City of Portland
Landmarks Commission

Design Advice Request

SUMMARY MEMO

Date: **September 5, 2024**

To: **Megan Neill, Multnomah County, Division of Transportation – Bridges**
megan.neill@multco.us

From: **Tim Heron, Design / Historic Review Team**
(503) 823-7726, tim.heron@portlandoregon.gov

Re: **EA 24-060617 DA – Earthquake Resilient Burnside Bridge**
Design Advice Request Commission Summary Memo – August 19, 2024

Thank you for taking advantage of the opportunity to hold a Design Advice Request regarding your project. I hope you find it informative and valuable as you continue with your project development. Following, is a summary of the comments provided by the Landmarks Commission at the **August 19, 2024 Design Advice Request**. 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: Efiles - EA 24-060617 DA – Earthquake Ready Burnside Bridge [EQRB], Type 4 Demolition Review (24/EF/7664) (portlandoregon.gov).

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 **August 19, 2024**. As the project design evolves, the comments, too, may evolve or may no longer be pertinent.

Design Advice Requests are not intended to substitute for other Code-required land use or legislative procedures. Please keep in mind that the formal Type 4 land use review process [which includes a land use review application, public notification, and a Final Decision] must be followed once the Design Advice Request meetings are complete if formal approval for specific elements of your project is desired.

Please continue to coordinate with me as you prepare your Type 4 Land Use Review Application.

Encl:
Summary Memo

Cc: *Landmarks Commission*
Respondents

Commissioners present: *Chair Andrew Smith, Vice Chair Kimberly Moreland, Commissioner Hannah Bronfman, Commissioner "Hugo" Hamblin-Agosto, and Commissioner Peggy Moretti. Commissioner Maya Foty and Commissioner Cleo Davis were absent.*

Executive Summary
The Landmarks Commission agreed that replacing the existing Historic Burnside Bridge with a new seismically resilient bridge crossing the Willamette River that will be immediately usable after a major earthquake was warranted.

The Landmarks Commission agreed with the proposed three-step analysis to address the Type 4 Demolition Approval Criteria:

1. Describe the Project as it relates to demolition evaluation factors (a) through (f).
2. Determine which Comprehensive Plan and Central City Plan goals and related policies apply to this demolition request and how these policies relate to demolition evaluation factors (a) through (f).
3. Explain why, on balance, applicable Comprehensive Plan and Central City Plan goals and policies support the demolition and replacement of the Burnside Bridge.

However, the Landmarks Commission also agreed that additional information about mitigation is necessary before full support could be provided. Specifically:

- More information about the specific Programmatic Agreement mitigation elements, commitments and timing are necessary, and
- Additional mitigation beyond the Programmatic Agreement should be considered that further enhances historic resources within the Skidmore/ Oldtown National Register Historic District.

Summary of Comments. *Following is a general summary of Commission comments per the future Type 4 Land Use Review approval criteria.*

Land Use Type 4 Demolition Review Approval Criteria

Portland Zoning Code section 33.846.080. 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.

Historic Value:

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;

Comments:

- Commissioners stated that more specific information on historic integrity and sense of place and time must be highlighted.
- Commissioners noted that the homeless population should be considered and engagement with resource centers on the east side during demolition and construction.
- Commissioners encouraged reaching out and engaging with Latino and LGBTQ[IA] communities.
- Commissioners asked to see more documentation and analysis when the formal Land Use Type 4 for Demolition Review submittal is completed.

Economic Consequences & Demolition Merits:

b. The economic consequences for the owner and the community;

c. The merits of demolition;

Comments:

- The Landmarks Commission acknowledged that replacing the existing Historic Burnside Bridge with a new seismically resilient bridge at this regional connector crossing the Willamette River in downtown Portland that will be immediately usable after a major earthquake was warranted.
    - Goals and policies identified in the Approval Criteria for a future Type 4 Demolition Review would certainly support a new bridge that could safely support emergency relief efforts, reunite families, connect people to critical services, and serve an instrumental role in a faster, more efficient economic recovery for the region and state after a major earthquake.
- Commissioners noted that discussion about the reduction in columns under the west side of the bridge in the Historic District would open up more space and opportunities for the public to use Waterfront Park below.
- Commissioners also acknowledged the opportunity to add historic aesthetics within the new bridge design would better address these factors as well.

Redevelopment Merits:

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;

- One Commissioner expressed concern about recommending demolition when there is uncertainty with the replacement. Concerns may be alleviated if some statement of qualities/goals of the new bridge, like the gracefulness, the pedestrian scale, and detailing of the current bridge that will be incorporated into the new bridge.

- Commissioners noted that acknowledgment of the historic integrity of the current bridge should be addressed.

- Commissioners agreed that additional documentation would be needed to see more reassurance of a "game plan" for the elements to be salvaged and reused before the demolition review is approved. Delaying this discussion to the Land Use Type 3 Historic Review will be too late.

- Commissioners noted that since the applicant is planning to have another Design Advice Request and Land Use Type 3 Historic Resource Review for the western portion of the bridge in the Historic District, considering this unique discussion for a large-scale piece of regional infrastructure, it gives more comfort in reviewing this Demolition Review.

Preservation Merits:

e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and

Comments:

- The Commission agreed that replacing the existing Historic Burnside Bridge with a new seismically resilient bridge crossing the Willamette River that will be immediately usable after a major earthquake was warranted.

- Commissioners also acknowledged that in order to ensure resiliency of the historic bridge [seismic retrofit], the historic integrity of the Burnside Bridge would likely be ruined. And, not retrofitting the bridge means that it would likely not survive a major seismic event.

Demolition Mitigation:

f. Any proposed mitigation for the demolition.

Comments:

- One Commissioner noted that the Programmatic Agreement appeared to contain general and high-level mitigation proposals. The Commissioner was concerned with the level of documentation and would need additional assurances these mitigating elements can be completed and would provide the appropriate and necessary public benefit.
    - One recommendation included reusing the towers as wayfinding kiosks in Waterfront Park.

- One Commissioner noted, in accepting that the bridge will be demolished, that the Programmatic Agreement mostly consists of basic documentation which is not commensurate mitigation for a significant historic resource to be lost. How do we balance that loss within with context the character of the historic district?
    - One suggestion was that there are a lot of resources in the Old Town/ Skidmore Historic District that are Unreinforced Masonry buildings [URMs] that have not seen reinvestment for a long time.
    - One idea for additional mitigation: In the same spirit as 1% for Art, some percentage of the project budget could go into a grant fund that building owners in Old Town/Skidmore can tap to perform seismic studies on their buildings. Such a program could be the much-needed catalyst for a renaissance in the National Landmark district.
    - Additional Commissioners concurred, a fund for seismic studies in the Historic District is creative mitigation and meets the intent of the approval criteria.

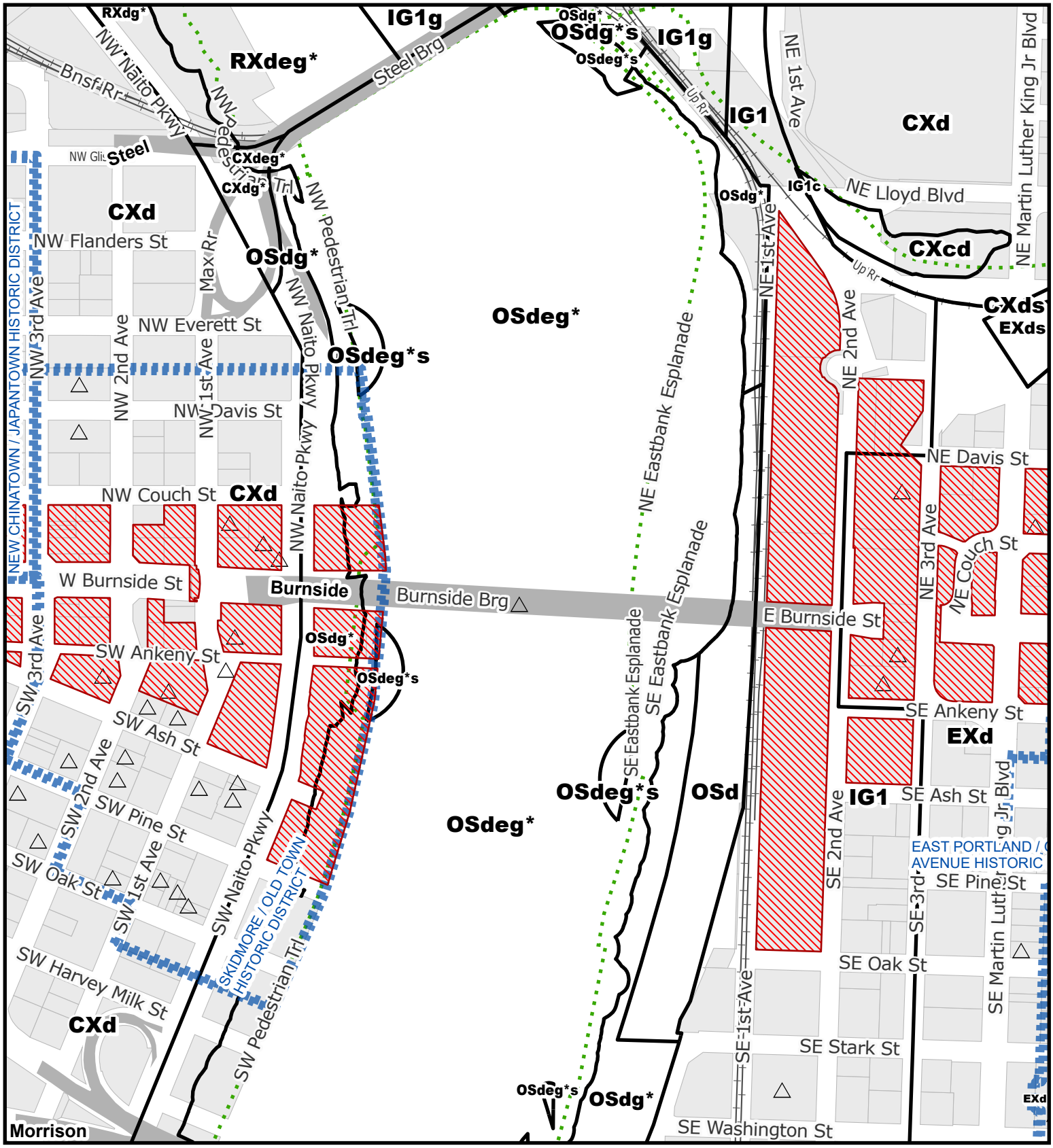
- One Commissioner noted a commitment to incorporating historical aesthetics into the design of the bridge.

