
Exhibit	B Sep 28, 2023		
LU 23-088549	HR DM, Exhibit D.1		

Light pole locations with Conservation and Scenic Overlays



LU 23-088549 HR DM

Light poles and fixture schematics



LU 23-088549 HR DM



LU 23-088549 HR DM



City of Portland, Oregon Bureau of Development Services Land Use Services

Carmen Rubio, Commissioner Rebecca Esau, Director Phone: (503) 823-7310 TTY: (503) 823-6868 www.portland.gov/bds

Date: December 13, 2023

- To: Portland Parks & Recreation | Brett Horner PORTLAND PARKS & RECREATION 1210 SW 5th Ave Suite 800 | Portland OR 97204 971.409.3518 | Brett.Horner@Portlandoregon.gov
- From: Arthur Graves | BDS Planner 503-865-6517 | Arthur.Graves@portlandoregon.gov
- RE: LU 23-088549 HR DM

Dear Applicant:

I have received your application for a Historic Resource Review DM at 6325 SE DIVISION ST. Your application was deemed complete on December 07, 2023 and the hearing is scheduled for **January 22, 2024**.

The Zoning Code requires you to post notice on the site of your proposal at least 30 days before the hearing. The information below will help you do this. **It is recommended that you work with a sign manufacturer to prepare the posting board**. I am enclosing a digital copy of the posting board, a copy of the notice that must be placed on the posting boards, and instructions for printing and installation.

- A. Because the hearing for your case is scheduled for **January 22, 2024**, you must post the notice by December 23, 2023, 30 days before the hearing.
- B. A certification statement is enclosed, which you must sign and return. The statement affirms that you posted the site. It also confirms your understanding that if you do not post the notice by the date above, your hearing will be automatically postponed. In addition, time limits on our processing of your case will be waived. You must return this statement to us by January 08, 2024, 14 days before the hearing.
- C. Your site has multiple frontages. There must be at least one sign every 600 feet along the entirety of the Mt Tabor frontages.
- D. These signs must be placed within 10 feet of the street frontage line and must be visible to pedestrians and motorists. You may <u>not</u> post in the public right-of-way.
- E. You should not remove the notice before the hearing, but it must be taken down within two weeks after the final decision is made on your request.
- Encl: Posting Notice Statement Certifying Posting
- cc: Application Case File

Portland Parks & Recreation | Brett Horner PORTLAND PARKS & RECREATION 1210 SW 5th Ave Suite 800 | Portland OR 97204 971.409.3518 | Brett.Horner@Portlandoregon.gov

DATE: \_\_\_\_\_

TO: Arthur Graves Arthur.Graves@portlandoregon.gov Bureau of Development Services 1900 SW Fourth Ave., Suite 5000 Portland, OR 97201

#### **APPLICANT'S STATEMENT CERTIFYING POSTING**

#### Case File LU 23-088549

This certifies that I have posted notice on my site as required by the Zoning Code. I understand that the hearing is scheduled for January 22, 2024, and that I was required to post the property at least 30 days before the hearing.

The required number of poster boards, with the notices attached, were set up on \_\_\_\_\_(date). These were placed within 10 feet of the street frontage line so that they were visible to pedestrians and motorists.

I understand that this form must be returned to the Bureau of Development Services no later than January 08, 2024, 14 days before the scheduled hearing. I also understand that if I do not post the notices by 30 days before the hearing, or return this form by 14 days before the hearing, my hearing will automatically be postponed. I also understand this will result in a waiver of the time limits for processing my case.

In addition, I understand that I may not remove the notices before the hearing, but am required to remove them within two weeks of the final decision on my request.

Signature

Print Name

Address

City/State/Zip Code

# **Type III Land Use Review**

# Mt. Tabor Removal and Replacement of 88 Light Poles

CASE FILE	LU 23-088549 HR DM (EA 23-047200 PC)
WHEN	<b>MONDAY, January 22, 2024 @ 1:30 PM</b> (not time certain) (This is the hearing start time –see Commission agenda for estimated project start time.)
WHERE	ONLINE: Link to hearing is available at https://www.portland.gov/bds/landmarks
HOW	TO TESTIFY: Follow instructions on the Historic Landmarks Commission agenda <u>or</u> email the planner at Grace.Jeffreys@portlandoregon.gov
<b>REVIEW BY</b>	HISTORIC LANDMARKS COMMISSION
LAND USE REVIEW TYPE	HISTORIC RESOURCE REVIEW and DEMOLITION REVIEW
PROPOSAL	Type III Historic Resource Review and Demolition Review for the replacement of 88 light poles: 84 within Mt Tabor Park and 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. Replacement poles will be installed in approximately the same location as the current poles.
REVIEW APPROVAL CRITERIA	<ul> <li>Light Installation: Portland Zoning Code Section 33.846.060.G. Other Approval Criteria</li> <li>Light Demolition: Portland Zoning Code Section 33.846.080.C.4</li> </ul>
SITE ADDRESS	Mt Tabor Park: 6325 SE DIVISION ST
ZONING/ DESIGNATION	OSc, s: Open Space base zone (33.100 Multi-Dwelling Zone) and Historic Resource Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
FURTHER INFO	Available online at <b>www.portlandoregon.gov/bds/dcagenda</b> or contact the planner listed below at the Bureau of Development Services.
QUESTIONS? BDS CONTACT	Grace Jeffreys, City Planner 503.865.6521 / Grace.Jeffreys@PortlandOregon.gov Bureau of Development Services, 1900 SW 4 <sup>th</sup> Ave, Suite 5000, Portland, OR 97201

Traducción e interpretación | Chuyển Ngữ hoặc Phiên Dịch | 翻译或传译 | Turjumida ama Fasiraadda | 翻訳または通訳 | ภามตะบิบาย Письменныйили устный перевод | Traducere sau Interpretare | 번역및통역 | الترجمة التحريرية أو الشفوية | Письменныйили

**C** 503-823-7300 **O** BDS@PortlandOregon.gov **D** www.PortlandOregon.gov/bds/translated TTY: 503-823-6868 Relay Service: 711



## City of Portland, Oregon Bureau of Development Services

Carmen Rubio, Commissioner David Kuhnhausen, Interim Director Phone: (503) 823-7300 TTY: 711 www.portland.gov/bds

FROM CONCEPT TO CONSTRUCTION

**Date:** January 2, 2024

To: Interested Person

From: Grace Jeffreys, Land Use Services 503-865-6521 / Grace.Jeffreys@portlandoregon.gov

#### **NOTICE OF A PUBLIC HEARING ON A PROPOSAL IN YOUR NEIGHBORHOOD**

CASE FILE:	LU 23-088549 HR DM - Mt Tabor Lights
	PC # 23-047200

REVIEW BY:Landmarks CommissionWHEN:January 23, 2024, 1:30pm

# <u>This land use hearing will be limited to remote participation via Zoom</u>. Please refer to the instructions included with this notice to observe and participate remotely (online or by phone).

Remote Access: Historic Landmarks Commission Agenda https://www.portland.gov/bds/landmarks

The development proposal, review process, and information on how to respond to this notice are described below. A copy of the site plan and zoning map are attached. I am the staff person handling the case. Please contact me if you have questions regarding this proposal. Please contact the applicant if you have questions regarding any future development on the site.

Applicant:	Brett Horner, Portland Parks & Recreation 1210 SW 5th Ave Suite 800, Portland OR 97204 971.409.3518   <u>Brett.Horner@Portlandoregon.gov</u>
Owner:	City of Portland 1900 SW 4th Ave Suite 7007, Portland, OR 97201-5380
Site Address:	6325 SE DIVISION ST
Legal Description: Tax Account No.: State ID No.: Quarter Section:	TL 100 190.32 ACRES, SECTION 05 1S 2E R992050130 1S2E05 00100 3136,3137,3236,3237
Neighborhood: Business District: District Coalition:	Mt. Tabor, contact at <u>contact.MTNA@gmail.com</u> NONE Southeast Uplift, contact at <u>operations@seuplift.org</u>
Plan District: Other Designations:	NONE Mount Tabor Parks Historic District, Mount Tabor Park Reservoirs Historic District

Zoning:	OSc,s: Open Space base zone (33.100 Multi-Dwelling Zone) and Historic Resource Protection Overlay Zone (33.445), Environmental Protection Overlay Zone (33.430), Scenic Resource Zone (33.480)
Case Type:	HR DM: Historic Resource Review, Demolition Review
Procedure:	Type III, with a public hearing before the Landmarks Commission. The decision of the Landmarks Commission can be appealed to City Council.

#### **Proposal:**

Type III Historic Resource Review for the replacement of 88 light poles: 84 within Mt Tabor Park and 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. Replacement poles will be installed in approximately the same location as the current poles.

Historic Resource Review is required because the proposal is for non-exempt development within a historic overlay zone, per Section 33.846.

**Relevant Approval Criteria:** In order to be approved, this proposal must comply with the criteria of Title 33. The relevant criteria are:

- Light Demolition: The four criteria listed under 33.846.080.C
- Light Installation: 33.846.060.G. Other Approval Criteria

The Portland Zoning Code is available online at <u>https://www.portland.gov/code/33</u>.

Zoning Code Section 33.700.080 states that land use review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. This application was submitted on September 28, 2023 and determined to be complete on December 7, 2023.

**Decision Making Process:** The Bureau of Development Services will make a recommendation on this proposal; our report and recommendation will be available 10 days before the hearing. The staff report will be posted on the Bureau of Development Services website at <a href="https://www.portland.gov/bds/zoning-land-use/public-notices">https://www.portland.gov/bds/zoning-land-use/public-notices</a>. Land use review notices are listed on the website by the District Coalition in which the site is located; the District Coalition for this site is identified at the beginning of this notice. If you are interested in viewing the file, please contact the planner listed on the front of this notice. The planner can provide information over the phone or via email. Only digital copies of the material in the file are available for viewing.

**We are seeking your comments on this proposal**. To comment, you may write or testify at the remote hearing. Please refer to the file number when seeking information or submitting testimony. In your comments, you must address the approval criteria as stated in the administrative report and decision which you previously received. Please note that all correspondence and testimony received will become part of the public record.

Written comments must be received by the close of the record and should include the case file number. Any new written testimony should be emailed to Grace Jeffreys at Grace.Jeffreys@portlandoregon.gov.

**Please note regarding USPS mail:** If you choose to mail written testimony via USPS, testimony must be received before the close of the record. Therefore, please mail testimony well in advance of the hearing date.

Thank you for any information you can provide regarding this case.

If you plan to testify at the hearing, please refer to instructions included with this notice.

ORS 227.178 states the City must issue a final decision on land use review applications within 120 days of the application being deemed complete. The 120-day review period may be extended at the request of the applicant.

**Appeal Process:** You can appeal the decision of the Landmarks Commission to the City Council. If appealed, City Council will hold an evidentiary hearing. New evidence can be submitted to the City Council in the event of an appeal of an evidentiary hearing.

A fee is charged for appeals. Recognized neighborhood associations may qualify for an appeal fee waiver. The City Council's decision may be appealed to the Oregon Land Use Board of Appeals (LUBA).

Failure to raise an issue in person or in writing by the close of the record at or following the final evidentiary hearing on this case may preclude an appeal to LUBA on that issue. If you do not provide enough detailed information to the Landmarks Commission, they may not be able to respond to the issue you are trying to raise. In such a situation an appeal to LUBA based on that issue may not be allowed.

#### **Hearing Cancellation:**

This public hearing may be canceled due to inclement weather or other emergency. Please see the agenda for the scheduled date under "Events" on the Commission webpage <a href="https://www.portland.gov/bds/landmarks">https://www.portland.gov/bds/landmarks</a> for information regarding cancellations or rescheduling. You may also contact the planner listed on this Notice. If canceled, the hearing will be rescheduled for the earliest possible date. A renotification notice will not be sent.

# The Bureau of Development Services is committed to providing equal access to information and hearings. To request an accommodation or alternative format of communication, please contact us at least five business days prior to the hearing at 503-823-7300 (TTY 503-823-6868).

**Enclosures:** Zoning Map Site Plan Lighting Plans Land Use Hearing Participation Information



For Zoning Code in Effect Post October 1, 2022



THIS SITE LIES WITHIN THE: MOUNT TABOR PARK HISTORIC DIST

Site
Also Owned Parcels
Historic District
Alsoric Landmark

File No.	LU 23 - 08	<u>88549 HR DM</u>
/4 Section	3136-37,3	3236-37
Scale	1 inch =8	00 feet
State ID	1S2E05	100
Exhibit	BS	Sep 28, 2023


Light pole locations with Conservation and Scenic Overlays

LU 23-088549 HR DM

LU 23-088549 HR DM, Exhibit D.5



#### Light poles and fixture schematics



# Observing or Testifying at the Portland Design Commission, Historic Landmarks Commission, or Adjustment Committee Webinar Hearings

Thank you for your interest in attending a land use public hearing. All hearings are currently held virtually, via Zoom. The information below will help you get connected.

\*\*\*If you do not have access to the internet from a home computer or mobile phone, please see the end of this document for instructions on how to participate from a City building at 1900 SW 4<sup>th</sup> Avenue in downtown Portland.

#### Preparing for the Hearing:

- 1. To access the Zoom Webinar, please go to the online hearing Agenda, and click the link under the hearing date you are interested in participating: <u>https://www.portlandoregon.gov/bds/42441</u>
- 2. In advance of the hearing, please review documents and drawings in the project link within the Online Agenda.
  - Please also provide comments to the planner assigned in advance of the hearing.

#### Getting into the Hearing [Registering in Zoom to observe or participate in Hearing]:

- 1. In order to observe or testify in the hearing, please be sure to Register for the Webinar as soon as possible.
  - The Webinar Link is posted to the Online Agenda typically one week prior to the hearing date.
- 2. Once you register you will receive an email notification of how to log-in or access the Webinar.
- 3. You can enter the Webinar no sooner than ten minutes before the start of the hearing.
- 4. You will be held in the Zoom waiting room until the Webinar begins. (Please note each individual agenda item has an <u>estimated</u> start time.)
- 5. If using a smartphone or tablet, download the Zoom app for easy entry into the Webinar.

#### Public participation in the Hearing:

- 1. After Staff and Applicant presentations, the Chair will announce public testimony is open, and will ask if anyone else would like to testify.
- 2. You can provide public comment in this Webinar in several ways:
  - If during registration you indicated you would like to testify, we will put your name in order of request. Once in the hearing, testifiers will be renamed "Testifier 1 – (Your Name)"
  - Members of the public will be automatically muted except for when they are called by the Hearings Clerk for their public comment. During the Webinar, the Hearings Clerk will promote participants to "Panelists" in the order of Webinar Registrations received. When it is your turn to provide testimony, please accept the Clerk's invitation to be promoted to Panelist.
  - If you indicated in your registration that you did not want to testify but later changed your mind, when testimony is open:
    - Click the "raise your hand" function in ZOOM, and the Hearings Clerk will add you to the list of testifiers.
    - If you will be participating by call-in, raise your hand by pressing \*9 the Webinar host will see this notification.
  - When you are moved to Panelist position for your testimony, your name will be announced by the Chair or Hearings Clerk. Please be prepared to provide testimony.
  - Each testifier is allotted 2 minutes of testimony unless the Chair grants additional time.
  - Please manage your time when testifying. As a courtesy to other testifiers and our volunteer Commissions, please do not attempt to exceed the allotted amount of time.
- 3. We will enable screen sharing of presentations only for Design and Landmarks Commission members, project teams, and staff participating in the Webinar.
- 4. Testifiers who engage in inappropriate behavior or language will be promptly removed from the hearing.

#### Follow-up:

1. The Webinar will be recorded and uploaded to the City of Portland Auditors website, under the Case File Number, here: <u>https://efiles.portlandoregon.gov/Search</u>.

\*\*\*If you do not have access to the internet from a home computer or mobile phone, we can provide accommodations for you to view a live video display of the hearing from 1900 SW 4<sup>th</sup> Avenue in downtown Portland. This option for participation requires you to travel to a City building where we will provide a computer for viewing the hearing. City staff will not be present at this viewing location. If you require such accommodation, please contact the BDS Hearings Clerk at 503-865-6525 before 8 AM on the day of the hearing.\*\*\*

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1 ENDORSEMENT INFOI	INFO2	NAME	ADDRESS/IO ADDRESS	CITYSTATEZIP/ADDRESSEE
1 ENDORCEMENT INFOT	102E0EDD 16000	WIDCHED WILLIAM & WIDCHED LINDCEY	7102 CE VAMUILI CE	DODELAND OD 07315
2 REFURN SERVICE REQUESTED	102E05AB 10400	WORSTER WILLIAM & WORSTER LINDSET	7014 CE VAMUILI CE	PORTLAND OR 97215
A DEFUNIT ADDITION DEVICE REQUESTED	132E03AB 19400	MUTAL DEBRA K	7214 SE TAMATEL ST	PORTLAND OR 97215-2274
4 RETURN SERVICE REQUESTED	ISZEUSAB 19500	SUSAN JEAN ROACH TR & ROACH THOMAS	/204 SE YAMHILL ST	PORTLAND OR 97215
5 RETURN SERVICE REQUESTED	1S2E05AB 19600	SHERIDAN STACIE	/148 SE YAMHILL ST	PORTLAND OR 97215
6 RETURN SERVICE REQUESTED	1S2E05AB 19601	MCKINNON FRANK V	2345 NW WILSON ST	PORTLAND OR 97210-2319
7 RETURN SERVICE REQUESTED	1S2E05AB 19700	HEADLEY ALICE C & PIRKLE EMILY L	7138 SE YAMHILL ST	PORTLAND OR 97215
8 RETURN SERVICE REQUESTED	1S2E05AB 19800	GARNER LINDSEY & GARNER SAMSON	7124 SE YAMHILL ST	PORTLAND OR 97215-2272
9 RETURN SERVICE REQUESTED	1S2E05AB 19900	CANADAY CHARITY	7110 SE YAMHILL ST	PORTLAND OR 97215-2272
10 RETURN SERVICE REQUESTED	1S2E05AB 20000	STUART FRED TR & STUART CONNIE TR	1010 SE 71ST AVE	PORTLAND OR 97215-2203
11 RETURN SERVICE REQUESTED	1S2E05AB 20100	KALBERG MICHAEL & KALBERG PAMELA	1022 SE 71ST AVE	PORTLAND OR 97215-2203
12 RETURN SERVICE REQUESTED	1S2E05AB 20200	WITTBOCK JOHN T	1034 SE 71ST AVE	PORTLAND OR 97215
13 RETURN SERVICE REQUESTED	192E05AB 20300	THOMPSON GARY & THOMPSON LAURTE	7109 SE TAVLOR ST	PORTLAND OR 97215-2259
14 DEWILDN CEDUICE DECIDESTED	19220578 20400	FUEDSTENAL DENNITS A	7125 SE TAVIOR ST	POPTIAND OF 97215-2259
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16 NETONA SERVICE REQUESTED	102E05AD 20500	SHOE HINDA M	7155 SE TRIBOR ST	PORTLAND OR 97215 2255
10 RETURN SERVICE REQUESTED	152E05AB 20700	LEIGHTON JEFFREI & SHERVEI JULIE	/215 SE TAILOR ST	PORTLAND OR 97215
17 RETURN SERVICE REQUESTED	152E05AB 20800	BAUER BRIAN D & LUPACH LAURA C	/22/ SE TAILOR ST	PORTLAND OR 97215
18 RETURN SERVICE REQUESTED	1S2E05AB 21000	HUGO RICHARD & CARLSON JENNIFER	7239 SE TAYLOR ST	PORTLAND OR 97215-2260
19 RETURN SERVICE REQUESTED	1S2E05AC 12300	HARE VIRGINIA A	7236 SE TAYLOR ST	PORTLAND OR 97215-2261
20 RETURN SERVICE REQUESTED	1S2E05AC 12400	SHUE ROBIN L	7224 SE TAYLOR ST	PORTLAND OR 97215
21 RETURN SERVICE REQUESTED	1S2E05AC 12500	COLE TONY TR & COLE MIKIKO TR	7214 SE TAYLOR ST	PORTLAND OR 97215
22 RETURN SERVICE REQUESTED	1S2E05AC 12600	JONES JENNIFER A	7204 SE TAYLOR ST	PORTLAND OR 97215
23 RETURN SERVICE REQUESTED	1S2E05AC 12700	VEDANTA SOCIETY	7207 SE SALMON ST	PORTLAND OR 97215-2957
24 RETURN SERVICE REQUESTED	1S2E05AC 12800	DUNN ZACHARY J & DUNN JULIA C	7215 SE SALMON ST	PORTLAND OR 97215
25 RETURN SERVICE REQUESTED	1S2E05AC 12900	STAUDINGER MICHAEL & KATHLEEN	7225 SE SALMON ST	PORTLAND OR 97215
26 RETURN SERVICE REQUESTED 1S2E05AC 13000	CRAIG D CLINTON &	BARBARA ELISABETH BURDON TR	7235 SE SALMON ST	PORTLAND OR 97215
27 RETURN SERVICE REQUESTED	1S2E05AC 13600	VAN DRIESCHE KELLY J	7226 SE SALMON ST	PORTLAND OR 97215
28 RETURN SERVICE REQUESTED	1S2E05AC 13700	LIPKIND DAVID I	7216 SE SALMON ST	PORTLAND OR 97215-2958
29 RETURN SERVICE REQUESTED	1S2E05AC 13800	HENNRICH MARY L	7206 SE SALMON ST	PORTLAND OR 97215
30 RETURN SERVICE REQUESTED	1S2E05AC 13900	SCHLOE ROGER TR & SCHLOE MARGRET TR	1226 SE 72ND AVE	PORTLAND OR 97215-2901
31 RETURN SERVICE REQUESTED	1S2E05AC 14000	BERTHA GUPTILL REV LIV TR	7217 SE MAIN ST	PORTLAND OR 97215
32 RETURN SERVICE REQUESTED	1S2E05AC 14100	H & HBO TR	7225 SE MAIN ST	PORTLAND OR 97215-2949
33 RETURN SERVICE REQUESTED	1S2E05AC 14200	KUBERNICK SAMUEL & CHILDS MARISHA	7233 SE MAIN ST	PORTLAND OR 97215
34 RETURN SERVICE REQUESTED 1S2E05AC 14700	STAMBAUGH CHRISTOPHER J &	POMERANZ ANNE E	7234 SE MAIN ST	PORTLAND OR 97215
35 RETURN SERVICE REQUESTED	19280550 14800	GROVE STEPHEN & CORNETT KATHLEEN	7206 SE MAIN ST	PORTLAND OR 97215-2950
36 BETUIN SERVICE REQUESTED	18220580 14900	KATNER CLARE & JARRETT AARON R	1326 SE 72ND AVE	PORTLAND OR 97215
37 DEFINITION SERVICE DECHESTED	19280500 14901	SUADON CAVIED AMESTON ITU TD	7209 SE MADISON ST	POPTIAND OF 97215-2937
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30 RETURN SERVICE REQUESTED	102E05AC 15100	DOWE KARULEEN & DOWE CUDICEODUED	7221 SE MADISON SI 7235 SE MADISON SE	PORTLAND OR 97215
10 DEWING ADVICE REQUESTED	102D05AC 15100	KOWE KAIHLEEN & KOWE CHRISIOPHER	7255 SE MADISON SI	PORILAND OR 97215
40 REIGN SERVICE REQUESTED	132E05AC 15500	RADIER KURI	7234 SE MADISON SI	PORILAND OR 97215
41 RETURN SERVICE REQUESTED	152EUSAC 15600	BENNETT DARRELL & KRAUS SARA	1726 SE MADISON ST	PORTLAND OR 97215
42 REIORN SERVICE REQUESTED	132E0JAC 13700	DODEN CHRISIOPHER	ISZZI NE COUCH SI	PORTLAND OR 97230
45 RETURN SERVICE REQUESTED	ISZEUSAC 15800	IUST LOWELL A	7204 SE MADISON ST	PORTLAND OR 97215-2938
44 RETURN SERVICE REQUESTED	ISZEUSAC IS900	HUMKE KENNETH T	1432 SE /2ND AVE	PORTLAND OR 97215-2912
45 RETURN SERVICE REQUESTED	ISZEUSAC 16000	SCHMIDT SARA	7215 SE HAWTHORNE BLVD	PORTLAND OR 97215
46 RETURN SERVICE REQUESTED	1S2E05AC 16100	HENLEY DIANE R	7227 SE HAWTHORNE BLVD	PORTLAND OR 97215
47 RETURN SERVICE REQUESTED 1S2E05AC 16200	LYNCH X NEPTUNE A TR &	LYNCH KATHERINE J TR	7233 SE HAWTHORNE BLVD	PORTLAND OR 97215
48 RETURN SERVICE REQUESTED	1S2E05AC 16500	HARGER LORN S	1510 SE 72ND AVE	PORTLAND OR 97215-2914
49 RETURN SERVICE REQUESTED 1S2E05AC 16600	MC KAMEY NEIL A &	GONZALEZ-MC KAMEY FANNY	7212 SE HAWTHORNE BLVD	PORTLAND OR 97215-2930
50 RETURN SERVICE REQUESTED	1S2E05AC 16700	ISKOWITZ BELLE & ASCH ANTHONY	7222 SE HAWTHORNE BLVD	PORTLAND OR 97215
51 RETURN SERVICE REQUESTED	1S2E05BA 11500	DUNCAN LILA M TR	905 SE 70TH AVE	PORTLAND OR 97215-2163
52 RETURN SERVICE REQUESTED	1S2E05BA 11600	SEMPREVIVO DAMIEN & OTSU JUNKO	915 SE 70TH AVE	PORTLAND OR 97215-2163
53 RETURN SERVICE REQUESTED	1S2E05BA 11700	PORTLAND CITY OF	1120 SW 5TH AVE #1000	PORTLAND OR 97204-1912
54 RETURN SERVICE REQUESTED	1S2E05BA 11800	GREENBAUM PAUL B	916 SE 70TH AVE	PORTLAND OR 97215-2130
55 RETURN SERVICE REQUESTED	1S2E05BA 11900	JONES BRIDGET & KLIEWER MICHAEL	904 SE 70TH AVE	PORTLAND OR 97215
56 RETURN SERVICE REQUESTED	1S2E05BA 12900	YUEN COLLINS REV LIV TR	915 SE 71ST AVE	PORTLAND OR 97215
57 RETURN SERVICE REQUESTED	1S2E05BA 13000	MORROW DENNIS & MORROW VICTORIA	7037 SE YAMHILL ST	PORTLAND OR 97215-2159
58 RETURN SERVICE REQUESTED	1S2E05BA 13100	LENTZ EDWARD L JR & EMERY LINDSEY	7025 SE YAMHILL ST	PORTLAND OR 97215
59 RETURN SERVICE REQUESTED	1S2E05BA 13200	WEIT-MARTUS FAMILY TR	7015 SE YAMHILL ST	PORTLAND OR 97215
60 RETURN SERVICE REQUESTED 1S2E05BA 13400	LANG MITCHELL TR & LANG PAULA TR	(LANG FAMILY TRUST)	928 SE 70TH AVE	PORTLAND OR 97215-2130
61 RETURN SERVICE REQUESTED 1S2E05BA 13500	DEN HERDER NANCY J TR &	WILLIAMS MARY M-LE	6939 SE YAMHILL ST	PORTLAND OR 97215-2157
62 RETURN SERVICE REQUESTED	1S2E05BA 13600	BRAKE HUGHES BELLERMANN LLP	1701 PENNSYLVANIA AVE NW #200	WASHINGTON DC 20006
63 RETURN SERVICE REQUESTED	1S2E05BA 13600	SUMMER MARY & CHURILLA PAUL	6929 SE YAMHILL ST	PORTLAND OR 97215
64 RETURN SERVICE REQUESTED	1S2E05BA 13700	PAPAJACK JOHN	1932 NW NORFOLK CT	PORTLAND OR 97229
65 RETURN SERVICE REQUESTED	1S2E05BA 13800	SLOAN FAMILY TRUST	7000 SE YAMHILL ST	PORTLAND OR 97215
66 RETURN SERVICE REQUESTED	1S2E05BA 13900	ROBINSON KEVIN R	6909 SE YAMHILL ST	PORTLAND OR 97215-2157
67 RETURN SERVICE REQUESTED	1S2E05BA 14000	PETERSEN RYAN & PETERSEN ROBERTA	930 SE 69TH AVE	PORTLAND OR 97215
68 RETURN SERVICE REQUESTED	1S2E05BA 14100	WARNER ROGER	6920 SE BELMONT ST	PORTLAND OR 97215
69 RETURN SERVICE REQUESTED	1S2E05BA 14200	STEVENSON JENNIFER	6914 SE BELMONT ST	PORTLAND OR 97215
70 RETURN SERVICE REQUESTED	1S2E05BA 14300	MEYERS JAMES F & MEYERS JOY C	920 SE 69TH AVE	PORTLAND OR 97215-2120
71 RETURN SERVICE REQUESTED	1S2E05BA 14400	THERIAULT MYRA & FRANCESCHI MONICA	908 SE 69TH AVE	PORTLAND OR 97215
72 RETURN SERVICE REQUESTED	1S2E05BA 14500	GEORGE & ISABELLE ZIFCAK FAMILY TR	4928 NE ALAMEDA ST	PORTLAND OR 97213
73 RETURN SERVICE REQUESTED	1S2E05BA 14600	WILLIAMS REBECCA M	931 SE 69TH AVE	PORTLAND OR 97215-2119

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74	RETURN SERVICE REQUESTED		1S2E05BA 14700	WESTLIND DENNIS E & WESTLIND EVA A	6835 SE YAMHILL ST	PORTLAND OR 97215-2156
75	RETURN SERVICE REQUESTED		1S2E05BA 14800	BARCLAY BRUCE W	940 SE 68TH AVE	PORTLAND OR 97215-2110
76	DETUDN CEDUICE DEQUECTED	10300503 14000	MEDCED CEMU (	CERCHOULCH MERCER ANNA	032 CE 60EU NUE	DODELAND OD 07215
70	REIORN SERVICE REQUESTED	132E0JBA 14500	MERCER SEIN &	GERSKOVICH-MERCER ANNA	532 SE COIR AVE	FORILAND OR 57213
11	RETURN SERVICE REQUESTED		1S2E05BA 15000	SIRI LIVING TRUST	6816 SE BELMONT ST	PORTLAND OR 97215
78	RETURN SERVICE REQUESTED		1S2E05BA 15200	MA YENLY	905 SE 68TH AVE	PORTLAND OR 97215
79	RETURN SERVICE REQUESTED		1S2E05BA 15300	BAILEY DOUGLAS P	915 SE 68TH AVE	PORTLAND OR 97215
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00	RETURN SERVICE REQUESTED		152EU5BA 15400	TIAN GEORGE & GU WENJIE	5821 ABERNATHI DR	LUS ANGELES CA 90045
81	RETURN SERVICE REQUESTED		1S2E05BA 15500	BARRON JANET S	939 SE 68TH AVE	PORTLAND OR 97215-2109
82	RETURN SERVICE REQUESTED		1S2E05BA 15600	KIDD CLAIR E TR & KIDD SHARON M TR	6723 SE YAMHILL ST	PORTLAND OR 97215-2031
83	DETUDN SEDUTCE DECHESTED		19220520 15700	DDIM EVONA M TO	2165 GW MAIN GT	POPTIAND OF 97205
0.0	REFORM SERVICE REQUESTED		102E05BA 15700	DRIM BYONG M TR	CRE OF VANUEL OF	PORTLAND OR 97205
04	RETURN SERVICE REQUESTED		152EU5BA 15800	LEMS ANNET	6705 SE TAMHILL ST	PORTLAND OR 97215-2031
85	RETURN SERVICE REQUESTED		1S2E05BA 15900	GREEN WILLIAM C & GREEN DEBORAH S	920 SE 67TH AVE	PORTLAND OR 97215-2008
86	RETURN SERVICE REQUESTED		1S2E05BA 16000	NG JAMES TR & STENZEL MOLLY TR	6704 SE BELMONT ST	PORTLAND OR 97215
87	RETURN SERVICE REQUESTED		182E05BA 16200	DESSERAULT MICHAEL & IVERSON JANT	6306 SE 36TH AVE	PORTLAND OR 97202
00			102200201 10200			PORTLAND OR STOLE
00	RETURN SERVICE REQUESTED		152EU5BA 16300	SMITH JAMES L & SMITH GAIL M	922 SE 00TH AVE	PORTLAND OR 97215-2006
89	RETURN SERVICE REQUESTED		1S2E05BA 16400	MT HOPE INVESTMENTS LLC	6666 SE YAMHILL ST	PORTLAND OR 97215-2030
90	RETURN SERVICE REQUESTED		1S2E05BA 16500	BELAND KATHLEEN & KOKOPELL PETER	6677 SE YAMHILL ST	PORTLAND OR 97215
91	DETUDN SEDUTCE DECHESTED	19200500 16600	DDIM_EDWADDS THITS C	FOMADOS DANDALI	6666 CE VAMUITI CE	POPTIAND OF 97215-2030
- 21	KEIGKW SERVICE REQUESTED	102E03DA 10000	DRIM EDWARDS CODIA 4	EDWARDS RANDAEL	COUC SE TRANIES ST	FORTHAND OR 57215 2050
92	RETURN SERVICE REQUESTED		1S2E05BA 16700	FAUNT KAREN & DEMPSTER ROBERT	6700 SE YAMHILL ST	PORTLAND OR 97215-2032
93	RETURN SERVICE REQUESTED		1S2E05BA 16800	GOULD DAVID F	6720 SE YAMHILL ST	PORTLAND OR 97215-2032
94	RETURN SERVICE REQUESTED		1S2E05BA 16900	BOTTLES COLIN E & CHEN CATHERINE X	6732 SE YAMHILL ST	PORTLAND OR 97215
95	RETURN SERVICE REQUESTED		1S2E05BA 17000	LOUISE & GLUE FAMILY TR	15537 VILLAGE PARK CT	LAKE OSWEGO OR 97034
00			102200201 17000		colo en unumera en	
96	RETURN SERVICE REQUESTED		IS2E05BA 1/100	FREY NATHAN A & WALKER LINDA A	6810 SE YAMHILL ST	PORTLAND OR 97215
97	RETURN SERVICE REQUESTED		1S2E05BA 17200	KNEELAND SCOTT & KNEELAND LINDSAY	1005 SE 69TH AVE	PORTLAND OR 97215
98	RETURN SERVICE REQUESTED		1S2E05BA 17300	HASSETT-LANDSMAN REV LIV TR	1015 SE 69TH AVE	PORTLAND OR 97215
99	RETURN SERVICE REQUESTED		192E05BA 17400	SESAR NADA	1027 SE 69TH AVE	PORTLAND OR 97215
100	DEFUNI OBNITOR DEQUEOTED		102205201 17100	TONDETNO OUGAN C	1020 02 0011 1102	DODELAND OD 07015 0100
100	RETURN SERVICE REQUESTED		152EU5BA 1/500	TUMPRINS SUSAN G	1030 SE 69TH AVE	PORTLAND OR 97215-2122
101	RETURN SERVICE REQUESTED		1S2E05BA 17601	COSEO DAVID C & COSEO NADINE M	6912 SE YAMHILL ST	PORTLAND OR 97215-2158
102	RETURN SERVICE REQUESTED		1S2E05BA 17602	CORNEJO JILL T & CORNEJO BRANDON J	1010 SE 69TH AVE	PORTLAND OR 97215
103	RETURN SERVICE REQUESTED		192E05BA 17700	KWON ANNTE	6926 SE YAMHILI ST	PORTLAND OR 97215
103	DEFUTAT DERVICE DEQUECTED		102200201 17700	TEDWAN DAVE D C OUDDY OADAU D	CORA OR VANUELL OF	PODELAND OR 07215
104	RETORN SERVICE REQUESTED		152E05BA 17800	TIERMAN PAUL B & CURRI SARAH E	6934 SE TAMHILL ST	PORTLAND OR 97215
105	RETURN SERVICE REQUESTED		1S2E05BA 17900	THOMAS G MEYERS TR	6944 SE YAMHILL ST	PORTLAND OR 97215
106	RETURN SERVICE REQUESTED		1S2E05BA 18000	FREEMAN KIMBERLY & YELLIN BRIAN	6954 SE YAMHILL ST	PORTLAND OR 97215-2158
107	RETURN SERVICE REQUESTED		1S2E05BA 18200	BEISTEL TESS	7020 SE YAMHILL ST	PORTLAND OR 97215-2160
100	DEFUNI OBNITOR DEQUEOTED		10200500 10200	USERSED AMERICANITE I	7020 OD HAMITED OT	DODELAND OD 07015
100	RETURN SERVICE REQUESTED		152EU5BA 18400	VETTER STEPHANIE J	7050 SE TAMHILL ST	PORTLAND OR 97215
109	RETURN SERVICE REQUESTED		1S2E05BA 18500	DUANE A SORENSON TR	1025 SE 71ST AVE	PORTLAND OR 97215
110	RETURN SERVICE REQUESTED		1S2E05BA 18600	FARRAN MAUREEN P & KRASNER STEFANIE	1055 SE 71ST AVE	PORTLAND OR 97215-2202
111	RETURN SERVICE REQUESTED		1S2E05BA 9400	BELLING JOHN C II & BELLING CHERT	818 SE 67TH AVE	PORTLAND OR 97215
112	DETUDN CEDUICE DEQUECTED		102E0EBB 10000	DRENETCE TACON M & DUVEON EDIN O	6503 CE VAMUITI CE	DODET AND OD 07215 2025
112	KEIOKN SERVICE REQUESTED		132E03BB 10000	FRENIICE JASON M & BUXION ERIN O	0000 SE IRMAIDE CI	FORILAND OR 57213-2033
113	RETURN SERVICE REQUESTED		1S2E05BB 10100	FLECK JONATHAN E	6527 SE YAMHILL CT	PORTLAND OR 97215
114	RETURN SERVICE REQUESTED		1S2E05BB 10200	HURLEY ANDREW	6545 SE YAMHILL CT	PORTLAND OR 97215
115	RETURN SERVICE REQUESTED		1S2E05BB 10300	GRAVES JUDY J	6611 SE YAMHILL CT	PORTLAND OR 97215
116	RETURN SERVICE REQUESTED		1S2E05BB 10400	SIMKO JOAN M	6639 SE VAMHILL CT	PORTLAND OR 97215-2029
117	REFORM SERVICE REQUESTED	100000000 100000	13210300 10400	STRIC COAN M	COSS OF HAMILTEE OF	PORTLAND OR 57215 2025
117	RETURN SERVICE REQUESTED	ISZEU5BB 10600	DAVIS BENJAMIN P &	STRINGFELLOW-DAVIS MARY G	6645 SE YAMHILL CT	PORTLAND OR 9/215-2029
118	RETURN SERVICE REQUESTED		1S2E05BB 10700	HALLIGAN KERRY Q & ITEN RHONDA L	6635 SE YAMHILL CT	PORTLAND OR 97215-2029
119	RETURN SERVICE REQUESTED		1S2E05BB 10800	CHANDLER CHRIS & LEON-CHANDLER TONI	6621 SE YAMHILL CT	PORTLAND OR 97215-2029
120	RETURN SERVICE REQUESTED	182E05BB 11100	TEREMY I SHRALL REV TR &	CATHERINE M SHRALL REV TR	6373 SE VAMHILI ST	PORTLAND OR 97215-2832
120	DEFUTAT DERVICE DEQUECTED	102B05BD 11100	aupart Tabany Joun C		CORD VANUEL OF	PODELAND ON 97215 2002
14	NEIGHA SERVICE REQUESTED	102200000 11200	SHRALL JEREMI JURN &	SHIVE CAIRERINE MISHCA	US /S SE IMPRESSION	IONIDAD OK 57213
122	RETURN SERVICE REQUESTED		1S2E05BB 3500	TRAFFLEY CAROLE & PERINI RAYMOND	17 CARLEY AVE	HUNTINGTON NY 11743
123	RETURN SERVICE REQUESTED		1S2E05BB 3600	YAZZOLINO BRAD & FIEDLER NADINE A	6451 SE MORRISON CT	PORTLAND OR 97215-1949
124	RETURN SERVICE REQUESTED		1S2E05BB 3700	HURST TERA	6501 SE MORRISON ST	PORTLAND OR 97215
125	RETURN SERVICE REQUESTED		192E05BB 3800	MC CAULEY DALE & MC CAULEY EMMA	6515 SE MORRISON ST	PORTLAND OR 97215-2014
120	DEBUDN OFDUTOE DECURCERED		10220522 3000	WELCH CHANE C	6640 CE DELMONE CE	DODULAND OD 07215
126	REIDEN SERVICE REQUESTED		LOLLUJBB 4/UU	WELCH SHANE C	0045 SE BELMUNT ST	FURILAND OR 9/213
127	RETURN SERVICE REQUESTED		1S2E05BB 4800	BUSCH JORDAN S & BUSCH JAMIE L	6615 SE BELMONT ST	PORTLAND OR 97215
128	RETURN SERVICE REQUESTED	1S2E05BB 4900	CARDER PAULA &	SCHNABEL JOHN JEFFREY	6562 SE MORRISON ST	PORTLAND OR 97215
129	RETURN SERVICE REQUESTED		1S2E05BB 5000	PARKER PETER & ARPS CARLE	6550 SE MORRISON ST	PORTLAND OR 97215-2015
120	DESUDN CEDUICE DECUECTED		102E0EDB 5200	THEY BROWN WE	AGAG C NILDCAR DD	MOLATIA OD 07039
130	REIDEN SERVICE REQUESTED		TOTENDER DIN	JUDI BROWN TR	5555 5 WILDUAT RD	FIULALLA UK 9/038
131	RETURN SERVICE REQUESTED	1S2E05BB 5300	HAUSS ROBERT T & HAUSS BONNIE	HASTINGS BONNIE	6510 SE MORRISON ST	PORTLAND OR 97215-2015
132	RETURN SERVICE REQUESTED		1S2E05BB 5400	LEMING GEORGE III & WYRES TRACEY	6431 SE MORRISON ST	PORTLAND OR 97215
133	RETURN SERVICE REQUESTED		1S2E05BB 5500	DONOVAN GEOFFREY & WHITE RACHEL	6421 SE MORRISON ST	PORTLAND OR 97215
124	DESUDN CEDUICE DECUECTED		10320522 5600	MILLARD ANDREW C MILLARD MARCAN	2124 CE 53DD AVE	DODWIAND OD 07315
134	REJURN SERVICE REQUESTED		19750300 3000	MILLARD ANDREW & MILLARD MARTA J	TTOA OF OOKD WAR	FURILAND UK 9/210
135	RETURN SERVICE REQUESTED		1S2E05BB 5700	LIPPERT JODI M & BARR TIMOTHY L	6407 SE MORRISON ST	PORTLAND OR 97215-1945
136	RETURN SERVICE REQUESTED		1S2E05BB 5800	LORENZEN TERI K & WENTLAND SUSAN A	6348 SE MORRISON CT	PORTLAND OR 97215
137	RETURN SERVICE REQUESTED		1S2E05BB 7700	MANASSE WENDY I. & WIESE DAVID H	4330 PEPPERWOOD AVE	LONG BEACH CA 90808
129	DESUDN CEDUTOR DECURCEED		10200500 7800	DAUTO NAMUADINE E	6316 CE MODDICON CE	DODETIAND OD 07315
138	VETOWN SERVICE REQUESTED		19750300 /000	DAVIO NATHARINE E	UDIO DE MURRISUN ST	FURILAND OK 9/213
139	RETURN SERVICE REQUESTED		1S2E05BB 7900	BORG THOMAS D JR & FERRO ERIN E	6326 SE MORRISON ST	PORTLAND OR 97215
140	RETURN SERVICE REQUESTED		1S2E05BB 8000	VELIS CAROLINA	6338 SE MORRISON ST	PORTLAND OR 97215
141	RETURN SERVICE REQUESTED		1S2E05BB 8100	CONNIE & JEROME ISCRO TR	6400 SE MORRISON ST	PORTLAND OR 97215
1/2	DEBUDY ADDITOR DEGUEGED		10000000 0100	CENE & WIDE ED	CARL OF MORPTOON OF	DODELAND OD 07215
142	RETURN SERVICE REQUESTED		TRAFARE READ	GENE H WIBE TR	0424 SE MORRISON ST	FURTLAND OR 9/215
143	RETURN SERVICE REQUESTED	1S2E05BB 8300	ARNOLD M COGAN REV LIV TR &	ELAINE COGAN REV LIV TR	6436 SE MORRISON ST	PORTLAND OR 97215
144	RETURN SERVICE REQUESTED		1S2E05BB 8400	MULLIN DEAN & MULLIN RACHEL	807 SE 65TH AVE	PORTLAND OR 97215-2039
1/1	RETURN SERVICE REQUESTED		192E05BB 8500	CAMBLEN CASEY D & CAMPLEN LANDA A	6946 E 4TH AVE	DENVER CO 80220-6163
140	NEIGHA SERVICE REQUESTED		10220000 0000	CAPIDIIN CADLI D & CAPIDIIN LAURA A	CIOL DI TIT AVE	DERVER CO 80220-0103
146	RETURN SERVICE REQUESTED		TONFROOR SPON	STEVENSON CHRIS	0401 SE BELMONT ST	PORTLAND OR 97215-1942