- One Commissioner noted that a large piece of the Historic District is being removed by the demolition of the existing Historic Bridge, so encouraging a large degree of focus on the external very visible elements of the new bridge will be critical.

- Commissioners agreed that an additional meeting [future focus Briefing with the HLC] would be ideal to talk more about mitigation measures as it deserves more thoughtful input.

Exhibit List

A. Applicant's Submittals
    1. Original Submittal
B. Zoning Map [attached]
C. Drawings
    1. Application PPT Presentation 08-19-2024
D. Notification
    1. Mailing list
    2. Mailed notice
    3. Posting instructions sent to applicant
    4. Posting notice as sent to applicant
    5. Applicant's statement certifying posting
E. Service Bureau Comments
    1. Portland Bureau of Transportation
    2. Bureau of Environmental Services
F. Public Testimony [none]
G. Other
    1. Application form
    2. Staff memo to the Landmarks Commission with attachments
H. Landmarks Commission Meeting 8/19/24
    1. Staff Presentation
    2. Testimony Sheet



For Zoning Code in Effect Post October 1, 2022

ZONING

THIS SITE LIES WITHIN THE:
CENTRAL CITY PLAN DISTRICT
CENTRAL EASTSIDE, DOWNTOWN &
OLD TOWN / CHINATOWN SUBDISTS
MULTIPLE HISTORIC DISTRICTS

- Site
- Historic District
- △ Historic Landmark
- Recreational Trails

File No.	EA 24 - 060617 DA
1/4 Section	3030,3031,3029
Scale	1 inch =400 feet
State ID	1N1E34DC 100
Exhibit	B Jul 15, 2024

Historic Landmarks Commission Design Advice Request

Department of Community Services
Transportation Division

August 19, 2024

Multnomah County

EARTHQUAKE READY BURNSIDE BRIDGE

EA 24-060617 DA Exh C1

City of Portland, Oregon
Portland Permitting & Development
Land Use Services

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

Design Advice Request

DISCUSSION MEMO

Date: **August 9, 2024**

To: **Historic Landmarks Commission**

From: **Tim Heron, Design / Historic Review Team**
503-823-7726 | tim.heron@portlandoregon.gov

Re: **EA 24-060617 DA – Earthquake Ready Burnside Bridge, Type 4 Demolition Review**
August 19, 2024 Design Advice Request Meeting

As discussed at the June 10, 2024 Joint Briefing with Design Commission and the Historic Landmarks Commission (HLC), since 2016 Multnomah County has been working to create an Earthquake Ready Burnside Bridge (EQRB). The proposed project would replace the existing Burnside Bridge with a new movable bridge in approximately the same location and length as the existing bridge. The project area is shown on the figure below.

Attached is a Cover Memo and PPT presentation from Multnomah County for this Design Advice Request (DAR) meeting scheduled on August 19, 2024, for the Earthquake Ready Burnside Bridge, Type 4 Demolition Review. Also attached are several relevant documents including Approval Criteria, National Register Nominations, and past Type 4 Demolition Review cases.

Please contact me with any questions or concerns.

I. PROGRAM OVERVIEW

Because the existing Burnside Bridge is a historic landmark, its removal requires a Type IV Demolition Review for which the HLC will be providing their own advice in the form of a letter and/ or testimony to Portland City Council. At this DAR, the Project Team is seeking guidance from the HLC on the application of the approval criteria to this Project.

In addition, as discussed at the briefing, the applicant will also be sharing what was heard through the public engagement process in July. However, the focus of this DAR will not be on the design. At a separate land use review following City Council's decision on the demolition review, the HLC will consider the details of the proposed new bridge elements within the Portland Skidmore/Old Town Historic District, and the Project Team will schedule a second DAR with the HLC to discuss that Type III Historic Resource Review application.

II. FUTURE TYPE 4 DEMOLITION REVIEW APPROVAL CRITERIA:

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.

Type 4 Demolition Review Approval Criteria:

- Portland Zoning Code section 33.846.080.C.1.a-f *[January 2022]*
- Portland Comprehensive Plan 2035 *[May 2023]*
- Portland Central City 2035 *[April 2020]*
  - *Please note Central City 2035, Vol 1 – Goals and Policies is the primary goals and policy document of Central City 2035, and the only printed copy provided for those that request print. The remainder of the documents are used as background documents that support Vol 1 Goals and Policies.*

III. DEVELOPMENT TEAM BIO

Owner's Representative Megan Neill | Multnomah County
Project Valuation $ 825 million

IV. STAFF ANALYSIS & RECOMMENDED DAR DISCUSSION TOPICS

This is a unique DAR as its primary focus is advice for the future Type 4 Demolition Review approval criteria, not the presumed new bridge design. A second DAR is planned for the presumed future scope of the portion of a new bridge west of the Willamette River seawall in the Skidmore/ Old Town Historic District, as a future Type 3 Historic Review would be required should City Council support a Type 4 Demolition Review of the current bridge.

Staff has coordinated closely with the applicant to provide **a list of focused discussion topics (attached PPT presentation pages 33-37)** walking through each of the Approval Criteria of Portland Zoning Code section 33.846.080.C.1.a-f, pasted below for ease of reference, and advice on how to review to the relevant area plan Goals and Policies.

- *Portland Comprehensive Plan 2035*. It's all a good read, but Goals and Policies are pages 59-276, and
- *Portland Central City Plan 2035, Vol 1 Goals and Policies*. Again, great read, but Goals and Policies are pages 28-86.

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:

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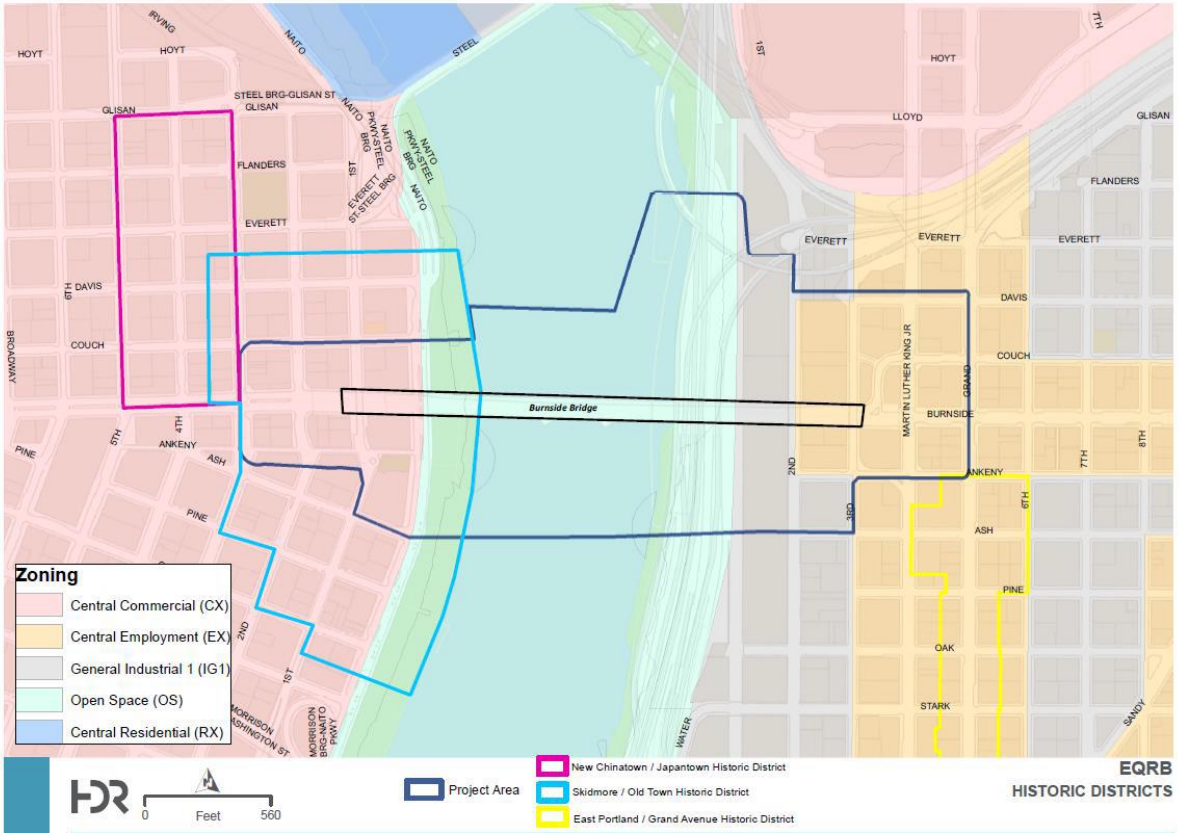
   c. The merits of demolition;
   d. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
   e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
   f. Any proposed mitigation for the demolition.

Staff also recommends reviewing these two reference documents that could further support the narrative response for context and background, but are <u>not</u> the approval criteria:

- National Register Nomination of Burnside Bridge 11-14-2012
- National Register Nomination for the Skidmore/ Old Town Historic District 9-30-1975

Lastly, Staff recommends reviewing two previous Type 4 Demolition Reviews as <u>examples</u> of Type 4 Demolition Reviews with a ***critical note:*** *the Type 4 Demolition Review Approval Criteria has been updated since these two Type 4 Demolition Review examples were processed.* However, they may provide helpful background on how City Council has applied the wide scope of Type 4 Demolition Review Approval Criteria.

- LU 09-171258 DM - Kiernan Building Type 4 Demolition Review City Council Final Findings and Decision
  - *Note pages 8-23 which address the previously adopted Comprehensive Plan Goals and previously adopted Central City Plan.*
- LU 14-249689 DM - Washington Park Reservoirs Type 4 Demolition Review City Council Final Findings and Decision
  - *Note pages 15-30 which address the previously adopted Comprehensive Plan Goals and Policies*



Attached:

- Zone Map
- EQRB HLC DAR Cover Memo FINAL 08-19-2024
- EQRB HLC DAR Presentation FINAL 08-19-2024
- Portland Comprehensive Plan 2035 *[May 2023]*
- Portland Central City 2035, Vol 1 – Goals and Policies *[April 2020]*
- National Register Nomination of Burnside Bridge [11-14-2012]
- National Register Nomination for the Skidmore/ Old Town Historic District [9-30-1975]
- Kiernan Building Type 4 Demolition Review, City Council Final Findings and Decision [2009]
- Washington Park Reservoirs Type 4 Demolition Review, City Council Final Findings and Decision [2014]

Historic Landmarks Commission Design Advice Request

Department of Community Services
Transportation Division

August 19, 2024

Multnomah County

EARTHQUAKE READY BURNSIDE BRIDGE

When we last met...

DESIGN PHASE

- June 10th, 2024 – Joint Briefing to Historic Landmark Commission/ Design Commission
  - Provided a project update
  - Reviewed range of east approach bridge types
  - Provided overview of land use application timelines

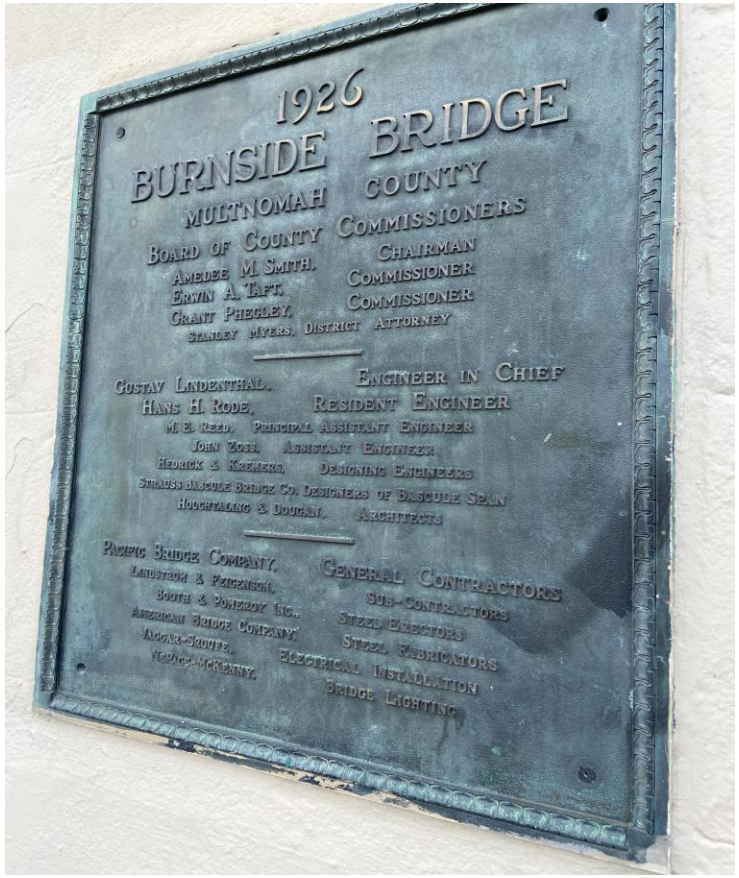
Agenda

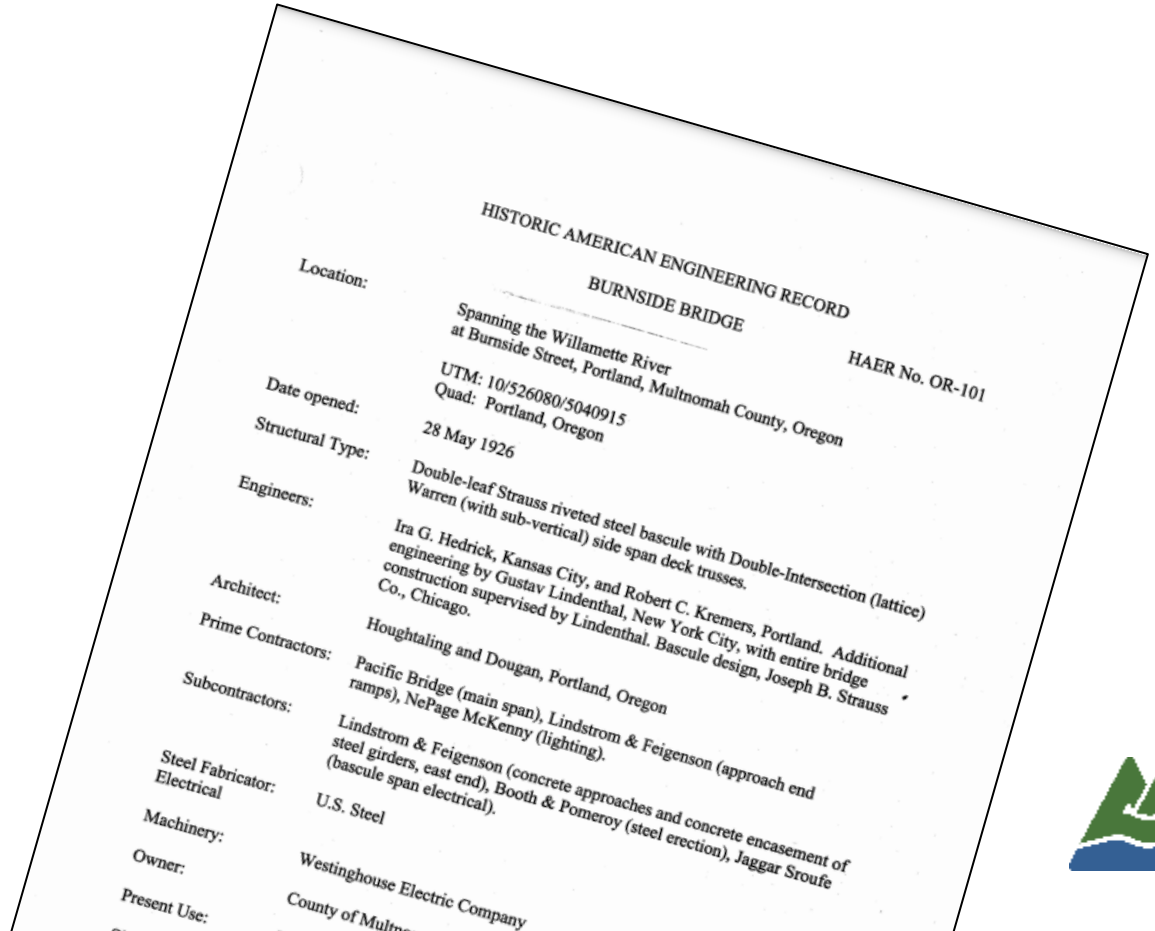
- Brief Background
- Project Features and Benefits
- Review of Mitigation Commitments
- Upcoming Land Use Reviews and Type IV Approval Criteria
- Discussion Questions

Brief Background

Brief Background

Multnomah County placed four bridges on the National Historic Register in 2012 as mitigation for adding a multi-use path on the Morrison Bridge.