	A	В	С	D	E	F
147	RETURN SERVICE REQUESTED		1S2E05BB 8700	NELSON KORY J	6333 SE BELMONT ST	PORTLAND OR 97215
148	RETURN SERVICE REQUESTED		1S2E05BB 8800	BRINES BRIANA & BRINES JONATHAN	6315 SE BELMONT ST	PORTLAND OR 97215
149	RETURN SERVICE REQUESTED		1S2E05BB 8900	HARPER PHILIP J	6305 SE BELMONT ST	PORTLAND OR 97215
150	RETURN SERVICE REQUESTED		1S2E05BB 9000	BELMONT HOUSE LLC	2000 NE 42ND AVE #D PMB 277	PORTLAND OR 97213-1359
151	RETURN SERVICE REQUESTED		1S2E05BB 9100	MARY E OLDEN TR	39 WATERSHORE CIR	SACRAMENTO CA 95831
152	DETIIN SERVICE DECHESTED		19220522 9200	LEVINE EDIC A & LEVINE LADA D	6248 SE DEIMONIT ST	POPTIAND OF 97215-1940
152	REIURN SERVICE REQUESTED		10220388 5200	DEVINE ERIC A & DEVINE DARA R	5100 UMBU OM	PORILAND OR 5/215-1540
155	RETURN SERVICE REQUESTED		152E05BB 9300	TELLA MALLIK N	SIUS UTAH ST	VANCOUVER WA 98661
154	RETURN SERVICE REQUESTED		1S2E05BB 9400	FUNABASHI YOKO	6385 SE YAMHILL ST	PORTLAND OR 97215-2832
155	RETURN SERVICE REQUESTED		1S2E05BB 9600	DUKE DAVID R & VROOM KATHLEEN	6393 SE YAMHILL ST	PORTLAND OR 97215
156	RETURN SERVICE REQUESTED		1S2E05BB 9700	PENA ANTONIO & PENA JULIE V	6425 SE YAMHILL ST	PORTLAND OR 97215
157	RETURN SERVICE REQUESTED		1S2E05BB 9800	ELIAS JULES M & ELIAS RENEE	6435 SE YAMHILL ST	PORTLAND OR 97215-2027
158	RETURN SERVICE REQUESTED		1S2E05BB 9900	SMITH KENNETH & BAUGNON BARBARA	6465 SE YAMHILL ST	PORTLAND OR 97215
159	RETURN SERVICE REQUESTED		1S2E05BC 101	BINKLEY BYRON & BECKER KARA	6371 SE YAMHILL ST	PORTLAND OR 97215
160	RETURN SERVICE REQUESTED		1S2E05BC 103	NIEDERMEIER MIKE & SHINSATO ALISON	6291 SE YAMHILL ST	PORTLAND OR 97215-2831
161	RETURN SERVICE REQUESTED		1S2E05BC 201	CHO AUNA S & CHO SUNGEY#D	6359 SE YAMHILI ST	PORTLAND OR 97215
162	DETIIDN SEDUTCE DECHESTED		19200500 202	EASTON TOUNATUAN & EASTON TEAU D	6303 SE VAMUTIT ST	POPTIAND OF 97215
163	DETUDN SERVICE REQUESTED		182E05BC 202	MOREDO WALTER & MOREDO VONDA	3420 GE 36TH AVE	POPTIAND OR 97213
164	REFORM SERVICE REQUESTED	10000500 300	ALVADART AMERICAN MD C	ADDERG WALTER & MODERG VONDA	CAR OF VANUEL OF	PORTLAND OR 07202
104	RETURN SERVICE REQUESTED	152E03BC 302	SLUSARSKI STEPHEN TR &	LAPAGLIA NANCI IK	6347 SE IAMHILL SI	PORTLAND OR 97215
165	RETURN SERVICE REQUESTED	1S2E05BC 400	PORTLAND CITY OF PARKS & REC	CAITLIN MURPHY & DANNY OSBORN	1120 SW 5TH AVE #858	PORTLAND OR 97204-1912
166	RETURN SERVICE REQUESTED		1S2E05BD 100	LENNON-MARHOEFER TR	1109 SE 72ND AVE	PORTLAND OR 97215
167	RETURN SERVICE REQUESTED		1S2E05BD 1000	GOTSCH STEVE & GOTSCH STEPHANIE	7117 SE MAIN ST	PORTLAND OR 97215
168	RETURN SERVICE REQUESTED		1S2E05BD 1100	KAPLAN-OEHLER FAMILY TR	7110 SE MAIN ST	PORTLAND OR 97215
169	RETURN SERVICE REQUESTED		1S2E05BD 1200	KOCHER GREGORY A & KOCHER PAULA J	1321 SE 72ND AVE	PORTLAND OR 97215-2910
170	RETURN SERVICE REQUESTED		1S2E05BD 1400	DUSTIN CHARLES & REED KATHERINE	1405 SE 72ND AVE	PORTLAND OR 97215-2911
171	RETURN SERVICE REQUESTED		1S2E05BD 1500	HALIBURTON MELANIE & ANDREW	1425 SE 72ND AVE	PORTLAND OR 97215
172	RETURN SERVICE REQUESTED		1S2E05BD 1600	PLUNKETT MICHAEL & CALDWELL AMELTA	1501 SE 72ND AVE	PORTLAND OR 97215
172	RETURN SERVICE REQUESTED		1S2E05BD 1700	DOVE PHILLIP M	1525 SE 72ND AVE	PORTLAND OR 97215
174	DETIIDN SERVICE DECHESTED		19220520 1800	VYCHODII BODIS	1528 SE 71ST AVE	POPTIAND OF 97215
175	DEFURN SERVICE REQUESTED		182E05BD 1000	CANY LYNN FAMILY ED	1520 SE 71ST AVE	PORTLAND OR 97215
175	REIORN SERVICE REQUESTED	1000000000 0000	132E03BD 1900	SANI LINN FAMILI IK	1304 3E 7131 AVE	PORTLAND OR 57215
176	RETURN SERVICE REQUESTED	ISZEUSED 200	AYERSMAN TIMOTHY &	GRAY-AYERSMAN PERYLL	IIZI SE /ZND AVE	PORTLAND OR 97215
1//	RETURN SERVICE REQUESTED	1S2E05BD 2000	RICHARD L COLLINS TR &	SHERIDAN P COLLINS TR	1428 SE 71ST AVE	PORTLAND OR 97215
1/8	RETURN SERVICE REQUESTED		1S2E05BD 2200	GHAN RYAN & WAGNER-MCCOY SARAH	1275 SE 71ST AVE	PORTLAND OR 97215
179	RETURN SERVICE REQUESTED		1S2E05BD 2300	NANCY MATELA LIV TRUST	1263 SE 71ST AVE	PORTLAND OR 97215-2902
180	RETURN SERVICE REQUESTED		1S2E05BD 2400	MARMION MELANIE E & CONKLIN GUY W	1253 SE 71ST AVE	PORTLAND OR 97215
181	RETURN SERVICE REQUESTED		1S2E05BD 2401	SMITHRUD CHRISTIAN D	1259 SE 71ST AVE	PORTLAND OR 97215-2902
182	RETURN SERVICE REQUESTED		1S2E05BD 2500	GOODREAU RENEE & BEAN JOSH	1233 SE 71ST AVE	PORTLAND OR 97215
183	RETURN SERVICE REQUESTED		1S2E05BD 2600	MAY ROBERT S & MAY NADINE M	1221 SE 71ST AVE	PORTLAND OR 97215-2902
184	RETURN SERVICE REQUESTED		1S2E05BD 2700	GARDNER HALLIE & TOMLINSON JOHN S	1201 SE 71ST AVE	PORTLAND OR 97215
185	RETURN SERVICE REQUESTED		1S2E05BD 2800	WHITNEY & STOCKARD WALTER A III	1145 SE 71ST AVE	PORTLAND OR 97215
186	RETURN SERVICE REQUESTED		1S2E05BD 300	NEWMAN DAVID & ORGEL LAURA J	1141 SE 72ND AVE	PORTLAND OR 97215
187	DETIIDN SEDUTCE DECHESTED		19220520 3600	MICUARIS IOSUIA 6 MUTTE MARTIANE	7005 SE MAIN ST	POPTIAND OF 97215
188	DETUDN SERVICE REQUESTED		192E05BD 3700	MADGEN MADE D & WHITE MARIDANE	1505 GE 710T AVE	PORTIAND OR 97215-2907
190	DEFURN SERVICE REQUESTED		102E05BD 3700	CANCUEZ DACUEL C CANCUEZ DDADLEY	11124 NE UNICEN CE DMD 444	PORTLAND OR 97215 2507
109	REIORN SERVICE REQUESTED		132E03BD 5000	SANCHEZ RACHEL & SANCHEZ BRADLEI	11124 NE RALSEI SI FMB 444	FORILAND OR 57220-2021
190	RETURN SERVICE REQUESTED		152E05BD 500	RICHTER CARRIE A	1151 SE 72ND AVE	PORTLAND OR 97215
191	RETURN SERVICE REQUESTED		ISZEUSED 600	MERRITHEW TONY C	12U3 SE /2ND AVE	PORTLAND OR 97215-2909
192	RETURN SERVICE REQUESTED		1S2E05BD 800	PACKARD DEE	1207 SE 72ND AVE	PORTLAND OR 97215-2909
193	RETURN SERVICE REQUESTED		1S2E05BD 900	WRIGHT STEPHEN & WRIGHT SARA	1229 SE 72ND AVE	PORTLAND OR 97215
194	RETURN SERVICE REQUESTED		1S2E05CA 100	JELINEO-FONK MARY & FONK MICHAEL	1537 SE 72ND AVE	PORTLAND OR 97215
195	RETURN SERVICE REQUESTED		1S2E05CA 1000	UTTERSTROM FLORENCE M	1630 SE 71ST AVE	PORTLAND OR 97215-3502
196	RETURN SERVICE REQUESTED		1S2E05CA 1100	WOOD MARY K & WOOD ERIC M	1630 SE 71ST AVE	PORTLAND OR 97215
197	RETURN SERVICE REQUESTED		1S2E05CA 1300	OSTRANDER JON & OSTRANDER SHANNON	1622 SE 71ST AVE	PORTLAND OR 97215
198	RETURN SERVICE REQUESTED	1S2E05CA 1400	COREY RICHARD &	WELTNER KATHERINE LYLE	8606 N SEWARD AVE	PORTLAND OR 97217-7348
199	RETURN SERVICE REQUESTED		1S2E05CA 1500	BERLOT HYNES LIV TR	1538 SE 71ST AVE	PORTLAND OR 97215
200	RETURN SERVICE REQUESTED		1S2E05CA 1700	WILLIAMS THOMAS M	1543 SE 71ST AVE	PORTLAND OR 97215-2907
201	RETURN SERVICE REQUESTED		1S2E05CA 1800	RON MCCOY & SANDRA MCCOY FAMILY TR	1607 SE 71ST AVE	PORTLAND OR 97215
202	RETURN SERVICE REQUESTED		1S2E05CA 1900	WEAVER ALICE E	1629 SE 71ST AVE	PORTLAND OR 97215
203	RETURN SERVICE REQUESTED	1S2E05CA 200	THOMAS M HORVAT REV LIV TR &	PATRICIA J IRINAGA REV LIV TR	1605 SE 72ND AVE	PORTLAND OR 97215
204	RETURN SERVICE REQUESTED		19280503 2000	HARTMAN GREGORY & C COTTER TANYA	1641 SE 71ST AVE	PORTLAND OR 97215-3501
205	DETIIN SERVICE REGISTED	18280500 2200	CONCALVES DELEN CAROLINE :	NEWMAN HOWADD ATAN	1707 GE 710F AVE	DODTIAND OF 97215
205	DESUDA CEDUICE DEQUECTED	1022000000 2200	102E05C3 2200	DEVICE WILCON AMDON C	1701 CE 710E AVE	DODULAND OF 07215
200	NEIGNA SERVICE REQUESTED		10200JCA 2000	DEVELO-WILSON APRON S	1/21 35 /131 AVE	DODITIOND OD 07000 5000
207	RETURN SERVICE REQUESTED		ISZEUJCA Z4UU	QUINN MICHAEL T	FU BUX 5908	PORTLAND OR 9/228-5908
208	RETURN SERVICE REQUESTED		ISZEUSCA 2600	LEEBORG NICKY J & LEEBORG NEIL F	1811 SE MOUNTAIN VIEW DR	PORTLAND OR 97215-3550
209	RETURN SERVICE REQUESTED		1S2E05CA 2700	SIMPSON DANIEL & FIELDS JOY & AMY	1825 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
210	RETURN SERVICE REQUESTED		1S2E05CA 2800	WILKEN NOLA J & DEMAREST THERESA C	1909 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
211	RETURN SERVICE REQUESTED		1S2E05CA 2900	CHINN DANIEL W & CHINN SALLY A	1919 SE MOUNTAIN VIEW DR	PORTLAND OR 97215-3552
212	RETURN SERVICE REQUESTED		1S2E05CA 300	HUANG CHING-LI	1635 SE 72ND AVE	PORTLAND OR 97215-3507
213	RETURN SERVICE REQUESTED		1S2E05CA 3000	WELLS JACK	7101 SE HARRISON ST	PORTLAND OR 97215
214	RETURN SERVICE REQUESTED		1S2E05CA 3100	MARTORANO JOANN K & MINARD JULIEN L	7106 SE HARRISON ST	PORTLAND OR 97215
215	RETURN SERVICE REQUESTED		1S2E05CA 3200	HILGART KAREN	7103 SE HARRISON CT	PORTLAND OR 97215-4035
216	BETURN SERVICE REQUESTED		1S2E05CA 3300	MCCONNELL FAMILY TR	7111 SE HARBISON CT	PORTLAND OR 97215
217	RETURN SERVICE REQUESTED		192E05CA 3400	AUER BOXANE & MILBOURN SCOTT	7143 SE HARRISON CT	PORTLAND OR 97215
210	DESUDA CEDUICE DEQUECTED		10220503 3500	WARE DEVOCADLE EDUCE	2025 CE ZOND AVE	DODULAND OD 07215
210	REJURN SERVICE REQUESTED		102E05CA 3500	CANER MARRIER	2000 CE 72ND AVE	PORTLAND OR 9/213
219	RETURN SERVICE REQUESTED		ISZEUJCA 3600	GANTZ MATTHEW	ZUUS SE /ZND AVE	FURTLAND OR 9/215

22	U RETURN SERVICE REQUESTED		152EU5CA 3700	FLINN JOHN B II	/152 SE HARRISON ST	PORTLAND OR 97215
22	1 RETURN SERVICE REQUESTED		1S2E05CA 3800	DAVIS BRIAN F & DAVIS LAURA D	1736 KILLARNEY DR	WEST LINN OR 97068-3925
22	2 RETURN SERVICE REQUESTED		1S2E05CA 3900	PALAZZO TANIA & WILLIS PHILIPPE G	7155 SE HARRISON ST	PORTLAND OR 97215-4033
22	3 RETURN SERVICE REQUESTED	1S2E05CA 400	HIROKO I ONO REV TR &	TADAHIKO ONO REV TR	1645 SE 72ND AVE	PORTLAND OR 97215-3507
22	4 RETURN SERVICE REQUESTED		1S2E05CA 4000	DIEDE MELISSA M	1912 SE MOUNTAIN VIEW DR	PORTLAND OR 97215-3553
22	5 RETURN SERVICE REQUESTED		182E05CA 4100	CREDIT SHELTER TR	1906 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
22	6 DETIIDN SEDUTCE DECHESTED	19200503 4200	TAMES D O'DOLIDKE TO C	KADEN A HEDV TO	1822 SE MOUNTAIN VIEW DR	DODUTIAND OF 97215
22	A REIORN SERVICE REQUESTED	132E0JCA 4200	JAMES F O ROURRE IR &	CAREN A RERI IN	1012 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
22	7 RETURN SERVICE REQUESTED		152E05CA 4500	STIPE SCOTT & STIPE ARISTI	1812 SE MOUNTAIN VIEW DR	PORTLAND OR 97215-5551
22	8 RETURN SERVICE REQUESTED		1S2E05CA 4400	GRANT MICHAEL J TR	1808 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
22	9 RETURN SERVICE REQUESTED		1S2E05CA 500	STUTZ BARBARA	1711 SE 72ND AVE	PORTLAND OR 97215
23	0 RETURN SERVICE REQUESTED		1S2E05CA 600	ANDERTON JOHN M & HUNTER SUSAN KAY	1725 SE 72ND AVE	PORTLAND OR 97215-3509
23	1 RETURN SERVICE REQUESTED		1S2E05CA 700	DB WOODS LLC	1725 SE 72ND AVE	PORTLAND OR 97215-3509
23	2 RETURN SERVICE REQUESTED		1S2E05CA 800	DOUGLAS BANDI L & COE MICHAEL T	1732 SE 71ST AVE	PORTLAND OR 97215-3504
23	3 RETURN SERVICE REQUESTED	152E05CA 900	WILLIAMS ROSALTE C TR &	WILLIAMS ROSALIE C TR	1718 SE 71ST AVE	PORTLAND OR 97215-3504
22	A DEFURN CERVICE DECUECTED	102200000 3000	10220500 100	MICUNELCON LARDY & CLAUDIA	ERE CE CEREDUENC CE	DORTLAND OR 97215 3451
23	4 RETURN SERVICE REQUESTED		152E05CB 100	MICHAELSON LARRI & CLAUDIA	6345 SE STEPHENS ST	PORTLAND OR 97215-5451
23	5 RETURN SERVICE REQUESTED		1S2E05CB 1000	D'AGUANNO JOHN & MICHAELSON JODY L	6216 SE STEPHENS ST	PORTLAND OR 97215
23	6 RETURN SERVICE REQUESTED		1S2E05CB 1100	GRANT DONALD K & GRAY LOUISE W	6224 SE STEPHENS ST	PORTLAND OR 97215-3450
23	7 RETURN SERVICE REQUESTED		1S2E05CB 1200	STREETER KELSEY M	1010 SW TAYLORS FERRY RD	PORTLAND OR 97219-4540
23	8 RETURN SERVICE REQUESTED		1S2E05CB 1300	RAMSAY REBECCA & RAMSAY CHARLES	6246 SE STEPHENS ST	PORTLAND OR 97215
23	9 RETURN SERVICE REQUESTED		1S2E05CB 1400	BLOOM WILLIAM R	6306 SE STEPHENS ST	PORTLAND OR 97215-3452
24	0 RETURN SERVICE REQUESTED		1S2E05CB 1500	FAUST DAVID N & FAUST SUSAN L	6316 SE STEPHENS ST	PORTLAND OR 97215
24	1 RETURN SERVICE REQUESTED	182E05CB 1600	PEDLEY DOUGLAS &	MANCHESTER KIMBERLY	6326 SE STEPHENS ST	PORTLAND OR 97215-3452
24		10220000 1000	1000000 1300	AUNIMENTAL AUXIMENTAL NOV	COAA OR OFFICIAL OF	PORTINUE OR 97215 3452
24	Z RETURN SERVICE REQUESTED		152E05CB 1700	CHAUMETON NIGEL & CHAUMETON AMI	6344 SE STEPHENS ST	PORTLAND OR 97215-5452
24	3 RETURN SERVICE REQUESTED		1S2E05CB 1800	JONES TUCKER & JONES STACY	6345 SE HARRISON ST	PORTLAND OR 97215
24	4 RETURN SERVICE REQUESTED		1S2E05CB 1900	HOGUE DEWEY T III & HOGUE JANICE B	6325 SE HARRISON ST	PORTLAND OR 97215-3347
24	5 RETURN SERVICE REQUESTED	1S2E05CB 200	BURKE DEBRA TR &	SPAULDING THOMAS TR	6335 SE STEPHENS ST	PORTLAND OR 97215-3451
24	6 RETURN SERVICE REQUESTED		1S2E05CB 2000	JORGENSEN JERED & TRANCHESE CLAIRE	6315 SE HARRISON ST	PORTLAND OR 97215-3447
24	7 RETURN SERVICE REQUESTED		1S2E05CB 2100	GORDON NOAH J & HABERLAND TERESA A	6303 SE HARRISON ST	PORTLAND OR 97215
24	8 RETURN SERVICE REQUESTED		1S2E05CB 2200	OUDINOT BOY	6245 SE HARRISON ST	PORTLAND OR 97215
24	9 DEFUEN CEDUICE DECUECTED		102E050D 2200	DONALD & KAMUEDINE HALL FAMILY MD	6231 CE UNDRIGON CE	PORTIAND OR 97215
24	A DEFURN SERVICE REQUESTED		102E0JCB 2300	RUNALD & RATHERINE HALL FAMILI IR	6231 SE HARRISON SI	PORTLAND OR 97215
23	W RETURN SERVICE REQUESTED		152E05CB 2400	THOMPSON FAMILI TRUST	6221 SE HARRISON ST	PORTLAND OR 97215
25	RETURN SERVICE REQUESTED		1S2E05CB 2500	STARR STEPHEN W & STARR BARBARA J	6211 SE HARRISON ST	PORTLAND OR 9/215-3446
25	2 RETURN SERVICE REQUESTED		1S2E05CB 300	MCPENCOW DENNIS & MCPENCOW BARBARA	6325 SE STEPHENS ST	PORTLAND OR 97215
25	3 RETURN SERVICE REQUESTED		1S2E05CB 500	GABRIELA GOLDFARB & PAUL C SIMON TR	6307 SE STEPHENS ST	PORTLAND OR 97215
25	4 RETURN SERVICE REQUESTED		1S2E05CB 600	WILLIAMSON JULIE M	6247 SE STEPHENS ST	PORTLAND OR 97215
25	5 RETURN SERVICE REQUESTED		1S2E05CB 700	DIETZ WAYNE TR & DIETZ DARLENE TR	6233 SE STEPHENS ST	PORTLAND OR 97215-3449
25	6 RETURN SERVICE REQUESTED		1S2E05CB 800	LUDEMAN ROSS & LUDEMAN MELISSA	6225 SE STEPHENS ST	PORTLAND OR 97215
25	7 PETUDN SERVICE PEOUESTED		182E05CB 900	MORANO KALYNN & MCMAHON CHRISTORIER	6215 CE CTEDUENC CT	PORTIAND OR 97215
23	PERUPA SERVICE REQUESTED		10220308 500	MORANO RALINN & MCMAHON CHRISIOPHER	CODE DIEFRENS SI	PORTLAND OR 97215
23	6 RETURN SERVICE REQUESTED		15280500 100	LE CALVIN K	6336 SE LINCOLN ST	PORTLAND OR 97215
25	9 RETURN SERVICE REQUESTED		1S2E05CC 1000	CLATTENBURG CHRISTINE & STANLEY	6229 SE GRANT ST	PORTLAND OR 97215-4058
26	0 RETURN SERVICE REQUESTED		1S2E05CC 1100	NGO MAI & NGUYEN MAI T T	6235 SE GRANT ST	PORTLAND OR 97215
26	1 RETURN SERVICE REQUESTED		1S2E05CC 1200	WOOKIE TRUST	6309 SE GRANT ST	PORTLAND OR 97215
26	2 RETURN SERVICE REQUESTED		1S2E05CC 1300	QU BAOLI & LIU MEIRU	PO BOX 513	PORTLAND OR 97207-0513
26	3 RETURN SERVICE REQUESTED		1S2E05CC 1500	GRAHAM DAVID E	6319 SE GRANT ST	PORTLAND OR 97215
26	4 RETURN SERVICE REQUESTED		1S2E05CC 1600	STONE LARRY & MCDANIEL ELAINE	16630 SE LILLIAN WAY	PORTLAND OR 97236
26	5 RETURN SERVICE REQUESTED		1S2E05CC 1700	SCHOFTELD JENNIFER L	2203 SE 64TH AVE	PORTLAND OR 97215
26	C DEFURN SERVICE REQUESTED		10220500 1000	SCHOFTEDD DEMNITER D	COO OF OPANE OF	PORTIAND OR 07215
20	7 DEMUN SERVICE REQUESTED		10220300 1000	WILLOW SUSAN	COLO DE GRANT ST	FORTLAND OR 9/213
20	W RETURN SERVICE REQUESTED		152E05CC 1900	CILER PETER & CILER AMANDA	6310 SE GRANT ST	PORTLAND OR 9/215
26	6 KETURN SERVICE REQUESTED		ISZEUSCC 200	AMANN MARY ANN	6318 SE LINCOLN ST	FURTLAND OR 97215
26	9 RETURN SERVICE REQUESTED		1S2E05CC 2000	IANNONE MARK & ROMAN MIRTHA	6304 SE GRANT ST	PORTLAND OR 97215-4059
27	0 RETURN SERVICE REQUESTED		1S2E05CC 2100	NGUYEN CUONG & NGUYEN SOPHIE	6240 SE GRANT ST	PORTLAND OR 97215-4057
27	1 RETURN SERVICE REQUESTED		1S2E05CC 2200	LE PHAN HUY & VU KHUE NGOC	6236 SE GRANT ST	PORTLAND OR 97215
27	2 RETURN SERVICE REQUESTED		1S2E05CC 2300	PATTIE LILIANA	6230 SE GRANT ST	PORTLAND OR 97215
27	3 RETURN SERVICE REQUESTED		1S2E05CC 2400	GEDZ ROMAN & GEDZ BEVERLY J	6224 SE GRANT ST	PORTLAND OR 97215-4057
27	4 RETURN SERVICE REQUESTED		182E05CC 2500	CHAN CAT LING	6225 SE SHERMAN ST	PORTLAND OR 97215
27	5 RETURN SERVICE REQUESTED		152E05CC 2600	TRUONG NGOCCAM THI	6233 SE SHERMAN ST	PORTLAND OR 97215-4063
27	6 DEBUDN CEDUICE DECUECTED		10220500 2000	MAU VIN CUONE & MAU TAT TINE CUAN	6247 CE CUEDMAN CE	DODELAND OD 07215 4063
2/	U REJURN SERVICE REQUESTED		13220300 2/00	MAR IIM CHUNG & MAH LAI LING CHAN	0247 SE SHERMAN ST	FURILAND UK 9/213-4063
27	/ KETURN SERVICE REQUESTED		152EU5CC 2800	MITCHELL ELIZABETH J	6305 SE SHERMAN ST	FURTLAND OR 97215
27	8 RETURN SERVICE REQUESTED		1S2E05CC 2900	LABARRE RYAN D	6315 SE SHERMAN ST	PORTLAND OR 97215
27	9 RETURN SERVICE REQUESTED		1S2E05CC 300	NICOLA NANCY C	84-544 MANUKU ST	MAKAHA HI 96792
28	0 RETURN SERVICE REQUESTED		1S2E05CC 3000	TAN QIU Z	6325 SE SHERMAN ST	PORTLAND OR 97215-4068
28	1 RETURN SERVICE REQUESTED		1S2E05CC 3200	KLASSY CHARLES R & KLASSY SUSANNE	6335 SE SHERMAN ST	PORTLAND OR 97215-4068
28	2 RETURN SERVICE REQUESTED		1S2E05CC 3300	BENTING DIANNA R	6344 SE SHERMAN ST	PORTLAND OR 97215-4067
20	BETHEN SERVICE RECHESTED		152E05CC 3400	CHAN KIN HOI & PEAKE BDITTINEY U	6336 SE SHERMAN ST	PORTLAND OR 97215
20	A DEMUNA SERVICE REQUESTED		10220500 3500	CHEDAN DIANE M MD	6334 OF OURDMAN OF	DODELAND OD 07215 4067
28	HALIURN SERVICE REQUESTED		19750300 3300	SILFAN DIANE M TR	0324 SE SHERMAN ST	FURILAND UK 9/213-406/
28	5 KETURN SERVICE REQUESTED	152EU5CC 3600	MARILYN M CRILLEY CREDIT SHELTER TR	& CRILLEY & ROWBOTTOM TRUST	6314 SE SHERMAN ST	FURTLAND OR 97215
28	6 RETURN SERVICE REQUESTED		1S2E05CC 3700	WINTER KATHLEEN A	6306 SE SHERMAN ST	PORTLAND OR 97215-4067
28	7 RETURN SERVICE REQUESTED		1S2E05CC 3800	HARTER MICHAEL	6244 SE SHERMAN ST	PORTLAND OR 97215
28	8 RETURN SERVICE REQUESTED		1S2E05CC 3900	STEVENSON MARJORIE L	6232 SE SHERMAN ST	PORTLAND OR 97215
28	9 RETURN SERVICE REQUESTED		1S2E05CC 400	FOX MARJORIE L	5741 SE INSLEY ST	PORTLAND OR 97206
20	0 RETURN SERVICE REQUESTED		1S2E05CC 4000	BILODEAU MARK ET AL	6226 SE SHERMAN ST	PORTLAND OR 97215
20	1 DETIIDN SERVICE DECHESTED		19280500 4200	WESTON INVESTMENT CO LLC	2154 NE BROADWAY	POPTIAND OF 97232-1590
23	A DECOM SERVICE REQUESTED		10200500 4200	PLONEDC ODVILLE I	7715 NE 210E AVE	DODULAND OD 07211 1000
1 20	I A DEPOSITI FLAME ACTIVITY FLATING TREAST CONTRACTOR				A REAL PROPERTY OF THE REAL PR	