HISTORIC AMERICAN ENGINEERING RECORD

BURNSIDE BRIDGE

HAER No. OR-101

Location: Spanning the Willamette River at Burnside Street, Portland, Multnomah County, Oregon
UTM: 10/526080/5040915
Quad: Portland, Oregon

Date opened: 28 May 1926

Structural Type: Double-leaf Strauss riveted steel bascule with Double-Intersection (lattice) Warren (with sub-vertical) side span deck trusses.

Engineers: Ira G. Hedrick, Kansas City, and Robert C. Kremers, Portland. Additional engineering by Gustav Lindenthal, New York City, with entire bridge construction supervised by Lindenthal. Bascule design, Joseph B. Strauss Co., Chicago.

Architect: Houghtaling and Dougan, Portland, Oregon

Prime Contractors: Pacific Bridge (main span), Lindstrom & Feigenson (approach end ramps), NePage McKenny (lighting).

Subcontractors: Lindstrom & Feigenson (concrete approaches and concrete encasement of steel girders, east end), Booth & Pomeroy (steel erection), Jaggar Sroufe (bascule span electrical).

Steel Fabricator: U.S. Steel

Electrical

Machinery: Westinghouse Electric Company

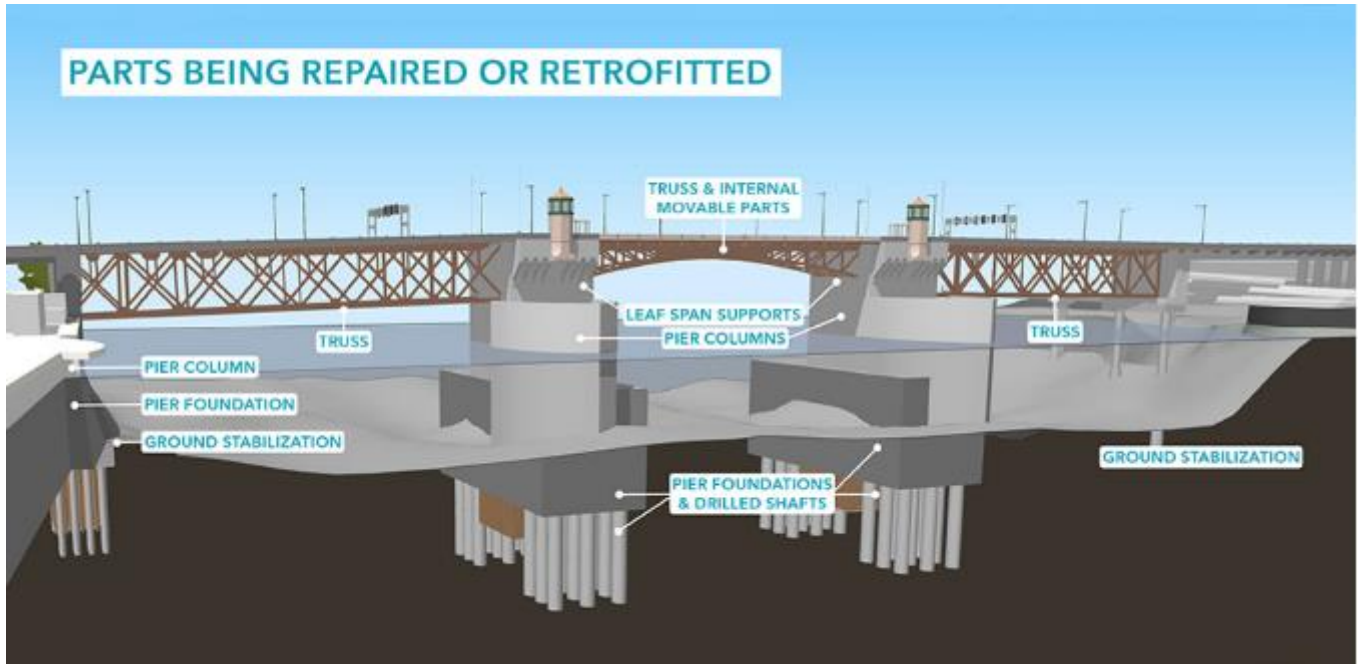
Owner: County of Multn

Present Use:

EARTHQUAKE READY BURNSIDE BRIDGE

Brief Background

As part of the Environmental Review Phase, the County evaluated and dismissed seismically retrofitting the existing bridge



Conclusion

- Same cost or more as a replacement
- Deteriorated bridge condition (95+ years old)
- Requires major structural modifications
- Remains a Section 106 Adverse Effect

Project Features and Benefits

Proposed New Burnside Bridge

Range of East Approach Bridge Types under Consideration

Proposed New Burnside Bridge

Range of East Approach Bridge Types under Consideration

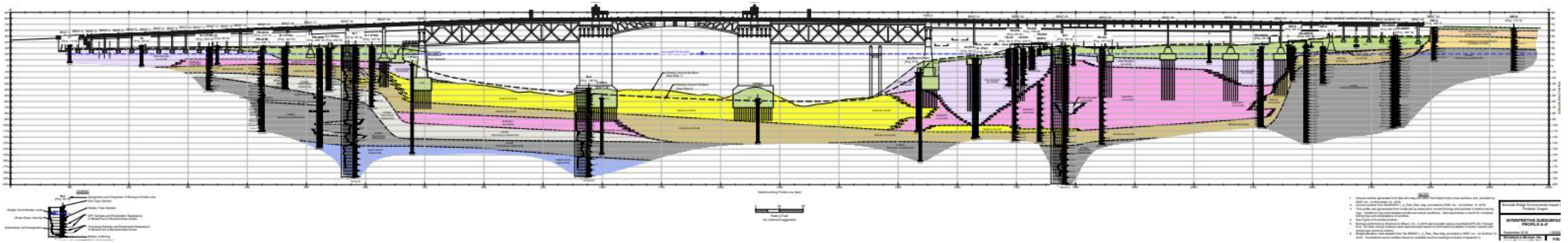
CS1- Goalpost tower | CS2- V tower | CS3- Inverted-Y tower

TA1-Unbraced vertical arches | TA2-Braced basket-handle arch | TA3- Braced vertical arches

Project Features and Benefits

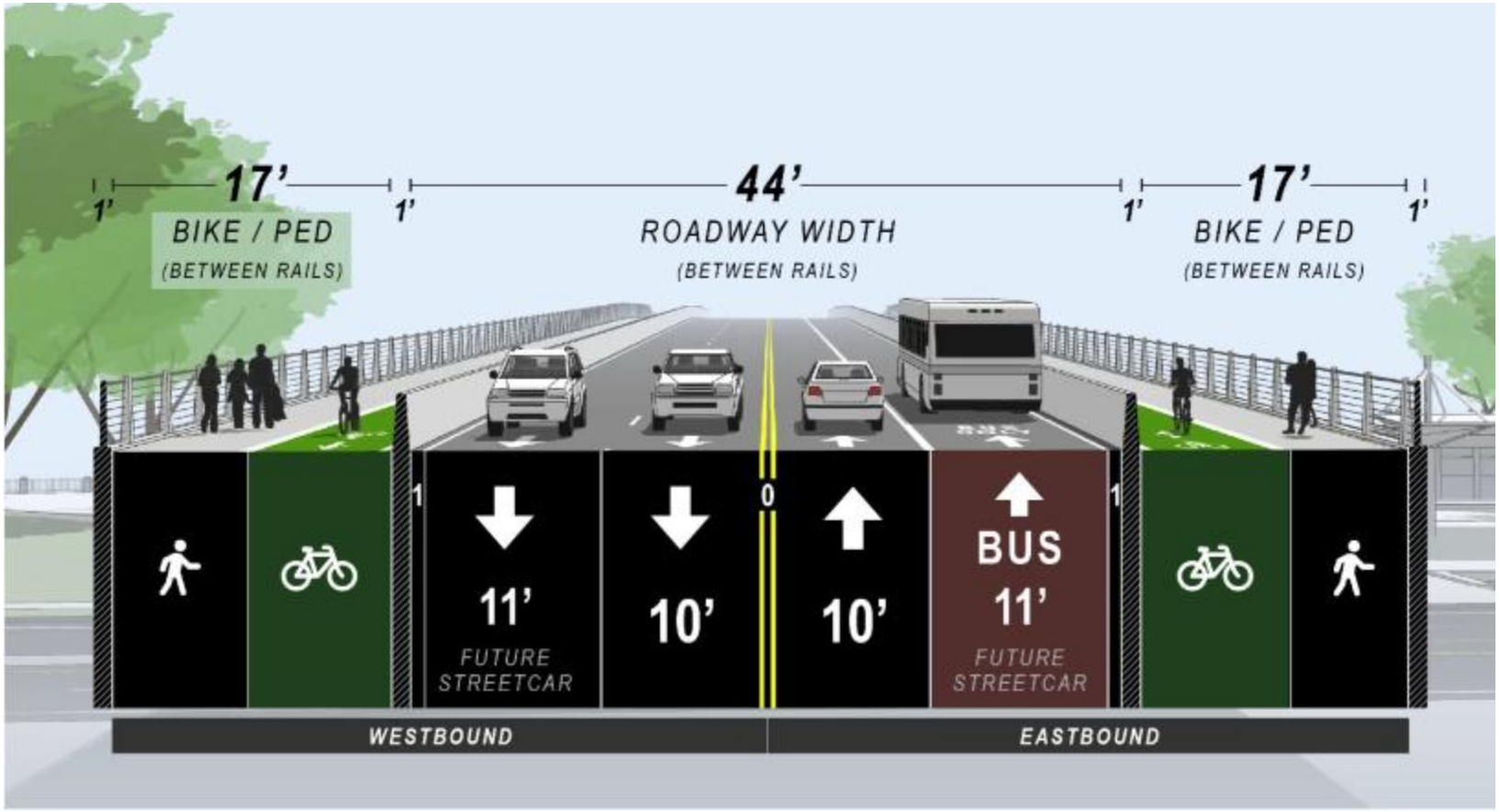
Seismically Resilient Willamette River Crossing

- The Project will build the first seismically resilient vehicular crossing in downtown Portland that will be immediately usable after a major earthquake.
- The new Burnside Bridge will support emergency relief efforts, reunite families, connect people to critical services, and serve an instrumental role in a faster, more efficient economic recovery for the region and state.



Project Features and Benefits

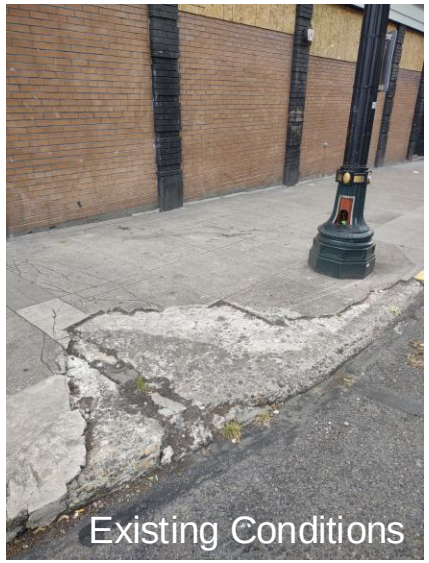
IMPROVED PEDESTRIAN, BICYCLE, TRANSIT FACILITIES ON BRIDGE

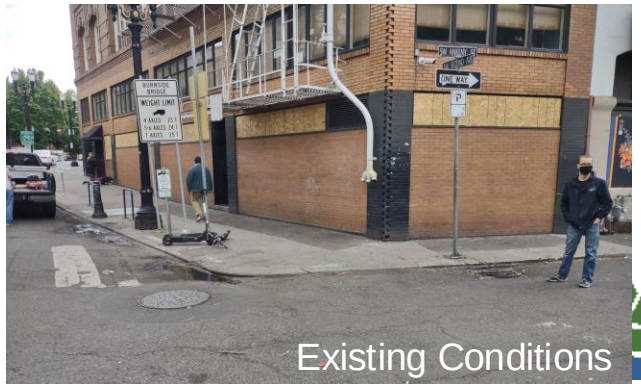


Proposed Typical Bridge Cross Section

Project Features and Benefits

IMPROVED PEDESTRIAN FACILITIES OFF BRIDGE

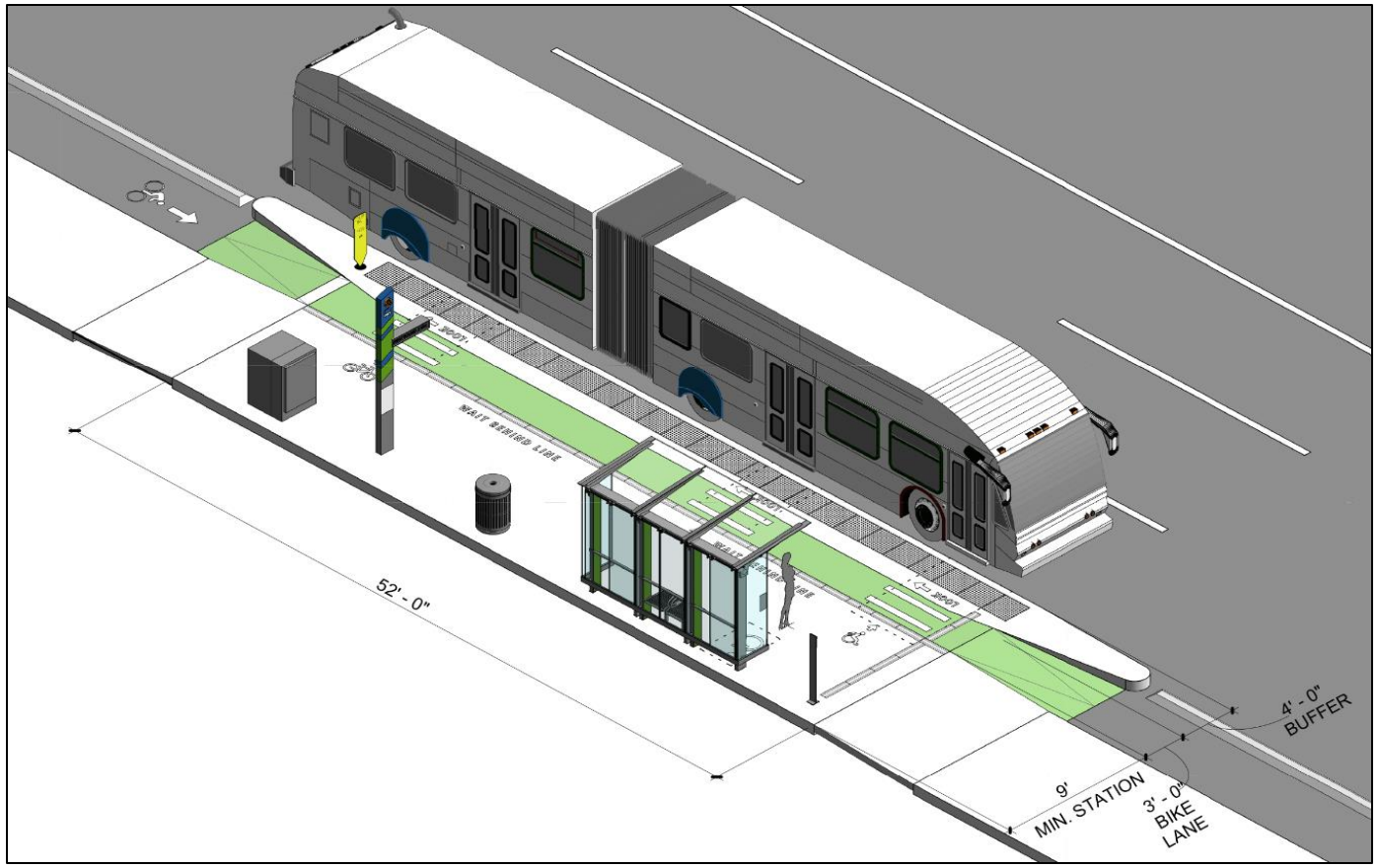




The project will add new or improved ADA-compliant sidewalks that connect to nearby transit facilities, creating safer, more comfortable access for people with disabilities.

Project Features and Benefits

IMPROVED TRANSIT FACILITIES OFF BRIDGE



Example of proposed bus stop currently under consideration

Project Features and Benefits

- The Project will reduce the amount of bridge Structure in Waterfront Park
- Reinforce pedestrian scale and orientation in the district.
- Reestablish the sense of the district in Waterfront Park and on Naito Parkway.
- Removes obstructions (exploring 1 or 2 supports) for greater pedestrian circulation and open feel

Existing condition in Waterfront Park

Review of Mitigation Commitments

Programmatic Agreement

Signatories

- Federal Highway Administration
- Oregon State Historic Preservation Office
- Oregon Department of Transportation
- Multnomah County
- Advisory Council on Historic Preservation

Key Findings: No adverse effect on any historic buildings

Purpose

- **Identifies** mitigation of adverse effects to the Burnside Bridge
- **Defines** an Archeological Identification, Monitoring, and Treatment Plan
- **Defines** minimization efforts for construction vibration
- **Identifies** stipulations for the protection and treatment of historic resources during construction

Consulting Parties Advisory Group

Purpose:

To advise the project on the implementation of mitigation commitments identified in the Programmatic Agreements