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		IS2E05CC 4800	BUGAR LISA F & BUGAR EDWARD L	2245 SE 66TH AVE	PORTLAND OR 97215
294 RETURN SERVICE REQUESTED		1S2E05CC 500	TRAN MICHAEL & TRAN ANTHONY	6238 SE LINCOLN ST	PORTLAND OR 97215
295 RETURN SERVICE REQUESTED		1S2E05CC 600	POH LEONG CHIN & FELICIA HANG-KU	10526 160TH AVE NE	REDMOND WA 98052
296 RETURN SERVICE REQUESTED		1S2E05CC 6000	STANUCK LLC	7458 SW ASHFORD ST	TIGARD OR 97224-7142
297 RETURN SERVICE REQUESTED		1S2E05CC 6100	DOMANSKI JAMESS DOMANSKI JENNIFER	2425 SE 67TH AVE	PORTLAND OR 97206-1214
209 DEFUEN CEDVICE DECUECTED		10220500 0100	DOLAN DODELAND DEODEDETES IIC	20270 N 102ND DI	COMPEDATE AZ 85255
200 RETORN SERVICE REQUESTED		13220300 0200	BODAN FORTEAND FROTENTES DEC	20275 N 102ND 11	SCOTTSDALL AN 05255
299 RETURN SERVICE REQUESTED		IS2E05CC 6300	FOSTER STEPHEN M & FOSTER SALLY	241/ SE 66TH AVE	PORTLAND OR 97206-1205
300 RETURN SERVICE REQUESTED		1S2E05CC 6400	2407 SE 66TH LLC	12999 S CASTO RD	OREGON CITY OR 97045
301 RETURN SERVICE REQUESTED		1S2E05CC 6500	DIVISION STREET APTS NUMBER 1 LLC	82 UNDERHILL RD	ORINDA CA 94563
302 RETURN SERVICE REQUESTED		1S2E05CC 700	YOUNGER JACK W JR & YOUNGER AYAKA	6228 SE LINCOLN ST	PORTLAND OR 97215
303 RETURN SERVICE REQUESTED		1S2E05CC 7100	FAYEN JASON L & FAYEN ANN M	2428 SE 64TH AVE	PORTLAND OR 97206
304 RETURN SERVICE REQUESTED		1S2E05CC 7200	OTT STEVE M	6332 SE DIVISION ST	PORTLAND OR 97206
30F DEFUNA OPPUTOR DEGUNDER		10220500 7200	NEGEN GLADZ	COOL OF DIVISION OF \$1	DODELAND OD 07200
305 RETURN SERVICE REQUESTED	10000500 0100	ISZEUSCC /SUU	NEGEN CLARK	6320 SE DIVISION ST #1	PORTLAND OR 97206
306 RETURN SERVICE REQUESTED	1S2E05CC /400	MAGDALENO JOHNNY &	HAY-MAGDALENO SANDRA	6316 SE DIVISION ST	PORTLAND OR 97206-1352
307 RETURN SERVICE REQUESTED		1S2E05CC 7500	GUNDERSON PROPERTIES LLC	3529 SE KNAPP ST	PORTLAND OR 97202
308 RETURN SERVICE REQUESTED		1S2E05CC 800	KHUT SAKHENN & KHUT SAY K	6222 SE LINCOLN ST	PORTLAND OR 97215-4074
309 RETURN SERVICE REQUESTED		1S2E05CC 8400	WARD STRAUSS FAMILY TR	6319 SE WINDSOR CT	PORTLAND OR 97206-1366
310 RETURN SERVICE REQUESTED		1S2E05CC 8500	ALEX CHERYL A	2425 SE 64TH AVE	PORTLAND OR 97206-1368
311 DETUDN SERVICE DECHESTED		18280500 8600	DROWNDRIDGE EINN & CULOE	2427 SE 64TH AVE	DODTIAND OD 97206-1368
212 DEBUDN CEDUICE REQUESTED	10320500 0701	SCOUT OPCO SE DIVISION STREET LLC	BROWNBRIDGE FINN & CHECE	15 W 6mu cm #2400	TUT CD OK 7/110
312 REIGRN SERVICE REQUESTED	132E03CC 8701	SSSRI OFCO SE DIVISION SIREEI LLC	KIAN LLC	15 W 01H 31 #2400	1013A OK /4115
313 RETURN SERVICE REQUESTED	IS2E05CC 8701	SSSHT PROPCO SE DIVISION STREET LLC	SSSHT ACQUIS LLC/MICHAEL TERJUNG	10 TERRACE RD	LADERA RANCH CA 92694-1182
314 KETURN SERVICE REQUESTED		152E05CC 900	TAVAN EMMANUEL TRUNG TOAN	6223 SE GRANT ST	FURTLAND OR 97215
315 RETURN SERVICE REQUESTED	1S2E05CC 90000	ASSOCIATION OF UNIT OWNERS OF	TABOR PARK CONDOMINIUM	PO BOX 28205	PORTLAND OR 97228-8205
316 RETURN SERVICE REQUESTED		1S2E05CC 90001	MURRAY CHRISTOPHER	6600 SE DIVISION ST #101	PORTLAND OR 97206
317 RETURN SERVICE REQUESTED		1S2E05CC 90002	TURNQUIST JOSEPH & TURNQUIST KAORI	6600 SE DIVISION ST #102	PORTLAND OR 97206
318 BETURN SERVICE REQUESTED		1S2E05CC 90003	SWOPE PARKER ET AL	6600 SE DIVISION ST #103	PORTLAND OR 97206
319 DETIIN SERVICE DECURCEED		19280500 90004	SCHILLING FLT N	6600 SE DIVISION OF #104	POPTIAND OF 97206
220 DESUDA CEDUICE DECUECTED		10220500 90004	ADDRA MILITAMO DEV VIV MD	0000 OF DIATON OI 4104	DODULAND OR 57200
320 RETURN SERVICE REQUESTED		IS2E05CC 90005	ARETA WILLIAMS REV LIV TR	ZIU3 NE IS8TH PL	PORTLAND OR 97230-8246
321 RETURN SERVICE REQUESTED		1S2E05CC 90006	VORE RACHEL ANN	6600 SE DIVISION ST #106	PORTLAND OR 97206
322 RETURN SERVICE REQUESTED		1S2E05CC 90008	THOMAS E HERING REV LIV TR	1908 NE 70TH AVE	PORTLAND OR 97213-5329
323 RETURN SERVICE REQUESTED		1S2E05CC 90009	SEIPP DALE E JR & SEIPP DANA	6600 SE DIVISION ST #202	PORTLAND OR 97206-1285
324 RETURN SERVICE REQUESTED		1S2E05CC 90010	MANEK EWA	6600 SE DIVISION ST #203	PORTLAND OR 97206
325 RETURN SERVICE REQUESTED		182E05CC 90011	FROHMAN JENNIFER L	6600 SE DIVISION ST #204	PORTLAND OR 97206
326 DETUDN SERVICE DECHESTED		18280500 90012	DOGEN DENIAMAN U	6600 SE DIVISION ST #205	DODITIAND OD 97206
227 DEFURN SERVICE REQUESTED		102205000 00012	ANTEL MANNED T	COOL OF DIVISION OF #205	PORTLAND OR 97200
327 RETURN SERVICE REQUESTED	10000500 00014	152E05CC 90013	SMITH TANNER J	6600 SE DIVISION ST #206	PORTLAND OR 97206
328 RETURN SERVICE REQUESTED	1S2E05CC 90014	MUGGLESTONE IANTHE &	GREY ALEXANDRIA	6600 SE DIVISION ST #207	PORTLAND OR 97206
329 RETURN SERVICE REQUESTED		1S2E05CC 90015	WENDY PATTEE SUPPLEMENTAL NEEDS TR	5523 SE CESAR E CHAVEZ BLVD	PORTLAND OR 97202
330 RETURN SERVICE REQUESTED		1S2E05CC 90016	SHORR SCOTT & SHORR KAREN	3110 NE KLICKITAT ST	PORTLAND OR 97212
331 RETURN SERVICE REQUESTED		1S2E05CC 90017	WATSON CRAIG R & WATSON SUSAN M	1215 CARRIAGE DR	EAST AURORA NY 14052
332 RETURN SERVICE REQUESTED		1S2E05CC 90018	C JANSEN LLC	31618 BRYANT WAY SW	ALBANY OR 97321
333 RETURN SERVICE REQUESTED		182E05CC 90019	YEE SHARNA	6600 SE DIVISION ST #303	PORTLAND OR 97206
334 DETUDN SERVICE DECHESTED		18280500 90020	UFFERON DIANE M	6600 SE DIVISION ST #304	DODITIAND OD 97206
551 ABIOTA OBIATOD ABGODOTED		10110000 90010		5500 0E DIVIDION DI \$500	PORTEMIND OIL 97200
JA DEBUIDN CEDUICE DECUECEED		10200500 00021			DODELAND OD 07206
335 RETURN SERVICE REQUESTED		1s2E05cc 90021	CARMONA MANUEL	6600 SE DIVISION ST #305	PORTLAND OR 97206
335 RETURN SERVICE REQUESTED 336 RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022	ERWERT ANNA M	6600 SE DIVISION ST #305 6600 SE DIVISION ST #306	FORTLAND OR 97206 FORTLAND OR 97206
335 RETURN SERVICE REQUESTED 336 RETURN SERVICE REQUESTED 337 RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022 1S2E05CC 90023	ERWERT ANNA M BERMAN ALYSON	6600 SE DIVISION ST #305 6600 SE DIVISION ST #306 6600 SE DIVISION ST #307	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022 1S2E05CC 90023 1S2E05CC 90024	ERWERT ANNA M BERNAN ALYSON DRUI LAURENT A	6600 SE DIVISION ST #305 6600 SE DIVISION ST #306 6600 SE DIVISION ST #307 6600 SE DIVISION ST #308	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206
335   RETURN SERVICE REQUESTED     336   RETURN SERVICE REQUESTED     338   RETURN SERVICE REQUESTED     339   RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022 1S2E05CC 90023 1S2E05CC 90024 1S2E05CC 90025	ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V	6600 SE DIVISION ST #305 6600 SE DIVISION ST #306 6600 SE DIVISION ST #307 6600 SE DIVISION ST #308 7610 SE TAGGART ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206
335   RETURN SERVICE REQUESTED     336   RETURN SERVICE REQUESTED     337   RETURN SERVICE REQUESTED     338   RETURN SERVICE REQUESTED     340   RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022 1S2E05CC 90023 1S2E05CC 90024 1S2E05CC 90025 1S2E05CD 100	CARGUNA PANUEL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL	6600 SE DIVISION ST #305 6600 SE DIVISION ST #306 6600 SE DIVISION ST #307 6600 SE DIVISION ST #308 7610 SE TAGGART ST 2045 SE 72ND AVE	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215
335   RETURN SERVICE REQUESTED     336   RETURN SERVICE REQUESTED     337   RETURN SERVICE REQUESTED     339   RETURN SERVICE REQUESTED     340   RETURN SERVICE REQUESTED     341   RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022 1S2E05CC 90023 1S2E05CC 90024 1S2E05CD 90025 1S2E05CD 1000 1S2E05CD 1000	CAROUNA PANUEL ERWERT ANNA M BERWAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA 6 WIENER MICHAEL ROSS LOREN M 6 LAFRANCHISE JULTE M	b600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE T2ND AVE	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215
335   RETURN SERVICE REQUESTED     336   RETURN SERVICE REQUESTED     337   RETURN SERVICE REQUESTED     338   RETURN SERVICE REQUESTED     340   RETURN SERVICE REQUESTED     341   RETURN SERVICE REQUESTED     342   RETURN SERVICE REQUESTED		1S2E05CC       90021         1S2E05CC       90022         1S2E05CC       90023         1S2E05CC       90024         1S2E05CC       90025         1S2E05CC       100         1S2E05CD       1000         1S2E05CD       1000	CARGUNA PARUEL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROFERT B, & HOWARD AWY J.	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         2120 SE LUNCOLN ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215
335   RETURN SERVICE REQUESTED     336   RETURN SERVICE REQUESTED     337   RETURN SERVICE REQUESTED     338   RETURN SERVICE REQUESTED     340   RETURN SERVICE REQUESTED     341   RETURN SERVICE REQUESTED     342   RETURN SERVICE REQUESTED		1S2E05CC 90021 1S2E05CC 90022 1S2E05CC 90023 1S2E05CC 90025 1S2E05CD 100 1S2E05CD 1000 1S2E05CD 1100 1S2E05CD 1200	CARBUNA PARUEL ERWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA 6 WIENER MICHAEL ROSS LOREN M 6 LAFRANCHISE JULIE M HOWARD ROBERT B 6 HOWARD AMY L EIETCHER JEFEREY AIM	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         712 SE LINCOLN ST         712 SE LINCOLN ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97205 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED		1S2E05CC       90021         1S2E05CC       90022         1S2E05CC       90023         1S2E05CC       90024         1S2E05CC       90025         1S2E05CD       1000         1S2E05CD       1100         1S2E05CD       1100         1S2E05CD       1200	CRARONA PAROLL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         7120 SE LINCOLN ST         7121 SE LINCOLN ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED		1S2E05CC     90021       1S2E05CC     90022       1S2E05CC     90023       1S2E05CC     90024       1S2E05CC     1000       1S2E05CD     1000       1S2E05CD     1100       1S2E05CD     1200       1S2E05CD     1200       1S2E05CD     1200	CAROUNA PARULL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA 6 WIENER MICHAEL ROSS LOREN M 6 LAFRANCHISE JULIE M HOWARD ROBERT B 6 HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         712 SE LINCOLN ST         718 SE LINCOLN ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97205 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215-4052
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335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED		1S2E05CC     90021       1S2E05CC     90022       1S2E05CC     90024       1S2E05CC     90025       1S2E05CC     100       1S2E05CD     100       1S2E05CC     1100       1S2E05CD     1100       1S2E05CD     1200       1S2E05CD     1300       1S2E05CD     1400       1S2E05CD     1500	CAROUNA PANULL ERWERT ANNA M EERWAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL & KAUFER ELLEN NELLY	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7103 SE GRANT ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215 PORTLAND OR 97215
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335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED	152E05CD 1800 RODRIGUEZ	1S2E05CC     90021       1S2E05CC     90023       1S2E05CC     90024       1S2E05CC     90025       1S2E05CD     100       1S2E05CD     1000       1S2E05CD     1200       1S2E05CD     1200       1S2E05CD     1300       1S2E05CD     1400       1S2E05CD     1500       1S2E05CD     1500       1S2E05CD     5500       1S2E05CD     1600       FERNANDO & SCHULZ-RODRIGUEZ SEREMA	CARGUAR PARULL ERWERT ANNA M EERWAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALOME TR MOWREY MARY WILTON CHERYL & AUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215-4052 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4031 PORTLAND OR 97215
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED	182E05CD 1800 RODRIGUEZ	1S2E05CC     90021       1S2E05CC     90022       1S2E05CC     90024       1S2E05CC     90025       1S2E05CD     100       1S2E05CD     1000       1S2E05CD     1000       1S2E05CD     1000       1S2E05CD     1200       1S2E05CD     1300       1S2E05CD     1500       1S2E05CD     1500       1S2E05CD     1600       IS2E05CD     1600       IS2E05CD     1600       IS2E05CD     1600       IS2E05CD     1600       IS2E05CD     1900	CARGUNA PANULL ERWERT ANNA M BERWAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL & KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAM MARK & SHERMAN KAREN M	b600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         7102 SE LINCOLN ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7104 SE LINCOLN ST         7105 SE LINCOLN ST         7106 SE LINCOLN ST         7103 SE GRANT ST         7107 SE GRANT ST         7121 SE GRANT ST         7121 SE CRANT ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215-4052 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4031 PORTLAND OR 97215-4031 PORTLAND OR 97215-4031 PORTLAND OR 97215-4031
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED	152E05CD 1800 RODRIGUEZ	1S2E05CC     90021       1S2E05CC     90022       1S2E05CC     90024       1S2E05CC     90025       1S2E05CD     100       1S2E05CD     1000       1S2E05CD     1200       1S2E05CD     1200       1S2E05CD     1400       1S2E05CD     1500       1S2E05CD     1600       FENNANDO 6     SCHUL2-RODRIGUEZ SERENA       1S2E05CD     1900	CARBUNA PANULL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHEERNAN MARK & SHERMAN KAREN M MINDERSON CHETS & A UNDERSON PANM	6600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #307         6600 SE DIVISION ST #307         7610 SE TAGGART ST         2045 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7114 SE LINCOLN ST         7103 SE GRANT ST         7103 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7121 SE CRANT ST         7122 SE CANT ST         7123 SE CRANT ST         7124 SE CRANT ST         7125 SE 72ND AVE	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4031 PORTLAND OR 97215-4031 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       350     RETURN SERVICE REQUESTED	152E05CD 1800 RODRIGUEZ	152205CC   90021     152205CC   90023     152205CC   90024     152205CC   90025     152205CD   100     152205CD   100     152205CD   1200     152205CD   1300     152205CD   1300     152205CD   1400     152205CD   1500     152205CD   1600     FERNANDO & SCHULZ-RODRIGUEZ SERENA     152205CD   1900     152205CD   1900     152205CD   1900     152205CD   2000	CARGUNA PANULL ERWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFFANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAM MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN PENNLEND DARON	6600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7107 SE GRANT ST         7115 SE CRANT ST         7121 SE ZIND AVE         7123 SE JANDOL ST         7103 SE GRANT ST         7121 SE CRANT ST         7121 SE ZIND AVE         7121 SE CRANT ST         7121 SE JANDA VE         7121 SE CRANT ST         7121 SE CRANT ST         7121 SE ZIND AVE	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       350     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED	152E05CD 1800 RODRIGUEZ	1S2E05CC     90021       1S2E05CC     90023       1S2E05CC     90024       1S2E05CC     90025       1S2E05CD     100       1S2E05CD     1000       1S2E05CD     1000       1S2E05CD     1200       1S2E05CD     1300       1S2E05CD     1400       1S2E05CD     1600       FERNANDO     & SCHULZ-RODRIGUEZ SERENA       1S2E05CD     1900       1S2E05CD     2000       1S2E05CD     2000	CARGUNA PANULL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN PENDLAND AARON	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7103 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7121 SE T2ND AVE         7227 SE 72ND AVE         7247 SE 72ND AVE         7247 SE 72ND AVE         7247 SE 72ND AVE	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4031 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAN
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335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       350     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED       353     RETURN SERVICE REQUESTED       354     RETURN SERVICE REQUESTED       355     RETURN SERVICE REQUESTED	152E05CD 1800 RODRIGUEZ	1S2E05CC     90021       1S2E05CC     90022       1S2E05CC     90024       1S2E05CC     90025       1S2E05CD     100       1S2E05CD     1000       1S2E05CD     1000       1S2E05CD     1000       1S2E05CD     1300       1S2E05CD     1400       1S2E05CD     1600       FERNANDO     & SCHULZ-RODRIGUEZ       1S2E05CD     1900       1S2E05CD     2000       1S2E05CD     2100       1S2E05CD     2200       1S2E05CD     2200       1S2E05CD     2200	CHARDIAN PANULL ERWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOERN M & LAFRANCHISE JULLE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHHIS & ANDERSON FAWN PENULAND AARON REWILL LLC TI DAVID	b600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #307         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7103 SE GRANT ST         7121 SE GRANT ST         7122 SE 72ND AVE         2129 SE 72ND AVE         2129 SE 72ND AVE         2129 SE 72ND AVE         2129 SE 72ND AVE         7106 SE GRANT ST         7107 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7122 SE 72ND AVE         7130 SE GRANT ST         714 SE SC SCANT ST	PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97206 PORTLAND OR 97215 PORTLAND OR 97215 PORTLAND OR 97215-4052 PORTLAND OR 97215-4052 PORTLAND OR 97215-4052 PORTLAND OR 97215-4031 PORTLAND OR 97215-4031 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215-4045 PORTLAND OR 97215-4035 PALO ALTO CA 94306-2609 PORTLAND OR 97215-4032
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SCHULZ-RODRIGUEZ SERENA     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2500     1S2E05CD   2600     1S2E05CD   2600     1S2E05CD   2600     1S2E05CD   2700     1S2E05CD   2800</th> <th>CHARDIAN PANULL ENWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA &amp; WIENER MICHAEL ROSS LOREN M &amp; LAFRANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHRIS &amp; ANDERSON FAWN FENDLAND AARON REWILL LLC TI DAVID GARBER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PATRICIA HUDSON CHARLES &amp; CHISHOLM SARAH CAIDO LAS L&amp; HERETH LESSICA P</th> <th>b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7104 SE LINCOLN ST         7105 SE LINCOLN ST         7107 SE GRANT ST         7121 SE GRANT ST         7121 SE CRANT ST         7121 SE CRANT ST         7121 SE CRANT ST         7121 SE GRANT ST         7121 SE CRANT ST         7121 SE ST 2ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE</th> <th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215</th>	152E05CD 1800 RODRIGUEZ	1S2E05CC   90021     1S2E05CC   90022     1S2E05CC   90024     1S2E05CC   90025     1S2E05CC   100     1S2E05CC   1000     1S2E05CC   1000     1S2E05CC   1000     1S2E05CD   1200     1S2E05CD   1300     1S2E05CD   1400     1S2E05CD   1600     FERNANDO & SCHULZ-RODRIGUEZ SERENA     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2000     1S2E05CD   2500     1S2E05CD   2600     1S2E05CD   2600     1S2E05CD   2600     1S2E05CD   2700     1S2E05CD   2800	CHARDIAN PANULL ENWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN FENDLAND AARON REWILL LLC TI DAVID GARBER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PATRICIA HUDSON CHARLES & CHISHOLM SARAH CAIDO LAS L& HERETH LESSICA P	b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7104 SE LINCOLN ST         7105 SE LINCOLN ST         7107 SE GRANT ST         7121 SE GRANT ST         7121 SE CRANT ST         7121 SE CRANT ST         7121 SE CRANT ST         7121 SE GRANT ST         7121 SE CRANT ST         7121 SE ST 2ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215
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WIENER MICHAEL ROSS LOEN M &amp; LAFRANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &amp; KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHHIS &amp; ANDERSON FAWN PENDLAND AARON REWILL LLC TI DAVID GARBER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PATRICIA HUDSON CHALES &amp; CHISHOLM SARAH CAIRO ELLAS J &amp; HERFH JESSICA R KOEHLER PETER &amp; TILLOTSON KEELEY</th><th>b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7113 SE GRANT ST         7104 SE LINCOLN ST         7105 SE LINCOLN ST         7106 SE GRANT ST         7117 SE GRANT ST         7121 SE GRANT ST         7122 SE 72ND AVE         7227 SE 72ND AVE         7227 SE 72ND AVE         7223 SE 72ND AVE         7223 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7245 SE 72ND AVE         7245 SE 72ND AVE         7245 SE 72ND AVE         7241 SE ORT AVE         7245 SE 72ND AVE   </th></t<> <th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215</th>	1S2E05CD 1800 RODRIGUEZ	152205CC       90021         152205CC       90022         152205CC       90024         152205CC       90025         152205CC       100         152205CD       100         152205CD       100         152205CD       1200         152205CD       1300         152205CD       1600         152205CD       1600         152205CD       1600         152205CD       1600         152205CD       1600         152205CD       1600         152205CD       1900         152205CD       2000         152205CD       2000         152205CD       2000         152205CD       2500         152205CD       2500         152205CD       2600         152205CD       2600         152205CD       2800         152205CD       2800         152205CD       2800         152205CD       2800         152205CD       2900         152205CD       2900	CHARDIAN PANULL ENWERT ANNA M BERMAN ALYSON DRUI LUNENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOEN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL & KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHHIS & ANDERSON FAWN PENDLAND AARON REWILL LLC TI DAVID GARBER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PATRICIA HUDSON CHALES & CHISHOLM SARAH CAIRO ELLAS J & HERFH JESSICA R KOEHLER PETER & TILLOTSON KEELEY	b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7113 SE GRANT ST         7104 SE LINCOLN ST         7105 SE LINCOLN ST         7106 SE GRANT ST         7117 SE GRANT ST         7121 SE GRANT ST         7122 SE 72ND AVE         7227 SE 72ND AVE         7227 SE 72ND AVE         7223 SE 72ND AVE         7223 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7245 SE 72ND AVE         7245 SE 72ND AVE         7245 SE 72ND AVE         7241 SE ORT AVE         7245 SE 72ND AVE	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215
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SCHULZ-RODRIGUEZ SERENA         1S2E05CD       2100         1S2E05CD       2100         1S2E05CD       2100         1S2E05CD       2300         1S2E05CD       2500         1S2E05CD       2500         1S2E05CD       2600         1S2E05CD       2700         1S2E05CD       2800         1S2E05CD       2900         1S2E0</th><th>CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA &amp; WIENER MICHAEL ROSS LOREN M &amp; LAFFANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERVL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHHIS &amp; ANDERSON FAWN FENDLAND AARON RWHIL LLC TI DAVID GARBER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PATRICIA HUDSON CHARLES &amp; CHISHOLM SARAH CAIRO ELLAS J &amp; HERETH JESSICA R KOEHLER PETER &amp; TILLOTSON KEELEY BATHURST ELIZABETH A</th><th>6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE CRANT ST         7121 SE T2ND AVE         217 SE 72ND AVE         217 SE 72ND AVE         2207 SE 72ND AVE         2217 SE 72ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2245 SE 72ND AVE         2244 SE 72ND AVE         2245 SE 72ND AVE         2244 SE 72ND AVE         2245 SE 72ND AVE</th><th>PORTLAND OR 97206         PORTLAND OR 97205         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215         PALO ALTO CA 94306-2609         PORTLAND OR 97215         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215</th></t<>	152E05CD 1800 RODRIGUEZ	1S2E05CC       90021         1S2E05CC       90023         1S2E05CC       90024         1S2E05CC       90024         1S2E05CC       90025         1S2E05CD       1000         1S2E05CD       1000         1S2E05CD       1200         1S2E05CD       1400         1S2E05CD       1500         1S2E05CD       1600         FERNAND & SCHULZ-RODRIGUEZ SERENA         1S2E05CD       2100         1S2E05CD       2100         1S2E05CD       2100         1S2E05CD       2300         1S2E05CD       2500         1S2E05CD       2500         1S2E05CD       2600         1S2E05CD       2700         1S2E05CD       2800         1S2E05CD       2900         1S2E0	CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFFANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERVL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHHIS & ANDERSON FAWN FENDLAND AARON RWHIL LLC TI DAVID GARBER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PATRICIA HUDSON CHARLES & CHISHOLM SARAH CAIRO ELLAS J & HERETH JESSICA R KOEHLER PETER & TILLOTSON KEELEY BATHURST ELIZABETH A	6600 SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE CRANT ST         7121 SE T2ND AVE         217 SE 72ND AVE         217 SE 72ND AVE         2207 SE 72ND AVE         2217 SE 72ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2245 SE 72ND AVE         2244 SE 72ND AVE         2245 SE 72ND AVE         2244 SE 72ND AVE         2245 SE 72ND AVE	PORTLAND OR 97206         PORTLAND OR 97205         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215         PALO ALTO CA 94306-2609         PORTLAND OR 97215         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215
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WIENER MICHAEL ROSS LOEN M &amp; LAFRANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAM MARK &amp; SHERMAN KAREN M ANDERSON CHRIS &amp; ANDERSON FAWN FENDLAND AARON REWILL LLC TI DAVID GARERT JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PATRICIA HUDSON CHARLES &amp; CHISHOLM SARAH CAIRO ELLISA J &amp; HERFTH JESSICA R KOEHLER FETER &amp; TILLOTSON KEELEY BATHURST ELIZABETH A CATO LINDA</th><th>b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7105 SE GRANT ST         7107 SE GRANT ST         7115 SE 72ND AVE         7121 SE GRANT ST         7227 SE 72ND AVE         7227 SE 72ND AVE         7223 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7141 SE 55TH AVE         7122 SE HARRISON CT         7069 SE DIVISION ST</th><th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4051         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215<!--</th--></th></t<>	1S2E05CD 1800 RODRIGUEZ	1S2205CC       90021         1S2205CC       90022         1S2205CC       90024         1S2205CC       90025         1S2205CC       100         1S2205CD       100         1S2205CD       100         1S2205CD       1200         1S2205CD       1300         1S2205CD       1600         1S2205CD       1600         1S2205CD       1600         1S2205CD       1600         1S2205CD       1900         1S2205CD       1900         1S2205CD       2000         1S2205CD       2000         1S2205CD       2000         1S2205CD       2500         1S2205CD       2500         1S2205CD       2500         1S2205CD       2500         1S2205CD       2600         1S2205CD       2800         1S2205CD       2800         1S2205CD       2800         1S2205CD       2900         1S2205CD       300         1S2205CD       300         1S2205CD       300         1S2205CD	CHARDIAN PANULL ENWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOEN M & LAFRANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAM MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN FENDLAND AARON REWILL LLC TI DAVID GARERT JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PATRICIA HUDSON CHARLES & CHISHOLM SARAH CAIRO ELLISA J & HERFTH JESSICA R KOEHLER FETER & TILLOTSON KEELEY BATHURST ELIZABETH A CATO LINDA	b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7105 SE GRANT ST         7107 SE GRANT ST         7115 SE 72ND AVE         7121 SE GRANT ST         7227 SE 72ND AVE         7227 SE 72ND AVE         7223 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7141 SE 55TH AVE         7122 SE HARRISON CT         7069 SE DIVISION ST	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4051         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215 </th
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       350     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED       352     RETURN SERVICE REQUESTED       353     RETURN SERVICE REQUESTED       354     RETURN SERVICE REQUESTED       355     RETURN SERVICE REQUESTED       356     RETURN SERVICE REQUESTED       357     RETURN SERVICE REQUESTED       358     RETURN SERVICE REQUESTED       359     RETURN SERVICE REQUESTED <t< th=""><th>152E05CD 1800 RODRIGUEZ</th><th>1S2205CC     90021       1S2205CC     90023       1S2205CC     90024       1S2205CC     1000       1S2205CC     1000       1S2205CD     1000       1S2205CD     1000       1S2205CD     1200       1S2205CD     1400       1S2205CD     1600       FERNANDO     &amp; SCHULZ-RODRIGUEZ       1S2205CD     1600       FERNANDO     &amp; SCHULZ-RODRIGUEZ       1S2205CD     2000       1S2205CD     2300       1S2205CD     2300       1S2205CD     2000       1S2205CD     2000       1S2205CD     2500       1S2205CD     2600       1S2205CD     2600       1S2205CD     2700       1S2205CD     2900       1S2205CD     3100</th></t<> <th>CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA &amp; WIENER MICHAEL ROSS LOREN M &amp; LAFFANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHHIS &amp; ANDERSON FAWN FENDLAND AARON RWHIL LLC TI DAVID GARBER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PATRICIA HUDSON CHARLES &amp; CHISHOLM SARH CAIRO ELLAS J &amp; HERETH JESSICA R KOEHLER PETER &amp; TILLOTSON KEELEY BATHURST ELIZABETH A CATO LINDA WORTH ERIN J &amp; WORTH DAVID J</th> <th>bold SE DIVISION ST # 305         6600 SE DIVISION ST # 306         6600 SE DIVISION ST # 308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7106 SE GRANT ST         7106 SE GRANT ST         7106 SE GRANT ST         7227 SE 72ND AVE         2237 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         7122 SE HARRISON CT         7066 SE DIVISION ST         7120 SE HARRISON CT</th> <th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4051         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PALO ALTO CA 94306-2609         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215</th>	152E05CD 1800 RODRIGUEZ	1S2205CC     90021       1S2205CC     90023       1S2205CC     90024       1S2205CC     1000       1S2205CC     1000       1S2205CD     1000       1S2205CD     1000       1S2205CD     1200       1S2205CD     1400       1S2205CD     1600       FERNANDO     & SCHULZ-RODRIGUEZ       1S2205CD     1600       FERNANDO     & SCHULZ-RODRIGUEZ       1S2205CD     2000       1S2205CD     2300       1S2205CD     2300       1S2205CD     2000       1S2205CD     2000       1S2205CD     2500       1S2205CD     2600       1S2205CD     2600       1S2205CD     2700       1S2205CD     2900       1S2205CD     3100	CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFFANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHHIS & ANDERSON FAWN FENDLAND AARON RWHIL LLC TI DAVID GARBER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PATRICIA HUDSON CHARLES & CHISHOLM SARH CAIRO ELLAS J & HERETH JESSICA R KOEHLER PETER & TILLOTSON KEELEY BATHURST ELIZABETH A CATO LINDA WORTH ERIN J & WORTH DAVID J	bold SE DIVISION ST # 305         6600 SE DIVISION ST # 306         6600 SE DIVISION ST # 308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7104 SE LINCOLN ST         7103 SE GRANT ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7112 SE LINCOLN ST         7103 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7121 SE GRANT ST         7106 SE GRANT ST         7106 SE GRANT ST         7106 SE GRANT ST         7227 SE 72ND AVE         2237 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         2244 SE 72ND AVE         7122 SE HARRISON CT         7066 SE DIVISION ST         7120 SE HARRISON CT	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4051         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PALO ALTO CA 94306-2609         PORTLAND OR 97215-4047         PORTLAND OR 97215
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       350     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED       352     RETURN SERVICE REQUESTED       353     RETURN SERVICE REQUESTED       354     RETURN SERVICE REQUESTED       355     RETURN SERVICE REQUESTED       356     RETURN SERVICE REQUESTED       357     RETURN SERVICE REQUESTED       358     RETURN SERVICE REQUESTED       359     RETURN SERVICE REQUESTED       360     RETURN SERVICE REQUESTED <t< th=""><th>1S2E05CD 1800 RODRIGUEZ</th><th>152205CC       90021         152205CC       90023         152205CC       90024         152205CC       90025         152205CC       100         152205CD       100         152205CD       100         152205CD       1200         152205CD       1300         152205CD       1500         152205CD       1600         152205CD       1600         152205CD       1900         152205CD       1900         152205CD       2000         152205CD       2000         152205CD       2000         152205CD       2000         152205CD       2500         152205CD       2600         152205CD       2600         152205CD       2800         152205CD       2800         152205CD       2900         152205CD       3100         152205CD       3100         152205CD       4100</th><th>CHARDIAN PANULL ENWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA &amp; WIENER MICHAEL ROSS LOREN M &amp; LAFFANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHRIS &amp; ANDERSON FAWN FENDLAND AARON RFWILL LLC TI DAVID GAREER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN MARTH SAMAH CAIRO ELLIS J &amp; HERFTH JESICLA R KOEHLER FFTER &amp; TILLOTSON KEELEY BATHURST ELLZABETH A CATO LINDA WORTH ERIN J &amp; WORTH DAVID J BROWN MARIA M</th><th>b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7113 SE LINCOLN ST         7104 SE LINCOLN ST         7105 SE GRANT ST         7117 SE GRANT ST         7121 SE GRANT ST         7122 SE 12ND AVE         7227 SE 72ND AVE         7223 SE 72ND AVE         7223 SE 72ND AVE         7244 SE 70TH AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7241 SE STH AVE         7245 SE 72ND AVE   </th></t<> <th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215</th>	1S2E05CD 1800 RODRIGUEZ	152205CC       90021         152205CC       90023         152205CC       90024         152205CC       90025         152205CC       100         152205CD       100         152205CD       100         152205CD       1200         152205CD       1300         152205CD       1500         152205CD       1600         152205CD       1600         152205CD       1900         152205CD       1900         152205CD       2000         152205CD       2000         152205CD       2000         152205CD       2000         152205CD       2500         152205CD       2600         152205CD       2600         152205CD       2800         152205CD       2800         152205CD       2900         152205CD       3100         152205CD       3100         152205CD       4100	CHARDIAN PANULL ENWERT ANNA M BERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFFANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN FENDLAND AARON RFWILL LLC TI DAVID GAREER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN MARTH SAMAH CAIRO ELLIS J & HERFTH JESICLA R KOEHLER FFTER & TILLOTSON KEELEY BATHURST ELLZABETH A CATO LINDA WORTH ERIN J & WORTH DAVID J BROWN MARIA M	b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7113 SE LINCOLN ST         7104 SE LINCOLN ST         7105 SE GRANT ST         7117 SE GRANT ST         7121 SE GRANT ST         7122 SE 12ND AVE         7227 SE 72ND AVE         7223 SE 72ND AVE         7223 SE 72ND AVE         7244 SE 70TH AVE         7244 SE 70TH AVE         7245 SE 72ND AVE         7241 SE STH AVE         7245 SE 72ND AVE	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       350     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED       352     RETURN SERVICE REQUESTED       353     RETURN SERVICE REQUESTED       354     RETURN SERVICE REQUESTED       355     RETURN SERVICE REQUESTED       356     RETURN SERVICE REQUESTED       357     RETURN SERVICE REQUESTED       358     RETURN SERVICE REQUESTED       359     RETURN SERVICE REQUESTED <t< th=""><th>152E05CD 1800 RODRIGUEZ</th><th>1S2205CC     90021       1S2205CC     90023       1S2205CC     90024       1S2205CC     90025       1S2205CC     1000       1S2205CC     1000       1S2205CC     1000       1S2205CC     1000       1S2205CD     1200       1S2205CD     1400       1S2205CD     1600       FERNANDO     &amp; SCHULZ-RODRIGUEZ       1S2205CD     1900       1S2205CD     2000       1S2205CD     2000       1S2205CD     2300       1S2205CD     2300       1S2205CD     2600       1S2205CD     2600       1S2205CD     2900       1S2205CD     2000       1S2205CD     2600       1S2205CD     2900       1S2205CD     2000       1S2205CD     2000</th><th>CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA &amp; WIENER MICHAEL ROSS LOREN M &amp; LAFFANCHISE JULIE M HOWARD ROBENT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERIC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHRIS &amp; ANDERSON FAWN FENDLAND AARON RWHIL LLC TI DAVID GARBER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PARTICLA HUDSON CHARLES &amp; CHISHOLM SARH CAIRO ELLAS J &amp; HERETH JESSICA R KOEHLER FETER &amp; TILLOTSON KEELEY BATHURST ELIZABETH A CATO LINDA WORTH ERIN J &amp; WORTH DAVID J BRONK MARIA M</th><th>bold SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7103 SE GRANT ST         7104 SE LINCOLN ST         7105 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE CRANT ST         7121 SE T2ND AVE         2121 SE 72ND AVE         2121 SE 72ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2244 SE 70TH AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2244 SE 70TH AVE         7122 SE HARRISON CT         7140 SE HARRISON CT         7140 SE HARRISON CT         7140 SE JOURISON ST         7140 SE JOURISON ST</th><th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215</th></t<>	152E05CD 1800 RODRIGUEZ	1S2205CC     90021       1S2205CC     90023       1S2205CC     90024       1S2205CC     90025       1S2205CC     1000       1S2205CC     1000       1S2205CC     1000       1S2205CC     1000       1S2205CD     1200       1S2205CD     1400       1S2205CD     1600       FERNANDO     & SCHULZ-RODRIGUEZ       1S2205CD     1900       1S2205CD     2000       1S2205CD     2000       1S2205CD     2300       1S2205CD     2300       1S2205CD     2600       1S2205CD     2600       1S2205CD     2900       1S2205CD     2000       1S2205CD     2600       1S2205CD     2900       1S2205CD     2000       1S2205CD     2000	CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & WIENER MICHAEL ROSS LOREN M & LAFFANCHISE JULIE M HOWARD ROBENT B & HOWARD AMY L FLETCHER JEFFREY ALAN PAULA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERIC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN FENDLAND AARON RWHIL LLC TI DAVID GARBER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PARTICLA HUDSON CHARLES & CHISHOLM SARH CAIRO ELLAS J & HERETH JESSICA R KOEHLER FETER & TILLOTSON KEELEY BATHURST ELIZABETH A CATO LINDA WORTH ERIN J & WORTH DAVID J BRONK MARIA M	bold SE DIVISION ST #305         6600 SE DIVISION ST #306         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE 72ND AVE         2103 SE 72ND AVE         7120 SE LINCOLN ST         7112 SE LINCOLN ST         7108 SE LINCOLN ST         7103 SE GRANT ST         7104 SE LINCOLN ST         7105 SE GRANT ST         7121 SE LINCOLN ST         7103 SE GRANT ST         7121 SE CRANT ST         7121 SE T2ND AVE         2121 SE 72ND AVE         2121 SE 72ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2244 SE 70TH AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2245 SE 72ND AVE         2244 SE 70TH AVE         7122 SE HARRISON CT         7140 SE HARRISON CT         7140 SE HARRISON CT         7140 SE JOURISON ST         7140 SE JOURISON ST	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4031         PORTLAND OR 97215-4031         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215
335     RETURN SERVICE REQUESTED       336     RETURN SERVICE REQUESTED       337     RETURN SERVICE REQUESTED       338     RETURN SERVICE REQUESTED       339     RETURN SERVICE REQUESTED       340     RETURN SERVICE REQUESTED       341     RETURN SERVICE REQUESTED       342     RETURN SERVICE REQUESTED       343     RETURN SERVICE REQUESTED       344     RETURN SERVICE REQUESTED       345     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       347     RETURN SERVICE REQUESTED       348     RETURN SERVICE REQUESTED       349     RETURN SERVICE REQUESTED       346     RETURN SERVICE REQUESTED       351     RETURN SERVICE REQUESTED       352     RETURN SERVICE REQUESTED       353     RETURN SERVICE REQUESTED       354     RETURN SERVICE REQUESTED       355     RETURN SERVICE REQUESTED       356     RETURN SERVICE REQUESTED       357     RETURN SERVICE REQUESTED       358     RETURN SERVICE REQUESTED       359     RETURN SERVICE REQUESTED       360     RETURN SERVICE REQUESTED <t< th=""><th>182E05CD 1800 RODRIGUEZ</th><th>152205CC       90021         152205CC       90024         152205CC       90024         152205CC       90025         152205CC       100         152205CD       100         152205CD       100         152205CD       1200         152205CD       1300         152205CD       1500         152205CD       1600         152205CD       1600         152205CD       1900         152205CD       1900         152205CD       2000         152205CD       2600         152205CD       2600         152205CD       2900         152205CD       3100         152205CD       3100         152205CD       400         152205CD       400         152205CD       400         152205CD</th><th>CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA &amp; LAFEANCHISE JULIE M HOWARD ROBERT B &amp; HOWARD AMY L FLETCHER JEFFREY ALAN FULLA MALONE TR MOWREY MARY WILTON CHERYL &amp;KAUFER ELLEN NELLY LEE JENSEN G &amp; LEE MARY J &amp; SCHULZ ERLC SHERMAN MARK &amp; SHERMAN KAREN M ANDERSON CHRIS &amp; ANDERSON FAWN FENDLAND AARON RFWILL LLC TI DAVID GAREER JONATHAN S &amp; TURNER TAMMY N BURBACH DAVID &amp; BERGIN PATRICIA HUDSON CHARLES &amp; CHISHOLM SARAH CAIRO ELLAS J &amp; HERETH JESSICA R KOEHLER FFTER &amp; TILDOTSON KEELEY BATHURST ELLZABETH A CATO LINDA WORTH ERIN J &amp; WORTH DAVID J BRONN MARIA M MEYER RODRICK H</th><th>b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE TAGGART ST         2045 SE TARGART ST         2045 SE TARGART ST         710 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7105 SE CRANT ST         7107 SE GRANT ST         7115 SE TANDA VE         2115 SE TANDA VE         2121 SE CRANT ST         7121 SE GRANT ST         7122 SE TANDA VE         2217 SE TANDA VE         2219 SE 72ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2244 SE 70TH AVE         2245 SE 72ND AVE         7122 SE HARRISON CT         7069 SE DIVISION ST         7110 SE HARRISON CT         7069 SE DIVISION ST         7110 SE HARRISON CT         7045 SE 70TH AVE         234 SE 70TH AVE         234 SE 70TH AVE         234 SE 70TH AVE         236 SE 70TH AVE</th><th>PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4051         PORTLAND OR 97215-4031         PORTLAND OR 97215-4035         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215         PORTLAND OR 97215</th></t<>	182E05CD 1800 RODRIGUEZ	152205CC       90021         152205CC       90024         152205CC       90024         152205CC       90025         152205CC       100         152205CD       100         152205CD       100         152205CD       1200         152205CD       1300         152205CD       1500         152205CD       1600         152205CD       1600         152205CD       1900         152205CD       1900         152205CD       2000         152205CD       2600         152205CD       2600         152205CD       2900         152205CD       3100         152205CD       3100         152205CD       400         152205CD       400         152205CD       400         152205CD	CHARDIAN PANULL ENWERT ANNA M EERMAN ALYSON DRUI LAURENT A HO DAVID V WITTHAUS DENA & LAFEANCHISE JULIE M HOWARD ROBERT B & HOWARD AMY L FLETCHER JEFFREY ALAN FULLA MALONE TR MOWREY MARY WILTON CHERYL &KAUFER ELLEN NELLY LEE JENSEN G & LEE MARY J & SCHULZ ERLC SHERMAN MARK & SHERMAN KAREN M ANDERSON CHRIS & ANDERSON FAWN FENDLAND AARON RFWILL LLC TI DAVID GAREER JONATHAN S & TURNER TAMMY N BURBACH DAVID & BERGIN PATRICIA HUDSON CHARLES & CHISHOLM SARAH CAIRO ELLAS J & HERETH JESSICA R KOEHLER FFTER & TILDOTSON KEELEY BATHURST ELLZABETH A CATO LINDA WORTH ERIN J & WORTH DAVID J BRONN MARIA M MEYER RODRICK H	b600 SE DIVISION ST #305         6600 SE DIVISION ST #307         6600 SE DIVISION ST #308         7610 SE TAGGART ST         2045 SE TAGGART ST         2045 SE TARGART ST         2045 SE TARGART ST         710 SE LINCOLN ST         7112 SE LINCOLN ST         7104 SE LINCOLN ST         7105 SE CRANT ST         7107 SE GRANT ST         7115 SE TANDA VE         2115 SE TANDA VE         2121 SE CRANT ST         7121 SE GRANT ST         7122 SE TANDA VE         2217 SE TANDA VE         2219 SE 72ND AVE         2227 SE 72ND AVE         2235 SE 72ND AVE         2244 SE 70TH AVE         2245 SE 72ND AVE         7122 SE HARRISON CT         7069 SE DIVISION ST         7110 SE HARRISON CT         7069 SE DIVISION ST         7110 SE HARRISON CT         7045 SE 70TH AVE         234 SE 70TH AVE         234 SE 70TH AVE         234 SE 70TH AVE         236 SE 70TH AVE	PORTLAND OR 97206         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4052         PORTLAND OR 97215-4051         PORTLAND OR 97215-4031         PORTLAND OR 97215-4035         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4045         PORTLAND OR 97215-4047         PORTLAND OR 97215-4047         PORTLAND OR 97215

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36	6 RETURN SERVICE REQUESTED	•	1S2E05CD 4500	DIANE M DELUCA LIV TR	2236 SE 70TH AVE	PORTLAND OR 97215
36	7 RETURN SERVICE REQUESTED		1S2E05CD 4600	KREUTZER ELIZABETH A	2829 SE 46TH AVE	PORTLAND OR 97206-1663
36	8 RETURN SERVICE REQUESTED		1S2E05CD 4700	ALMIRALL JOHN	2220 SE 70TH AVE	PORTLAND OR 97215
36	9 RETURN SERVICE REQUESTED		1S2E05CD 4800	HARTLEY GEORGE W IV & WITTMAN PAUL	PO BOX 1036	GRESHAM OR 97030-0222
37	U RETURN SERVICE REQUESTED		152E05CD 4900	JARCHO DEBRA L	2204 SE /OTH AVE	PORTLAND OR 97215
27	2 RETURN SERVICE REQUESTED		162E05CD 500	FRIEDLANDER DAVID M	7332 SE HARRISON CT	PORTLAND OR 97215-4142
37	2 RETURN SERVICE REQUESTED	18280500 5000	DALE & MONICA MONDOE TR &	FORD BARBARA E TR & RIOS MELANIE TR WADNED DACTETC UNTUEDSTRY	AND SE HARRISON CT	PORTLAND OR 97213-4036
37	4 RETURN SERVICE REQUESTED	13220305 3000	1S2E05CD 5300	ZANGRA MARK E & IKEDA TERI I.	PO BOX 18091	PORTLAND OR 97218
37	5 RETURN SERVICE REQUESTED	1S2E05CD 5900	SODEXO AMERICA LLC	INTERNATIONAL APPRAISAL CO	6 ARROW RD #100	RAMSEY NJ 07446-1254
37	6 RETURN SERVICE REQUESTED		1S2E05CD 5900	WARNER PACIFIC COLLEGE	2219 SE 68TH AVE	PORTLAND OR 97215
37	7 RETURN SERVICE REQUESTED		1S2E05CD 600	COLLINS DIANA & GRUMICH ANNALISA	7105 SE LINCOLN ST	PORTLAND OR 97215
37	8 RETURN SERVICE REQUESTED		1S2E05CD 6100	WSCO PETROLEUM CORP	2929 NW 29TH AVE	PORTLAND OR 97210-1705
37	9 RETURN SERVICE REQUESTED		1S2E05CD 6100	EARLYOIL LLC	2929 NW 29TH AVE	PORTLAND OR 97210-1705
38	0 RETURN SERVICE REQUESTED		1S2E05CD 700	CROSETTI AURORA R & THOMAS JEFF	7111 SE LINCOLN ST	PORTLAND OR 97215
38	1 RETURN SERVICE REQUESTED		1S2E05CD 800	TREACY DARRELL & TREACY LINDA	7115 SE LINCOLN ST	PORTLAND OR 97215-4051
38	2 RETURN SERVICE REQUESTED		1S2E05CD 900	BARNES-RICKETT ALEX & CLAYTON	7125 SE LINCOLN ST	PORTLAND OR 97215-4051
38	3 RETURN SERVICE REQUESTED		1S2E05DB 11900	VAUPEL JASON	7211 SE CLAY ST	PORTLAND OR 97215
38	4 RETURN SERVICE REQUESTED		1S2E05DB 12000	WILBANKS REIS	1530 SE 72ND AVE	PORTLAND OR 97215
38	5 RETURN SERVICE REQUESTED		1S2E05DB 12100	LANDA-SUGNET TR	7210 SE CLAY ST	PORTLAND OR 97215
38	6 RETURN SERVICE REQUESTED	ISZEUSDB 13000	EAMON HAYES BRENNAN-KOS &	JENNIFER BRENNAN-KOS LIV TR	1632 SE 72ND AVE	PORTLAND OR 97215
38	PERUDA SERVICE REQUESTED		102E0EDB 13300	COUMER RUBERT M & BREWER APRIL L	1709 CE 72ND AVE	FURILAND OR 9/215-3508
20	Q DEMIDN SERVICE REQUESTED	19220508 14300	CARLON THEODORE T TR	CADISON LINDA I TP	1720 SE /2ND AVE	PORTLAND OR 9/215-3310
30	O RETURN SERVICE REQUESTED	102200DB 14000	192E05DB 14400	OWENS JASON D & OWENS JENNIERD F	1730 SE 72ND AVE	PORTLAND OR 97215
39	1 RETURN SERVICE REQUESTED		182E05DB 14500	DB WOODS IT LLC	1725 SE 72ND AVE	PORTLAND OR 97215
39	2 RETURN SERVICE REQUESTED		1S2E05DB 15500	PATTERSON KATHLEEN & KEITH	1822 SE 72ND AVE	PORTLAND OR 97215
39	3 RETURN SERVICE REQUESTED		1S2E05DB 15600	MCCONNELL SHAD	1836 SE 72ND AVE	PORTLAND OR 97215
39	4 RETURN SERVICE REQUESTED		1S2E05DB 15700	MAGANA EVELIA	1906 SE 72ND AVE	PORTLAND OR 97215
39	5 RETURN SERVICE REQUESTED		1S2E05DB 15800	SMITH MICHAEL & SMITH AILEEN	1918 SE 72ND AVE	PORTLAND OR 97215
39	6 RETURN SERVICE REQUESTED		1S2E05DB 16700	MAREMONT STEPHEN A	1932 SE 72ND AVE	PORTLAND OR 97215-3513
39	7 RETURN SERVICE REQUESTED		1S2E05DB 16800	WHITELIBBEY & DOW MARK	2004 SE 72ND AVE	PORTLAND OR 97215
39	8 RETURN SERVICE REQUESTED		1S2E05DB 16900	POSTULA DONALD & POSTULA SUZANNE	2018 SE 72ND AVE	PORTLAND OR 97215-4044
39	9 RETURN SERVICE REQUESTED		1S2E05DB 17700	HIGUERA JOHN	1147 SE 51ST AVE	PORTLAND OR 97215-2612
40	0 RETURN SERVICE REQUESTED		1S2E05DC 10800	EVANS CHRISTINE E	2232 SE 72ND AVE	PORTLAND OR 97215-4048
40	RETURN SERVICE REQUESTED		152E05DC 5100	STEVENSON KAREN 1	2048 SE /2ND AVE	PORTLAND OR 97215-4086
40	2 RETURN SERVICE REQUESTED		162E05DC 5200	MILEDODE DUCETN CUADLES	2004 SE /ZND AVE	PORTLAND OR 97215
40	4 RETURN SERVICE REQUESTED		1S2E05DC 9000	VEGAS EMBLE	2104 SE 72ND AVE	PORTLAND OR 97215
40	5 RETURN SERVICE REQUESTED		1S2E05DC 9100	SCHENK AMELIA T & SCHENK DANIEL P	3659 SE LEXINGTON ST	PORTLAND OR 97202
40	6 RETURN SERVICE REQUESTED		1S2E05DC 9200	LEVENSPIEL MORRIS	6240 C AVE	OTTER ROCK OR 97369-9738
40	7 RETURN SERVICE REQUESTED		1S2E05DC 9300	FRE 569 LLC	2206 SE 72ND AVE	PORTLAND OR 97215-4048
40	8 RETURN SERVICE REQUESTED		1S2E06AA 1100	DUKE RACHAEL A S & DUKE JOHN M III	6225 SE BELMONT ST	PORTLAND OR 97215-1939
40	9 RETURN SERVICE REQUESTED		1S2E06AA 1200	STREEDAIN ANDREA & RICHARD	12703 W BUCKHORN RD	LITTLETON CO 80127
41	0 RETURN SERVICE REQUESTED	1S2E06AA 1301	GRAFF MATTHEW D &	KENNEDY-DARLING MOLLY L	6208 SE BELMONT ST	PORTLAND OR 97215
41	1 RETURN SERVICE REQUESTED		1S2E06AA 1302	SABATINI JEFFERY & BOWDEN KRISTIN	6216 SE BELMONT ST	PORTLAND OR 97215
41	2 RETURN SERVICE REQUESTED		1S2E06AA 1400	MARQUIS COMPANIES I INC	4560 SE INTERNATIONAL WAY #100	MILWAUKIE OR 97222-4615
41	A DETURN SERVICE REQUESTED		152EUbAA 1400	MEDILOGIX LLC	IDIZ LARIMER ST #400	DERVER CO 80202
41	4 RETURN SERVICE REQUESTED	10200633 1402	ISZEUBAA 1400	REHAM 6 LLC ET AL	PU BUX 14955	PORTLAND OR 97293
41	6 RETURN SERVICE REQUESTED	192100AA 1402	192E06aa 1403	RIEDI, MARCO & RIEDI, ANNA K	6191 SE VAMHTLL ST	PORTLAND OR 97215-2824
41	7 RETURN SERVICE REQUESTED		1S2E06AA 1404	MACMULLIN CAMERON & ROCHA JUNEA	6381 SE YAMHILL ST	PORTLAND OR 97215
41	8 RETURN SERVICE REQUESTED		1S2E06AA 1405	ELLIN BRIAN C & ELLIN DEVIN N	6377 SE YAMHILL ST	PORTLAND OR 97215
41	9 RETURN SERVICE REQUESTED		1S2E06AA 1407	BRENNEIS/FURTH FAMILY REV TR	6207 SE YAMHILL ST	PORTLAND OR 97215
42	0 RETURN SERVICE REQUESTED		1S2E06AA 1408	DOUGHERTY CONNOR	6215 SE YAMHILL ST	PORTLAND OR 97215
42	1 RETURN SERVICE REQUESTED	1S2E06AA 80000	TABOR TERRACE CONDO OWNERS ASSN	ATTN SWEET HOME TABOR LLC	3050 SE DIVISION ST #235	PORTLAND OR 97202-1995
42	2 RETURN SERVICE REQUESTED		1S2E06AD 100	FOWLER CEDAR J	717 NW 33RD ST	CORVALLIS OR 97330
42	3 RETURN SERVICE REQUESTED		1S2E06AD 10000	GOLDSMITH SUSAN	5921 SE HAWTHORNE BLVD	PORTLAND OR 97215-3457
42	4 RETURN SERVICE REQUESTED		1S2E06AD 10100	BYLOOS MATTHEW & SEITZINGER CARRIE	5933 SE HAWTHORNE BLVD	PORTLAND OR 97215-3457
42	5 RETURN SERVICE REQUESTED		1S2E06AD 10200	HUNTER VALERIE	1400 SE 60TH AVE	PORTLAND OR 97215-2809
42	6 RETURN SERVICE REQUESTED		152E06AD 10300	PAIGE NIEBA	1322 SE 60TH AVE	PORTLAND OR 97215
42	RETURN SERVICE REQUESTED		18220680 10600	ORR GENEVIEVE B ET AL	6110 SE MAIN ST	PORTAND OR 9/213-2813
42	Q DEMIDN SERVICE REQUESTED		18220680 10000	WAA SIEVEN I & HALEI KATHLEEN	6126 CE MAIN ST	PORTLAND OR 9/215-2015
42	0 RETURN SERVICE REQUESTED		1S2E06AD 10800	EPLEY JON R & EPLEY KELLY L	6136 SE MAIN ST	PORTLAND OR 97215-2015
43	1 RETURN SERVICE REQUESTED		1S2E06AD 10900	LANCEFIELD RICHARD & FRANCES	6210 SE MAIN ST	PORTLAND OR 97215-2817
43	2 RETURN SERVICE REQUESTED		1S2E06AD 11000	MCDONALD BYRD & SHICK DOUG	6224 SE MAIN ST	PORTLAND OR 97215
43	3 RETURN SERVICE REQUESTED		1S2E06AD 11000	MORROW CREATIVE GROUP INC	6224 SE MAIN ST	PORTLAND OR 97215
43	4 RETURN SERVICE REQUESTED		1S2E06AD 11100	OSBORNE EVA & OSBORNE ALEX	11821 S PARK AVE	LOS ANGELES CA 90066
43	5 RETURN SERVICE REQUESTED		1S2E06AD 11200	RAVEAUX GREGORY & RAVEAUX LINDA	6133 SE MAIN ST	PORTLAND OR 97215-2814
43	6 RETURN SERVICE REQUESTED		1S2E06AD 11300	LEE JEFF S TR & CHANG MAY M TR	6115 SE MAIN ST	PORTLAND OR 97215-2814
43	7 RETURN SERVICE REQUESTED		1S2E06AD 11400	MCKINLEY LINDSEY R & AUSTIN CARRIE	6105 SE MAIN ST	PORTLAND OR 97215
43	8 RETURN SERVICE REQUESTED		152EU6AD 11500	BERGER DANIEL R & ROBERTS KERI A	6UZ/ SE MAIN ST	FORTLAND OR 97215-2812

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366 RETURN SERVICE REQUESTED

- 75	S REIORN SERVICE REQUESTED		132E00AD 11000	DWORK JOHNNI	1242 SE OUTH AVE #A	FORILAND OR 57213
44	0 RETURN SERVICE REQUESTED		1S2E06AD 11700	MOE GARY L & ATALAY ERKAN	1214 SE 60TH AVE	PORTLAND OR 97215
44	RETURN SERVICE REQUESTED		1S2E06AD 12000	RADEMACHER JO & RADEMACHER JO TR	6112 SE SALMON ST	PORTLAND OR 97215-2820
44	2 RETURN SERVICE REQUESTED		1S2E06AD 12100	DAVID S STUTZ LIV TR	6122 SE SALMON ST	PORTLAND OR 97215
44	3 RETURN SERVICE REQUESTED		1S2E06AD 12200	HILL JASON R & HILL CAMERON A	8222 SW QUARTERMASTER DR	VASHON WA 98070
44	4 RETURN SERVICE REQUESTED		1S2E06AD 12300	CORLISS BENJAMIN & PATTUMMA	6220 SE SALMON ST	PORTLAND OR 97215
44	5 BETURN SERVICE BEQUESTED		1S2E06AD 12400	ALL HAT LLCC/O ROBERTSON ACCTNG	11234 S SOUTHRIDGE DR	PORTLAND OR 97219
44	6 DETUDN CEDUICE DEQUECTED		102E06AD 12400	KADDES EDANCES ( CALLANAN MART	11254 5 SOUTHRIDGE DR	PORTIAND OR 97215
44	6 RETURN SERVICE REQUESTED		152E06AD 13101	KAPPES FRANCES & CALLANAN MATT	6120 SE TAILOR CT	PORTLAND OR 97215
44	7 RETURN SERVICE REQUESTED		1S2E06AD 13300	ROBBINS RICHARD & ROBBINS NANCY	6154 SE TAYLOR CT	PORTLAND OR 97215-2828
44	8 RETURN SERVICE REQUESTED		1S2E06AD 13400	NEIDHART CARL E & NEIDHART KAREN M	6176 SE TAYLOR CT	PORTLAND OR 97215
44	9 RETURN SERVICE REQUESTED		1S2E06AD 13500	THOMAS MARKS TR & ERIKA MARKS TR	6187 SE TAYLOR CT	PORTLAND OR 97215
45	0 RETURN SERVICE REQUESTED		1S2E06AD 13600	BRUCE ANDERSON TR	6177 SE TAYLOR CT	PORTLAND OR 97215
45	1 BETURN SERVICE BEQUESTED		1S2E06AD 13700	MORGAN PATRICIA J TR	6135 SE TAVLOR CT	PORTLAND OR 97215-2827
45	2 DETUDN SEDVICE DECHESTED		19220600 13800	KUMMET THITTE C KUMMET MARC	5100 E CAMINO CIELO	SANTA BABBADA CA 93105
45	Z REFORM SERVICE REQUESTED		132E00AD 13000	NOMMED CODIE & NOMMED MAKE	SING E CAMINO CIEBO	SANTA BANDANA CA JSTOS
45	3 RETURN SERVICE REQUESTED		1S2E06AD 13900	CAMBIER ABRAHAM & CAMBIER JENNIFER	6310 SE YAMHILL ST	PORTLAND OR 97215-2833
45	4 RETURN SERVICE REQUESTED		1S2E06AD 14000	DOHT LYNETTE A	6320 SE YAMHILL ST	PORTLAND OR 97215-2833
45	5 RETURN SERVICE REQUESTED		1S2E06AD 14100	KINGSTON STEVEN & KINGSTON JOANN	6330 SE YAMHILL ST	PORTLAND OR 97215-2833
45	6 RETURN SERVICE REQUESTED		1S2E06AD 14300	JOHNSON CLAIRE I	6215 SE SALMON ST	PORTLAND OR 97215-2821
45	7 RETURN SERVICE REQUESTED		1S2E06AD 200	SOLOMON SUSAN C	6132 SE YAMHILL ST	PORTLAND OR 97215
45	8 BETURN SERVICE BEQUESTED		1S2E06AD 301	CARPENTER BRENT & REDDY DEEPIKA	PO BOX 14336	PORTLAND OR 97293
45	9 DEFUIN CEDUICE DEQUECTED		10220000 301	DECKT TOUN	6313 CE VAMILLE CE	DODELAND OF 97215
45	S REIGRN SERVICE REQUESTED		132E00AD 302	KESKI JUHN	0212 SE TAMATLE ST	PORTLAND OR 97213
40	U RETURN SERVICE REQUESTED	152EU6AD 400	KING KATY MARY KATHLEEN ET AL	C/O KING TIMOTHY IGOE	6300 SE YAMHILL ST	PORTLAND OR 97215
46	1 RETURN SERVICE REQUESTED		1S2E06AD 4600	VOMINH TAN TR & VOMINH THANH HAI TR	1225 SE 60TH AVE	PORTLAND OR 97215-2806
46	2 RETURN SERVICE REQUESTED		1S2E06AD 4700	MILLER LOUISE L	5925 SE MADISON ST	PORTLAND OR 97215-2735
46	3 RETURN SERVICE REQUESTED		1S2E06AD 5000	RODAL MONICA B	5833 SE MADISON ST	PORTLAND OR 97215-2733
46	4 RETURN SERVICE REQUESTED	1S2E06AD 5200	CORRIGAN DENNIS TR &	CORRIGAN PHYLLIS J TR	5821 SE MADISON ST	PORTLAND OR 97215-2733
46	5 RETURN SERVICE REQUESTED		192E06AD 5300	FUCHS ANDREW & MULHOLLAND PATRICIA	1318 SE 58TH AVE	PORTLAND OR 97215
40	6 DETIIDN SEDUTCE DECHESTED		19220630 5400	TOUTHE TOUN D & TOUTHE DEEND D	1304 SE 58TH AVE	POPTIAND OF 97215-2728
40	KEIGKN SERVICE REQUESTED		132E00AD 3400	INVINE JOHN D & INVINE BRENDA D	1304 SE JOIN AVE	FORILAND OR 57213-2728
40	7 RETURN SERVICE REQUESTED		ISZEU6AD 800	GUFFANTI GREGORY T & CORBETT LUCY E	6041 SE TAYLOR CT	PORTLAND OR 9/215-2825
46	8 RETURN SERVICE REQUESTED		1S2E06AD 8200	PALMER PATRICIA A	1406 SE 58TH AVE	PORTLAND OR 97215
46	9 RETURN SERVICE REQUESTED		1S2E06AD 8300	HARTLEY GLORIA	1416 SE 58TH AVE	PORTLAND OR 97215
47	0 RETURN SERVICE REQUESTED		1S2E06AD 8400	BURNS MATTHEW & WILD ANDREA	1424 SE 58TH AVE	PORTLAND OR 97215
47	1 RETURN SERVICE REQUESTED		1S2E06AD 8500	APPERSON ERIN E & SOLOMON GARY P R	1434 SE 58TH AVE	PORTLAND OR 97215
47	2 RETURN SERVICE REQUESTED		1S2E06AD 8600	ALLEN RACHEL D & ALLEN MATTHEW F	1446 SE 58TH AVE	PORTLAND OR 97215-2730
47			102200000 0000		14F4 OR FORM NUR	PORTAND OR 97215 2750
47	S RETURN SERVICE REQUESTED		152E06AD 8700	STORES AMI K	1454 SE SOTH AVE	PORTLAND OR 97215
47	4 RETURN SERVICE REQUESTED		152EU6AD 88UU	COWAN PETER	5829 SE HAWTHORNE BLVD	PORTLAND OR 97215
47	5 RETURN SERVICE REQUESTED		1S2E06AD 8900	ANNETTE S LEVY REV LIV TR	5837 SE HAWTHORNE BLVD	PORTLAND OR 97215-3455
47	6 RETURN SERVICE REQUESTED		1S2E06AD 9000	ROSS GRAHAM A & ROSS SHARON L	5908 SE MADISON ST	PORTLAND OR 97215-2736
47	7 RETURN SERVICE REQUESTED		1S2E06AD 9200	PRUKOP DAVID L & PRUKOP KRISTIN	5826 SE MADISON ST	PORTLAND OR 97215
47	8 RETURN SERVICE REQUESTED	1S2E06AD 9300	SAVAGE JOHNSON FAM TR	MICHAEL & JOHNSON AMY TR	5836 SE MADISON ST	PORTLAND OR 97215
47	9 BETURN SERVICE BEQUESTED		1S2E06AD 9500	HILLEBRANDT MARK & ROWE DIANE	1409 SE 60TH AVE	PORTLAND OR 97215
49	DEFURN CERVICE REQUECTED		10220630 9600	STGALON CALLERA	1431 SE 60EU NVE	DODELAND OD 07215
40	A REJURN SERVICE REQUESTED		132E00AD 9000	SIGALOV CALLISIA	1421 SE COTH AVE	PORTLAND OR 97215
40	RETURN SERVICE REQUESTED		152E06AD 9700	WAREFIELD JUNATHAN & ILENE	1431 SE 60TH AVE	PORTLAND OR 9/215-2808
48	2 RETURN SERVICE REQUESTED		1S2E06AD 9800	DAKAN SEANN S & DAKAN LISA L	1443 SE 60TH AVE	PORTLAND OR 97215-2808
48	3 RETURN SERVICE REQUESTED		1S2E06AD 9900	SCHWARTZ KATHRYN N	5907 SE HAWTHORNE BLVD	PORTLAND OR 97215
48	4 RETURN SERVICE REQUESTED		1S2E06DA 100	JUNTA ROBERT J TR	32675 SW LAKE POINT CT	WILSONVILLE OR 97070
48	5 RETURN SERVICE REQUESTED		1S2E06DA 10000	DETRICK LIZA J	1702 SE 59TH AVE	PORTLAND OR 97215
48	6 RETURN SERVICE REQUESTED		1S2E06DA 10100	CARREL MARK D & WONG JOYCE K	12833 ROSE AVE	LOS ANGELES CA 90066
48	7 RETURN SERVICE REQUESTED		19280603 10200	BALSIGER HOMES LLC	3140 NE 135TH AVE	PORTLAND OR 97230-2814
40	P REFURN SERVICE REQUESTED		10200DA 10200	MINTERS INTER	1734 CE EQUIL AVE	DODELAND OF 97215
40	DEBUDY OBVIOL REQUESTED	1000000 10400	ISLOVDA IUSUU	TINDA WI GRAN DEN TEL TE	1,54 55 5516 AVE #A	DODELAND OF 07215
48	9 RETURN SERVICE REQUESTED	152EUDDA 10400	WAILAND LI &	LINDA IU SHAN REV LIV TR	1000 SE S9TH AVE	PORTLAND OR 9/215
49	U RETURN SERVICE REQUESTED		1S2EU6DA 10500	LEE GERALD E & LEE ROSANNE S	1814 SE 59TH AVE	PORTLAND OR 97215-3431
49	1 RETURN SERVICE REQUESTED		1S2E06DA 10600	O'QUINN SANDY L	1824 SE 59TH AVE	PORTLAND OR 97215
49	2 RETURN SERVICE REQUESTED		1S2E06DA 10700	GUTH JEAN A	1834 SE 59TH AVE	PORTLAND OR 97215
49	3 RETURN SERVICE REQUESTED	1S2E06DA 10800	PAYNE MICHAEL &	HUTCHINSON ELIZABETH	1844 SE 59TH AVE	PORTLAND OR 97215-3431
49	4 RETURN SERVICE REQUESTED		1S2E06DA 10900	DAVIS DAVID P & DAVIS BETTY A	1904 SE 59TH AVE	PORTLAND OR 97215-3433
49	5 RETURN SERVICE REQUESTED		19250603 11000	TAVIOR AVALYN	1914 SE 59TH AVE	PORTLAND OR 97215
40	6 DEBUIN CEDUICE DECURCERD		10220603 11100	VIDZEV DODNEV I	1024 CE EQUIL AVE	DODELAND OF 07215
49	C REJURN SERVICE REQUESTED		132EU0DA 111UU	NIDALI NUUNEI J	1524 SE JUTH AVE	FURILAND UK 9/210
49	A RETURN SERVICE REQUESTED		ISZEUDDA IIZUU	KAF LLC	2020 SW 4TH AVE #600	FURTLAND OR 9/201
49	8 RETURN SERVICE REQUESTED	1S2E06DA 11300	BEST CHRISTOPHER J TR &	SANDER NANCY A TR	1944 SE 59TH AVE	PORTLAND OR 97215
49	9 RETURN SERVICE REQUESTED		1S2E06DA 11400	SUSAN E MONSON LIV TR	2002 SE 59TH AVE	PORTLAND OR 97215
50	0 RETURN SERVICE REQUESTED		1S2E06DA 11500	CAMP GREGORY TR & CAMP SARAH TR	2014 SE 59TH AVE	PORTLAND OR 97215
50	1 RETURN SERVICE REQUESTED		1S2E06DA 11600	PRISBY STEPHEN V	2015 SE 60TH AVE	PORTLAND OR 97215-3443
50	2 RETURN SERVICE REQUESTED		19250603 11700	MAXWELL BALPH N	2007 SE 60TH AVE	PORTLAND OR 97215
50	DESULT SERVICE REQUESTED		102E06DA 11900	DUICED DADDADA I	1045 CE COMU AVE	DODELAND OF 07215
50	A REFURN SERVICE REQUESTED		ISZEVUDA IISUU	RRIGER DARBARA L	1940 SE OUTH AVE	FURILAND UK 9/213
50	4 RETURN SERVICE REQUESTED		ISZEU6DA 11900	TURRES ISABEL & TORRES JORGE E	1935 SE 6UTH AVE	FORTLAND OR 97215
50	RETURN SERVICE REQUESTED		1S2E06DA 12000	SMITH KAREN M	1925 SE 60TH AVE	PORTLAND OR 97215-3441
50	6 RETURN SERVICE REQUESTED	1S2E06DA 12100	BORGMAN BEVERLY &	BURCK CHARLES PEARSON	1917 SE 60TH AVE	PORTLAND OR 97215
50	7 RETURN SERVICE REQUESTED		1S2E06DA 12200	SPITZER MICHAEL J	1903 SE 60TH AVE	PORTLAND OR 97215
50	8 RETURN SERVICE REQUESTED		1S2E06DA 12300	SWENTEK SCOTT	1843 SE 60TH AVE	PORTLAND OR 97215
50	9 PETIDN SERVICE PECHESTED		19280600 12400	CAMPBELL LARS & DUTITIES DEDRUGH	1833 SE 60TH AVE	POPTIAND OF 97215
1 50	DEPUTY SERVICE REQUESTED		10000CD3 10000	CLARING & FILLEFO REDERAR	DO DOV 06000	DODELAND OD 07200
51	A REFERENCE REQUESTED		152EU0DA 123UU	U QUINN SANDI	FU BUA 8022U	FURILAND UK 9/200
1 51	RETURN SERVICE REQUESTED		LSZRUDDA IZDUU	LANUSMAN JUKDANA M	3/22 GLENEAGLES DR	TARZANA CA 91356-5623

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512 R	ETURN SERVICE REQUESTED		1S2E06DA 12700	HATCH JOSH & HATCH BRIGIT A	1803 SE 60TH AVE	PORTLAND OR 97215
513 R	ETURN SERVICE REQUESTED		1S2E06DA 12800	NOLAN BOONE W	1735 SE 60TH AVE	PORTLAND OR 97215
514 0	ETURN SERVICE BEQUESTED		19250603 12900	THOMAS JAMES S & HASTINGS LANCE C	1725 SE 60TH AVE	PORTLAND OR 97215-3438
515 -	STOLL OBLITCE REQUESTED		102200203 122000	MONTHING CARDA D	DO DOV 15001	DODITIAND OD 07202
515 K	ETURN SERVICE REQUESTED		152E06DA 15000	MUKINNEI SARA K	PO BOX 15201	PORTLAND OR 97293
516 R	ETURN SERVICE REQUESTED		1S2E06DA 13100	HAMILTON NICOLE & WINGER ZACHARY	1707 SE 60TH AVE	PORTLAND OR 97215
517 R	ETURN SERVICE REQUESTED		1S2E06DA 13200	LESLIE KATHLEEN & SLAUGHTER LELAND	1631 SE 60TH AVE	PORTLAND OR 97215
518 R	ETURN SERVICE REQUESTED		1S2E06DA 13300	WIELAND JOE & MCKENNA CARLA	1611 SE 60TH AVE	PORTLAND OR 97215-3437
519 R	ETURN SERVICE REQUESTED		1S2E06DA 13400	YOUNG ADAM H	1601 SE 60TH AVE	PORTLAND OR 97215
520 B	ETURN SERVICE REQUESTED		182E06DA 13500	ROBERTSON ROBERT & MELISSA	1535 SE 60TH AVE	PORTLAND OR 97215
521 D	EMUDN CEDUICE DEQUECTED		10200600 13600	INCORCON CHARGENCED TEEEDEN ( TODI	1532 CE 60mu ave	DODELAND OD 07215
522 0	EIGRN SERVICE REQUESTED		132E00DA 13000	COODURDE MAY & COODURDE LAUDEL	1525 SE COTH AVE	PORTLAND OR 57215
522 K	ETURN SERVICE REQUESTED		152E06DA 13700	GOODHART MAX & GOODHART LAUREL	IJUJ SE GUTH AVE	PORTLAND OR 97215
523 R	ETURN SERVICE REQUESTED		1S2E06DA 13800	VEGAS MATTHEW	1824 SE 60TH AVE	PORTLAND OR 97215
524 R	ETURN SERVICE REQUESTED		1S2E06DA 13900	HOESING THOMAS G & HOESING SALLY H	6003 SE STEPHENS ST	PORTLAND OR 97215
525 R	ETURN SERVICE REQUESTED		1S2E06DA 14000	CARMICHAEL LINDA L	6023 SE STEPHENS ST	PORTLAND OR 97215-3458
526 R	ETURN SERVICE REQUESTED		1S2E06DA 14100	WHITE HEATHER K	125 FAIR OAKS ST	SAN FRANCISCO CA 94110
527 R	ETURN SERVICE REQUESTED		1S2E06DA 14200	DREASHER RICHARD & DREASHER DAWN	6045 SE STEPHENS ST	PORTLAND OR 97215
528 B	ETURN SERVICE REQUESTED		182E06DA 14300	ROWELL GRETCHEN & ROWELL JAMES	6107 SE STEPHENS ST	PORTLAND OR 97215
520 D	EMUDN CEDUICE DEQUECTED		10320600 14400	CAREER DADULEI	6115 CE CEEDUENC CE	DODELAND OD 07215 2460
520 -	ETONN SERVICE REQUESTED		102E00DA 14400	CRITER RATITED	SIGS OF OTERHENS OF	TONIERNE OR 07215 5400
550 R	ETURN SERVICE REQUESTED		152E06DA 14500	GRIMALA GREITA G IR	6125 SE STEPHENS ST	PORTLAND OR 97215-3460
53 I R	ETURN SERVICE REQUESTED		152EU6DA 14600	LEVINE GABRIEL & LEVINE KIMBERLY	6135 SE STEPHENS ST	PORTLAND OR 9/215-3460
532 R	ETURN SERVICE REQUESTED		1S2EU6DA 14700	MT TABOR TERRACE LLC	5353 FIRWOOD RD	LAKE OSWEGO OR 97035
533 R	ETURN SERVICE REQUESTED		1S2E06DA 14800	STINE MICHAEL & HODGES JANE L	6207 SE STEPHENS ST	PORTLAND OR 97215-3449
534 R	ETURN SERVICE REQUESTED		1S2E06DA 14900	PORTER JOHN L & NIELSEN NATASHA	6208 SE STEPHENS ST	PORTLAND OR 97215-3450
535 R	ETURN SERVICE REQUESTED		1S2E06DA 15000	CROSS ANDREW B & FRANK BARBARA A	6146 SE STEPHENS ST	PORTLAND OR 97215
536 R	ETURN SERVICE REQUESTED		1S2E06DA 15100	ARMBRUSTER AARON & NATALIE	6134 SE STEPHENS ST	PORTLAND OR 97215-3448
537 p	ETURN SERVICE REQUESTED	192E06DA 15200	BENNETT JAMES S TR &	BENNETT LETLE M TR	6126 SE STEPHENS ST	PORTLAND OR 97215
520 ~	CRUDN CEDUICE REQUESTED	102200000 10200	102206D3 15200	AMEC TOTHE DEVI TH ED	6116 CE CEEDUENC CE	DODELAND OD 07215
530 R	LIURN SERVICE REQUESTED		102E00DA 10300	APED JUINT REV LIV TR	CILC OF OTEPHENS ST	PORILAND OR 9/213
539 R	ETURN SERVICE REQUESTED		152E06DA 15400	D'ONOFRIO PHILIP & LEE ILEANA	6106 SE STEPHENS ST	PORTLAND OR 97215-3448
540 R	ETURN SERVICE REQUESTED		1S2E06DA 15500	STRECKER DYLAN & STRECKER LAURIE	6044 SE STEPHENS ST	PORTLAND OR 97215
541 R	ETURN SERVICE REQUESTED		1S2E06DA 15600	REYES-CHECKOWAY FAM TR	6034 SE STEPHENS ST	PORTLAND OR 97215
542 R	ETURN SERVICE REQUESTED		1S2E06DA 15700	HOJNACKI MICHAEL & HOJNACKI LAUREN	6006 SE STEPHENS ST	PORTLAND OR 97215
543 R	ETURN SERVICE REQUESTED		1S2E06DA 15800	DOUGLAS C WATSON REV TR	1912 SE 60TH AVE	PORTLAND OR 97215
544 R	ETURN SERVICE REQUESTED		1S2E06DA 15900	MONTGOMERY CATHERINE S	1928 SE 60TH AVE	PORTLAND OR 97215
545 B	ETURN SERVICE REQUESTED		19280603 16000	SUDOFSKY KYRA A	1942 SE 60TH AVE	PORTLAND OR 97215
546 D	EMUEN SERVICE REQUESTED		102206000 100000	UNNERSEER IVIE COURAN	FOIE OF UNPRISON OF	DODTIAND OD 07215 2444
540 A	EIGRN SERVICE REQUESTED		132E06DA 16100	WANDESINEEN LILE & SUSAN	COLD BE HARRISON SI	PORTLAND OR 57215-3444
547 R	ETURN SERVICE REQUESTED		152E06DA 16200	TATAR ABDI & TATAR BARIS EMER SUNAT	6025 SE HARRISON ST	PORTLAND OR 97215-3444
548 R	ETURN SERVICE REQUESTED		1S2E06DA 16300	AMANN EDWARD T	6035 SE HARRISON ST	PORTLAND OR 97215
549 R	ETURN SERVICE REQUESTED		1S2E06DA 16400	GALLAGHER SCOTT & GALLAGHER JULIE	6045 SE HARRISON ST	PORTLAND OR 97215
550 R	ETURN SERVICE REQUESTED		1S2E06DA 16500	ILL DAVID & MARX MIRIAM	6105 SE HARRISON ST	PORTLAND OR 97215-3445
551 R	ETURN SERVICE REQUESTED		1S2E06DA 16600	ANDREWS ROGER & GOODALL JOCELYN	6115 SE HARRISON ST	PORTLAND OR 97215-3445
552 R	ETURN SERVICE REQUESTED		1S2E06DA 16700	FANNING ELIZABETH & FANNING SHANE	6125 SE HARRISON ST	PORTLAND OR 97215-3445
553 B	ETURN SERVICE REQUESTED		1S2E06DA 16800	ZAPAR ROXANNE ET AL	6135 SE HARRISON ST	PORTLAND OR 97215
554 p	ETTION SEDUTCE DECHESTED		19220603 16900	KEUDT EDMIND & KEUDT SUZAN	6201 GE HADDIGON OF	POPTIAND OF 97215-3445
554 1	ETONN SERVICE REQUESTED		102E00DA 10500	NEWER CURPLY A	5201 SE HARRISON ST	PORTLAND OR 97215 3445
555 K	ETURN SERVICE REQUESTED		152E06DA 4400	WARERHAUSER CHERIL A	SEUS SE HAWTHORNE BLVD	PORTLAND OR 97215-3456
550 R	ETURN SERVICE REQUESTED		152E06DA 4500	WARNER JOSHUA P	1518 SE 58TH AVE	PORTLAND OR 97215
557 R	ETURN SERVICE REQUESTED		1S2E06DA 4600	HUNTLEY DEANNA J	1524 SE 58TH AVE	PORTLAND OR 97215
558 R	ETURN SERVICE REQUESTED		1S2E06DA 4700	PHILLIPSON THOMAS & JORGENSON BRITT	1536 SE 58TH AVE	PORTLAND OR 97215
559 R	ETURN SERVICE REQUESTED		1S2E06DA 4800	GENNIFER R GORTNER TR	1604 SE 58TH AVE	PORTLAND OR 97215
560 R	ETURN SERVICE REQUESTED		1S2E06DA 4900	BRADLEY FAMILY REVOCABLE TR	1616 SE 58TH AVE	PORTLAND OR 97215-3415
561 R	ETURN SERVICE REQUESTED		1S2E06DA 5000	T&T REAL ESTATE INVESTMENTS LLC	1225 SE 60TH AVE	PORTLAND OR 97215
562 R	ETURN SERVICE REQUESTED		1S2E06DA 5100	CATAXINOS DANIELLE	1638 SE 58TH AVE	PORTLAND OR 97215
563 0	ETURN SERVICE REQUESTED		19280604 5200	ST LAWRENCE JULIA	1704 SE 58TH AVE	PORTLAND OR 97215
564	ETHEN SERVICE REGUESTED		19280600 5300	BOGGS AMY	1712 SE 58TH AVE	PORTLAND OR 97215
565 -	PRUDA OPAUTOR REQUESTED		102206Da 5400	ENERGINE PROPERTED ITO	10415 OF NAUPDLY OF FOIC4	MILWAUKTE OD 07222
305 R	LIURN SERVICE REQUESTED		132EU0DA 3400	NNELLAND PROPERTIES LLC	10415 SE WAVERLI UT #3164	PILLWAUKIE UK 9/222
566 R	ETURN SERVICE REQUESTED		152EU6DA 5500	MAHAN VINCENT & MAHAN ALESSANDRA	1/32 SE S8TH AVE	PORTLAND OR 97215
567 R	ETURN SERVICE REQUESTED		1S2E06DA 5600	JOSEPH & SUSAN CARTER TR	1804 SE 58TH AVE	PORTLAND OR 97215
568 R	ETURN SERVICE REQUESTED		1S2E06DA 5700	BURDEN VERNA & MONROE DUANE	1814 SE 58TH AVE	PORTLAND OR 97215
569 R	ETURN SERVICE REQUESTED		1S2E06DA 5800	HALL LYRA S & LYONS LANA A	1822 SE 58TH AVE	PORTLAND OR 97215
570 R	ETURN SERVICE REQUESTED		1S2E06DA 5900	SCHIFF ALEXANDER & SCHIFF CATHERINE	1834 SE 58TH AVE	PORTLAND OR 97215
571 R	ETURN SERVICE REQUESTED		1S2E06DA 6000	BRINK ANETTE S	1846 SE 58TH AVE	PORTLAND OR 97215-3419
572 R	ETURN SERVICE REQUESTED		1S2E06DA 6300	YOSHTHARA JAY & CLAUDIA	1924 SE 58TH AVE	PORTLAND OR 97215
573 R	ETURN SERVICE REQUESTED		1S2E06DA 6400	SULLTVAN MARY A	6323 SE DIVISION ST #301	PORTLAND OR 97206-1386
574 10	FTHEN SERVICE REGIESTED		19280600 6500	TELLES BONALD I	1044 SE 58TH AVE	POPTIAND OF 97215
574 R	LIGHN SERVICE REQUESTED		ISZEGODA OJUU	T DIAMON CLARKER	1977 DE JOIN AVE	LONIDAND OR 5/213
5/5 R	BIORN SERVICE REQUESTED		ISZEUDDA 6600	HETZ CHRISTINE & HETZ MARTIN	2004 SE 58TH AVE	PURTLAND OR 9/215
5/6 R	ETUKN SERVICE REQUESTED		ISZEU6DA 6700	LEE RAYMOND & BRENNEIS VALANCE	ZUI6 SE 58TH AVE	PORTLAND OR 97215-3423
577 R	ETURN SERVICE REQUESTED		1S2E06DA 6800	COOGAN CHRISTOPHER & COOGAN DENISE	2013 SE 59TH AVE	PORTLAND OR 97215
578 R	ETURN SERVICE REQUESTED		1S2E06DA 6900	FUREY CHRISTOPHER H	2005 SE 59TH AVE	PORTLAND OR 97215-3434
579 R	ETURN SERVICE REQUESTED		1S2E06DA 7000	TORVIK SHARON E & EADIE MARJORIE A	1945 SE 59TH AVE	PORTLAND OR 97215-3432
580 ₽	ETURN SERVICE REQUESTED		1S2E06DA 7100	SCHMIDT SERGEI & PILGRIM KRISTEN	1935 SE 59TH AVE	PORTLAND OR 97215-3432
581 -	ETURN SERVICE REQUESTED		1S2E06DA 7200	ALEXANDER HESSLER TR	1925 SE 59TH AVE	PORTLAND OR 97215
597	CRUDN CEDUICE REQUESTED		10220603 7200	CADAU I DAVED FAMILY MD	1015 CE EOMU AVE	DODELAND OD 07215
J02 R	LIURN SERVICE REQUESTED		102EUUDA /3UU	SARAR L BAREK FAMILI TK	151J SE JUTH AVE	FURILAND OR 9/213
583 R	ETUKN SERVICE REQUESTED		ISZEU6DA /400	NAMBA JOE T & NAMBA CRAIG	1905 SE 59TH AVE	FURTLAND OR 97215
584 R	ETURN SERVICE REQUESTED		1S2EU6DA 7500	ADAMS PAMELA A	1843 SE 59TH AVE	PORTLAND OR 97215-3430