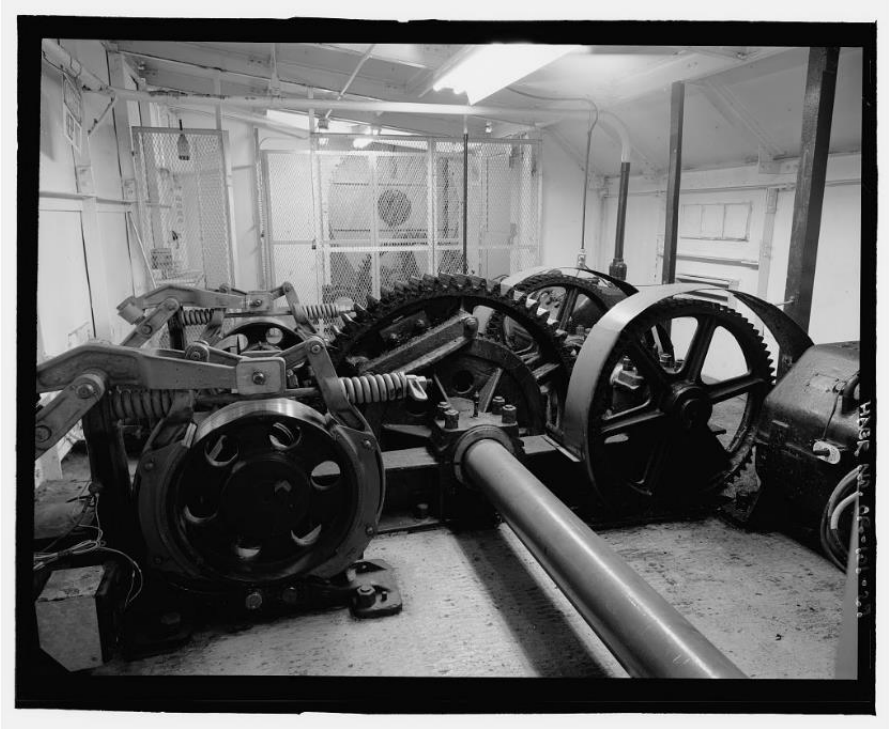
Invitees:

- Signatories: ODOT, FHWA, MultCo, ACHP
- Concurring Party: National Parks Service
- Confederated Tribes of the Grand Ronde
- Confederated Tribes of Siletz Indians
- Confederated Tribes of the Umatilla Indian Reservation
  Confederated Tribes of the Warm Springs Reservation
- Confederated Tribes and Bands of the Yakama Nation
- Cowlitz Indian Tribe
- Columbia River Inter-Tribal Fish Commission
- Architectural Heritage Center HistoricBridges.org
- Historic Bridge Foundation
- Japanese American Museum of Oregon
- New Traditional Architecture
- Oregon Black Pioneers
- Oregon Historical Society
- Restore Oregon
- Willamette Light Brigade
- Ed and Sharon Wortman

Section 106 Mitigation

Salvage and Reuse

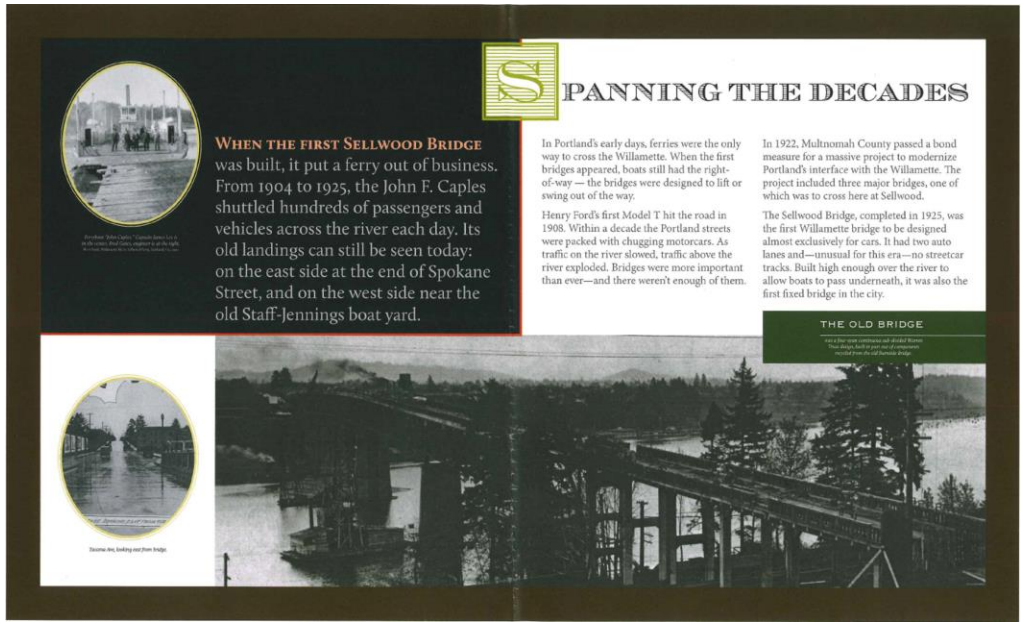
- Exploring options to salvage and reuse components of the current Burnside Bridge (examples: railings, mechanical components, etc.).



Section 106 Mitigation

Interpretive Displays

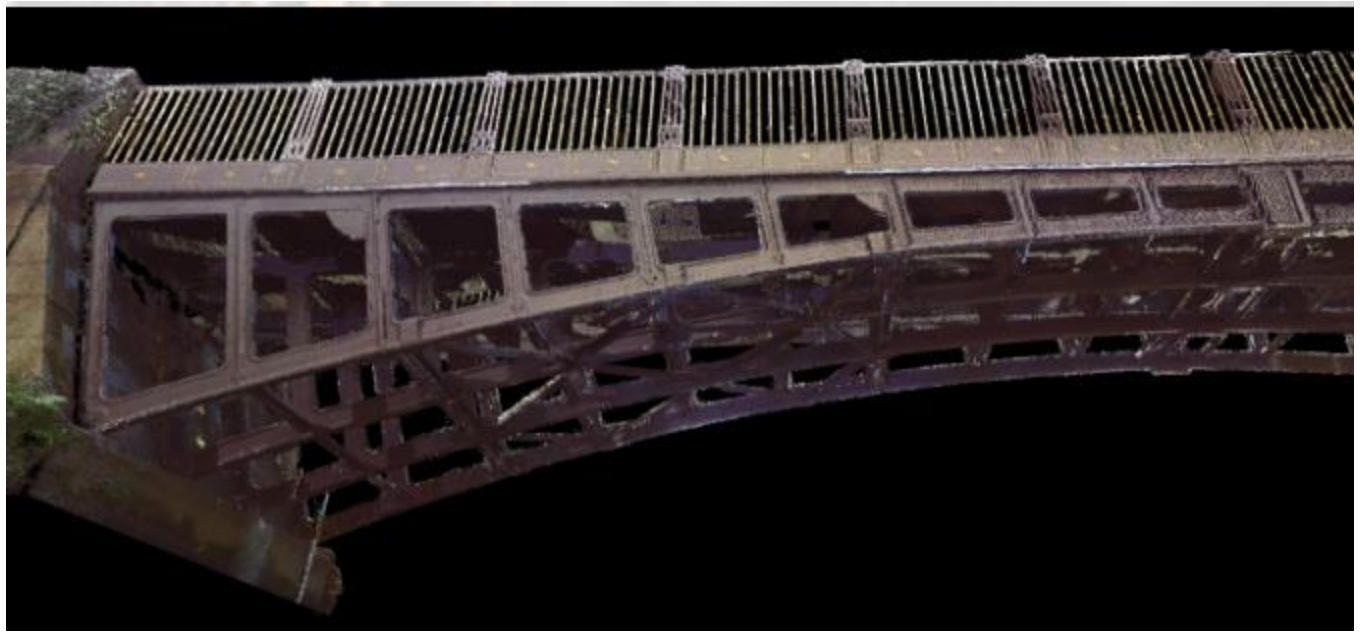
- Three displays (min) to be located on the bridge, focusing on the Burnside Bridge history and significance including social and civic importance.



Section 106 Mitigation

Three-Dimensional Scanning

- A three-dimensional scan will be made available to the public.



https://www.geoterra.co.uk/

Oregon State researchers work to preserve the past with 3D mapping of Silver Falls Lodge

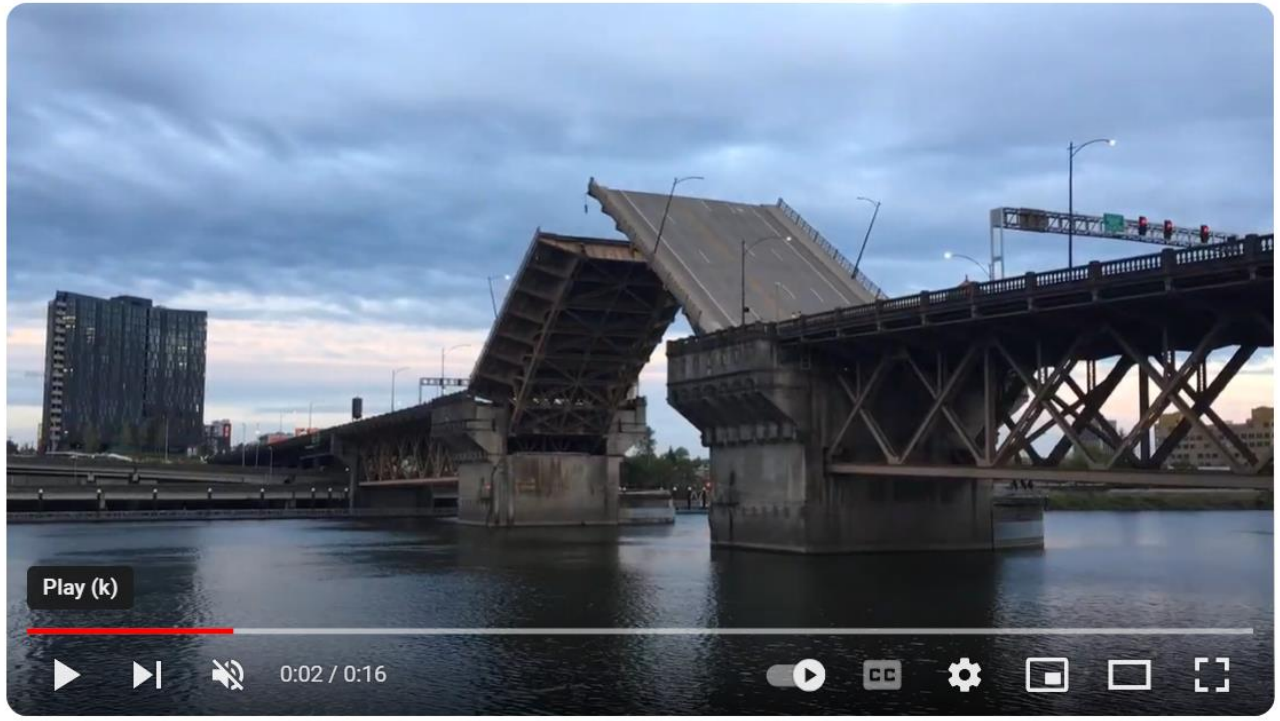
By Kristian Foden-Vencil (OPB)
May 4, 2024 6 a.m. **Updated:** May 13, 2024 4:21 p.m.