585 RETURN SERVICE REQUESTED		1S2E06DA 7600	MATHEWS MICHAEL & MATHEWS TAMARA	1835 SE 59TH AVE	PORTLAND OR 97215-3430
586 RETURN SERVICE REQUESTED		1S2E06DA 7700	PEARSE FAMILY TR	2558 LANDSFORD AVE	SAN JOSE CA 95125
587 RETURN SERVICE REQUESTED		1S2E06DA 7800	DAVIDSON HEATHER J	1813 SE 59TH AVE	PORTLAND OR 97215
588 RETURN SERVICE REQUESTED		1S2E06DA 7900	WARNER KATHRYN & WARNER MICHAEL	1805 SE 59TH AVE	PORTLAND OR 97215-3430
589 RETURN SERVICE REQUESTED		1S2E06DA 8000	JOHN & MAUREEN MOORE REV TR	1735 SE 59TH AVE	PORTLAND OR 97215-3428
590 RETURN SERVICE REQUESTED		1S2E06DA 8100	WILLSON DENNIS & GOODWIN MARCIA	1723 SE 59TH AVE	PORTLAND OR 97215-3428
591 RETURN SERVICE REQUESTED		1S2E06DA 8200	MICHAEL & PATRICIA FAMILY TR	1971 OLD MILITARY RD	CENTRAL POINT OR 97502
592 RETURN SERVICE REQUESTED		1S2E06DA 8300	WHITE KAMI J & COMINSKY JOSEPH B	1703 SE 59TH AVE	PORTLAND OR 97215-3428
593 DETIIDN SEDUTCE DECHESTED		19220603 8400	UNYMOND INDRY D & UNYMOND MEINITE	1630 CE 50TU AVE	DODITIAND OF 97215-3426
594 RETURN SERVICE REQUESTED		102200000 0100	DEARY EDIN M & DEARY CAMUDINE I	1631 CE EDEU AVE	PORTLAND OR 97215 3426
504 RETORN SERVICE REQUESTED		132E00DA 8500	BEATT ERIN M & BEATT CATHRINE L	1031 SE JOIN AVE	PORTLAND OR 97215-3420
555 RETORN SERVICE REQUESTED		132E00DA 8000	HEIING CHARLES	1015 SE JOIN AVE	FORTLAND OR 97215
596 RETURN SERVICE REQUESTED		1S2EU6DA 8700	HEALY ALEXANDRA & SCOGGIN SCOTT	1607 SE 59TH AVE	PORTLAND OR 97215
597 RETURN SERVICE REQUESTED		1S2E06DA 8800	LANNING STEPHEN II & STEPHANIE	1535 SE 59TH AVE	PORTLAND OR 97215
598 RETURN SERVICE REQUESTED		1S2E06DA 8900	WHEELER GLENDA R	1525 SE 59TH AVE	PORTLAND OR 97215-3424
599 RETURN SERVICE REQUESTED		1S2E06DA 9000	JEMISON JALAL J & BULFIN EMILY L	1517 SE 59TH AVE	PORTLAND OR 97215-3424
600 RETURN SERVICE REQUESTED		1S2E06DA 9100	BROWN LARISSA G & BROWN MARTIN J	5826 SE HAWTHORNE BLVD	PORTLAND OR 97215
601 RETURN SERVICE REQUESTED		1S2E06DA 9200	NIMZ ILEANA	12226 SE 104TH CT	HAPPY VALLEY OR 97086
602 RETURN SERVICE REQUESTED	1S2E06DA 9300	THE CRAIG R GARSHELIS 2001 TRUST &	THE MICHAEL ANDREWS LIVING TRUST	533 CHENERY ST	SAN FRANCISCO CA 94131-3031
603 RETURN SERVICE REQUESTED	1S2E06DA 9400	ALYSSA GASCA CONSULTING LLC	PETRUCCI BRIAN J & GASCA ALYSSA R	1534 SE 59TH AVE	PORTLAND OR 97215
604 RETURN SERVICE REQUESTED		1S2E06DA 9500	STIRNKORB FAM TR	1600 SE 59TH AVE	PORTLAND OR 97215
605 RETURN SERVICE REQUESTED		1S2E06DA 9600	ROBERT & DONNA CAIN LIV TR	1612 SE 59TH AVE	PORTLAND OR 97215
606 RETURN SERVICE REQUESTED	152E06DA 9700	HUMPHRIES GRANT N &	GARCIA-HUMPHRIES JESSICA R	1620 SE 59TH AVE	PORTLAND OR 97215
607 RETURN SERVICE REQUESTED		19250603 9800	HALL MATTHEW W & HALL JANET	1630 SE 59TH AVE	PORTLAND OR 97215
608 DETUIN SERVICE REQUESTED		19220603 9000	TOV N FILTS DEV TP	1640 CF 50TH AVE	POPTIAND OF 97215
600 RETURN SERVICE REQUESTED		102E06DD 11000	UNDER TARE COMCONSTRUCT VERT	1010 DE JJIR AVE	DODE BOWNEEND NA 00360
CIO RETURN SERVICE REQUESTED		132E00DD 11000	HANDEN JANE & GAMGUNEISHVILI YEFIM	201 W 21	FURI IUWNSEND WA 98308
610 RETURN SERVICE REQUESTED		152EU6DD 11100	MISSONA COURTNEY & MISSONA PETER	ZZUJ SE 6UTH AVE	PORTLAND OR 97215-4061
611 RETURN SERVICE REQUESTED		1S2E06DD 11101	ENNIS BRENSON & MADSEN ALAINA	2213 SE 60TH AVE	PORTLAND OR 97215
612 RETURN SERVICE REQUESTED		1S2E06DD 11200	HIRANO SEN H & YANG CHING-WEN W	2145 SE 60TH AVE	PORTLAND OR 97215-4019
613 RETURN SERVICE REQUESTED		1S2E06DD 11300	KAMALI M REZA & KAMALI DIANE	PO BOX 16068	PORTLAND OR 97292-0068
614 RETURN SERVICE REQUESTED		1S2E06DD 11400	BIRMINGHAM JUSTIN & DINA	2115 SE 60TH AVE	PORTLAND OR 97215-4019
615 RETURN SERVICE REQUESTED		1S2E06DD 11500	HERNANDEZ STEVEN & HERNANDEZ JAMIE	5932 SE LINCOLN ST	PORTLAND OR 97215
616 RETURN SERVICE REQUESTED		1S2E06DD 11600	LI CHRISTINA & LI CARMEN	6026 SE LINCOLN ST	PORTLAND OR 97215
617 RETURN SERVICE REQUESTED		1S2E06DD 11700	BRUMBELOW THOMAS & KUBOTERA NATSUKI	2120 SE 60TH AVE	PORTLAND OR 97215
618 RETURN SERVICE REQUESTED		1S2E06DD 11800	VILLA BARRANCA CRISTOPHER J	6032 SE LINCOLN ST	PORTLAND OR 97215-4073
619 RETURN SERVICE REQUESTED		1S2E06DD 11900	KOHSE WILL & KOHSE SYLVIA	6044 SE LINCOLN ST	PORTLAND OR 97215
620 BETURN SERVICE REQUESTED	1S2E06DD 12000	PHIMMASONE SOPHON OUK &	PHIMMASONE VIBAT	6102 SE LINCOLN ST	PORTLAND OR 97215
621 REFURN SERVICE REQUESTED	10200000 12000	10220600 12100	LEE CIMON C & LEE MEI MEI V	6110 SE LINCOLN SE	PORTLAND OR 97215
622 REIORN SERVICE REQUESTED	10000 DD 10000	ISZEDODD IZIOO	LEE SIMON 5 & LEE MEI MEI I	CIID SE LINCOLN SI	PORTLAND OR 97215
622 RETURN SERVICE REQUESTED	152E06DD 12200	CHU XUAN MAI THI &	TROUNG KHIEM DINH	6118 SE LINCOLN ST	PORTLAND OR 97215-4078
623 RETURN SERVICE REQUESTED		IS2E06DD 12300	LARSEN STACY L	6126 SE LINCOLN ST	PORTLAND OR 97215
624 RETURN SERVICE REQUESTED		1S2E06DD 12400	STEPPA CINDY & KINGSBURY G GAGE	6134 SE LINCOLN ST	PORTLAND OR 97215-4078
625 RETURN SERVICE REQUESTED		1S2E06DD 12500	HEGEDUS-SZTARAY FAMILY TR	6206 SE LINCOLN ST	PORTLAND OR 97215
626 RETURN SERVICE REQUESTED		1S2E06DD 12600	BARISH NOAH & BARISH CALLIE	6214 SE LINCOLN ST	PORTLAND OR 97215-4074
627 RETURN SERVICE REQUESTED	1S2E06DD 12700	VAN COURT PETER M &	REYNAUD-VAN COURT ANNE	17627 VINEYARD RD	CASTRO VALLEY CA 94546
628 RETURN SERVICE REQUESTED		1S2E06DD 12800	ORTMAN DAVID S	6203 SE GRANT ST	PORTLAND OR 97215
629 RETURN SERVICE REQUESTED		1S2E06DD 12900	WELDING JEANNINE P	6145 SE GRANT ST	PORTLAND OR 97215-4056
630 RETURN SERVICE REQUESTED		1S2E06DD 13000	GIEDWOYN ANNA & JERZY & BOZENA	6133 SE GRANT ST	PORTLAND OR 97215
631 RETURN SERVICE REQUESTED		1S2E06DD 13100	DOPP ALLISON & SCHAFFSTALL SAMANTHA	6125 SE GRANT ST	PORTLAND OR 97215
632 RETURN SERVICE REQUESTED		1S2E06DD 13200	TARA M ASAI TR	6115 SE GRANT ST	PORTLAND OR 97215
633 RETURN SERVICE REQUESTED		1S2E06DD 13300	JOHNSON JESSICA & JOHNSON JUSTIN	6103 SE GRANT ST	PORTLAND OR 97215-4056
634 RETURN SERVICE REQUESTED		1S2E06DD 13400	AGUILERA-TITUS ALEJANDRO & MARY	13134 VALLEYWOOD DR	STLVER SPRING MD 20906-3959
635 BETURN SERVICE REQUESTED		1S2E06DD 13500	TRANG TRACEY BUT	6033 SE GRANT ST	PORTLAND OR 97215
636 BETURN SERVICE BEQUESTED		19250600 13600	COX CLIFFORD & ROSENTHAL CASSANDRA	2126 SE 60TH AVE	PORTLAND OR 97215-4072
637 RETURN SERVICE PROVESTED		1S2E06DD 13700	BUTLER GARRETT & CDIFCS IIII	2134 SE 60TH AVE	PORTLAND OR 97215
638 DETUIN CEDUICE DECUECTED		19220600 13800	CADDITE TEDEMY	2204 SE 60EU AVE	DODTIAND OF 97215-4075
620 DEBUIN CEDUICE DECUECTED		10220600 13000	DIFTO ADICATI C PTICON TAVORN	4363 N VANCOUVED NUR 4503	DODULAND OF 97217
640 DERUDA ADDUTAR DEGUEGED		10020CDD 14000	FLEISS ABIGAIL & WILSON JAIDEN	4202 N VANCUUVER AVE #303	FURILAND UK 9/21/
640 RETURN SERVICE REQUESTED	100000000 111000	152EU0DD 14000	PAUNSARHAN & PAUNMANA KEU	OUS4 SE GRANT ST	PORTLAND OR 9/215-4053
641 RETURN SERVICE REQUESTED	152EU6DD 14100	MANDELL NIKKI D TR &	MARCH RICHARD A TR	6044 SE GRANT ST	PORTLAND OR 97215
642 RETURN SERVICE REQUESTED		1S2E06DD 14200	SCHADE DAVID F	6104 SE GRANT ST	PORTLAND OR 97215-4055
643 RETURN SERVICE REQUESTED		1S2E06DD 14300	TRUONG PHUONG NGOC & TRUONG DENNIS	6116 SE GRANT ST	PORTLAND OR 97215-4055
644 RETURN SERVICE REQUESTED		1S2E06DD 14400	FISHER CLAIRE M ET AL	6126 SE GRANT ST	PORTLAND OR 97215
645 RETURN SERVICE REQUESTED		1S2E06DD 14500	KATZ DAVID W TR & KATZ MARY J TR	8825 SW MAYO ST	PORTLAND OR 97223
646 RETURN SERVICE REQUESTED		1S2E06DD 14600	NGUYEN CHI LAN	6146 SE GRANT ST	PORTLAND OR 97215-4055
647 RETURN SERVICE REQUESTED		1S2E06DD 14700	CHUDD PAULA L & SAFFIR DUNCAN Z	6204 SE GRANT ST	PORTLAND OR 97215
648 RETURN SERVICE REQUESTED		1S2E06DD 14800	MARTINSON WALLACE & LYNNE	6216 SE GRANT ST	PORTLAND OR 97215-4057
649 RETURN SERVICE REQUESTED	1S2E06DD 200	TRACY RONALD &	RELATIVO-TRACY MARLEEN	2033 SE 60TH AVE	PORTLAND OR 97215-3443
650 RETURN SERVICE REQUESTED		1S2E06DD 300	DILLENDER MARGARET T	2024 SE 59TH AVE	PORTLAND OR 97215-3435
651 RETURN SERVICE REQUESTED		1S2E06DD 400	ERREND LEE D & ERREND LAURTE R	5915 SE LINCOLN ST	PORTLAND OR 97215-4041
652 DETIIN SERVICE DECHESTED		19220600 500	DELICA SADA & DELICA DALLAS	2033 CF 50TH AVE	DODTIAND OF 97215-3434
GE2 DEMUN SERVICE REQUESTED		10220000 000	DEBUCA SARA & DEBUCA DALLAS	2000 00 5000 AVE	DODTIAND OF 07215 2424
655 RETURN SERVICE REQUESTED		10020CDD 200	IWED KIKUYO & JURGENS BURT	2025 SE 59TH AVE	PORTLAND OR 9/215-3434
054 RETURN SERVICE REQUESTED		127F00DD /00	SURENSEN MARY ANN	ZUZO SE SOTH AVE	PORTLAND OR 9/215-3423
000 KETURN SERVICE REQUESTED		152E06DD 7800	MACIAS HELENA Z & SQUIRE COREY Z	2135 SE 59TH AVE	PORTLAND OR 97215
656 RETURN SERVICE REQUESTED		1S2E06DD 7900	WALKER PETER & COATNEY CAROLINE	2125 SE 59TH AVE	PORTLAND OR 97215-4013
65/ RETURN SERVICE REQUESTED		19220600 800	SHUNDOINTE ENTE C UNNING	5809 SE I INCOIN SE	DODTIAND OD 97215

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658 RETURN SERVICE REQUESTED		1S2E06DD 8000	RENARD LISA S	2131 SE 54TH AVE	PORTLAND OR 97215
659 RETURN SERVICE REQUESTED		1S2E06DD 8100	TREAT BRUCE & TREAT LYNN E	5834 SE LINCOLN ST	PORTLAND OR 97215
660 RETURN SERVICE REQUESTED		1S2E06DD 8300	GERDING ROBERT G	5916 SE LINCOLN ST	PORTLAND OR 97215-4042
661 RETURN SERVICE REQUESTED		1S2E06DD 8400	HANSON DONALD E & HANSON BARBARA J	2124 SE 59TH AVE	PORTLAND OR 97215-4014
662 RETURN SERVICE REQUESTED		1S2E06DD 8500	HOYLE DANA B	2136 SE 59TH AVE	PORTLAND OR 97215-4014
663 RETURN SERVICE REQUESTED		1S2E06DD 8600	WHITLEY BRITTA	2144 SE 59TH AVE	PORTLAND OR 97215
664 RETURN SERVICE REQUESTED		1S2E06DD 8700	JONES FLOY E	2204 SE 59TH AVE	PORTLAND OR 97215-4016
665 RETURN SERVICE REQUESTED		1S2E06DD 8800	KOCH GEOFFREY A & IZUMI BETTY T	2214 SE 59TH AVE	PORTLAND OR 97215-4016
666 RETURN SERVICE REQUESTED		1S2E08BB 1000	CANFIL ADRIANNE & BULHOES MARY ANN	2501 SE 66TH AVE	PORTLAND OR 97206
667 RETURN SERVICE REQUESTED		1S2E08BB 101	MOSTACHETTI MICHAEL & ISA	2491 SE 67TH AVE	PORTLAND OR 97206
668 RETURN SERVICE REQUESTED		1S2E08BB 102	CARLSON AMANDA & CARLSON JOSHUA	2505 SE 67TH AVE	PORTLAND OR 97206
669 RETURN SERVICE REQUESTED		1S2E08BB 1100	KEYES JESSE & DRAPER LORELEI L	2507 SE 66TH AVE	PORTLAND OR 97206
670 RETURN SERVICE REQUESTED		1S2E08BB 1200	HYDE LIV TR	2516 NE 61ST AVE	PORTLAND OR 97213
6/1 RETURN SERVICE REQUESTED		1S2E08BB 1500	WINDSOR CT HOUSES LLC	12999 S CASTO RD	OREGON CITY OR 97045
6/2 RETURN SERVICE REQUESTED		1S2E08BB 2400	LIPINSKY BILL R	2514 SE 64TH AVE	PORTLAND OR 97206-1370
6/3 RETURN SERVICE REQUESTED		1S2E08BB 2500	CENEDELLA MICHAEL	2504 SE 64TH AVE	PORTLAND OR 97206-1370
6/4 RETURN SERVICE REQUESTED		1S2E08BB 700	SLUSHER CHARLES	2514 SE 66TH AVE	PORTLAND OR 97206
6/5 RETURN SERVICE REQUESTED		1S2E08BB 800	ROSE THOMAS P & ROSE KAREN L	207 SE CLAY ST	PORTLAND OR 97214
6/6 RETURN SERVICE REQUESTED		1S2E08BB 900	GRABOWSKI JOHN & GRABOWSKI ABBY	2437 SE 66TH AVE	PORTLAND OR 97206-1205
677			CURRENT RESIDENT	1226 SE 63RD AVE	PORTLAND OR 9/215
678			CURRENT RESIDENT	1335 SE /2ND AVE	PORTLAND OR 9/215
679			CURRENT RESIDENT	1508 SE SETH AVE	PORTLAND OR 9/215
691			CURRENT RESIDENT	1522 SE SETH AVE	PORTLAND OR 9/215
692			CURRENT RESIDENT	1722 SE SETH AVE	PORTLAND OR 9/215
692			CUDDENT DECIDENT	1910 CE 73ND AVE	PORTLAND OR 97215
684			CURRENT RESIDENT	1813 SE 60TH AVE	PORTIAND OR 97215
685			CURRENT RESIDENT	1846 SE 58TH AVE #B	PORTLAND OR 97215
686			CUBBENT RESIDENT	1934 SE 58TH AVE	PORTLAND OR 97215
687			CURBENT RESIDENT	2203 SE 60TH AVE #A	PORTLAND OR 97215
688			CURRENT RESIDENT	2206 SE 72ND AVE #A	PORTLAND OR 97215
689			CURRENT RESIDENT	2206 SE 72ND AVE #B	PORTLAND OR 97215
690			CURRENT RESIDENT	2213 SE 60TH AVE #B	PORTLAND OR 97215
691			CURRENT RESIDENT	2215 SE 68TH AVE	PORTLAND OR 97215
692			CURRENT RESIDENT	2220 SE 72ND AVE #B	PORTLAND OR 97215
693			CURRENT RESIDENT	2231 SE 66TH AVE	PORTLAND OR 97215
694			CURRENT RESIDENT	2252 SE 70TH AVE	PORTLAND OR 97215
695			CURRENT RESIDENT	2259 SE 66TH AVE	PORTLAND OR 97215
696			CURRENT RESIDENT	2260 SE 70TH AVE	PORTLAND OR 97215
697			CURRENT RESIDENT	2265 SE 66TH AVE	PORTLAND OR 97215
698			CURRENT RESIDENT	2304 SE 66TH AVE	PORTLAND OR 97215
699			CURRENT RESIDENT	2307 SE 66TH AVE	PORTLAND OR 97215
700			CURRENT RESIDENT	2309 SE 66TH AVE	PORTLAND OR 97215
701			CURRENT RESIDENT	2315 SE 66TH AVE	PORTLAND OR 97215
702			CURRENT RESIDENT	2409 SE 66TH AVE	PORTLAND OR 97206
703			CURRENT RESIDENT	2411 SE 66TH AVE	PORTLAND OR 97206
704			CURRENT RESIDENT	2430 SE 00TH AVE #2	PORTLAND OR 9/206
705			CURRENT RESIDENT	6040 SE DELMONT ST	PORTIAND OR 97215
707			CURRENT RESIDENT	6115 SE TAYLOR CT	PORTLAND OR 97215
708			CURRENT RESIDENT	6120 SE YAMHILL ST	PORTLAND OR 97215
709			CURRENT RESIDENT	6125 SE DIVISION ST #111	PORTLAND OR 97206
710			CURRENT RESIDENT	6125 SE DIVISION ST #112	PORTLAND OR 97206
711			CURRENT RESIDENT	6125 SE DIVISION ST #114	PORTLAND OR 97206
712			CURRENT RESIDENT	6125 SE DIVISION ST #116	PORTLAND OR 97206
713			CURRENT RESIDENT	6125 SE DIVISION ST #131	PORTLAND OR 97206
714			CURRENT RESIDENT	6125 SE DIVISION ST #132	PORTLAND OR 97206
715			CURRENT RESIDENT	6125 SE DIVISION ST #134	PORTLAND OR 97206
716			CURRENT RESIDENT	6125 SE DIVISION ST #160	PORTLAND OR 97206
717			CURRENT RESIDENT	6125 SE DIVISION ST #171	PORTLAND OR 97206
718			CURRENT RESIDENT	6125 SE DIVISION ST #183	PORTLAND OR 97206
/19			CURRENT RESIDENT	6125 SE DIVISION ST #203	PORTLAND OR 97206
720			CURRENT RESIDENT	6125 SE DIVISION ST #206	PORTLAND OR 97206
722			CURRENT RESIDENT	6125 SE DIVISION ST #215	PORTLAND OR 97206
722			CURRENT RESIDENT	CI25 OF DIVISION OF #223	PORIAND OR 97206
724			CURRENT RESIDENT	6125 GE DIVISION ST #223	PORTAND OF 97206
725			CUDDENT DECIDENT	6125 GE DIVISION ST #253	POPTIAND OF 97206
726			CURRENT RESIDENT	6125 SE DIVISION ST #255	PORTLAND OR 97206
727			CURRENT RESIDENT	6125 SE DIVISION ST #256	PORTLAND OR 97206
728			CURRENT RESIDENT	6125 SE DIVISION ST #258	PORTLAND OR 97206
729			CURRENT RESIDENT	6125 SE DIVISION ST #260	PORTLAND OR 97206
730			CURRENT RESIDENT	6125 SE DIVISION ST #264	PORTLAND OR 97206

	A	В	C	D	E	F
731				CURRENT RESIDENT	6125 SE DIVISION ST #271	PORTLAND OR 97206
732				CURRENT RESIDENT	6125 SE DIVISION ST #273	PORTLAND OR 97206
733				CURRENT RESIDENT	6125 SE DIVISION ST #276	PORTLAND OR 97206
734				CURRENT RESIDENT	6125 SE DIVISION ST #282	PORTLAND OR 97206
735				CURRENT RESIDENT	6125 SE DIVISION ST #304	PORTLAND OR 97206
736				CURRENT RESIDENT	6125 SE DIVISION ST #306	PORTLAND OR 97206
737				CURRENT RESIDENT	6125 SE DIVISION ST #308	PORTLAND OR 97206
738				CURRENT RESIDENT	6125 SE DIVISION ST #310	PORTLAND OR 97206
739				CURRENT RESIDENT	6125 SE DIVISION ST #311	PORTLAND OR 97206
740				CURRENT RESIDENT	6125 SE DIVISION ST #313	PORTLAND OR 97206
741				CURRENT RESIDENT	6125 SE DIVISION ST #324	PORTLAND OR 97206
742				CURRENT RESIDENT	6125 SE DIVISION ST #326	PORTLAND OR 97206
743				CUBRENT RESIDENT	6125 SE DIVISION ST #328	PORTLAND OR 97206
744				CUBRENT RESIDENT	6125 SE DIVISION ST #330	PORTLAND OR 97206
745				CUBRENT RESIDENT	6125 SE DIVISION ST #331	PORTLAND OR 97206
746				CURRENT RESIDENT	6125 SE DIVISION ST #333	PORTLAND OR 97206
747				CURRENT RESIDENT	6125 SE DIVISION ST #350	PORTLAND OR 97206
748				CURRENT RESIDENT	6125 SE DIVISION ST #370	PORTLAND OR 97206
7/10				CURRENT RESIDENT	6125 SE DIVISION ST #374	PORTIAND OR 97206
750				CURRENT RESIDENT	6125 SE DIVISION ST #376	PORTIAND OR 97206
751				CURRENT RESIDENT	6125 SE DIVISION ST #570	PORTLAND OR 97200
752				CURRENT RESIDENT	6125 SE DIVISION SI #576	PORTLAND OR 97200
752				CURRENT RESIDENT	6124 CE CDANE CE	PORTLAND OR 97215
753				CURRENT RESIDENT	CIAZ OR OWRDURNO OW	PORTLAND OR 97215
754				CURRENT RESIDENT	6147 SE STEPHENS ST	PORTLAND OR 97215
755				CURRENT RESIDENT	0180 SE TAMHILL ST #B	PORTLAND OR 97215
750				CURRENT RESIDENT	6211 SE DIVISION ST #141	PORTLAND OR 97206
757				CURRENT RESIDENT	6211 SE DIVISION ST #148	PORTLAND OR 97206
758				CURRENT RESIDENT	6211 SE DIVISION ST #149	PORTLAND OR 97206
759				CURRENT RESIDENT	6211 SE DIVISION ST #151	PORTLAND OR 97206
760				CURRENT RESIDENT	6211 SE DIVISION ST #236	PORTLAND OR 97206
761				CURRENT RESIDENT	6211 SE DIVISION ST #237	PORTLAND OR 97206
762				CURRENT RESIDENT	6211 SE DIVISION ST #239	PORTLAND OR 97206
763				CURRENT RESIDENT	6211 SE DIVISION ST #241	PORTLAND OR 97206
764				CURRENT RESIDENT	6211 SE DIVISION ST #243	PORTLAND OR 97206
765				CURRENT RESIDENT	6211 SE DIVISION ST #245	PORTLAND OR 97206
766				CURRENT RESIDENT	6211 SE DIVISION ST #246	PORTLAND OR 97206
767				CURRENT RESIDENT	6211 SE DIVISION ST #247	PORTLAND OR 97206
768				CURRENT RESIDENT	6211 SE DIVISION ST #251	PORTLAND OR 97206
769				CURRENT RESIDENT	6211 SE DIVISION ST #341	PORTLAND OR 97206
770				CURRENT RESIDENT	6211 SE DIVISION ST #343	PORTLAND OR 97206
771				CURRENT RESIDENT	6211 SE DIVISION ST #344	PORTLAND OR 97206
772				CURRENT RESIDENT	6228 SE BELMONT ST	PORTLAND OR 97215
773				CURRENT RESIDENT	6230 SE BELMONT ST	PORTLAND OR 97215
774				CURRENT RESIDENT	6236 SE STEPHENS ST	PORTLAND OR 97215
775				CURRENT RESIDENT	6239 SE GRANT ST	PORTLAND OR 97215
776				CURRENT RESIDENT	6243 SE BELMONT ST	PORTLAND OR 97215
777				CURRENT RESIDENT	6255 SE YAMHILL ST	PORTLAND OR 97215
778				CURRENT RESIDENT	6306 SE DIVISION ST	PORTLAND OR 97206
779				CURRENT RESIDENT	6308 SE LINCOLN ST	PORTLAND OR 97215
780				CURRENT RESIDENT	6323 SE DIVISION ST #101	PORTLAND OR 97206
781				CURRENT RESIDENT	6323 SE DIVISION ST #103	PORTLAND OR 97206
782				CURRENT RESIDENT	6323 SE DIVISION ST #104	PORTLAND OR 97206
783				CURRENT RESIDENT	6323 SE DIVISION ST #105	PORTLAND OR 97206
784				CURRENT RESIDENT	6323 SE DIVISION ST #106	PORTLAND OR 97206
785				CURRENT RESIDENT	6323 SE DIVISION ST #207	PORTLAND OR 97206
786				CURRENT RESIDENT	6323 SE DIVISION ST #211	PORTLAND OR 97206
787				CURRENT RESIDENT	6323 SE DIVISION ST #213	PORTLAND OR 97206
788				CURRENT RESIDENT	6323 SE DIVISION ST #237	PORTLAND OR 97206
789				CURRENT RESIDENT	6323 SE DIVISION ST #238	PORTLAND OR 97206
790				CURRENT RESIDENT	6323 SE DIVISION ST #303	PORTLAND OR 97206
791				CURRENT RESIDENT	6323 SE DIVISION ST #304	PORTLAND OR 97206
792				CURRENT RESIDENT	6323 SE DIVISION ST #305	PORTLAND OR 97206
793				CURRENT RESIDENT	6323 SE DIVISION ST #309	PORTLAND OR 97206
794				CURRENT RESIDENT	6323 SE DIVISION ST #316	PORTLAND OR 97206
795				CURRENT RESIDENT	6323 SE DIVISION ST #328	PORTLAND OR 97206
796				CURRENT RESIDENT	6323 SE DIVISION ST #331	PORTLAND OR 97206
797				CURRENT RESIDENT	6323 SE DIVISION ST #333	PORTLAND OR 97206
798				CURRENT RESIDENT	6323 SE DIVISION ST #334	PORTLAND OR 97206
799				CURRENT RESIDENT	6323 SE DIVISION ST #335	PORTLAND OR 97206
800				CURRENT RESIDENT	6409 SE BELMONT ST	PORTLAND OR 97215
801				CURRENT RESIDENT	6415 SE MORRISON ST	PORTLAND OR 97215
802				CURRENT RESIDENT	6418 SE DIVISION ST	PORTLAND OR 97206
803				CURRENT RESIDENT	6424 SE DIVISION ST	PORTLAND OR 97206

	A	В	C	D	E	F
804				CURRENT RESIDENT	6428 SE DIVISION ST	PORTLAND OR 97206
805				CURRENT RESIDENT	6437 SE DIVISION ST	PORTLAND OR 97206
806				CURRENT RESIDENT	6444 SE DIVISION ST	PORTLAND OR 97206
807				CURRENT RESIDENT	6454 SE DIVISION ST	PORTLAND OR 97206
808				CURRENT RESIDENT	6456 SE DIVISION ST	PORTLAND OR 97206
809				CURRENT RESIDENT	6468 SE DIVISION ST	PORTLAND OR 97206
810				CURRENT RESIDENT	6472 SE DIVISION ST	PORTLAND OR 97206
811				CURRENT RESIDENT	6476 SE DIVISION ST	PORTLAND OR 97206
812				CURRENT RESIDENT	6512 SE DIVISION ST #4	PORTLAND OR 97206
813				CURRENT RESIDENT	6512 SE DIVISION ST #6	PORTLAND OR 97206
814				CURRENT RESIDENT	6512 SE DIVISION ST #9	PORTLAND OR 97206
815				CURRENT RESIDENT	6518 SE DIVISION ST #101	PORTLAND OR 97206
816				CURRENT RESIDENT	6541 SE DIVISION ST	PORTLAND OR 97206
817				CURRENT RESIDENT	6547 SE DIVISION ST	PORTLAND OR 97206
818				CURRENT RESIDENT	6600 SE DIVISION ST #107	PORTLAND OR 97206
819				CURRENT RESIDENT	6600 SE DIVISION ST #201	PORTLAND OR 97206
820				CURRENT RESIDENT	6621 SE YAMHILL ST	PORTLAND OR 97215
821				CURRENT RESIDENT	6658 SE BELMONT ST	PORTLAND OR 97215
822				CURRENT RESIDENT	6732 SE DIVISION ST	PORTLAND OR 97206
823				CURRENT RESIDENT	7120 SE HARRISON ST	PORTLAND OR 97215
824				CURRENT RESIDENT	1460 SE 58TH AVE	PORTLAND OR 97215
825				CURRENT RESIDENT	1523 SE 71ST AVE	PORTLAND OR 97215
826				CURRENT RESIDENT	1631 SE 59TH AVE #B	PORTLAND OR 97215
827				CURRENT RESIDENT	1717 SE 60TH AVE	PORTLAND OR 97215
828				CURRENT RESIDENT	1805 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
829				CURRENT RESIDENT	1906 SE 58TH AVE	PORTLAND OR 97215
830				CURRENT RESIDENT	2036 SE 72ND AVE	PORTLAND OR 97215
831				CURRENT RESIDENT	2203 SE 60TH AVE #B	PORTLAND OR 97215
832				CURRENT RESIDENT	2211 SE 66TH AVE	PORTLAND OR 97215
833				CURRENT RESIDENT	2213 SE 60TH AVE #A	PORTLAND OR 97215
834				CURRENT RESIDENT	2219 SE 66TH AVE	PORTLAND OR 97215
835				CURRENT RESIDENT	2227 SE 70TH AVE	PORTLAND OR 97215
836				CURRENT RESIDENT	2229 SE 70TH AVE	PORTLAND OR 97215
837				CURRENT RESIDENT	2241 SE 66TH AVE	PORTLAND OR 97215
838				CURRENT RESIDENT	2251 SE 70TH AVE	PORTLAND OR 97215
839				CURRENT RESIDENT	2263 SE 66TH AVE	PORTLAND OR 97215
840				CURRENT RESIDENT	2267 SE 66TH AVE	PORTLAND OR 97215
841				CURRENT RESIDENT	2271 SE 66TH AVE	PORTLAND OR 97215
842				CURRENT RESIDENT	2303 SE 66TH AVE	PORTLAND OR 97215
843				CURRENT RESIDENT	2309 SE 70TH AVE	PORTLAND OR 97215
844				CURRENT RESIDENT	2325 SE 66TH AVE	PORTLAND OR 97215
845				CURRENT RESIDENT	2335 SE 66TH AVE	PORTLAND OR 97215
846				CURRENT RESIDENT	2350 SE 60TH AVE	PORTLAND OR 97215
847				CURRENT RESIDENT	2407 SE 66TH AVE	PORTLAND OR 97206
848				CURRENT RESIDENT	2426 SE 66TH AVE #3	PORTLAND OR 97206
849				CURRENT RESIDENT	2427 SE 67TH AVE	PORTLAND OR 97206
850				CURRENT RESIDENT	5826 SE HAWTHORNE BLVD #2	PORTLAND OR 97215
851				CURRENT RESIDENT	6109 SE TAYLOR CT	PORTLAND OR 97215
852				CURRENT RESIDENT	6125 SE DIVISION ST #105	PORTLAND OR 97206
853				CURRENT RESIDENT	6125 SE DIVISION ST #125	PORTLAND OR 97206
854				CURRENT RESIDENT	6125 SE DIVISION ST #158	PORTLAND OR 97206
855				CURRENT RESIDENT	6125 SE DIVISION ST #161	PORTLAND OR 97206
856				CURRENT RESIDENT	6125 SE DIVISION ST #172	PORTLAND OR 97206
857				CURRENT RESIDENT	6125 SE DIVISION ST #174	PORTLAND OR 97206
858				CURRENT RESIDENT	6125 SE DIVISION ST #176	PORTLAND OR 97206
859				CURRENT RESIDENT	6125 SE DIVISION ST #178	PORTLAND OR 97206
860				CURRENT RESIDENT	6125 SE DIVISION ST #185	PORTLAND OR 97206
861				CURRENT RESIDENT	6125 SE DIVISION ST #204	PORTLAND OR 97206
862				CURRENT RESIDENT	6125 SE DIVISION ST #211	PORTLAND OR 97206
863				CURRENT RESIDENT	6125 SE DIVISION ST #213	PORTLAND OR 97206
864				CURRENT RESIDENT	6125 SE DIVISION ST #220	PORTLAND OR 97206
865				CURRENT RESIDENT	6125 SE DIVISION ST #224	PORTLAND OR 97206
866				CURRENT RESIDENT	6125 SE DIVISION ST #231	PORTLAND OR 97206
867				CURRENT RESIDENT	6125 SE DIVISION ST #233	PORTLAND OR 97206
868				CURRENT RESIDENT	6125 SE DIVISION ST #261	PORTLAND OR 97206
869				CURRENT RESIDENT	6125 SE DIVISION ST #263	PORTLAND OR 97206
870				CURRENT RESIDENT	6125 SE DIVISION ST #278	PORTLAND OR 97206
871				CURRENT RESIDENT	6125 SE DIVISION ST #280	PORTLAND OR 97206
872				CURRENT RESIDENT	6125 SE DIVISION ST #284	PORTLAND OR 97206
8/3				CURRENT RESIDENT	6125 SE DIVISION ST #314	PORTLAND OR 97206
8/4				CURRENT RESIDENT	6125 SE DIVISION ST #322	PORTLAND OR 97206
875				CURRENT RESIDENT	6125 SE DIVISION ST #334	PORTLAND OR 97206
8/6				CURRENT RESIDENT	bizh SE DIVISION ST #355	FORTLAND OR 97206

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	A	В	С	D	E	F
877		-	-	CURRENT RESIDENT	6125 SE DIVISION ST #359	PORTLAND OR 97206
878				CURRENT RECIDENT	6125 SE DIVISION SE #360	POPTIAND OF 97206
070				CURRENT RESIDENT	CI25 SE DIVISION SI #500	PODELAND OR 97200
0/9				CURRENT RESIDENT	6125 SE DIVISION ST #3/1	PORTLAND OR 97206
880				CURRENT RESIDENT	6125 SE DIVISION ST #373	PORTLAND OR 97206
881				CURRENT RESIDENT	6211 SE DIVISION ST #138	PORTLAND OR 97206
882				CURRENT RESIDENT	6211 SE DIVISION ST #139	PORTLAND OR 97206
883				CURRENT RESIDENT	6211 SE DIVISION ST #248	PORTLAND OR 97206
884				CURRENT RESIDENT	6211 SE DIVISION ST #339	PORTLAND OR 97206
001				CURRENT RECEDENT	COLL OF DIVIDION OF #340	PODELIND OD 07200
000				CURRENT RESIDENT	6211 SE DIVISION ST #349	PORTLAND OR 97206
886				CURRENT RESIDENT	6215 SE GRANT ST	PORTLAND OR 97215
887				CURRENT RESIDENT	6245 SE BELMONT ST	PORTLAND OR 97215
888				CURRENT RESIDENT	6302 SE LINCOLN ST	PORTLAND OR 97215
889				CURRENT RESIDENT	6320 SE DIVISION ST	PORTLAND OR 97206
890				CURRENT RESIDENT	6323 SE DIVISION ST #107	PORTLAND OR 97206
901				CURRENT RECIDENT	6333 CE DIVICION CE #304	DODELAND OD 07206
000				CORRENT RESIDENT	COOD OF PERFORM OF LOOS	FORTHAND OR 57200
892				CURRENT RESIDENT	6323 SE DIVISION ST #205	PORTLAND OR 97206
893				CURRENT RESIDENT	6323 SE DIVISION ST #209	PORTLAND OR 97206
894				CURRENT RESIDENT	6323 SE DIVISION ST #221	PORTLAND OR 97206
895				CURRENT RESIDENT	6323 SE DIVISION ST #223	PORTLAND OR 97206
896				CURRENT RESIDENT	6323 SE DIVISION ST #302	PORTLAND OR 97206
897				CURBENT RESIDENT	6323 SE DIVISION ST #317	PORTLAND OR 97206
808				CURRENT RESIDENT	6323 SE DIVISION ST #318	PORTLAND OR 97206
900				CURDENE DECIDENT	COOL OF DIVISION OF #010	DODELAND OD 07206
899				CORRENT RESIDENT	5325 SE DIVISION ST #330	PORTLAND OR 9/206
900				CURRENT RESIDENT	6323 SE DIVISION ST #337	PORTLAND OR 97206
901				CURRENT RESIDENT	6323 SE DIVISION ST #338	PORTLAND OR 97206
902				CURRENT RESIDENT	6325 SE DIVISION ST	PORTLAND OR 97206
903				CURRENT RESIDENT	6408 SE DIVISION ST	PORTLAND OR 97206
904				CURRENT RESIDENT	6414 SE DIVISION ST	PORTLAND OR 97206
905				CURBENT RESIDENT	6420 SE DIVISION ST	PORTLAND OR 97206
906				CURRENT RESTRENT	6426 SE DIVISION ST	POPTIAND OF 97206
907				CURRENT RESIDENT	6420 SE DIVISION ST	PORTLAND OR 97200
009				CURRENT RESIDENT	CAAC OF NINDOOD OF	PORTLAND OR 97200
900				CURRENT RESIDENT	6446 SE WINDSOR CT	PORTLAND OR 9/206
909				CURRENT RESIDENT	6456 SE WINDSOR CT	PORTLAND OR 97206
910				CURRENT RESIDENT	6506 SE WINDSOR CT	PORTLAND OR 97206
911				CURRENT RESIDENT	6512 SE DIVISION ST #1	PORTLAND OR 97206
912				CURRENT RESIDENT	6512 SE DIVISION ST #8	PORTLAND OR 97206
913				CURRENT RESIDENT	6539 SE DIVISION ST	PORTLAND OR 97206
914				CURRENT RESIDENT	6545 SE DIVISION ST	PORTLAND OR 97206
915				CURBENT RESIDENT	6567 SE BELMONT ST	PORTLAND OR 97215
916				CURRENT RESTRENT	6600 SE DIVISION ST #208	POPTIAND OF 97206
017				CURRENT RESIDENT	CCOD OF DIVISION OF \$200	PORTLAND OR 97200
010				CURRENT RESIDENT	0000 3E DIVISION 31 #205	FORILAND OR 57200
910				CURRENT RESIDENT	6702 SE DIVISION ST	PORTLAND OR 9/206
919				CURRENT RESIDENT	7110 SE GRANT ST	PORTLAND OR 97215
920				CURRENT RESIDENT	7120 SE GRANT ST	PORTLAND OR 97215
921				CURRENT RESIDENT	7126 SE GRANT ST	PORTLAND OR 97215
922				CURRENT RESIDENT	7207 SE TAYLOR ST	PORTLAND OR 97215
923				CURRENT RESIDENT	806 SE 62ND AVE	PORTLAND OR 97215
924				CURRENT RESIDENT	925 SE 68TH AVE	PORTLAND OR 97215
925				CURRENT RESIDENT	1534 SE 71ST AVE	PORTLAND OR 97215
926				CURRENT RESIDENT	1606 GE 71GE AVE	POPTIAND OF 97215
027				CURRENT RESIDENT	1616 GR 5089 NR 50	PORTLAND OR 07215
921				CONNENT REGIDENT	TOTO DE JOIR AVE #B	LONIDAND ON 57213
928				CURRENT RESIDENT	1/24 SE 59TH AVE	PORTLAND OR 9/215
929				CURRENT RESIDENT	1734 SE 59TH AVE #B	PORTLAND OR 97215
930				CURRENT RESIDENT	1821 SE 72ND AVE	PORTLAND OR 97215
931				CURRENT RESIDENT	1944 SE 59TH AVE #B	PORTLAND OR 97215
932				CURRENT RESIDENT	2057 SE 72ND AVE	PORTLAND OR 97215
933				CURRENT RESIDENT	2106 SE 59TH AVE	PORTLAND OR 97215
934				CURRENT RESIDENT	2133 SE 60TH AVE	PORTLAND OR 97215
935				CURRENT RESIDENT	2133 SE 64TH AVE	PORTLAND OR 97215
026				CURRENT RECIDENT	2200 CE 64EU AVE	POPULAND OR 97215
077				CUDDENE DECEDENE	2210 CE 60EU AVE	DODELAND OD 07215
937				CURRENT RESIDENT	2212 SE OUTH AVE	FURILAND OR 9/215
938				CURRENT RESIDENT	2223 SE bUTH AVE	FURTLAND OR 9/215
939				CURRENT RESIDENT	2225 SE 66TH AVE	PORTLAND OR 97215
940				CURRENT RESIDENT	2255 SE 70TH AVE	PORTLAND OR 97215
941				CURRENT RESIDENT	2273 SE 66TH AVE	PORTLAND OR 97215
942				CURRENT RESIDENT	2275 SE 66TH AVE	PORTLAND OR 97215
943				CURRENT RESIDENT	2305 SE 66TH AVE	PORTLAND OR 97215
944				CURRENT RESIDENT	2413 SE 66TH AVE	PORTLAND OR 97206
9/15				CURRENT RESIDENT	2426 SE 66TH NVE #4	POPTIAND OF 97206
945				CUDDENT DECIDENT	2401 CF 67mH AVE #4	DODITIAND OF 97200
047				CUNNENT RESIDENT	LIJI DE U/IE AVE #A	DODITIOND OF 07215
947				CURRENT RESIDENT	5824 SE LINCOLN ST	PORTLAND OR 97215
948				CURRENT RESIDENT	6043 SE GRANT ST	PORTLAND OR 97215
949				CURRENT RESTRENT	6122 CE VAMUTIT CT	DODELAND OD 07215