OSU student and staff fly a 3D mapping drone at Silver Falls State Park, April 24, 2024.
Kristian Foden-Vencil / OPB

Section 106 Mitigation

Video Documentation

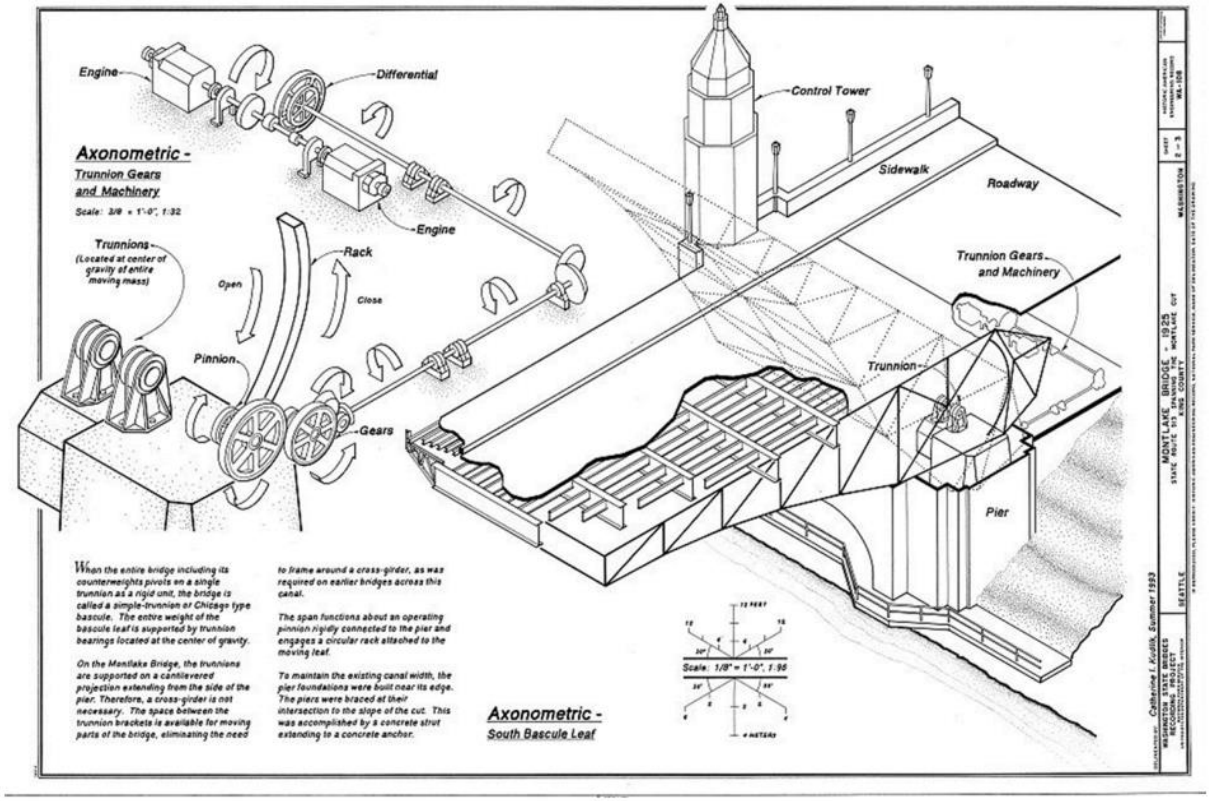
- Four videos (min) showing opening and closing operations, interior of the bridge cab and processes, internal bridge machinery in operation, and demolition and construction.



Section 106 Mitigation

Generate HAER Documentation

- Historic American Engineering Record (HAER) documentation details and requirements will be prescribed by National Park Service.



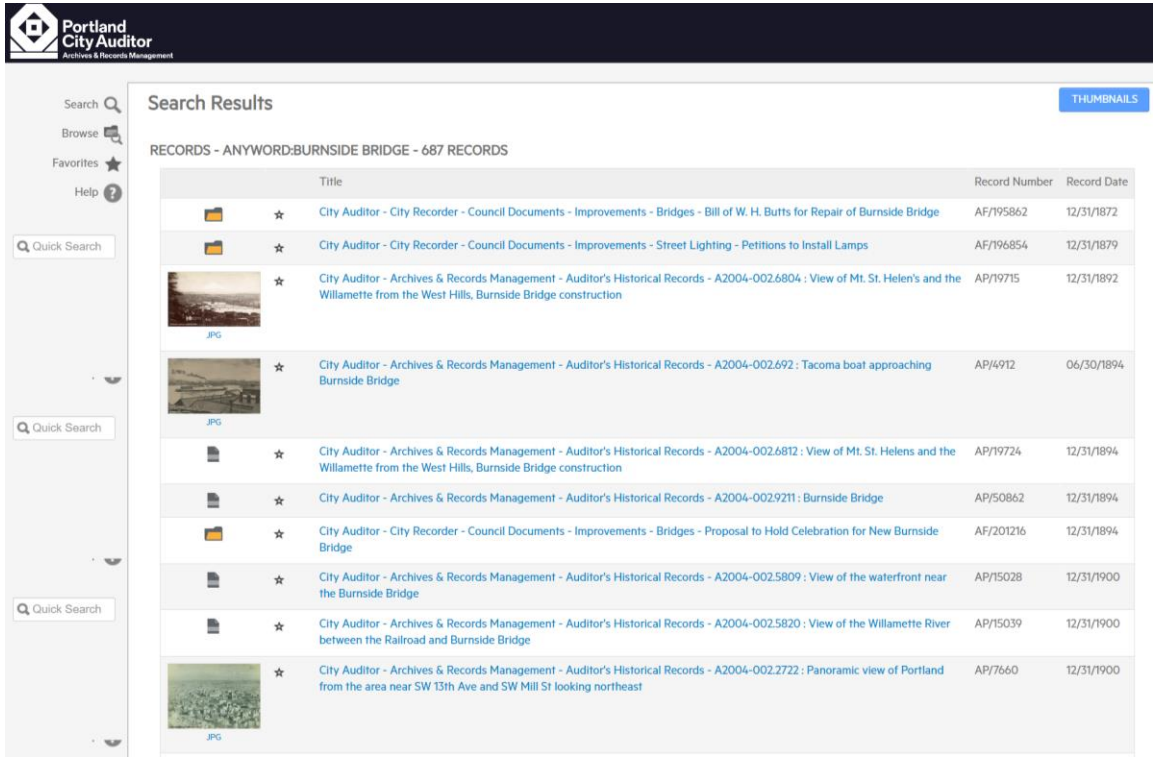
Example of HAER style drawings

Source: Courtesy Library of Congress

Section 106 Mitigation

Digitize Archival Records

- Inventory of manuscript and photographic holdings and review of unarchived materials resulting in digitizing and making new submissions to archive records for the Burnside Bridge.