			c.		-	-
	A	В	Ĺ	D	E	F
950				CURRENT RESIDENT	6125 SE DIVISION ST #102	PORTLAND OR 97206
951				CURRENT RESIDENT	6125 SE DIVISION ST #106	PORTLAND OR 97206
952				CURRENT RESIDENT	6125 SE DIVISION ST #113	PORTLAND OR 97206
953				CURRENT RESIDENT	6125 SE DIVISION ST #121	PORTLAND OR 97206
954				CURRENT RESIDENT	6125 SE DIVISION ST #122	PORTLAND OR 97206
955				CURRENT RESIDENT	6125 SE DIVISION ST #124	PORTLAND OR 97206
956				CURBENT RESIDENT	6125 SE DIVISION ST #126	PORTLAND OR 97206
057				CURRENT RESIDENT	6125 SE DIVISION SI #120	PORTIAND OR 97200
050				CURRENT RESIDENT	0125 SE DIVISION SI #155	FORTLAND OK 97206
958				CURRENT RESIDENT	6125 SE DIVISION ST #163	PORTLAND OR 97206
959				CURRENT RESIDENT	6125 SE DIVISION ST #175	PORTLAND OR 97206
960				CURRENT RESIDENT	6125 SE DIVISION ST #182	PORTLAND OR 97206
961				CURRENT RESIDENT	6125 SE DIVISION ST #184	PORTLAND OR 97206
962				CURRENT RESIDENT	6125 SE DIVISION ST #205	PORTLAND OR 97206
963				CURRENT RESIDENT	6125 SE DIVISION ST #208	PORTLAND OR 97206
964				CURRENT RESIDENT	6125 SE DIVISION ST #226	PORTLAND OR 97206
965				CURBENT BESIDENT	6125 SE DIVISION ST #228	PORTLAND OR 97206
966				CURBENT RESIDENT	6125 SE DIVISION ST #232	PORTLAND OR 97206
067				CURRENT RECIDENT	6125 CE DIVICION CE #250	PORTIAND OR 97206
000				CURRENT RESIDENT	0125 SE DIVISION SI #255	FORTLAND OK 97206
968				CURRENT RESIDENT	6125 SE DIVISION ST #262	PORTLAND OR 97206
969				CURRENT RESIDENT	6125 SE DIVISION ST #270	PORTLAND OR 97206
970				CURRENT RESIDENT	6125 SE DIVISION ST #274	PORTLAND OR 97206
971				CURRENT RESIDENT	6125 SE DIVISION ST #285	PORTLAND OR 97206
972				CURRENT RESIDENT	6125 SE DIVISION ST #303	PORTLAND OR 97206
973				CURRENT RESIDENT	6125 SE DIVISION ST #320	PORTLAND OR 97206
974				CURRENT RESIDENT	6125 SE DIVISION ST #321	PORTLAND OR 97206
975				CURRENT RESIDENT	6125 SE DIVISION ST #323	PORTLAND OR 97206
976				CURBENT RESIDENT	6125 SE DIVISION ST #335	PORTLAND OR 97206
977				CURRENT RESIDENT	6125 SE DIVISION ST #350	POPTIAND OR 97206
079				CURDENT RESIDENT	6125 GE DIVISION SI #354	PORTLAND OR 97200
070				CURRENT RESIDENT	0125 SE DIVISION SI #350	FORTLAND OR 57206
979				CURRENT RESIDENT	6125 SE DIVISION ST #358	PORTLAND OR 97206
980				CURRENT RESIDENT	6125 SE DIVISION ST #362	PORTLAND OR 97206
981				CURRENT RESIDENT	6125 SE DIVISION ST #372	PORTLAND OR 97206
982				CURRENT RESIDENT	6125 SE DIVISION ST #381	PORTLAND OR 97206
983				CURRENT RESIDENT	6125 SE DIVISION ST #383	PORTLAND OR 97206
984				CURRENT RESIDENT	6125 SE DIVISION ST #385	PORTLAND OR 97206
985				CURRENT RESIDENT	6186 SE YAMHILL ST #A	PORTLAND OR 97215
986				CURBENT BESIDENT	6200 SE SALMON ST	PORTLAND OR 97215
987				CURRENT RESIDENT	6211 SE DIVISION ST #137	PORTLAND OR 97206
988				CURRENT RESIDENT	6211 SE DIVISION ST #140	PORTIAND OR 97206
090				CURDENT RESIDENT	6211 SE DIVISION SI #140	PORTLAND OR 97200
000				CURRENT RESIDENT	0211 3E DIVISION 31 #143	FORTLAND OR 57206
990				CURRENT RESIDENT	6211 SE DIVISION ST #145	PORTLAND OR 97206
991				CURRENT RESIDENT	6211 SE DIVISION ST #147	PORTLAND OR 9/206
992				CURRENT RESIDENT	6211 SE DIVISION ST #242	PORTLAND OR 97206
993				CURRENT RESIDENT	6211 SE DIVISION ST #244	PORTLAND OR 97206
994				CURRENT RESIDENT	6211 SE DIVISION ST #249	PORTLAND OR 97206
995				CURRENT RESIDENT	6211 SE DIVISION ST #336	PORTLAND OR 97206
996				CURRENT RESIDENT	6211 SE DIVISION ST #337	PORTLAND OR 97206
997				CURRENT RESIDENT	6211 SE DIVISION ST #338	PORTLAND OR 97206
998				CURBENT BESIDENT	6211 SE DIVISION ST #346	PORTLAND OR 97206
999				CURBENT RESIDENT	6211 SE DIVISION ST #348	PORTLAND OR 97206
1000				CURRENT RESIDENT	6211 SE DIVISION ST #351	PORTLAND OR 97206
1000				CUDDENT DECIDENT	6211 OF DIVISION OF #355	POPTIAND OR 97206
1001				CURDENT RECIDENT	COAD OF VINITIT OF	DODULAND OF 97215
1002				CURRENT RESIDENT	0243 SE IAMHILL ST	FURILAND UK 9/213
1003				CURRENT RESIDENT	024/ SE YAMHILL ST	PORTLAND OR 9/215
1004				CURRENT RESIDENT	6303 SE GRANT ST	PORTLAND OR 97215
1005				CURRENT RESIDENT	6304 SE BELMONT ST	PORTLAND OR 97215
1006				CURRENT RESIDENT	6304 SE DIVISION ST	PORTLAND OR 97206
1007				CURRENT RESIDENT	6304 SE MORRISON ST	PORTLAND OR 97215
1008				CURRENT RESIDENT	6308 SE DIVISION ST	PORTLAND OR 97206
1009				CURRENT RESIDENT	6323 SE DIVISION ST #102	PORTLAND OR 97206
1010				CURRENT RESIDENT	6323 SE DIVISION ST #214	PORTLAND OR 97206
1011				CURRENT RESIDENT	6323 SE DIVISION ST #215	PORTLAND OR 97206
1012				CUBBENT BESIDENT	6323 SE DIVISION ST #216	PORTLAND OR 97206
1012				CUDDENE DECIDENE	COLD OF DIVISION OF #200	DODELAND OF 07206
1013				CURDENT RECIDENT	COLD OF DIVISION OF #220	DODELAND OF 97200
1014				CURRENT RESIDENT	COOD OF DIVISION ST #230	FURILAND UK 9/200
1015				CURRENT RESIDENT	6323 SE DIVISION ST #234	PORTLAND OR 97206
1016				CURRENT RESIDENT	63∠3 SE DIVISION ST #236	FORTLAND OR 97206
1017				CURRENT RESIDENT	6323 SE DIVISION ST #307	PORTLAND OR 97206
1018				CURRENT RESIDENT	6323 SE DIVISION ST #321	PORTLAND OR 97206
1019				CURRENT RESIDENT	6323 SE DIVISION ST #323	PORTLAND OR 97206
1020				CURRENT RESIDENT	6323 SE DIVISION ST #324	PORTLAND OR 97206
1021				CURRENT RESIDENT	6323 SE DIVISION ST #325	PORTLAND OR 97206
1022				CURRENT RESIDENT	6323 SE DIVISION ST #329	PORTLAND OR 97206

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1023				CURRENT RESIDENT	6323 SE DIVISION ST #332	PORTLAND OR 97206
1024				CURRENT RESIDENT	6338 SE STEPHENS ST	PORTLAND OR 97215
1025				CURRENT RESIDENT	6406 SE DIVISION ST	PORTLAND OR 97206
1026				CURRENT RESIDENT	6410 SE DIVISION ST	PORTLAND OR 97206
1027				CURRENT RESIDENT	6412 SE DIVISION ST #A	PORTLAND OR 97206
1028				CURRENT RESIDENT	6434 SE DIVISION ST	PORTLAND OR 97206
1029				CURRENT RESIDENT	6438 SE DIVISION ST	PORTLAND OR 97206
1030				CURRENT RESIDENT	6440 SE DIVISION ST	PORTLAND OR 97206
1031				CURRENT RESIDENT	6450 SE DIVISION ST	PORTLAND OR 97206
1032				CURRENT RESIDENT	6452 SE DIVISION ST	PORTLAND OR 97206
1033				CURRENT RESIDENT	6462 SE DIVISION ST	PORTLAND OR 97206
1034				CURRENT RESIDENT	6466 SE DIVISION ST	PORTLAND OR 97206
1035				CUBBENT BESIDENT	6470 SE DIVISION ST	PORTLAND OR 97206
1036				CUBBENT BESIDENT	6510 SE WINDSOR CT	PORTLAND OR 97206
1037				CUBBENT BESIDENT	6512 SE DIVISION ST #10	PORTLAND OR 97206
1038				CUBBENT BESIDENT	6512 SE DIVISION ST #11	PORTLAND OR 97206
1039				CUBBENT RESIDENT	6512 SE DIVISION ST #12	PORTLAND OR 97206
1040				CURRENT RESIDENT	6512 SE DIVISION ST #12	POPTIAND OF 97206
10/1				CURRENT RESIDENT	6512 SE DIVISION ST #7	POPTIAND OF 97206
1041				CURRENT RESIDENT	6518 SE DIVISION ST #100	POPTIAND OR 97206
1042				CURRENT RESIDENT	6518 SE DIVISION SI #100	PORTLAND OR 97200
1043				CURRENT RESIDENT	6510 SE DIVISION SI #502	PORTLAND OR 97200
1044				CURRENT RESIDENT	COD OF DIVISION OF 5000	PORTLAND OR 97213
1045				CURRENT RESIDENT	6600 SE DIVISION ST #302	PORTLAND OR 97206
1046				CURRENT RESIDENT	6654 SE BELMONT ST	PORTLAND OR 97215
1047				CURRENT RESIDENT	6/38 SE YAMHILL ST	PORTLAND OR 97215
1048				CURRENT RESIDENT	6838 SE BELMONT ST	PORTLAND OR 97215
1049				CURRENT RESIDENT	6919 SE YAMHILL ST	PORTLAND OR 97215
1050				CURRENT RESIDENT	6928 SE BELMONT ST	PORTLAND OR 97215
1051				CURRENT RESIDENT	7111 SE GRANT ST	PORTLAND OR 97215
1052				CURRENT RESIDENT	7112 SE GRANT ST	PORTLAND OR 97215
1053				CURRENT RESIDENT	7214 SE MADISON ST	PORTLAND OR 97215
1054				CURRENT RESIDENT	904 SE 69TH AVE	PORTLAND OR 97215
1055				CURRENT RESIDENT	909 SE 69TH AVE	PORTLAND OR 97215
1056				CURRENT RESIDENT	1245 SE 60TH AVE	PORTLAND OR 97215
1057				CURRENT RESIDENT	1504 SE 71ST AVE #B	PORTLAND OR 97215
1058				CURRENT RESIDENT	1631 SE 59TH AVE #A	PORTLAND OR 97215
1059				CURRENT RESIDENT	1714 SE 59TH AVE	PORTLAND OR 97215
1060				CURRENT RESIDENT	1715 SE 59TH AVE	PORTLAND OR 97215
1061				CURRENT RESIDENT	1801 SE MOUNTAIN VIEW DR	PORTLAND OR 97215
1062				CURRENT RESIDENT	1823 SE 60TH AVE	PORTLAND OR 97215
1063				CURRENT RESIDENT	1825 SE 59TH AVE	PORTLAND OR 97215
1064				CURRENT RESIDENT	1934 SE 59TH AVE	PORTLAND OR 97215
1065				CURRENT RESIDENT	2120 SE 72ND AVE	PORTLAND OR 97215
1066				CURRENT RESIDENT	2205 SE 70TH AVE	PORTLAND OR 97215
1067				CURRENT RESIDENT	2219 SE 70TH AVE	PORTLAND OR 97215
1068				CUBBENT BESIDENT	2228 SE 70TH AVE	PORTLAND OR 97215
1069				CUBBENT BESIDENT	2237 SE 70TH AVE	PORTLAND OR 97215
1070				CUBBENT BESIDENT	2239 SE 70TH AVE	PORTLAND OR 97215
1071				CURRENT RESIDENT	2261 SE 66TH AVE	PORTLAND OR 97215
1072				CUBBENT RESIDENT	2269 SE 66TH AVE	PORTLAND OR 97215
1073				CURRENT RESIDENT	2301 SE 66TH AVE	PORTLAND OR 97215
1074				CURRENT RESIDENT	2307 SE 72ND AVE	PORTLAND OR 97215
1075				CUBBENT BESIDENT	2312 SE 66TH AVE	PORTLAND OR 97215
1076				CURRENT RESIDENT	2313 SE 66TH AVE	POPTIAND OF 97215
1077				CURRENT RESIDENT	2427 OF 66MU AVE	DODELAND OF 97215
1078				CURRENT RESIDENT	2430 SE 66TH AVE #1	POPTIAND OR 97206
1070				CURRENT RESIDENT	2401 CE 67mu AVE #1	DORTIAND OR 97200
1079				CURRENT RESIDENT	2451 SE 0/IR AVE #B	PORTLAND OR 97200
1000				CURRENT RESIDENT	2000 SE COIR AVE	PORTLAND OR 97200
1001				CURRENT RESIDENT	COSS SE SIEFRENS SI	PORILAND OR 97213
1082				CURRENT RESIDENT	6125 SE DIVISION ST #103	PORTLAND OR 97206
1083				CURRENT RESIDENT	6125 SE DIVISION ST #107	PORTLAND OR 97206
1084				CURRENT RESIDENT	6125 SE DIVISION ST #110	PORTLAND OR 97206
1085				CURRENT RESIDENT	6125 SE DIVISION ST #115	PORTLAND OR 97206
1086				CURRENT RESIDENT	6125 SE DIVISION ST #123	PORTLAND OR 97206
1087				CURRENT RESIDENT	6125 SE DIVISION ST #128	PORTLAND OR 97206
1088				CURRENT RESIDENT	6125 SE DIVISION ST #130	PORTLAND OR 97206
1089				CURRENT RESIDENT	6125 SE DIVISION ST #135	PORTLAND OR 97206
1090				CURRENT RESIDENT	6125 SE DIVISION ST #155	PORTLAND OR 97206
1091				CURRENT RESIDENT	6125 SE DIVISION ST #159	PORTLAND OR 97206
1092				CURRENT RESIDENT	6125 SE DIVISION ST #162	PORTLAND OR 97206
1093				CURRENT RESIDENT	6125 SE DIVISION ST #164	PORTLAND OR 97206
1094				CURRENT RESIDENT	6125 SE DIVISION ST #173	PORTLAND OR 97206
1095				CURRENT RESIDENT	6125 SE DIVISION ST #181	PORTLAND OR 97206

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1096				CURRENT RESIDENT	6125 SE DIVISION ST #202	PORTLAND OR 97206
1007				CURRENT RECEDENT	CIDE OF DEVICION OF #202	PORTLAND OR 07200
1097				CURRENT RESIDENT	6125 SE DIVISION ST #207	PORTLAND OR 97206
1098				CURRENT RESIDENT	6125 SE DIVISION ST #210	PORTLAND OR 97206
1099				CURRENT RESIDENT	6125 SE DIVISION ST #212	PORTLAND OR 97206
1100				CURRENT RECIDENT	6125 CE DIVICION CE #214	DODELAND OD 07206
1100				CURRENT RESIDENT	0125 SE DIVISION SI #214	FORTLAND OR 97200
1101				CURRENT RESIDENT	6125 SE DIVISION ST #222	PORTLAND OR 97206
1102				CURRENT RESIDENT	6125 SE DIVISION ST #230	PORTLAND OR 97206
1103				CURRENT RESIDENT	6125 SE DIVISION ST #234	PORTLAND OR 97206
1104				CURRENT RECIDENT	6125 CE DIVICION CE #252	DODELAND OD 07206
1104				CORRENT RESIDENT	0125 SE DIVISION SI #252	FORILAND OR 57200
1105				CURRENT RESIDENT	6125 SE DIVISION ST #254	PORTLAND OR 97206
1106				CURRENT RESIDENT	6125 SE DIVISION ST #281	PORTLAND OR 97206
1107				CURRENT RESIDENT	6125 SE DIVISION ST #283	PORTLAND OR 97206
1109				CURRENT RECIDENT	6125 CE DIVICION CE #202	DODELAND OD 07206
1100				CORRENT RESIDENT	0125 3E DIVISION 31 #502	FORTLAND OR 57200
1109				CURRENT RESIDENT	6125 SE DIVISION ST #305	PORTLAND OR 97206
1110				CURRENT RESIDENT	6125 SE DIVISION ST #307	PORTLAND OR 97206
1111				CURRENT RESIDENT	6125 SE DIVISION ST #312	PORTLAND OR 97206
1112				CUPPENT PECTDENT	6125 SE DIVISION ST #325	POPTIAND OF 97206
1112				CONNENT RESIDENT	0125 SE DIVISION SI #525	FORTHAND OR 57200
1113				CURRENT RESIDENT	6125 SE DIVISION ST #332	PORTLAND OR 97206
1114				CURRENT RESIDENT	6125 SE DIVISION ST #352	PORTLAND OR 97206
1115				CURRENT RESIDENT	6125 SE DIVISION ST #361	PORTLAND OR 97206
1116				CURRENT RESIDENT	6125 SE DIVISION ST #375	PORTLAND OR 97206
1117				OURDENE DEGIDENT	CIDE OF DIVISION OF #3/3	DODELAND OD 07200
1117				CORRENT RESIDENT	0123 SE DIVISION ST #380	PORTLAND OR 9/206
1118				CURRENT RESIDENT	6125 SE DIVISION ST #384	PORTLAND OR 97206
1119				CURRENT RESIDENT	6211 SE DIVISION ST #136	PORTLAND OR 97206
1120				CURBENT RESIDENT	6211 SE DIVISION ST #142	PORTLAND OR 97206
1120						PORTLAND OR 97200
1121				CORRENT RESIDENT	6211 SE DIVISION ST #144	PORTLAND OR 97206
1122				CURRENT RESIDENT	6211 SE DIVISION ST #146	PORTLAND OR 97206
1123				CURRENT RESIDENT	6211 SE DIVISION ST #150	PORTLAND OR 97206
1124				CURRENT RESIDENT	6211 SE DIVISION ST #238	PORTLAND OR 97206
1125				CUPPENT DESTDENT	6211 SE DIVISION ST #240	POPTIAND OF 97206
1125				CURRENT RESIDENT	COLL OF DIVISION OF #240	PORTLAND OR 97200
1120				CORRENT RESIDENT	0211 3E DIVISION 31 #230	FORILAND OR 57200
1127				CURRENT RESIDENT	6211 SE DIVISION ST #252	PORTLAND OR 97206
1128				CURRENT RESIDENT	6211 SE DIVISION ST #340	PORTLAND OR 97206
1129				CURRENT RESIDENT	6211 SE DIVISION ST #342	PORTLAND OR 97206
1130				CUDDENT DECIDENT	6211 SE DIVISION ST #347	POPTIAND OF 97206
1121				CURRENT RECEDENT	COLL OF PIVIOION OF #350	DODELAND OD 07200
1151				CORRENT RESIDENT	6211 SE DIVISION ST #350	PORTLAND OR 9/206
1132				CURRENT RESIDENT	6211 SE DIVISION ST #352	PORTLAND OR 97206
1133				CURRENT RESIDENT	6213 SE MAIN ST	PORTLAND OR 97215
1134				CURRENT RESIDENT	6234 SE LINCOLN ST	PORTLAND OR 97215
1135				CURRENT RESIDENT	6259 SE YAMHILI, ST	PORTLAND OR 97215
1126				CURRENT RECEDENT	6203 OD DIWINIDD OF	DODELAND OD 07200
1127				CURRENT RESIDENT	0323 3E DIVISION 31 #105	FORTLAND OR 97200
1137				CURRENT RESIDENT	6323 SE DIVISION ST #111	PORTLAND OR 97206
1138				CURRENT RESIDENT	6323 SE DIVISION ST #113	PORTLAND OR 97206
1139				CURRENT RESIDENT	6323 SE DIVISION ST #115	PORTLAND OR 97206
1140				CURRENT RESIDENT	6323 SE DIVISION ST #201	PORTLAND OR 97206
11/1				CUPPENT DESTDENT	6323 GE DIVITSION OF #202	POPTIAND OF 97206
1140				CORRENT RESIDENT	0525 SE DIVISION SI #202	PORTLAND OR 07200
1142				CURRENT RESIDENT	6323 SE DIVISION ST #203	PORTLAND OR 97206
1143				CURRENT RESIDENT	6323 SE DIVISION ST #206	PORTLAND OR 97206
1144				CURRENT RESIDENT	6323 SE DIVISION ST #217	PORTLAND OR 97206
1145				CURBENT RESIDENT	6323 SE DIVISION ST #224	PORTLAND OR 97206
1146				CURRENT PROTECTION	(333 GR DIVIGION OF #335	DODELAND OD 07200
1140				CONNENT REGIDENT	0323 35 DIVISION 31 #223	DONTERNE OR 57200
114/				CURRENT RESIDENT	6323 SE DIVISION ST #226	PORTLAND OR 97206
1148				CURRENT RESIDENT	6323 SE DIVISION ST #229	PORTLAND OR 97206
1149				CURRENT RESIDENT	6323 SE DIVISION ST #231	PORTLAND OR 97206
1150				CURRENT RESIDENT	6323 SE DIVISION ST #232	PORTLAND OR 97206
1151				CUPPENT DESTDENT	6323 GE DIVITOTON OF #233	POPTIAND OF 97206
1150				CORRENT RESIDENT	0525 SE DIVISION SI #255	PORTLAND OR 07200
1152				CURRENT RESIDENT	6323 SE DIVISION ST #306	PORTLAND OR 97206
1153				CURRENT RESIDENT	6323 SE DIVISION ST #311	PORTLAND OR 97206
1154				CURRENT RESIDENT	6323 SE DIVISION ST #313	PORTLAND OR 97206
1155				CURRENT RESIDENT	6323 SE DIVISION ST #314	PORTLAND OR 97206
1156				CURRENT RESIDENT	6323 GE DIVISION OF #315	POPTIAND OF 97206
1157				OURDENE DEGIDENT	5323 OF DIVISION OF #313	DODELAND OD 07200
1157				CURRENT RESIDENT	0323 SE DIVISION ST #322	FURILAND UK 9/200
1158				CURRENT RESIDENT	6323 SE DIVISION ST #326	PORTLAND OR 97206
1159				CURRENT RESIDENT	6323 SE DIVISION ST #336	PORTLAND OR 97206
1160				CURRENT RESIDENT	6336 SE SHERMAN ST #B	PORTLAND OR 97215
1161				CUBBENT BESIDENT	6353 SE YAMHILI ST	PORTLAND OR 97215
1162				CURRENT RESIDENT	6402 SE DIVISION ST	POPTIAND OF 97206
1102				OURDENT REGIDENT	CALC OF DIVIDION OF	DODELAND OD 07200
1163				CURRENT RESIDENT	0410 SE DIVISION ST	FURILAND OK 9/206
1164				CURRENT RESIDENT	6422 SE DIVISION ST	PORTLAND OR 97206
1165				CURRENT RESIDENT	6430 SE DIVISION ST	PORTLAND OR 97206
1166				CURRENT RESIDENT	6436 SE DIVISION ST	PORTLAND OR 97206
1167				CURRENT RESIDENT	6441 SE MORRISON CT	PORTLAND OR 97215
1107				CURRENT RESIDENT	CAAD OR DIVERSION OF	DODINAND OR 57213
0011				CURRENT RESIDENT	0442 SE DIVISION ST	PORTLAND OR 9/206

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1169				CURRENT RESIDENT	6458 SE DIVISION ST	PORTLAND OR 97206
1170				CURRENT RESIDENT	6458 SE WINDSOR CT	PORTLAND OR 97206
1171				CURRENT RESIDENT	6460 SE DIVISION ST	PORTLAND OR 97206
1172				CURRENT RESIDENT	6502 SE WINDSOR CT	PORTLAND OR 97206
1173				CURRENT RESIDENT	6512 SE DIVISION ST #2	PORTLAND OR 97206
1174				CURRENT RESIDENT	6512 SE DIVISION ST #5	PORTLAND OR 97206
1175				CURRENT RESIDENT	6517 SE DIVISION ST	PORTLAND OR 97206
1176				CURRENT RESIDENT	6518 SE DIVISION ST #301	PORTLAND OR 97206
1177				CURRENT RESIDENT	6600 SE DIVISION ST #105	PORTLAND OR 97206
1178				CURRENT RESIDENT	6600 SE DIVISION ST #301	PORTLAND OR 97206
1179				CURRENT RESIDENT	6600 SE DIVISION ST #309	PORTLAND OR 97206
1180				CURRENT RESIDENT	6659 SE YAMHILL ST	PORTLAND OR 97215
1181				CURRENT RESIDENT	6715 SE YAMHILL ST	PORTLAND OR 97215
1182				CURRENT RESIDENT	7114 SE GRANT ST	PORTLAND OR 97215
1183				CURRENT RESIDENT	7122 SE GRANT ST	PORTLAND OR 97215
1184				CURRENT RESIDENT	7124 SE GRANT ST	PORTLAND OR 97215
1185				CURRENT RESIDENT	7203 SE MAIN ST	PORTLAND OR 97215
1186				CURRENT RESIDENT	7220 SE STEPHENS ST	PORTLAND OR 97215
1187				CURRENT RESIDENT	7226 SE MADISON ST	PORTLAND OR 97215
1188				CURRENT RESIDENT	912 SE 69TH AVE	PORTLAND OR 97215
1189				CURRENT RESIDENT	922 SE 66TH PL	PORTLAND OR 97215
1190 R	ETURN SERVICE REQUESTED	OWNER	1S2E05 100	PORTLAND CITY OF	1900 SW 4TH AVE #7007	PORTLAND OR 97201-5380
1191 R	ETURN SERVICE REQUESTED	APPLICANT/OWNERS AGENT	PORTLAND PARKS & RECREATION	HORNER BRETT	1210 SW 5TH AVE #800	PORTLAND OR 97204
1192 R	ETURN SERVICE REQUESTED		LAND USE CONTACT C/O SEUL	MT TABOR NEIGHBORHOOD ASSOCIATION	3534 SE MAIN ST	PORTLAND OR 97214
1193 R	ETURN SERVICE REQUESTED		PORTLAND SCHOOL DISTRICT	LAND USE NOTICE CONTACT	501 N DIXON	PORTLAND OR 97227
1194 R	ETURN SERVICE REQUESTED		SOUTH TABOR NEIGHBORHOOD ASSOC	CARR JOHN	2918 SE 67TH AVE	PORTLAND OR 97206
1195 R	ETURN SERVICE REQUESTED		LAND USE CONTACT	SE UPLIFT NEIGHBORHOOD PROGRAM	3534 SE MAIN ST	PORTLAND OR 97214
1196 R	ETURN SERVICE REQUESTED		BELMONT AREA BUSINESS ASSOCIATION	COOK NICHOLAS	PO BOX 14472	PORTLAND OR 97293
1197 R	ETURN SERVICE REQUESTED		HAWTHORNE BLVD BUSINESS ASSOCIATION	LEVESQUE WILLIAM	PO BOX 15271	PORTLAND OR 97293
1198 R	ETURN SERVICE REQUESTED			KARLA MOORE-LOVE (CITY HALL)	1221 SW 4TH AVE #130	PORTLAND OR 97204
1199 R	ETURN SERVICE REQUESTED		RISK & LAND DEPARTMENT	NW NATURAL	250 SW TAYLOR ST	PORTLAND OR 97204-3038
1200 R	ETURN SERVICE REQUESTED		LAND USE CONTACT	PACIFIC POWER & LIGHT	7544 NE 33RD DR	PORTLAND OR 97211
1201 R	ETURN SERVICE REQUESTED		PORTLAND METRO REGIONAL SOLUTIONS	C/O DLCD REGIONAL REPRESENTATIVE	1600 SW FOURTH AVE #109	PORTLAND OR 97201
1202 R	ETURN SERVICE REQUESTED		LAND USE CONTACT	PORT OF PORTLAND PLANNING	PO BOX 3529	PORTLAND OR 97208
1203 R	ETURN SERVICE REQUESTED		LAND USE CONTACT	TRANSIT DEVELOPMENT	1800 SW FIRST AVE #300	PORTLAND OR 97201
1204 R	ETURN SERVICE REQUESTED		LAND USE CONTACT	STATE HISTORIC PRESERVATION OFFICE	725 SUMMER NE #C	SALEM OR 97301
1205 R	ETURN SERVICE REQUESTED			JUDY PETERS	6916 NE 40TH ST	VANCOUVER WA 98661
1206				PORTLAND PARK TRAIL	TATE WHITE	B106/R1302
1207				LAND USE CONTACT	PROSPER PORTLAND	129/PROSPER
1208					HEARINGS CLERK	299/3100
1209					DAWN KRANTZ	B299/R5000

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#### RESPONSE TO THE BUREAU OF DEVELOPMENT SERVICES LAND USE REVIEW REQUEST

#### Portland Transportation Development Review Bureau of Transportation Engineering & Development

LU: 23-088549-LU

Date: January 5, 2024

- To: Grace Jeffreys, Bureau of Development Services
- 503-865-6521, grace.jeffreys@portlandoregon.gov
- From: Eileen Cunningham, PBOT Development Review 503-823-2999, Eileen.Cunningham@portlandoregon.gov
- Applicant: Brett Horner PORTLAND PARKS & RECREATION 1210 SW 5TH AVE SUITE 800 PORTLAND OR 97204

Location: 6325 SE DIVISION ST

TYPE OF REQUEST: Type 3 procedure HR - Historic Resource Review

### **DESCRIPTION OF PROJECT**

HLC HEARING - Type III Historic Resource Review for the replacement of 88 light poles: 84 within Mt Tabor Park and 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. Replacement poles will be installed in approximately the same location as the current poles. Historic Resource Review is required because the proposal is for non-exempt development within a historic overlay zone, per Section 33.846.

### RESPONSE

Portland Transportation/Development Review has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services.

- 1. There are no transportation related approval criteria for the subject review.
- 2. The proposal does not trigger either of the public improvement requirements of 17.88.020. No public improvements or dedication are required.
- 3. The light poles to be replaced are not PBOT assets, although at least one light pole appears to be within the right-of-way. The poles will be replaced in their current location.
- 4. Any encroachments within the right-of-way will require an encroachment permit. The City's Encroachment Policy has provisions for recognizing pre-existing encroachments. (See page 4 at <a href="https://www.portland.gov/sites/default/files/2020-03/409066.pdf">https://www.portland.gov/sites/default/files/2020-03/409066.pdf</a>.) If the site contains existing

encroachment within right-of-way, PBOT will require a current encroachment permit to document all the encroachments on the site. If so, the applicant will be required to apply for an encroachment permit, which will need to be approved prior to land use review approval. The encroachment permit application is available at <a href="https://www.portland.gov/transportation/development/encroachment-permits">https://www.portland.gov/transportation/development/encroachment-permits</a>, including applicable fees. Please email the application and all supporting documentation to: <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a>. Please contact PBOT encroachment questions via email at <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a>. Please contact PBOT encroachment questions via email at <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a>. Please contact PBOT encroachment questions via email at <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a>. Please contact PBOT encroachment questions via email at <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a>. Please contact PBOT encroachment questions via email at <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a>. Please contact PBOT encroachment questions via email at <a href="mailto:encroachments@portlandoregon.gov">encroachments@portlandoregon.gov</a> (preferred). You may also call 503-823-7002 and select Option 3. For an overview of the encroachment permit process, please visit <a href="https://www.portland.gov/transportation/development/encroachment-permits">encroachment.permits.</a>

5. If the proposed development will impact the use of an area within the public right-of-way, a separate street temporary closure permit will be required. Additionally, closures that do not allow safe passage and unobstructed flow of normal public use in a partially open area or lane, will also require a City approved Traffic Control Plan. For an application, general information, cost, and submittal information, please visit Temporary Street Use Permitting (TSUP) | Portland.gov or call 503-823-7365.

#### RECOMMENDATION

PBOT has no objection to the subject request.

**PORTLAND PARKS & RECREATION** 



# Urban Forestry Land Use Review Response

Date:	December 22, 2023
From:	Mariano Masolo
	503-823-4560, Mariano.Masolo@portlandoregon.gov
Case File:	23-088549-000-00-LU
Location	6325 SE DIVISION ST
Proposal:	HLC HEARING - Type III Historic Resource Review for the repla
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acement of 88 light poles: 84 within Mt Tabor Park and 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. Replacement poles will be installed in approximately the same location as the current poles.

Historic Resource Review is required because the proposal is for non-exempt development within a historic overlay zone, per Section 33.846.

Urban Forestry has reviewed the proposal for its impact on existing city trees, street trees and heritage trees, street tree planting requirements and related mitigation in accordance with Title 11, Trees and for potential impacts upon urban tree canopy. It is the applicant's responsibility to disclose all aspects of their land use proposal that may impact required street tree plantings and existing street trees during the land use review process.

#### UNLESS EXPLICITLY STATED HEREIN, THIS REVIEW DOES NOT APPROVE STREET TREE REMOVALS AND DOES NOT PROVIDE ANY EXEMPTIONS TO TITLE 11 REQUIRMENTS.

Permits required after land use approval are subject to all applicable development standards and all provisions of the City Code, including Title 11. Title 11 regulations will be applied during the permit review process.

#### PLEASE NOTE THERE MAY BE OTHER APPLICABLE TREE REQUIREMENTS AS PER TITLE **33 PLANNING & ZONING.**

#### A. Response Summary

The applicant has not provided a Tree Protection Plan. Tree protection is required for all trees required to be retained in accordance with Title 11 Trees, Protection Methods (11.60.030).

With the conditions recommended in this response, Urban Forestry does not object to approval of the land use proposal.

The proposed development will be subject to Title 11 regulations during the permit review process.



### A. Tree Plan (<u>11.50.070</u>)

A Title 11 compliant tree plan must be submitted with each phase of development review and permitting including land use reviews, building permits, and public works permits. The same tree plan shall be included with each permit.

A tree plan was not submitted with the land use proposal, and additional tree information is required.

The following information is required for street trees, Heritage trees, and trees on city owned property and was not included with the proposal:

- a. Exiting trees
  - 1. Heritage trees
  - 2. Private trees at least 12 inches in diameter
  - 3. City trees at least 6 inches in diameter
  - 4. Street trees at least 3 inches in diameter
- b. Proposed tree activity
  - 1. Indicate trees to be retained and proposed tree protection.
  - 2. Indicate trees to be removed.
  - 3. Show location, species, planting size and number of trees to be planted.
- c. Protection plan
  - i. The protection plan must describe the potential impacts of construction methods, staging areas, equipment usage, loading areas, and building materials that will impact regulated trees. The plan must describe how the existing street, heritage, and city trees will have continued protection, in accordance with the protection requirements of 11.60, during the proposed development.

#### **B.** Street Trees

#### 1. Existing Street Conditions

According to available GIS data, the frontages have the following configuration.

a. SE Taylor St: The site has approximately 600 feet of street frontage. The right-of-way is improved with pavement. There are no curbs, nor planting strip and sidewalks. There are no overhead high voltage power lines. There are five street trees.

A field visit by Urban Forestry staff have confirmed the following trees:i. 5 Bradford pear (*Pyrus calleryana* ' Bradford'), 10"-16" DBH. Trees are in fair

- condition.
- 2. Street Tree Preservation (<u>11.50.040</u>)

The land use proposal has not provided adequate information to determine if existing trees may be approved and permitted for removal as part of the proposed development. All trees not approved for removal are required to be retained and protected during all stages of the development.

3. Street Tree Protection Specifications (<u>11.60.030</u>)

The applicant has not provided a street tree protection plan. Tree protection is required for all trees required to be retained in accordance with Title 11 Trees, Protection Methods (11.60.030). Tree protection shall follow either the Prescriptive or Performance path. Protection methods must be shown on the tree plan. If using the Performance path, the alternate tree protection plan must be prepared by an arborist who has visited the site.

The protection plan must describe the potential impacts of construction methods, staging areas, equipment usage, loading areas, and building materials that will impact regulated trees.



#### C. On Site Trees

#### City Managed Sites (<u>11.50.040.C.2.a</u>)

For development on City owned or managed sites applicants are required to consult with the City Forester at the preliminary project design phase if City or Street Tree removal is likely to occur to complete the project. The purpose of this consultation is to identify potential impacts and opportunities to retain existing trees, as well as any measures required to protect trees on site. (11.50.040)

The proposal is being reviewed by Urban Forestry in case 23-101463-UF.

#### 1. On-Site Tree Preservation (<u>11.50.040</u>)

The land use proposal has not provided adequate information to determine if existing trees may be approved and permitted for removal as part of the proposed development during the permit review process.

If the applicant believes the tree(s) require removal to facilitate development, the applicant must provide an adequate written technical analysis report demonstrating how and why the tree(s) cannot be preserved while developing the site to City standards.

The written technical analysis must include, but is not limited to, a feasibility study of the alternative measures considered in an effort to retain the tree(s). The technical analysis may address any relevant topics such as tree condition, equipment requirements, construction methodology, or cost. The submittal of a technical analysis and feasibility study does not provide approvals or permits for tree removals. Technical analysis and feasibility study documents will be reviewed by the City Forester to make a final determination.

All trees not approved for removal are required to be retained and protected during all stages of the development.

1. On-Site Tree Protection Specifications (<u>11.60.030</u>)

The applicant has not provided a street tree protection plan. Tree protection is required for all trees required to be retained in accordance with Title 11 Trees, Protection Methods (11.60.030). Tree protection shall follow either the Prescriptive or Performance path. Protection methods must be shown on the tree plan.

If using the Performance path, the alternate tree protection plan must be prepared by an arborist who has visited the site. The protection plan must describe the potential impacts of construction methods, staging areas, equipment usage, loading areas, and building materials that will impact regulated trees.

2. On-Site Tree Density Standards (<u>11.50.050.D</u>)

The applicant has not provided a tree planting plan. The required tree area is based on the size and the type of proposed existing development as shown in Title 11 Table 50-2. Trees must be planted at a minimum 1.5 caliper inches. Trees will be required to be planted through the permit review process.

### **D.** Heritage Trees

1. *Heritage Trees* (<u>11.20.060</u>): There are two trees located on the site on the City of Portland's Heritage Tree list:

> Sustaining a healthy park and recreation system to make Portland a great place to live, work and play. www.PortlandParks.org • Commissioner Dan Ryan • Director Adena Long Urban Forestry Land Use Review Response – Updated 1/3/24 | page 3



Sequoiadendron giganteum and Tilia tomentosa.

These tree must be retained and protected unless removal is approved by the Urban Forestry Commission.

Written authorization from Urban Forestry is required prior to any work done to the trees or within the root protection zone.

The protection methods must be shown on the Tree Preservation Plan.

#### E. Recommendations

Urban Forestry requires the following conditions be included in the decision:

- 1. A Tree Protection Plan must be submitted by an arborist, as defined in chapter 11.80.020.B.3:
- 2. The Tree Protection Plan for the existing park trees and street trees must be approved by Urban Forestry prior to any construction.







1900 SW Fourth Avenue • Portland, Oregon 97201 | 503-823-7300 | www.portland.gov/bds

To:Grace JeffreysFrom:Sloan Shelton, Life Safety Plans ExaminerDate:December 20, 2023RE:6325 SE DIVISION ST, 23-088549-LU

#### LIFE SAFETY PLAN REVIEW RESPONSE

The following comments are based on the plans and documents provided to the Life Safety Plan reviewer. They are intended to provide the applicant with preliminary Building Code information that could affect the Land Use Review, Public Records request and/or future Building Permit reviews. The comments may not identify all conflicts between the Land Use proposal and the Building Codes. A complete Life Safety plan review will be provided at the time of Building Permit submittal at which time any additional Building Code issues will be noted. The comments are based on the Oregon Structural Specialty Code (OSSC), the International Existing Building Code (IEBC), the Oregon Mechanical Specialty Code (OMSC), or the Oregon Residential Specialty Code (ORSC).

#### **RESPONSE SUMMARY**

Life Safety Plan Review does not object to the approval of this proposal. The applicant should be aware that several building code requirements may impact the final design of this building. For information regarding future compliance, see the **GENERAL LIFE SAFETY COMMENTS** below.

Item #	GENERAL LIFE SAFETY COMMENTS
1	<b>Building Permit Required -</b> A separate Building Permit is required for the work proposed and the proposal must be designed to meet all applicable building codes and ordinances. Information about submitting a permit application request is available online at <a href="https://www.portland.gov/bds/permit-review-process/apply-or-pay-permits">https://www.portland.gov/bds/permit-review-process/apply-or-pay-permits</a> .

Hello,

I recently became aware of the proposal to remove the historic lighting from Mt Tabor Park. I am a long-time resident of the Mt Tabor neighborhood and visit the park almost every day for exercise and recreation. I am VEHEMENTLY opposed to the removal of the historic light posts. They provide a wonderful charm and character to the park. I was so sad when the post on the upper forest trail was replaced. Removing all of them would be almost as tragic as removing a mature Douglas Fir tree from the park. That money should be devoted to GOOD causes for the city, not the destruction of historic architecture. Please please don't do this.

Jesse Powell

This message is intended for the sole use of the addressee, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the addressee you are hereby notified that you may not use, copy, disclose, or distribute to anyone the message or any information contained in the message. If you have received this message in error, please immediately advise the sender by reply email and delete this message.

Mt. Tabor lights PC # 23-047200

Commissioners,

I was very skeptical when I first heard that all of the historic park lamp posts were declared a hazard after an ill-advised attempted nap in a hammock. I feared that the Parks Bureau would replace the lighting with cheaper modern fixtures.

I raised the concerns with Friends of Mt. Tabor Park and several civic agencies (including Landmarks and SHPO), citing the language of the Historic District listing with the National Park Service.

I am happy to see that the Parks Bureau has chosen a replacement design that closely resembles the original posts and lanterns. Today, I visited Colonel Summers Park to see the new fixtures. They are beautiful.

My only question is how these installations can be so expensive. My calculations based on the project budget for parks citywide show a unit cost of about \$74,000. I am not an engineer or architect, but that seems to be a pretty big figure. A high level breakdown of these cost elements would be of interest.

Again, I am very pleased at the proposed replacement lighting in the park, and urge approval by the commission.

David Kaplan 7110 SE Main St. Portland, Oregon 97215 Dear Ms Jeffrey's,

I am a neighbor of Mt Tabor Park and wish to comment on what I would like to see in the replacement of the lampposts. Since the park recently received a national award for the quiet, it is my opinion that light contributes to that quiet. Low light, with the light aimed down would be wonderful. Going into the park to see the sky is such a blessing. In addition, the style of the lamppost should be the same style as the current lampposts. It is a historical site and, in my opinion, the historical appearance should be replicated.

Thank you for your consideration of my thoughts.

Linda Raveaux

Sent from my iPad



R

### City of Portland, Oregon - Bureau of Development Services

1900 SW Fourth Avenue • Portland, Oregon 97201 | 503-823-7300 | www.portland.gov/bds

Land Use Revie	w Application	File Number:		
FOR INTAKE, STAFF U	SE ONLY	Qtr Sec Map(s)	Zoning	
Date Rec	by	Plan District		
■ Type I 🗆 Type Ix 🗅 Type II 🗅 Typ	e IIx 🗖 Type III 📮 Type IV 🛛 ELD	Historic and/or Design Dis	trict	
LU Reviews		Neighborhood		
[Y] [N] Unincorporated MC		District Coalition       Business Assoc       Related File #		
[Y] [N] Potential Landslide	lazard Area (LD & PD only)			
[Y] [N] 100-year Flood Plain	[Y] [N] DOGAMI			
APPLICANT Email this ap	Complete all sections below th plication and supporting docum	at apply to the proposal. Plea ents to: LandUseIntake@por	ise print legibly. tlandoregon.gov	
Development Site Address or Location				
Cross Street		Sq. ft./Acrea	ge	
Site tax account number(s)				
R	R	R		

R

Describe project (attach additional page if necessary)

R

Describe proposed stormwater disposal methods

Identify requested land use reviews

• Design & Historic Reviews - For new development, provide project valuation.	\$
For <b>renovation</b> , provide exterior alteration value. <b>AND</b> provide total project valuation.	\$ \$
• Land Divisions - Identify number of lots (include lots for existing development).	
New street (public or private)?	🗖 yes 🗖 no
• Affordable Housing - For buildings containing five or more dwelling units, will 50% or more of the units be affordable to households with incomes equal to or less than 60% of the median family	yes no N/A continued / over
income for the county or state, whichever is greater?	1

#### **Applicant Information**

•	Identify the primary	contact person,	applicant, prope	erty owner ar	nd contract	purchaser.	Include any	person tha	at has an i	nterest in	your
	property or anyone	you want to be	notified. Informat	ion provided	l, including	telephone i	numbers and	e-mail ad	dresses, v	vill be incl	uded
	in public notices.										

- For all reviews, the applicant must sign the Responsibility Statement.
- For land divisions, all property owners must sign the application.

PRIMARY CONTACT:						
Typed Full Name					nar	me as my signature
Company/Organizatior	۱					
Mailing Address						
City			State		Zip Code	
Day Phone		FAX		email		<b> </b>
Check all that apply	Applicant	Owner	Other			
Typed Full Name					l ac nar	cknowledge this typed me as my signature
Company/Organizatior	۱					,
Mailing Address						
City			State		Zip Code	· · · · · · · · · · · · · · · · · · ·
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City			State		Zip Code	· · · · · · · · · · · · · · · · · · ·
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Check all that apply	Applicant	Owner	Other			
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Mailing Address						
City			State		Zip Code	
Day Phone		FAX		email		· · · · · · · · · · · · · · · · · · ·
Check all that apply		Owner	Other			

**Responsibility Statement** As the applicant submitting this application for a land use review, I am responsible for the accuracy of the information submitted. The information being submitted includes a description of the site conditions. I am also responsible for gaining the permission of the owner(s) of the property listed above in order to apply for this review and for reviewing the responsibility statement with them. If the proposal is approved, the decision and any conditions of the approval must be recorded in the County Deed Records for the property. The City of Portland is not liable if any of these actions are taken without the consent of the owner(s) of the property. In order to process this review, City staff may visit the site, photograph the property, or otherwise document the site as part of the review. I understand that the completeness of this application is determined by the Director. By my signature, I indicate my under-standing and agreement to the Responsibility Statement.

Name of person submitting this application agrees to the above Responsibility Statement and acknowledges typed name as signature:

Phone number: Email this application and supporting documents to protected documents will delay		Date:	
Landoseintake@portlandoregon.gov I intake of your application.	Phone number:	Email this application and supporting documents to LandUseIntake@portlandoregon.gov	Submittal of locked or password protected documents will delay intake of your application. 2



City of Portland, Oregon Bureau of Development Services Land Use Services

Carmen Rubio, Commissioner Rebecca Esau, Director Phone: (503) 823-7310 TTY: (503) 823-6868 www.portland.gov/bds

October 19, 2023

Brett Horner PORTLAND PARKS & RECREATION 1210 SW 5th Ave Suite 800 Portland OR 97204

Re: Land Use Review LU 23-088549 HR DM

Dear Brett Horner:

The Bureau of Development Services received your application for a Historic Resource Review located at 6325 SE DIVISION ST on September 28, 2023. Your case has been assigned to me, Arthur Graves. In order to continue to review your application, additional information is needed. Once you submit this information, your application will be considered complete, and I will proceed with a full review of your proposal. Up to this point, your application has been reviewed only to determine if all required information has been submitted. The application has not been fully reviewed to determine if it meets the relevant approval criteria, however some issues you may want to consider are identified in Section II below.

#### I. Information Necessary to Complete Application

## RESPOND TO EACH OF THE ISSUE LISTED BELOW IN ORDER, PROVIDING THE COMPLETE RESPONSE/ANSWER AFTER THE STATED ISSUE

The following information must be submitted before your proposal can be evaluated:

- 1. Please clarify the specific reason for the removal of the proposed historic light poles from the Mt Tabor Historic District.
- 2. Please clarify the submitted Exhibits with labels and page numbers. When referencing Exhibits cite the specific Exhibit and page number.
- 3. Please clarify the statements on page 5 of the *Application Narrative* regarding the existing light poles not meeting building code requirements. Please provide documentation and support for this.
- 4. Please provided information clarifying the structural integrity of the light poles to be removed. Provide both documentation and drawings.
- 5. Please provide the engineers report(s) mentioned on page 7 of the *Application Narrative*.
- 6. Please clarify which of the poles to be replaced will not be located in exactly the same locations as the existing light pole to be removed/replaced. Please provided documentation and drawings.
- 7. Please provide complete drawings (plans, elevations, sections, etc.) of the historic light poles. ALL DRAWINGS MUST BE TO SCALE.
- 8. Please provide complete drawings (plans, elevations, sections, etc.) of the proposed replacement light poles. ALL DRAWINGS MUST BE TO SCALE.
- 9. Please clarify exactly which of the historic light poles are failing and need to be removed due to clearly visible structural deterioration.
- 10. Please clarify specifically what "'dark skies' compliance" (mentioned on page 7 of the *Application Narrative*) refers to.
- 11. Within the 'dark skies' comment, please clarify how the proposed light poles are shielded.

- 12. Please clarify the statement in the fourth bullet on page 7 of *Application Narrative* regarding lumens. Is this saying the proposed lights will be 33% less bright?
- 13. Please clarify the statement on page 7 of the *Application Narrative* starting, "Due to an inadequate anchoring system...it is not practicable to reuse the poles". Please provide information clarifying why existing historic light poles footings cannot be repaired and/or reinforced.
- 14. Please clarify what the industry standard is for light pole installation in parks.
- 15. Please clarify where the specific structural issue is with the historic light poles: the footing, base, poles, light, etc. Clarify if this a systemic issue will all historic light poles within the Mt Tabor Historic District.
- 16. On page 7 of the *Application Narrative*, in the last paragraph, "other information" is mentioned regarding "determining full replacement". Please provide this "other information".
- 17. The closure of the Columbia Pool is mentioned on page 8 of the *Application Narrative*. Please clarify why this pool was closed.
- 18. On page 14 of the *Application Narrative*, in the fourth paragraph, a comment is made about, "Similar poles at historic parks..." Please provide the supporting citation for this comment.
- 19. On page 15 of the *Application Narrative*, in the second paragraph, a comment is made about 61 light poles. Please clarify in drawings where these light poles are located.
- 20. Please provide a schedule and corresponding plan for the light poles in the Mt Tabor Historic District to include: light pole age, installation date, construction type, degree of deterioration, reason for proposed removal and replacement. Number light poles 1-88 on the plan and in schedule.
- 21. Please clarify in drawings (plans, elevations, etc.) where Nonconforming Situations associated with LU 17-245440 and mentioned on page 23 of the *Application Narrative* will be installed.
- 22. Please clarify why irrigation drawings have been submitted.
- 23. Please clarify how conduit will be concealed with the proposed replacement light poles.
- 24. Please clarify where "Sheet 4" is located (this is mentioned on page 41 of the *Application Narrative*.
- 25. Please clarify why the bases/footings of the existing historic light poles cannot be repaired and/or reinforced.
- 26. Please clarify options investigated to repair the historic light poles. Please provide restoration experts/specialists consulted.

#### II. Time to Complete Application

The Portland Zoning Code allows you up to 180 days to complete your application. Since the 180-day period began on the day we received the application, the deadline to make your application complete is **Tuesday March 26, 2024**.

#### **III. Determination of a Complete Application**

The application will be determined complete when you have submitted:

- All of the requested information included in Section I, above. If you cannot provide all of the requested information at one time and intend to submit additional information, please include a <u>written</u> statement with each separate submittal indicating that you still intend to provide the additional missing information by the **Tuesday March 26**, **2024** deadline, **or**
- 2. Some of the requested information included in Section I, above, and a <u>written</u> statement that no additional information will be provided; **or**

3. A <u>written</u> statement that none of the requested information included in Section I, above, will be provided.

Please be aware that not submitting the requested information may result in your application being denied. The information is needed to demonstrate the approval criteria are met. Once the application is deemed complete, review of your application can proceed using the information you have provided.

Your application will be approved if it meets the relevant land use review approval criteria. It is your responsibility to document how the approval criteria are met. The items listed above will help provide that documentation.

#### **Voiding of Application**

If your application is not complete by **Tuesday March 26, 2024**, it will be voided, and the application fee will not be refunded. The City's land use review procedures are outlined in Chapter 33.730 of the Portland Zoning Code.

Please contact me if you have any questions about this letter. My telephone number is **503.865.6517**, and my e-mail address is Arthur.Graves@portlandoregon.gov. Requested information noted above should be emailed to me. Please e-mail me for file dropbox instructions if document or drawing file sizes are greater than 5MB. Please label all correspondence and materials you submit with the case number LU 23-088549 HR DM.



Arthur Graves, Planner Land Use Services Division

cc: City of Portland | 1900 SW 4<sup>th</sup> Ave Suite 7007 | Portland OR 97201 Application Case File
#### **Completeness Response**

- Date: October 27, 2023
- To: Arthur Graves, BDS Land Use Services 503-865-6517, Arthur.Graves@portlandoregon.gov
   From: Ella Ruth, BES Systems Development 503-823-8068, Ella.Ruth@portlandoregon.gov

Case File: LU 23-088549

Location: 6325 SE DIVISION ST

**Proposal:** As part of the city's light pole safety project, install 84 light poles within Mt. Tabor Park and an additional 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. The lighting system is a basic utility that functions as an accessory use to the primary park use on the site. Replacement poles will be installed in the same location as the current poles to maintain the historic spatial pattern of the lighting system except where relocation is required to retain trees and limit impacts to trees consistent with Title 11.

BES provides the following comments in response to materials received for the purpose of determining completeness of the above-referenced Land Use application. Items requested in this memo should not be considered final, as staff reserves the right to request additional materials during the formal review period.

1. The applicant has submitted the minimum level of information for BES to begin conducting a full review of the land use application. As staff begins reviewing the application against relevant approval criteria and BES code requirements, additional information may be requested.

#### RESPONSE TO THE BUREAU OF DEVELOPMENT SERVICES Request for Completeness

#### Portland Transportation Development Review Bureau of Transportation Engineering & Development

LU: 23-088549-LU

Date: October 30, 2023

To: Arthur Graves, Bureau of Development Services

503-865-6517, arthur.graves@portlandoregon.gov

From: Eileen Cunningham, PBOT Development Review

503-823-2999, Eileen.Cunningham@portlandoregon.gov

Applicant: Brett Horner PORTLAND PARKS & RECREATION 1210 SW 5TH AVE, SUITE 800 PORTLAND, OR 97204

Location: 6325 SE DIVISION ST

TYPE OF REQUEST: Type 3 procedure HR - Historic Resource Review

#### **DESCRIPTION OF PROJECT**

As part of the city's light pole safety project, install 84 light poles within Mt. Tabor Park and an additional 4 light poles in the SE Taylor Street right-of-way that are part of an existing and historic illuminated circulation system. The lighting system is a basic utility that functions as an accessory use to the primary park use on the site. Replacement poles will be installed in the same location as the current poles to maintain the historic spatial pattern of the lighting system except where relocation is required to retain trees and limit impacts to trees consistent with Title 11.

#### RESPONSE

Portland Transportation/Development Review has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services.

- 1. There are no transportation related approval criteria for the subject review.
- 2. The proposal does not trigger either of the public improvement requirements of 17.88.020. No public improvements or dedication are required.
- 3. The light poles to be replaced are not PBOT assets, although at least one light pole appears to be within the right-of-way. The poles will be replaced in their current location.
- 4. Any encroachments within the right-of-way will require an encroachment permit. The City's Encroachment Policy has provisions for recognizing pre-existing encroachments. (See page 4 at

https://www.portland.gov/sites/default/files/2020-03/409066.pdf.) If the site contains existing encroachment within right-of-way, PBOT will require a current encroachment permit to document all the encroachments on the site. If so, the applicant will be required to apply for an encroachment permit, which will need to be approved prior to land use review approval. The encroachment permit application is available at <u>https://www.portland.gov/transportation/development/encroachmentpermits</u>, including applicable fees. Please email the application and all supporting documentation to: <u>encroachments@portlandoregon.gov</u>. Please contact PBOT encroachment questions via email at <u>encroachments@portlandoregon.gov</u> (preferred). You may also call 503-823-7002 and select Option 3. For an overview of the encroachment permit process, please visit https://www.portland.gov/transportation/development/encroachment-permits.

5. If the proposed development will impact the use of an area within the public right-of-way, a separate street temporary closure permit will be required. Additionally, closures that do not allow safe passage and unobstructed flow of normal public use in a partially open area or lane, will also require a City approved Traffic Control Plan. For an application, general information, cost, and submittal information, please visit Temporary Street Use Permitting (TSUP) | Portland.gov or call 503-823-7365.

#### RECOMMENDATION

PBOT has no objection to the application being deemed complete.



# City of Portland Historic Landmarks Commission



## SUMMARY MEMO

Date:	March 27, 2023
То:	Brett Horner, Portland Parks & Recreation
From:	Hillary Adam, Design / Historic Review hillary.adam@portlandoregon.gov, 503-823-8953

#### Re: Briefing on Lighting in Historic Parks Summary of March 13, 2023 Landmarks Commission Briefing

Thank you for taking advantage of the opportunity to hold a preliminary briefing with the Landmarks Commission regarding your project. I hope you find it informative and valuable as you continue with your project development. Attached is a brief summary of the comments provided by the Landmarks Commission at the March 13, 2023 hearing. This summary was generated from notes taken at the public meeting and a subsequent review of the public meeting recordings. To review those recordings, please visit: <u>https://efiles.portlandoregon.gov/Record/15910294/</u>.

These Landmarks Commission comments are intended to guide you in further design exploration of your project. These comments may also inform City staff when giving guidance over the course of future related land use reviews. It should be understood that these comments address the project as presented on March 13, 2023. As the project design evolves, the comments, too, may evolve or may no longer be pertinent.

Preliminary briefings are not intended to substitute for other Code-required land use or legislative procedures.

Please continue to coordinate with me, Hillary Adam, as necessary as you prepare your formal land use application.

*Encl:* Summary Memo

Cc: Landmarks Commission

This memo summarizes Landmarks Commission design direction provided on March 13, 2023.

#### Commissioners in attendance on March 13, 2023 include: Smith, Minor, Roman, Foty, Moretti

#### **Executive Summary:**

• Commissioners suggested that repair is preferable to replacement. Commissioners noted a desire to better understand the structural issues and expressed a desire to see the engineer's report when it is released, adding that this information should be in the public record. Commissioners noted that the issue seems to primarily be the anchoring system rather than the concrete poles and noted that this should be further explored so that repair could be further explored as an option. Commissioners expressed a desire for coherency within each park with regard to each park's lighting scheme.

#### Comments include:

- Commissioners asked for clarification if the flaw in the light poles is with the anchors at the base of the poles or with the poles themselves. The Commission asked for more explanation on what the systemic issue is across all the light poles.
- Following some explanation on how the historic poles were installed and connected at the bases, the Commission noted that the issue appears to be primarily at the anchors.
- One Commissioner asked if there had been any thought to try to replicate the original acorn glass globes.
- One Commissioner noted that, during a prior land use review for the Maintenance Yard, the Commission recommended that Parks look at the existing lighting in the Park and develop a consistent lighting scheme for the park. He also asked if foundation work would also be needed if the lights are replaced. Another Commissioner noted that each park's lighting scheme should be coherent within each park.
- One Commissioner suggested sensitively decommissioning the lights rather than throwing them away.
- Commissioners noted that while the light poles are utilitarian concrete and have been modified over time, they are significant character-defining features of the parks. One Commissioner noted that Mt. Tabor Park has seen an erosion of character-defining features over the years. It was suggested that any poles that need to be replaced should be replaced in-kind to match the historic light poles rather than installing something with a similar aesthetic.
- A couple Commissioners noted that it didn't seem like there has been much exploration into whether or not the bases could be reinforced. One Commissioner noted there should be a conditions assessment of each pole to identify which ones truly need to be replaced and which may be able to be reinforced. For those that need to be replaced, the characteristics should be analyzed and closely matched in the replacements.
- In response to Parks representatives noting an engineer's report about the poles, one Commissioner suggested that reinforcement was probably insufficient when the poles were first installed. He noted that this documentation is important for the record.
- One Commissioner suggested that Parks should identify which poles are higher risk with more vehicular and pedestrian activity nearby and those that are less likely to be impacted by neighboring activities.
- One Commissioner noted that hooded fixture options may be a good choice toward meeting Dark Skies goals even if they are not replicating the original.

- One Commissioner noted an acceptance of the need to replace the concrete poles, but suggested that the poles and fixtures should be decoupled with the existing fixtures installed on new poles. The intent would be to minimize loss of existing materials, whether historic or not.
- A couple Commissioners noted that it was strange that the poles in Laurelhurst Park are structurally sound when they appear to be of the same vintage as other light poles in other parks. One Commissioner noted that if the lights at Laurelhurst are fine because they have a good anchoring system, then it's likely that some of the poles in other parks that seem to be okay except for their base connections could potentially be saved with better base connections.
- One Commissioner suggested all repair options should be exhausted before replacement is proposed. He noted that the one pole that was shown to have a crack running along the length of it appeared to be a separate issue than the base – likely water intruded into the concrete and eroded the rebar and cracked the column, which is a separate issue than faulty anchors.
- One Commissioner strongly disagreed with the assertion that 100-year old concrete is inherently in need of replacement, noting that her firm specifically is in the business of analyzing and preserving historic masonry and concrete structures. She noted that there are many reasons why concrete could fail, including rust jacking as evidenced in the photo of the cracked light pole. But she noted there are ways to better understand the true condition of the concrete poles (if that is desired) through a more thorough investigation. She also noted there are ways to protect concrete from water intrusion as well. She noted that if there is a funding issue then repair should definitely be considered with only the most damaged (cracked) to be replaced.

Files related to this Briefing can be found here: <u>https://efiles.portlandoregon.gov/record/15884446</u>.

Please contact me with any questions.



City of Portland, Oregon Bureau of Development Services Land Use Services

## STAFF REPORT AND RECOMMENDATION TO THE LANDMARKS COMMISSION

CASE FILE:	LU 23-088549 HR DM
	PC # 23-047200
	Replacement of Mt Tabor Light Poles
	and Fixtures
REVIEW BY:	Landmarks Commission
WHEN:	January 22, 2024, 1:30pm
REMOTE ACC	ESS: Historic Landmarks Commission Agenda
https://www.po	ortlandoregon.gov/bds/HLCagenda

#### This land use hearing will be limited to remote participation via Zoom. Please refer to the instructions included with this notice to observe and participate remotely.

**Bureau of Development Services Staff:** Grace Jeffreys 503-865-6521 / Grace.Jeffreys@portlandoregon.gov

#### **GENERAL INFORMATION**

Applicant:	Brett Horner, Portland Parks & Recreation 1210 SW 5th Ave Suite 800, Portland OR 97204 971.409.3518   <u>Brett.Horner@Portlandoregon.gov</u>					
Owner:	City Of Portland 1900 SW 4th Ave Ste 7007, Portland, OR 97201-5380					
Site Address:	6325 SE DIVISION ST					
Legal Description: Tax Account No.: State ID No :	TL 100 190.32 ACRES, SECTION 05 1S 2E R992050130, R992050130, R992050130, R992050130, R992050130					
Quarter Section:	00100, 1S2E05 00000, 1S2E05 00000000000000000000000000000000000					
Neighborhood: Business District: District Coalition:	Mt. Tabor, contact at contact.MTNA@gmail.com NONE Southeast Uplift, contact at operations@seuplift.org					
Plan District: Other Designations:	NONE Mount Tabor Parks Historic District, Mount Tabor Park Reservoirs Historic District					

Zoning:	<b>OSc,s:</b> Open Space base zone (33.100 Multi-Dwelling Zone) and					
	Historic Resource Protection Overlay Zone (33.445),					
	Environmental Protection Overlay Zone (33.430), Scenic					
	Resource Zone (33.480)					
Case Type:	HR DM: Historic Resource Review, Demolition Review					
Procedure:	Type III HR and DM, with a public hearing before the					
	Landmarks Commission. The decision of the Landmarks					
	Commission can be appealed to City Council.					

#### Proposal:

Type III Historic Resource Review and Demolition Review for the replacement of 88 light poles and fixtures which are part of part an existing historic lighting system which is considered a contributing aspect of the Mt Tabor Historic District. Of the 88 existing poles to be replaced:

- 84 are located within Mt. Tabor Park.
- 4 are located in the SE Taylor St. right-of-way (ROW).

The new concrete light poles will be hexagonal to match existing, and the new light fixtures will be acrylic/metal flight fixtures with decorative metal strapping. The proposed replacement poles and fixtures will be installed in approximately the same location as the current poles.

Reviews:

- <u>Demolition Review</u> is required because the proposal to remove historic light poles and fixtures is for non-exempt demolition of contributing features within a Historic District, per Section 33.445.200.E.
- <u>Historic Resource Review</u> is required because the proposal to add new light poles and fixtures is for non-exempt development within a historic overlay zone, per Section 33.846.

#### **Relevant Approval Criteria:**

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- <u>Demolition of existing poles and fixtures</u>: One of the four criteria listed under 33.846.080.C.
- Installation of new poles and fixtures: 33.846.060.G. Other Approval Criteria.

#### ANALYSIS

**Site and Vicinity:** The project site, Mt. Tabor Park, is roughly bound by SE Division Street on the south, SE 64<sup>th</sup> Avenue and SE 60<sup>th</sup> Avenue on the east, SE Yamhill on the north, and SE 71<sup>st</sup> Avenue on the west.

Mt. Tabor Park is a 196-acre public park located in a residential area of southeast Portland. The park encompasses most of a volcanic butte, with four peaks. The tallest summit rises to an elevation of 643 feet, making it a prime landmark visible from points all around the city. Because of its elevation, the site became a distribution site for Portland's gravity-fed, mountain-source drinking water in 1894 with the construction of two open reservoirs, Reservoir 1, and the since-demolished Reservoir 2. In 1903, Mt. Tabor was identified as a potential city park by John Charles Olmsted, adopted son of Frederick Law Olmsted, and who, along with his brother Frederick Law Olmsted Jr., operated the landscape firm Olmsted Brothers landscape firm which carried forth the legacy of their father. In 1909, voter-approved bonds were used to purchase the properties that made up the park. Emanuel Tillman Mische, who had previously worked for Olmsted Brothers, was hired the prior year as Portland's Park superintendent and

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designed the park. Two additional open reservoirs, Reservoirs 5 and 6, were constructed in 1911 on the western slope of the park.

Mt. Tabor Park is individually listed in the National Register and is classified as a Historic District. The "historic lighting system" is identified as one of the contributing aspects of the site. In the Nomination for the Historic District, the lighting system is described in detail:

Adding distinctive charm and illumination is the period lighting system comprised of eighty-eight single concrete standard lampposts that follow the drives and some of the main interior pathways throughout the park. These lampposts give off a soft, friendly light, reminiscent of gaslights, especially in the interior forested areas where they serve as a reminder of the original design of accessibility. The lighting encourages pedestrian exploration of the hills and dells throughout the park even in the short days of the colder months. Originally topped with a single, white, glass globe, polygonal lantern-style shades have replaced the globes. In 1911, Superintendent Mische requested of the Park Board, lampposts with glass globes to be serviced by an alternating current feed. He also requested underground conduits. The lampposts are serviced via underground conduits. The lighting system dates from 1924 and 1925.

**Zoning:** The <u>Open Space</u> (OS) zone is intended to preserve public and private open, natural, and improved park and recreation areas identified in the Comprehensive Plan. These areas serve many functions including: providing opportunities for outdoor recreation; providing contrasts to the built environment; preserving scenic qualities; protecting sensitive or fragile environmental areas; preserving the capacity and water quality of the stormwater drainage system; and providing pedestrian and bicycle transportation connections.

The <u>Environmental Conservation Zone</u> "c" overlay conserves important resources and functional values in areas where the resources and functional values can be protected while following environmentally sensitive urban development.

The <u>historic resource overlay zone</u> protects historic resources that have been identified as significant to the history of the city and region. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting education and enjoyment for those living in and visiting the region. The regulations foster awareness, memory, and pride among the region's current and future residents in their city and its diverse architecture, culture, and history. Historic preservation recognizes social and cultural history, retains significant architecture, promotes economic and environmental health, and stewards important resources for the use, education, and enjoyment of future generations.

The <u>Scenic Resource Zone</u> "s" overlay is intended to protect Portland's significant scenic resources as identified in the *Scenic Resources Protection Plan* (1991) and the *Central City Scenic Resources Protection Plan* (2017); enhance the appearance of Portland to make it a better place to live and work; create attractive entrance ways to Portland and its districts; improve Portland's economic vitality by enhancing the City's attractiveness to its citizens and to visitors; and implement the scenic resource policies and objectives of Portland's Comprehensive Plan. The purposes of the Scenic Recourse zone are achieved by establishing height limits within view corridors to protect significant views and by establishing additional landscaping and screening standards to preserve and enhance identified scenic resources.

**Land Use History:** City records indicate that prior land use reviews include the following:

- <u>LU 61-001380 (ref. file: CU 029-61)</u> Conditional Use approval for a small storage building;
- <u>LU 64-002651 CU (ref. file: CU 067-64)</u> Conditional Uwe approval to construct a plant potting building on the SW corner of Mt. Tabor Park on park warehouse land;
- <u>LU 65-002285 CU (ref. file: CU 056-65</u>) Conditional Use Approval with the condition that planting.
- be provided to screen the facilities from adjacent park and residential areas;
- <u>LU 67-003406 (ref. file: CU 93-67)</u> Conditional Use approval for a maintenance building and office;
- <u>LU 74-000650 (ref. file: CU 007-74</u>) Conditional Use approval for a greenhouse;
- <u>LU 74-002392 (ref. file: CU 059-74)</u> Conditional Use approval for a picnic shelter;
- <u>LU 77-002064 (ref. file: CU 49-77)</u> Conditional Use approval for a water pumping station;
- <u>LU 89-003906 CU (ref. file: CU 26-89)</u> Conditional Use approval for parking lot expansion;
- LU 89-021552 (ref. file: MP 107-89) Approval of a 3-lot minor partition;
- <u>LU 90-024202</u> Approval to locate and maintain a motor vehicle service building;
- <u>LU 99-017214 EN (ref. file: LUR 99-00809)</u> Environmental Review approval of trail constructions and improvements in the Environmental Concern zone;
- <u>LU 06-178213 HDZ</u> Historic Design Review approval for an 8' wide accessible path on the north side of Reservoir #6;
- <u>LU 07-139442 HDZ</u> Historic Design Review approval for interim security and deferred maintenance improvements;
- <u>LU 14-218444 HR EN</u> Historic Resource Review and Environmental Review approval of disconnection of reservoirs #1, #5, and #6 from the public drinking water system;
- <u>LU 16-148005 HR</u> Historic Resource Review approval for rehabilitation of the Mt. Tabor Summit Restroom building;
- <u>LU 17-158467 HRM</u> Historic Resource Review approval for exterior alterations to the Mount Tabor Yards;
- <u>LU 17-206893 HR</u> Historic Resource Review approval for the replacement of existing and addition of new railings along the existing stairway of the Mount Tabor steps and the Summit Comfort Station;
- <u>LU 17-245440 HR</u> Conditional Use approval for uses and improvements for the 13.3-acre project area including the Yard, Upper Nursery and Long Block areas of the park in the Mount Tabor Park Historic District;
- <u>LU 18-103566 HR</u> Historic Resource Review approval for replacement of existing non-historic light poles with new, historically-appropriate pole lighting; and
- <u>LU 21-053526 HR</u> Historic Resource Review approval for installation of an Interpretive Program to satisfy the requirement per Condition of Approval 'C' of LU 14-218444 HR EN.

**Agency Review:** A "Notice of proposal in Your Neighborhood" was mailed **January 2**, **2024**. The following seven Bureaus, Divisions and/or Sections responded with no objections, and three of these included written comments, found in Exhibits E.1-E.3:

- Bureau of Transportation Engineering (Exhibit E.1)
- Bureau of Parks-Forestry Division (Exhibit E.2)
- Life Safety Section of BDS (Exhibit E.3)
- Bureau of Environmental Services
- Water Bureau
- Fire Bureau
- Site Development Section of BDS

**Neighborhood Review:** A Notice of Proposal in Your Neighborhood was mailed on **January 2, 2024**. Three written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

- 1. Jesse Powell, 1-2-2024, wrote in opposition of removing historic lighting posts.
- 2. David Kaplan, 1-4-2024, wrote in support of the replacement design because it closely resembles the original posts and lanterns.
- 3. Linda Raveaux, 1-10-24, wrote in support of low light that is aimed downward to maintain the award winning "quiet" aspect of the park. Also supported maintaining existing historic appearance of the posts and fixtures.

*Staff Response:* Staff appreciates these neighbors for taking the time to share their thoughtful comments. Commission (Exhibit G.3) and Staff agree that repair is preferable to replacement However, the applicant's submittals show that options to retain, rehabilitate, and reuse the existing light poles were explored, however, there was not an acceptable way for them to be anchored in a manner that would meet current building codes while also retaining enough of the pole's historic and design integrity. Commission (Exhibit G.3) and Staff also support replacement design that closely resembles the original posts and lanterns, with respect for Dark Skys.

#### **Procedural History:**

1. A voluntary <u>Briefing on Lighting in Historic Parks</u> was held in 3-13-2023, which included this work (Exhibit G.3). From the Summary Memo:

Commissioners suggested that repair is preferable to replacement. Commissioners noted a desire to better understand the structural issues and expressed a desire to see the engineer's report when it is released, adding that this information should be in the public record. Commissioners noted that the issue seems to primarily be the anchoring system rather than the concrete poles and noted that this should be further explored so that repair could be further explored as an option. Commissioners expressed a desire for coherency within each park with regard to each park's lighting scheme.

#### **ZONING CODE APPROVAL CRITERIA**

#### Historic Resource Review Process

## Chapters 33.445, Historic Resource Overlay Zone, and 33.846, Historic Resource Reviews

#### 33.445.010 Purpose [of Historic Resource Overlay Zone]

The historic resource overlay zone protects historic resources that have been identified as significant to the history of the city and region. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting education and enjoyment for those living in and visiting the region. The regulations foster awareness, memory, and pride among the region's current and future residents in their city and its diverse architecture, culture, and history. Historic preservation recognizes social and cultural history, retains significant architecture, promotes economic and environmental health, and stewards important resources for the use, education, and enjoyment of future generations.

#### 33.846.010 Purpose [of Historic Resource Review]

This chapter provides procedures and establishes the approval criteria for all historic reviews. The approval criteria protect the region's historic resources and preserve significant parts of the region's heritage. The reviews recognize and protect the region's historic and architectural resources, ensuring that changes to a designated historic

resource preserve historic and architectural values and provide incentives for historic preservation.

#### 33.846.080 Demolition Review

#### 33.445.200.E Demolition of resources in a Historic District.

Demolition of contributing resources within a Historic District requires demolition review to ensure their historic value is considered and that there is an opportunity for the owner and community to consider alternatives to demolition.

#### 33.846.080 A. Purpose of Demolition Review

Demolition review protects landmarks and contributing resources in districts. Demolition review recognizes that historic resources are irreplaceable assets significant to the region's architectural, cultural, and historical identity and their preservation promotes economic and community vitality, resilience, and memory. In the event that demolition of a historic resource is approved, demolition review also addresses the potential for mitigation of the loss.

**Findings:** The applicant has applied for Demolition Review to demolish contributing resources within the boundary of an existing Historic District.

Mt. Tabor Park is individually listed in the National Register and is classified as a Historic District. Within that District, the park land is counted as a contributing feature, and the historic lighting system is a component of the park land, as noted in the Nomination:

Mount Tabor Park contains one contributing site, seven contributing buildings, five contributing structures, and one contributing object... The park land was counted as one contributing site; infrastructure such as driveways, paths, maintenance yard, and the lighting system, as well as those areas with loose physical definition such as play and picnic grounds, and the nursery, are included as part of the site.

The light poles and light fixtures, which are part of that historic lighting system, are therefore subject to demolition review.

#### 33.846.080.C. Demolition Review Approval criteria

Proposals to demolish a historic resource will be approved if the review body finds that one of the following approval criteria is met:

- 1. Demolition of the resource has been evaluated against and, on balance, demolition has been found to be equally or more supportive of the relevant goals and policies of the Comprehensive Plan, and any relevant area plans, than preservation, rehabilitation, or reuse of the resource. The evaluation must consider:
  - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
  - b. The economic consequences for the owner and the community;
  - c. The merits of demolition;
  - d. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
  - e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
  - f. Any proposed mitigation for the demolition.

- a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
- b. The economic consequences for the owner and the community;
- c. Relevant goals and policies of the Comprehensive Plan.
- **3.** The proposal is to demolish a contributing resource in a single-dwelling zone in a National Register District, and demolition of the resource will facilitate the creation of more deeply affordable dwelling units than could practicably result from preservation, rehabilitation, or reuse of the resource. In this case, deeply affordable means permanently affordable to those earning no more than 60 percent of the area median family income. The evaluation must consider:
  - a. The resource's age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities;
  - b. The economic consequences for the owner and the community;
  - c. Relevant goals and policies of the Comprehensive Plan.
- **4.** The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

#### **Findings:**

One of the four approval criteria under 33.846.080.C must be shown to be met to demolish these contributing features.

The primary uses on this site are Parks and Open Areas, and the light poles and fixtures that are the subject of this demolition review are of secondary importance to these primary uses. Therefore, they are considered "accessory structures" under PZC 33.190 Definitions:

**33.910 Definitions; Accessory Structure.** A structure of secondary importance or function on a site. In general, the primary use of the site is not carried on in an accessory structure. Accessory structures may be attached or detached from the primary structure. Examples of accessory structures include garages, decks, fences, trellises, flag poles, stairways, heat pumps, awnings, and other structures.

Because the light poles and fixtures are accessory structures, the proposal to remove and replace light poles within Mt. Tabor Park may be reviewed under the approval criterion of C.4.

**4.** The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

As the findings below will describe, the demolition and replacement of the existing light poles and fixtures will not significantly diminish the architectural, cultural, or historic significance or integrity of the district.

<u>The light fixtures are not original fixtures.</u> All of the current fixtures to be removed and replaced are not original. The Nomination notes that while the lighting system dates from 1924 and 1925, the original single, white, glass globes were later replaced with polygonal lantern-style shades seen today.

Parks notes in their narrative that the current fixtures are consistent in design to existing lantern-style metal framed fixtures within Mt. Tabor Park and those found in other city parks (Irvington, Lair Hill Parks, Laurelhurst, Washington, etc.). Archival records indicate the now iconic lantern-style fixtures were first installed at Mt. Tabor Park in the 1950s.

The proposed replacement fixtures will match the existing fixtures in both materials and design (see Exhibit A-10, pages 15APP-G).

<u>Some light poles may be original, however, documentation for individual poles</u> <u>varies</u>. Some of the light poles were replaced at least once before with installation dates ranging from the 1950s through the 1980s (See Exhibit A.10, page 15). Currently, there are only 81 poles are installed at Mt. Tabor Park along the circulation system, and at most, 61 of the poles currently illuminating the park's circulation system are original installations.

<u>The light poles are showing their age and the foundations do not meet current</u> <u>building code</u>. Conditions include cracking and flaking in the concrete surface, as well as efflorescence (white discoloration from moisture loss), pitting, and even external evidence of corrosion of internal metal components, or 'spalling' (see photographs included in Exhibit A.10 – APP H).

The earlier poles were installed using an anchoring system that does not meet current building code (Exhibit A.6, pages 2-3). The primary issue with the wire anchor connector is that the steel tie wire connection was not designed to meet lateral loads. Additionally, some tie wires have deteriorated over time because of water/moisture influence. According to consulting engineers, even with a retrofit to replace the wire anchor, the following light pole elements would not meet code requirements (Exhibit A.6, pages 4-10):

- Footing depth
- Reinforcing steel; and
- lack of vertical steel with transverse ties.

These code deficiencies led the consultant to recommend replacement of the entire light poles and their footings, as documented in the Emergency declaration issued by the Commissioner-in-charge on December 28, 2022 (Exhibit A.10 - APP K).

The project team and engineering consultants explored options to retain, rehabilitate, and reuse the existing light poles in Mt. Tabor Park. However, this is not practicable as there is not an acceptable way for them to be anchored in a manner that would meet current building code for anchoring, while also retaining enough of the pole's historic and design integrity. Therefore, all the poles must be removed and replaced. The light system will be restored to 88 light poles to match the number of poles identified in the historic nomination. All of the new replacement poles will match the existing ones in design and material (see Exhibit C.5-7 drawings, and Exhibit A.10 – APP G photos).

<u>Finally, the quality of the overall illumination that the historic light system</u> provides to the circulation system is valued as an important feature within the park site, rather than the individual light poles and fixtures.

In terms of the historical listing, the primary cultural or historic significance of Mt. Tabor Park is the Park's association with the Olmsted Brothers through the 1903 Olmsted Plan, which identified Mt. Tabor as a desirable site for a public park, and its design, which embodies the principles of landscape architecture espoused by the Olmsteds.

As such, the historic lighting system is a feature within the contributing resource of the park landscape as a whole and provides historic and functional value by illuminating the park's circulation system. In the nomination, some care was taken to determine when the various drives and formal pathways were constructed for the historical nomination, however, no such attempt was made regarding the lighting system. Further, no attempt was made to distinguish individual poles or their location, date individual poles to the period of significance, or assign historical value to individual poles in the nomination.

Updating the light poles within the existing landscape will do nothing to erode the cultural importance of Mt. Tabor Park as a significant park within the Portland Park System, nor will it impact the integrity of the landscape itself. In fact, by replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

This criterion is met.

Staff note: While the light poles clearly met criterion C.4. for accessory structures, the applicant's submittal, Exhibit A.7, provide findings demonstrating how the proposal also meets criteria C.1. and C.2.

#### 33.846 Historic Resource Review

#### 33.846.060 E. Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

**Findings:** The site is within in a Historic District, and the proposal is for nonexempt treatments. Therefore, the proposal requires Historic Resource Review approval. The approval criteria are those listed in *33.846.060 G. – Other Historic Approval Criteria*.

Staff has considered all of the approval criteria and addressed only those applicable to this proposal.

#### 33.846.060 G. Other Historic Approval Criteria

**1. Historic character.** The historic character of the landmark or contributing resource will be retained and preserved. Removal of historic materials or alteration of

features and spaces that contribute to the historic significance of the landmark or contributing resource will be avoided.

#### **Findings:**

The historic listing identifies multiple parcels totaling 196-acres for the Mt. Tabor Park historical district, including both the park and maintenance yard. The district contains multiple contributing resources in addition to the park's landscape. The lighting system is just one component of the overall park site.

The replacement of the existing light poles and fixtures will have little to no impact on the existing natural areas and decorative landscaping, as the areas around the poles are typically kept clear of vegetation. Minor refinements to pole locations to avoid impacts to landscaping and tree could occur if needed to preserve the character of the landscaping and ensure trees are protected (See Exhibit C.31-36). The vast majority of the landscape, the historic vehicle entrances, and meandering drives, and all of the contributing buildings and structures will remain untouched by the light pole replacement project.

The lighting system itself will remain, even if components are replaced. Many of the original system components were replaced prior to the historical nomination, including all the light fixtures and 27 of the poles currently in use. The alternative to removing current poles would be to rehabilitate the existing poles despite their age and condition.

Bureau staff has verified with the consulting engineers at KPFF that the work necessary to mount existing poles to current code (installing rebar or other structural supports within the pole) is not considered practicable or cost-effective. For reuse, poles and footings would need to be removed and poles structurally altered to increase their structural capacity and then anchored to a new footing to meet current code standards. External alterations to enhance structural capacity would have a detrimental effect on the look and character of the pole, while internal alterations to replace or add reinforcing steel would significantly impact the structural integrity of the concrete. Internal alterations to 99-year-old concrete that was not originally built to meet current building code standards would significantly compromise the integrity of the poles (Exhibit A.6, pages 1-9)

By preserving the spatial pattern of poles (adjacent to the circulation system and distributed across the landscape), and installing poles of similar materials and design, the illuminated pathways will retain their historical character. The compelling nature of the park's landscape as a place of urban refuge offering a variety of forested, pastoral, and scenic experiences will be preserved through this project. Therefore, the contributing resource, the park's landscape will not be negatively affected by this project.

#### This criterion is met.

**2. Record of its time.** The landmark or contributing resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.

#### **Findings:**

The illuminated circulation system provided vehicular access at the dawning of the automobile age to one of the city's most prominent natural features and ensured even nighttime visits would be safe and enjoyable. Pole and fixture replacement will result in a restoration of the illumination system at the time of the historic nomination, thus preserving the warmly illuminated meandering drives that provide access throughout the park, even in the darkest of forested areas.

This criterion is met.

**3. Historic changes.** Most resources change over time. Those changes that have acquired historic significance will be preserved.

#### **Findings:**

The project proposes to provide light pole replacements consistent in number to the historical listing. Locations will match that documented in 1988 and 1989 to the extent possible. Although not part of the period of significance, the current lantern-style fixtures, and the metal strapping at the top of certain light poles have acquired significance and are considered representative of Mt. Tabor Park in particular. The proposed new light poles will be topped with lantern-style fixtures along with metal strapping of similar in design and style, as shown in the Exhibit A.10 - APP G, to maintain the iconic significance these features have acquired over time.

This criterion is met.

**4. Historic features.** Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the historic feature in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.

#### **Findings:**

The lighting system that illuminates the circulation system is identified as contributing to the park's historic landscape. The replacement of 88 poles is needed to maintain structural safety of the lighting system due to severe deterioration, as certified by the city's consulting engineers. Installing modern fixtures at the same time poles are replaced will ensure the illumination system meets current electrical code, will reduce the need for future spot replacements, and will generate significant saving by reducing energy consumption. The new poles will match the historic ones in material, texture, color, and design (as shown in the comparison photographs in Exhibit A.10 - APP Exhibit G).

Written and graphic evidence regarding the existing system is provided in Exhibit A.10 - APP Exhibit F, which documents at least 27 pole replacements over time and the installation of the now iconic lantern-style fixtures. While the first elements of the lighting system were installed in 1924 and 1925, development of the park's physical elements occurred over time and it is likely some individual poles were added later, for example when the bridle path was established in 1929 and Mt. Tabor Drive was constructed (circa 1934). The earliest record of the number and location of light poles dates from the 1950s (outside the period of significance). Over time, individual poles have been replaced as needed – however the overall system of illuminated drives and paths providing circulation through the landscape has been maintained. Documentation of the lighting system is also located in the historic listing (Exhibit A.10 - APP J, pages 7-8, 44, 78, 86, 88). The existing light poles and fixtures are compared in photographs in Exhibit A.10 - APP G and details of the proposed replacements are shown in the specification sheets in Exhibit C.5-7.

This criterion is met.

**5. Historic materials.** Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

#### **Findings:**

Poles will be ground-mounted, and the installation will not affect historic materials. Under normal circumstances, a direct buried concrete pole can be set directly into an augered hole that minimizes the amount of ground disturbance or impacts to surrounding soils or any historic concrete. Depending on the strength of the soil, backfilling can be accomplished with aggregate, concrete, or the original soil. This technique does not require the use of sandblasting or chemicals and meets modern building code requirements for structural safety.

This criterion is met.

**6. Archaeological resources.** Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.

#### **Findings:**

There are no known archaeological resources on site. Development, including significant ground disturbance and excavation on the site has been documented since 1894. Given the project will install replacement light poles in previously developed locations using modern techniques that limit ground disturbance, it is very unlikely any materials of archaeological interest will be encountered. Regardless, should any archaeological discoveries occur, work will be stopped in the affected area and the Bureau will notify the State Historic Preservation Office (SHPO). Prior to submitting this application, the Parks Bureau contacted the SHPO but has not heard back from them regarding any state requirements, concerns, or suggestions about this project.

This criterion is met.

**7. Differentiate new from old.** New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a landmark or contributing resource. New work may be differentiated from the old if the differentiation does not diminish the character, features, materials, form, or integrity of the landmark or contributing resource and, if in a Historic District, the district as a whole.

**8.** Architectural compatibility. New additions, exterior alterations, or new construction will be compatible with the massing, size, scale, and architectural features of the landmark or contributing resource and, if in a district, the district as a whole. When retrofitting to improve accessibility for persons with disabilities or accommodate seismic improvements, design solutions will not compromise the architectural integrity of the landmark or contributing resource.

#### Findings for 7 and 8:

The integrity of the park's landscape (the contributing resource) will not be affected by the replacement poles, as they will maintain the existing spatial pattern of the lighting system adjacent to the circulation system. As previously Many of the current components of the light system are almost a hundred years old. By replacing the poles now, the structural integrity of the lighting system is assured for a long time to come. No other changes to the landscape or to any of the contributing architectural structures or buildings are proposed.

These criteria are met.

**9. Preserve the form and integrity of historic resources.** New additions, exterior alterations, or new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the landmark or contributing resource and, if in a district, the district as a whole would be unimpaired.

#### **Findings:**

The lighted circulation system is an integral component of the landscape in the Mt. Tabor Park Historic District, as the illumination provided alongside the historic drives and formal pathways enhances access to the park's various experiences. However, individual pole replacement has occurred repeatedly over time without affecting the integrity of the overall system of lighting or circulation. Therefore, it is reasonable to conclude that if an individual pole needs to be removed in the future, as long as it was replaced in the same vicinity and with similar materials and design, neither the system of illumination or circulation would be affected, and the character of the landscape would remain unimpaired.

This criterion is met.

**10. Hierarchy of compatibility.** New additions, exterior alterations, or new construction will be designed to be compatible primarily with the landmark or contributing resource and, if located within a district, secondarily with contributing resources within 200 feet and, finally, with the rest of the district. Where practical, compatibility in districts will be pursued on all three levels.

#### Findings:

The lighting system will maintain its function and role of illuminating the park's circulation system. Replacement poles will maintain the look and design of the current poles within the illumination system. There is a compelling relationship between the lighting system and the circulation system. Areas in the vicinity of the existing lighting system that are part of the circulation system will not be affected by the replacement, as the overall lighting system will remain intact and individual replacement poles are of compatible materials and design to existing ones. Most importantly, the illuminated nature of the circulation system will be maintained.

No changes are proposed to the location or pattern of the circulation system within the park. The replacement of individual poles will not affect the contributing architectural resources. No changes are proposed to alter other aspects of the landscape, such as the terrain or vegetation.

The overall spatial pattern of the light poles illuminating the circulation pattern will be retained. Only minor refinements to pole locations are anticipated. Two poles near Reservoir 5 may conflict with water lines, as shown in the

disturbance area site plans (Exhibit C.31-36), however, no changes are proposed that would affect the contributing resources within the Mt. Tabor Park Reservoir Historic District.

Based on the above, the planned pole replacements will be compatible with the circulation system, the landscape as a whole, other contributing resources, and both of the historic districts at the site.

*This criterion is met.* 

#### **DEVELOPMENT STANDARDS AND ADDITIONAL PROCESS**

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

Of the 88 existing light poles to be replaced, 4 are located in the SE Taylor Street right of way (ROW), Poles in the ROW will be addressed through the Portland Bureau of Transportation (PBOT) permit process for existing utility structures (encroachment permit review).

#### CONCLUSIONS

The purpose of the Historic Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance.

This project will replace 88 light poles and fixtures adjacent to the park's circulation system. Approximately 60 of the poles may date from the park district's historic period of significance, and none of the fixtures do. Options to retain, rehabilitate, and reuse the existing light poles were explored. However, there was not an acceptable way for them to be anchored in a manner that would meet current building codes while also retaining enough of the pole's historic and design integrity.

The materials and design of replacement poles closely resembles existing ones and will preserve the historic character of the lighting system. Efforts have been made to preserve the spatial pattern of the illumination system. Replacement of the poles and the fixtures will ensure the system of illuminated pathways, staircases, and historic drives continues to provide comfort and safety as community members explore the historic landscape and cherished scenic views of Mt. Tabor Park. By replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

This proposal meets the applicable Historic Resource Review criteria and Demolition Review criteria and therefore warrants approval.

#### **TENTATIVE STAFF RECOMMENDATION**

(May be revised upon receipt of new information at any time to the Landmarks Commission decision)

Staff recommends approval of Historic Resource Review and Demolition Review for the replacement of 88 light poles and light fixtures in Mt Tabor Park. Of the 88 existing poles to be replaced:

- 84 are located within Mt. Tabor Park.
- 4 are located in the SE Taylor St. right-of-way (ROW).

The new concrete light poles will be hexagonal to match existing, and the new light fixtures will be acrylic/metal flight fixtures with decorative metal strapping. The proposed replacement poles and fixtures will be installed in approximately the same location as the current poles.

Staff recommends approval per the following conditions of approval:

- A. As part of the building permit application submittal, the following developmentrelated conditions (B through C) must be noted on each of the 4 required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE - Case File LU 23-088549 HR DM". All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. At the time of building permit submittal, a signed Certificate of Compliance form (<u>Certificate of Compliance for Design and Historic Resource Review Approvals</u> | <u>Portland.gov</u>) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- C. No field changes allowed.

**Procedural Information.** The application for this land use review was submitted on September 28, 2023, and was determined to be complete on December 7, 2023.

\_\_\_\_\_

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore, this application was reviewed against the Zoning Code in effect on September 28, 2023.

*ORS 227.178* states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant waived the 120-day review period, as stated with Exhibit A.5. Unless further extended by the applicant, **the 120 days will expire on: December 6, 2024.** 

**Some of the information contained in this report was provided by the applicant.** As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the recommendation of the Bureau of Development Services with input from other City and public agencies.

This report is not a decision. The review body for this proposal is the Landmarks Commission who will make the decision on this case. This report is a recommendation to the Landmarks Commission by the Bureau of Development Services. The review body may adopt, modify, or reject this recommendation. The Landmarks Commission will make a decision about this proposal at the hearing or will grant a continuance. Your comments to the Landmarks Commission can be mailed, c/o the Landmarks Commission, 1900 SW Fourth Ave., Suite 5000, Portland, OR 97201 or faxed to 503-823-5630.

You will receive mailed notice of the decision if you write a letter received before the hearing or testify at the hearing, or if you are the property owner or applicant. You may review the file on this case by appointment at our office at 1900 SW Fourth Ave., Suite 5000, Portland, OR 97201. Please call the file review line at 503-823-7617 to schedule an appointment.

**Appeal of the decision.** The decision of the Landmarks Commission may be appealed to City Council, who will hold a public hearing. If you or anyone else appeals the decision of the Landmarks Commission, City Council will hold an evidentiary hearing, one in which new evidence can be submitted to them. Upon submission of their application, the applicant for this land use review chose to waive the 120-day time frame in which the City must render a decision. This additional time allows for any appeal of this proposal to be held as an evidentiary hearing.

**Who can appeal:** You may appeal the decision only if you write a letter which is received before the close of the record for the hearing, if you testify at the hearing, or if you are the property owner/applicant. **Appeals must be filed within 14 days of the decision.** An appeal fee of \$5,000.00 will be charged.

Additional information on how to file and the deadline for filing an appeal will be included with the decision. Assistance in filing the appeal and information on fee waivers are available from the Bureau of Development Services in the Development Services Center, 1900 SW Fourth Ave., First Floor. Neighborhood associations recognized by the Office of Neighborhood Involvement may qualify for a waiver of the appeal fee provided that the association has standing to appeal. The appeal must contain the signature of the Chairperson or other person\_authorized by the association, confirming the vote to appeal was done in accordance with the organization's bylaws.

Neighborhood associations, who wish to qualify for a fee waiver, must complete the Type III Appeal Fee Waiver Request for Organizations Form and submit it prior to the appeal deadline. The Type III Appeal Fee Waiver Request for Organizations Form contains instructions on how to apply for a fee waiver, including the required vote to appeal.

#### Recording the final decision.

If this land use review is approved the final decision will be recorded with the County Recorder. *Unless appealed*, the final decision will be recorded by the Bureau of Development Services.

**Expiration of this approval.** An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time. Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

**Applying for your permits.** A building permit, occupancy permit, or development permit must be obtained before carrying out this project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed here.
- All applicable development standards, unless specifically exempted as part of this land use review.
- All requirements of the building code.
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions, and regulations of the city.

#### The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).

Grace Jeffreys January 12, 2024

#### **EXHIBITS** – NOT ATTACHED UNLESS INDICATED

- A. Applicant's Submittals
  - 1. Narrative, 9-28-2023
  - 2. Appendix, 9-28-2023.
  - 3. Plans, 9-28-2023
  - 4. Pre App Summary, 9-28-2023
  - 5. 120-day waiver, 10-12-2023
  - 6. Incomplete Response, 12-7-2023
  - 7. Revised narrative, 12-7-2023
  - 8. New Site Plans, 12-7-2023
  - 9. New Construction Plans, 12-7-2023
  - 10. Revised Appendix, 12-7-2023
  - 11. Revised Plans, 12-7-2023
- B. Zoning Map (attached)
- C. Plan & Drawings
  - 1. Contents
  - 2. Vicinity Plan
  - 3. Historic District plan
  - 4. Site Plan (attached)
  - 5. Light Fitting drawings (attached)
  - 6. Light pole drawings
  - 7. Light pole drawings (attached)
  - 8. Light pole details
  - 9. 20. Illumination studies
  - 21. 24. Permitted Landscape Plans
  - 25. 30. Tree plans
  - 31. 36. Disturbance Area Plans
- D. Notification information:
  - 1. Request for response
  - 2. Posting letter sent to applicant.
  - 3. Notice to be posted.
  - 4. Applicant's statement certifying posting.
  - 5. Mailed notice.
  - 6. Mailing list

- 1. Bureau of Transportation Engineering and Development Review
- 2. Bureau of Parks, Forestry Division
- 3. Life Safety Review Section of BDS
- F. Letters
  - 1. Jesse Powell, 1-2-2024, wrote in opposition of removing historic lighting posts.
  - 2. David Kaplan, 1-4-2024, wrote in support of the replacement design because it closely resembles the original posts and lanterns.
  - 3. Linda Raveaux, 1-10-24, wrote in support of low light that is aimed downward to maintain the award winning "quiet" aspect of the park. Also supported maintaining existing historic appearance of the posts and fixtures.

#### G. Other

- 1. Original LUR Application
- 2. Incomplete letter 10-19-23
  a. RFR response Bureau of Environmental Services
  b. RFR response Bureau of Transportation Engineering and Development
- 3. Summary from Briefing on Lighting in Historic Parks 3-13-23
- 4. Matrix of Guidelines

H.



For Zoning Code in Effect Post October 1, 2022

ZONING 🖗

THIS SITE LIES WITHIN THE: MOUNT TABOR PARK HISTORIC DIST

- Site
- Also Owned Parcels
- Historic District
- $\triangle$  Historic Landmark

File No.	LU 23 - 088549 HR DM
1/4 Section	3136-37,3236-37
Scale	1 inch =800 feet
State ID	1S2E05 100
Exhibit	B Sep 28, 2023
LU 23-088549	HR DM, Exhibt H.1





### LU 23-0885429-PARE 191MR EXHIBITE C!4



DESCRIPTION										AP	PR
SCREW WAS STANDARD. REMOVED GFI									D.O.		
EMBEDDED FLUTED POLE								_			
POLE HEIGHT ABOVE GRADE	LE GHT EMBEDDED IVE DEPTH IDE		OVI P LEI	OVERALL POLE LENGTH BUTT DIA ULTIMATE GROUND LINE MOMENT (ft-lbs)		POLE WEIGHT (lbs)					
12'-2"		5'-0"	1	7'-2" 18" 22,500			1,050		]		
E CONF	IG	CODES	]	"P" LEVEL POLE CONFIG CODES							
ENTRY		INFO		OPTI	ON CLA	SS	ENTRY	INFO			
I				MIX		11E	E	VT MAT	СН		
66538E				FINISH		3					
TMP				COLLAR			65850EPA		ROUNE	)	
MODFE		NOTE 7		POLE TOP CONFIG.			IFIG. MOD95				
				STR	UCT. MC	D	MODDCI		NOTE	8	

#### SHIPPING ASSEMBLY 2304-010 **BILL OF MATERIAL**

40195EM3PAA - MODIFIED FABRICATED ALUMINUM TENON ASSEMBLY, 2-7/8" O.D. x 3"

1. MIX (11E3I): GRAY NATURAL (EVT MATCH), EXPOSED AGGREGATE FINISH WITH AMERSHIELD ANTI-GRAFFITI COATING.

ASTM C-595 TYPE 1L GRAY CEMENT

PROTECTIVE COAT EXPOSED P.C. WIRES AT POLE ENDS.

7. MODFE: POLE BOTTOM PREPARATION FOR FREEZING OR CORROSIVE COASTAL ENVIRONMENT; SEE DOCUMENTATION.

8. MODDCI: CORROSION INHIBITOR MIX MODIFICATION.

9. POLE FULLY PRESTRESSED WITH (8) 7mm ASTM A421 STEEL WIRES.
 10. THE POLE (& IMPLIED TENON TOP ASSEMBLY) DEPICTED ON THIS DRAWING IS

DESIGNED TO WITHSTAND THE LOADS IMPARTED BY A SINGLE POST TOP LUMINAIRE (NOT TO EXCEED 1.5 SQ FT EPA & 47 LBS) AS DESIGNED PER THE 2013 AASHTO LTS-6 USING A 90 MPH WIND ZONE (3-SECOND GUSTS) CRITERIA FOR STREET LIGHT POLES. NO TORSIONAL (ARM OR TWIST) LUMINAIRE LOADS ANALYZED. PLEASE CONTACT & ADVISE MANUFACTURER IF INTENDED LOADING

MA	TERI/	AL L	IST

BER	DESCRIPTION	ORG	NOTES
)	SHIPPING ASSEMBLY	ANN	
	TAMPER PROOF WRENCH	ANN	1 FOR EVERY 5 POLES

ron	POLE				
•	PORTI AN		5		
VEO03.7	POLE WITH	TENON	ASSEMB	LY	
NTAINS INFORMAT DISCLOSED TO AN	TION WHICH IS PRO	PRIETARY TO NA IE PRIOR WRITTE	TIONAL OILWEL	L VARCO. IT SHA	LL NOT BE LWELL VARCO.
DATE:	4/6/23	APPR:		DATE:	
ER		REVISION	SHEET		SCALE
<u>04-010</u>	)	В	1 (	DF 1	NTS

LU 23-0885429-PPR DMR EXHIBITO C!6

## Installation Steps for a Direct Embedded Ameron<sup>™</sup> Concrete Pole



Position pole for pre-wiring, Protect pole as described in handling and storage guide, Wire and install luminaire,



Use only synthetic straps. Single pick point is preferred method of handling. Use double clove hitch to avoid slippage.



Excevete hole to proper depth (plus 6-in, if special backfill is required),



Set pole, Align/plumb, Maintain lension on the pole until compacted to bottom of cable entrance.

## Recommended backfill requirements\*

#### Good soil

Compact well-graded sand and gravel, hard clay, or well-graded fine and coarse sand (all drained so that water will not stand).

Use as is for bock/Q(.

#### \*Besed on location review by a qualified civil engineer

(# 2000 Matternal Office) Verse (4) Mights Reported - CANT-ADA\_MAG\_2003.

#### Medium soil

Compact fine send, medium and clay, compact sandy loam, loose coarse sand and gravel (all drained so that water will not stand].

#### Regelies select backfig-clean, washed send or )5-lo, minut well-graded gravel.



Use proper backfill. See recommended backfill requirements below, Tamp a 6-in, base to ensure correct setting depth and drainage (if required),



operations. Tamp 9-In. Intervals to bottom of cable entrance. Install underground cable. Check alignment. Finish compaction to a height of 2-In. above grade sloping away from pole to allow proper drainage.

## Poor soil

Soft clay, clay loam, poorly compacted send, or days containing large amounts of sit. Water may stand during wet 200300

Ges comercies: earth bochfill—mix one part dry commt possiler to 25 parts clean, weekeel canel.



# Ameron Concrete Pole Handling Instructions

Ameron<sup>®</sup> poles are made of pre-stressed concrets: a lough, elastic, durable material not limited by the properties of low strength, conventionally reinforced concrete. Like many other fabricated structures, Ameron poles are designed to withstand specific service loads and handling loads—with safety factors considered. Loads induced through handling are perhaps the ones most easily overlocked, even though only a few simple rules need be remembered. Attention to the following will minimize damage from handling and storage.

#### Storage (See Figs. 1 through 3)

1. Store on dunnage placed % of the total length from each end. Location of temporary support points may very from this rule for both storage and handling. Durinage is identity made from 4×4 fir, pine, or similar wood, which is linkshed enough to have opposite sides flat and parallel (no logs or branches). The durange should be in one piece for the full width of the stack and be of sufficient thickness as to allow the pincing. of slings or the insertion of foridilt fingers between the inversi of poles. Weathered isolary is better than newly cut because the latter may stain the concrete when moistane is present.

2. Store on a level surface. If surface is not paved, be certain the ground is solid enough so that the durinage does not sink into it.

3. When poles are stared in more than one layer, each piece of during e must be placed one above the other, so that the weight of the poles above is transmitted directly downward through the dunnage and does not induce bending stresses in the poles.

4. Distribution poles should be stacked no higher than nine layers and smaller poles no higher than 12 layers.

5. Each succeeding layer of poles should be placed with the tips in the opposite direction of the layer below.

6. Poles should be aligned so that the tips in each layer form a straight line normal to the center line of the poles.

7. Pince wedges on the during generat to the poles to prevent their rolling.

4. Do not step on the cantilevered tips of small poles in storage.

0. Hundle poles with reasonable care so as to avoid dropping or otherwise striking them against each other or other hard, solid objects.

## Handling

#### (See Fig. 4)

1. In litting the pole from a single pick-up point, use either a choker sling or a loop sling with one complete extra turn around the pole just above the balance point.

2. When lifting the pole using two pick-up points from a single hook, a choker-type attachment should be used on the pole.

3. Poles with a polished or textured surface should be handled with a rylon or other non-metallic sling, For these poles, fingers of a forklift should be fitted with protective covers.

4. When using a forklift to handle poles, slways use softeners on the fork times. Also, always use wedges to prevent poles from rolling.



LU 23-0885499-PPR 519 MR EXHIBIT C!8



# City of Portland Historic Landmarks Commission

## Type III Land Use Review

## MEMORANDUM

Date:January 12, 2024To:Historic Landmarks CommissionFrom:Grace Jeffreys, Design / Historic Review Team503-865-6521 | grace.jeffreys@portlandoregon.gov

Re: LU 23-088549 HR DM – Replacement of Mt Tabor Light Poles and Fixtures Type III Design Review– January 22, 2024

Attached is a drawing set for the Type III Historic Resource review scheduled on January 22, 2024. Please contact me with any questions or concerns.

#### I. PROGRAM OVERVIEW

Type III Historic Resource Review and Demolition Review for the replacement of 88 light poles and fixtures: 84 within Mt Tabor Park and 4 within the SE Taylor Street right-of-way, that are part of an existing and historic illuminated circulation system. Replacement poles and fixtures will be installed in approximately the same location as the current ones.

#### **II. DEVELOPMENT TEAM BIO**

Applicant	Brett Horner, Portland Parks & Recreation
Owner	City of Portland
Project Valuation	<b>\$</b> 704,000

- **III. DEMOLITION REVIEW –** One of the four criteria listed under 33.846.080.C, See attached matrix.
- IV. HISTORIC REVIEW APPROVAL CRITERIA 33.846.060.G, See attached matrix.

#### V. STAFF RECOMMENDATION

Staff found that the proposal meets the applicable Historic Resource Review criteria and Demolition Review criteria, therefore, the Staff Report recommends approval. From the SR conclusion:

This project will replace 88 light poles and fixtures adjacent to the park's circulation system. Approximately 60 of the poles may date from the park district's historic period of significance, and none of the fixtures do. Options to retain, rehabilitate, and reuse the existing light poles were explored. However, there was not an acceptable way for them to be anchored in a manner that would meet current building codes while also retaining enough of the pole's historic and design integrity. The materials and design of replacement poles closely resembles existing ones and will preserve the historic character of the lighting system. Efforts have been made to preserve the spatial pattern of the illumination system. Replacement of the poles and the fixtures will ensure the system of illuminated pathways, staircases, and historic drives continues to provide comfort and safety as community members explore the historic landscape and cherished scenic views of Mt. Tabor Park.

By replacing the outdated light poles with structurally sound poles using current construction methods, this project will maintain and preserve a lighted circulation system within the Mt. Tabor Park landscape for many years to come.

#### **VI. CONDITIONS OF APPROVAL**

The standard three conditions of approval have been added.

#### **VII. PROCEDURAL NOTES**

- The subject proposal was heard before at a voluntary Briefing on Lighting in Historic Parks which included this work, held on March 13, 2023 (Commissioners present: Smith, Minor, Roman, Foty, Moretti). See the attached summary of Commission comments.
- The application was deemed complete on December 7, 2023.

Reference Materials: <u>https://efiles.portlandoregon.gov/record/16493309</u>

- Exhibits C.1-36: Drawing Set 12-7-23.
- Exhibit G.4: Guidelines Matrix
- Exhibit G.3: Summary Notes from the Briefing held on March 13, 2023
- Exhibit A.7: Applicant's Narrative







#### APPROVAL CRITERIA: PROJECT NAME: DEMOLITION REVIEW - 33.846.080.C CASE NUMBER: LU 23-088549 HR DM Mt Tabor Light Poles HISTORIC RESOURCE REVIEW - 33.846.060.G PROJECT APPLICANT: Brett Horner, PP&R PROJECT VALUE \$ 704,000 DATE: 1-12-24 DEMOLITION REVIEW - 33.846.080.C STAFE COMMISSION Choose one of four +/-Comments +/-Comments 1. Demolition of the resource has been evaluated against and, on balance, demolition has been found to be equally or more supportive of the relevant goals and policies of the Comprehensive Plan, and any relevant area plans, than preservation, rehabilitation, or reuse of the resource. 2. The proposal is to demolish a contributing resource in a Conservation District or National Register District, and demolition of the resource will be mitigated to enhance, preserve, or restore the archaeological, architectural, cultural, or historic significance or integrity of the district. The mitigation must be responsive to the significance and integrity of the resource proposed for demolition. 3. The proposal is to demolish a contributing resource in a single-dwelling zone in a National Register District, and demolition of the resource will facilitate the creation of more deeply affordable dwelling units than could practicably result from preservation, rehabilitation, or reuse of the resource. In this case, deeply affordable means permanently affordable to those earning no more than 60 percent of the area median family income. 4. The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish + the architectural, cultural, or historic significance or integrity of the associated landmark or district. HISTORIC RESOURCE REVIEW - 33.846.060.G STAFF COMMISSION MACRO +/-+/-Comments Comments 1. Historic character. The historic character of the landmark or contributing resource will be retained and preserved. Removal of historic materials or alteration of +

features and spaces that contribute to the landmark or contributing resource will be avoided.			
8. Architecural compatibility. New additions, exterior alterations, or new construction will be compatible with the resource's massing, size, scale, and architectural features of the landmark or contributing resource and, if in a district, the district as a whole. When retrofitting to improve accessibility for persons with disabilities or accommdate seismic improvements, design solutions will not compromise the architectural integrity of the landmark or contributing resource.	+		

9. Preserve the form and integrity of historic resources. New additions, exterior alterations, or new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the landmark or contributing resource and, if in a district, the district as a whole would be unimpaired.	+			
<b>10. Hierarchy of compatibility.</b> New additions, exterior alterations, or new construction will be designed to be compatible primarily with the landmark or contributing resource and, if located within a district, secondarily with contributing resources located within 200 feet and, finally, with the rest of the district. Where practical, compatibility will be pursued on all three levels.	+			
MID	+/	STAFF	+/	COMMISSION
2. Record of its time. The landmark or contributing resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.	+	comments	+/-	
<b>3. Historic changes.</b> Most properties change over time. Those changes that have acquired historic significance will be preserved.	+			
<b>4. Historic features.</b> Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the historic feature in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.	+			
7. Differentiate new from old. New additions, exterior alterations, or new construction will not destroy historic materials that characterize a landmark or contributing resource. New work may be differentiated from the old if the differentiation does not diminish the character, features, materials, form, or integrity of the landmark or contributing resource and, if in a Historic District, the distrcit as a whole.	+			
MICRO		STAFF		COMMISSION
	+/-	Comments	+/-	Comments
<b>5. Historic materials</b> . Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.	+			
<b>6. Archaeological resources.</b> Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.	+			

## Existing



**Proposed** 





City of Portland Historic Landmarks Commission

# **Type III Land Use Review**

# LU 23-088549 HR DM 6325 SE Division

Replacement of Mt Tabor Light Poles & Fixtures

January 22, 2024

**Staff Presentation** 

# Context

Location Zoning Program Overview Approval Criteria Project History

# **Applicant Presentation**

# **Staff Recommendation**

Conditions of Approval Next Steps





## **Vicinity Plan**



## **Mt Tabor Park Historic District**

# Location

Mt Tabor Park Historic District


#### **Zoning Map**

#### Zoning

#### Base Zone:

OS, Open Space

#### **Overlays**:

- Historic Resource Protection
- Environmental Protection (c)
- Scenic Resource (s)







#### Program Overview

#### **Replacement of 88 light poles and fixtures**:

- 84 within Mt. Tabor Park.
- 4 in the SE Taylor St. right-of-way (ROW).

LU 23-088549 HR DM, Exhibt H.4

#### Proposal

#### Existing

F



#### Proposed



#### Program Overview

#### **Replacement of 88 light poles and fixtures**:

- 84 within Mt. Tabor Park.
- 4 in the SE Taylor St. right-of-way (ROW).

LU 23-088549 HR DM, Exhibt H.4

Exhibit G, Page 2

## Comparison

#### Existing



#### Proposed



#### Program Overview

## Replacement of 88 light poles and fixtures:

- 84 within Mt. Tabor Park.
- 4 in the SE Taylor St. right-of-way (ROW).

#### LU 23-088549 HR DM, Exhibt H.4



#### Reviews & Approval Criteria

#### **Demolition Review:**

One of the four criteria listed under 33.846.080.C.

#### **Historic Resource Review:**

33.846.060.G. Other Approval Criteria.

LU 23-088549 HR DM, Exhibt H.4

#### From the Summary Memo:

- Suggested that repair is preferable to replacement.
- Noted a desire to better understand the structural issues and expressed a desire to see the engineer's report.
- Noted that the issue seems to primarily be the anchoring system rather than the concrete poles and noted that this should be further explored so that repair could be further explored as an option.
- Expressed a desire for coherency within each park regarding each park's lighting scheme.

#### **Project History**

**Briefing held 3-13-23** Lighting in Historic Parks





#### Staff Report recommends approval.

Existing



Proposed



## Conditions of Approval

Three standard conditions





#### **Light Pole Safety Project: Mt Tabor Park** Type III Historic Resource Review





LU 23-088549 HR DM, Exhibit H.5



### **Application Overview**

**Project Site: Mt Tabor Park** 

**Project Need: Why Are The Light Poles Being Removed?** 

**Project Proposal: Mt Tabor Park Proposed Replacements** 

**Approval Criteria Met** 





#### Mt. Tabor Park

- 176-acre park in SE Portland.
- Has playground areas, tennis courts, picnic areas, trails, a dog off-leash area, a community garden, and a historic amphitheater.

#### • Site History

1894 - Public water reservoir established
1903 - Proposed for park use in Olmsted plan
1909 - Park use established
1911 - Park Plan of Development
1924/1925 - first paved drives illuminated





## Mt. Tabor Park's Illuminated Circulation System

- Paved drives, stairways, and some trails.
- Historic listing 88 poles in the system.
- 84 are located within park boundaries, 4 on SE Taylor St.





# The Illuminated Circulation System in the Park's Design

- The paved drives
- Automobile access to the cinder cone volcano
- Lighting the paved drives ensured night access
- Nationwide trend for parks at the time





## Project Need: Why Are the Light Poles Being Removed?



- PP&R evaluated a specific type of light pole in the park system.
- A flawed anchoring system.
- >250 decorative concrete light poles.
- 12 Portland parks.
- Potential life and safety hazards.
- PP&R started to remove flawed light poles.
- Work paused until replacement poles and fixtures available.



## Wire Anchor Connection

#### Tie wire used to connect poles to footings within the grout base via rebar

- Both poles and buried concrete footings contain reinforcing steel bars.
- Rebar bent into hairpin-shaped loops.
- Steel tie wire was wrapped around the rebar loops within the grout base.





## **Wire Anchor Connection**

#### Tie wire used to connect poles to footings within the grout base via rebar

- Rebar had signs of oxidation
- Steel ties had oxidation, deterioration, and breakage.
- The grout bases have deteriorated or broken.





#### **Safety Issues**

## The wire anchor does meet lateral loads currently required by code

• Steel wires have deteriorated.

#### **Other code deficiencies found:**

- Insufficient footing depth
- Insufficient reinforcing steel in footings and poles





# Some poles in Mt Tabor Park are original, but many have been replaced in recent decades





Unknown install date, but most likely 1980s

Original 1920s era pole



# Efflorescence, flaking, erosion, and cracking on base and bottom of poles



LU 23-088549 HR DM, Exhibit H.5



## **Utility Pole Life span**

Buildings and structures have life spans, beyond which time, replacement is recommended.

- City policy for asset management identifies a 30-year life span for lighting.
- While concrete is considered a long-lasting construction material, it doesn't last forever.

Pole Material	Life span	
Concrete	30 – 80 years	
Steel	15 – 80 years	
Wood	25 – 50 years	
Fiberglass	15 – 20 years	

Life span range based on figures from 4 light pole producers and one public utility industry article



## None of the light fixtures being removed are original. The Mt Tabor Park historic designation notes this fact.



Polygonal Lantern Style



Original 1920s era light fixture Existing lights from the 1950s and 1980s



## **Replacement Design Considerations**

- Honor the Historic Importance and Look
- Durability, Ease of Care, and Maintenance Needs
- Cost Effective and Conserve Energy
- Bird-Friendly
- Minimize Spill (Dark Sky)
- Provide Adequate Light for Safety and Enjoyment
- Known Quantity





## Mt. Tabor Park Light Poles

- Original circulation system's lighting system (red).
  - Other light poles (yellow) are specific to the Historic Reservoirs and are not affected by this project.
- Project will restore the historical system and install 88 poles.



LU 23-088549 HR DM, Exhibit H.5



Proposed Replacement Fixture and Metal Straps







#### **A View Side By Side Light Fixtures**







#### **Existing**



#### Side-by-Side Comparison Light Poles with Fixtures







#### Proposed

**PORTLANDPARKS.ORG** | Commissioner Dan Ryan | Director Adena Long



#### **Proposed Replacement Pole**

Octagonal	
Shape Just	
Like Existing	
Ones	





### **Proposed Replacement Pole**

Footing will ensure the poles are more stable.





## **Approval Criteria to install replacement light poles**

33.846.060 Historic Resource Review G. Other historic approval criteria.

- 1. Historic character.
- 2. Record of its time
- 3. Historic changes

- Mt. Tabor Park development was designed with Olmsted Brothers Landscape Architects' influence
- Constructed during the dawn of the automobile age
- Paved drives guide visitors through scenic and pastoral areas to reach the summit
- Project proposes to restore the historic illuminated circulation system



## **Approval Criteria to install replacement light poles**

33.846.060 Historic Resource ReviewG. Other historic approval criteria.4. Historic features

...Where the severity of deterioration requires replacement, the new features will match the historic in design, color, texture and other visual qualities and, where practical in materials.

- The replacement light poles will match the existing poles
  - Replacement poles are octagonal shape concrete, and with a matching color.
  - Replacement fixtures are metal framed, lantern-style, similar in shape and color to existing fixtures.
  - Metal strapping on replacement poles is similar in shape and color to original historic poles.



## **Approval Criteria to install replacement light poles**

- *G. Other historic approval criteria. 5. Historic materials*
- 6. Archaeological resources
- 7. Differentiate new from old
- 8. Architectural compatibility
- 9. Preserve the form and integrity10. Hierarchy of compatibility

- Other historic resources on-site not affected by the replacement
- There are no known archaeological resources onsite
- No new park elements are proposed, therefore the existing architectural forms and hierarchy are not affected
- Replacement ensures that aging or structural deficient poles don't damage contributing architectural resources



## **Approval Criteria to remove accessory structures**

33.846.080 C. 4.

The proposal is to demolish an accessory structure, and demolition of the resource will not significantly diminish the architectural, cultural, or historic significance or integrity of the associated landmark or district.

- The light poles are accessory structures
- Removal will not dimmish the historic values associated with the circulation system or the park district since the new poles match the old ones
- Restoring the existing historic illuminated circulation system ensures the historical integrity of the historic park district



#### **Summary of Public Process**

#### **Public Meetings**

- Historic Landmarks Commission, March 13, 2023
- Portland City Council, April 5, 2023
- Light Pole Safety Project neighborhood meetings, May 11 & 12, 2023
- Light Pole Safety Project community-wide meeting, May 17, 2023

#### **Comments At Meetings**

- No objections to look and design of replacement light poles and fixtures
- Interest in reuse or restoration was expressed.

#### **Comments Submitted to BDS/HLC**

- Interest in maintaining historic design features and support for replacement design
- Interest in keeping the existing lighting as is
- Interest in "low" light that is directed groundward



## Reuse

We cannot reuse the poles or fixtures; however, local organizations have accepted donations, and every effort will be made to recycle what can be recycled, including the concrete.

#### **Fixtures Accepted by:**

Oregon Historical Society (2) Oregon Architectural Heritage Center (4) Habitat for Humanity ReStore (35)






## **Questions and Discussion**







# **Questions and Discussion**

- Contact: Brett Horner
  (Brett.Horner@portlandoregon.gov)
- Resources for the public:
  - Check the Light Pole Safety Project
    Frequently Asked Questions available
    online for more information:
  - <u>https://www.portland.gov/parks/constru</u>
    <u>ction/light-pole-safety-project</u>



#### 1-22-24 - LANDMARKS COMMISSION

### LU 23-088549 HR DM – Mt Tabor Lights Replacement

#### ATTENDEES - TESTIFIERS IN RED (subject to change)

FIRST NAME	LAST NAME	EMAIL	WOULD YOU LIKE TO TESTIFY	ARE YOU FOR OR AGAINST	TESTIFIED
Aaron	Α	Zoopiedoop@gmail.com	YES	AGAINST	X
fred	leeson	frddleeson@hotmail.com	NO	N/A	
Kate	Dolan	dolkathleen@gmail.com	NO	N/A	
marisha	childs	marisha.childs@portlandoregon.gov	NO	N/A	
Alexa	Croft	alexa.croft@portlandoregon.gov	NO	N/A	