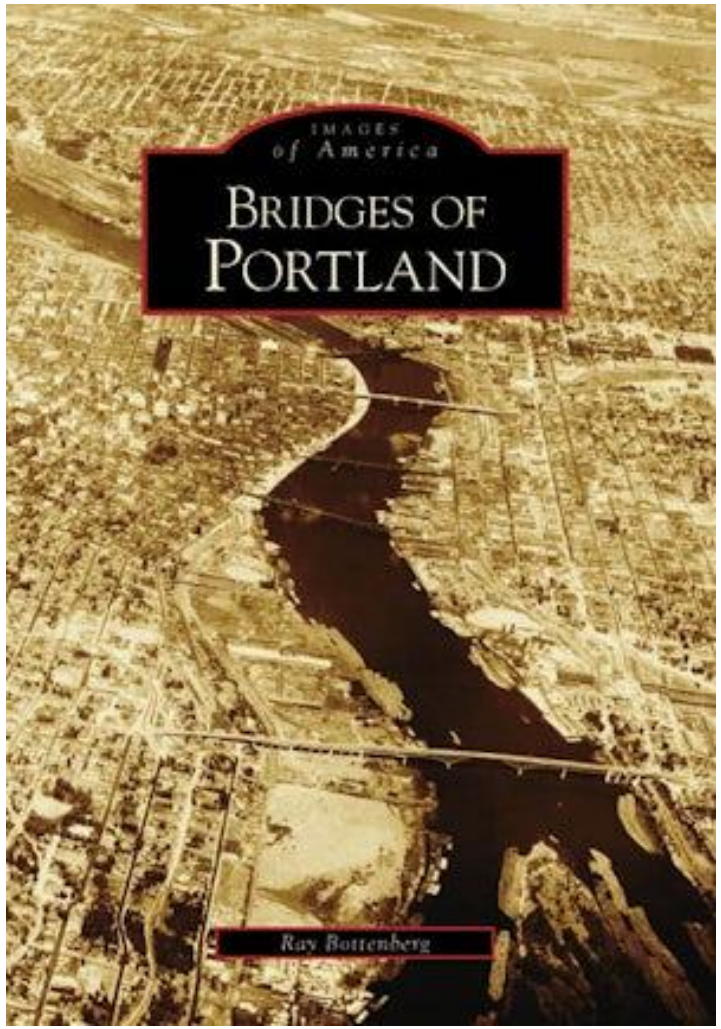


https://www.portland.gov/archives/archives

Section 106 Mitigation

Scholarly Publication

- Scholarly publication including history of lower Willamette River crossings addressing precontact crossings, ferries, and bridges, including historical themes and major chronological periods. The publication will also include documentation of the bridge's civic and social importance.

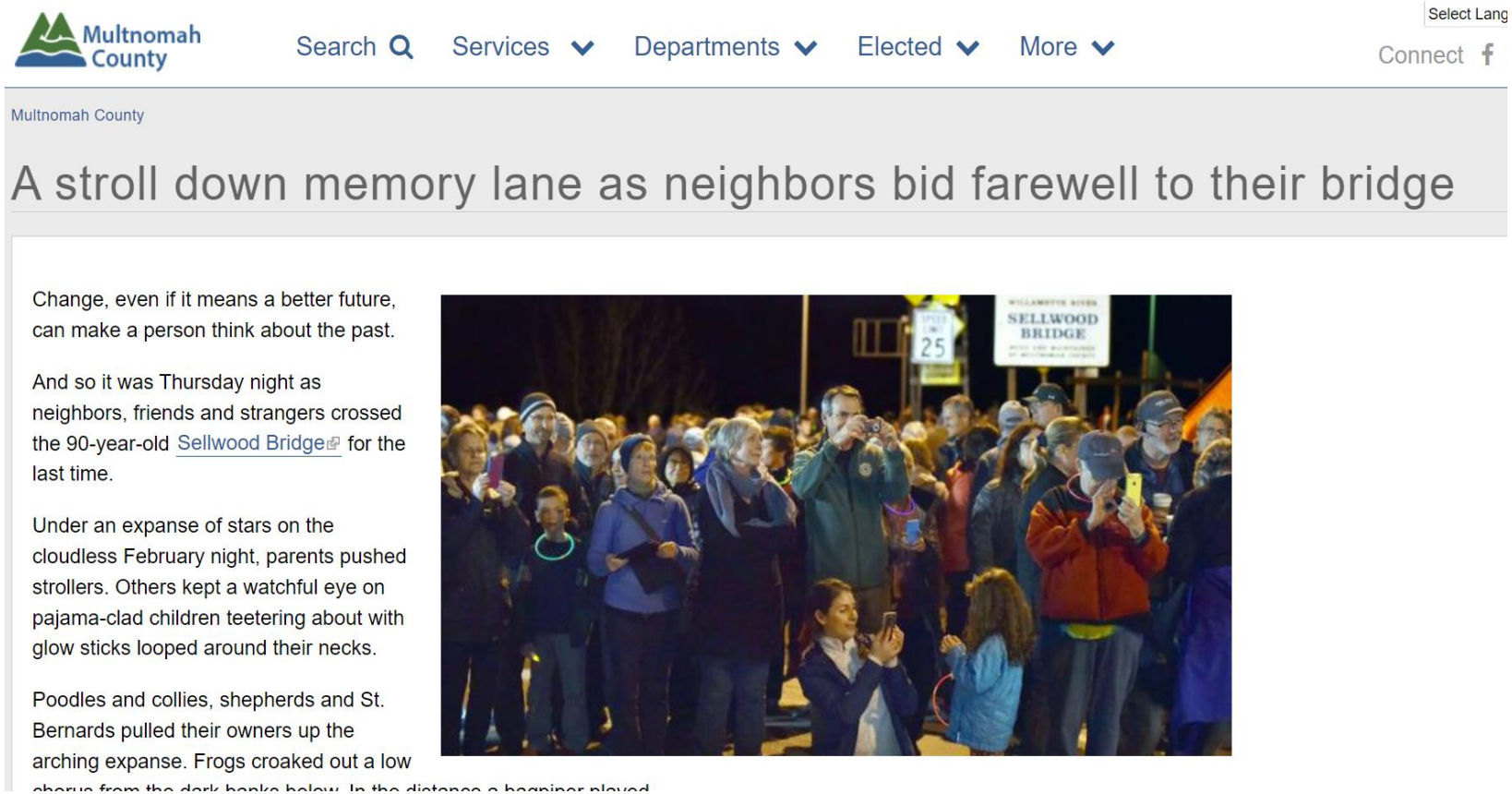


Bridges of Portland
By Ray Bottenberg

Section 106 Mitigation

Host Public Event Prior to Demolition

- A half-day event for the public will celebrate and acknowledge the history of the existing bridge.



Multnomah County

Search Services Departments Elected More Select Lang Connect

Multnomah County

A stroll down memory lane as neighbors bid farewell to their bridge

Change, even if it means a better future, can make a person think about the past.

And so it was Thursday night as neighbors, friends and strangers crossed the 90-year-old Sellwood Bridge for the last time.

Under an expanse of stars on the cloudless February night, parents pushed strollers. Others kept a watchful eye on pajama-clad children teetering about with glow sticks looped around their necks.

Poodles and collies, shepherds and St. Bernards pulled their owners up the arching expanse. Frogs croaked out a low

https://www.multco.us/multnomah-county/gallery/stroll-down-memory-lane-neighbors-bid-farewell-their-bridge

Section 106 Mitigation

3D Scale Model

- The model will be at a scale of 1:500, designed for public display, and fabricated of durable materials.

Made by feYerwerks

Section 106 Mitigation

Update Wikipedia Entry

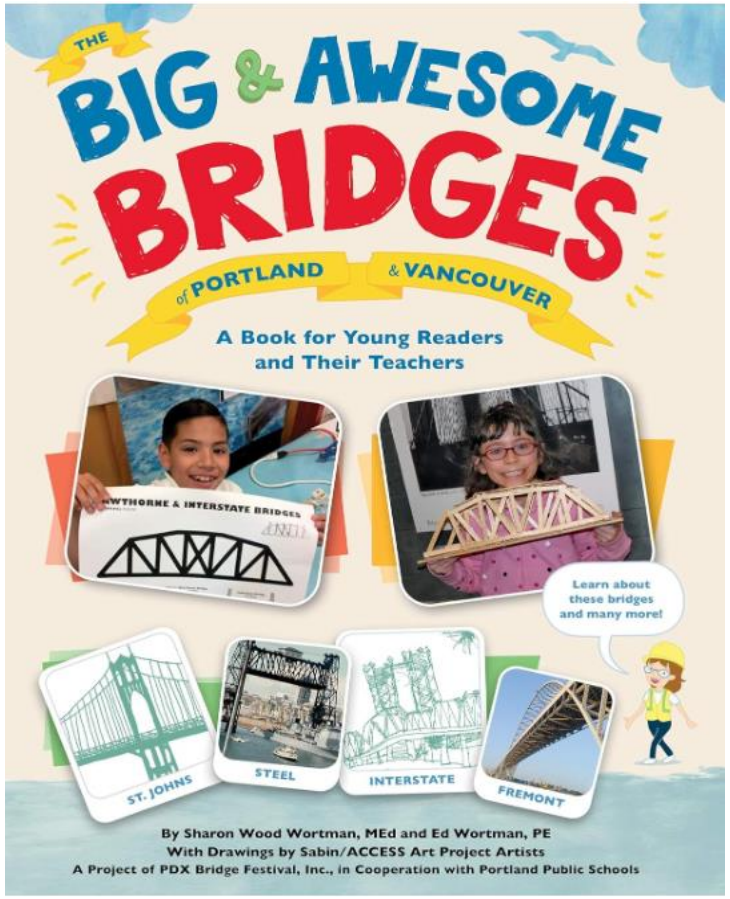
- Update the Wikipedia entry to include the broader social and cultural context, corrected links, and link to the Multnomah County Burnside Bridge website.

Update Oregon Encyclopedia Entry

- Develop an entry for the online Oregon Encyclopedia including the role of the Burnside Bridge and its significance.

Update *The Big and Awesome Bridges of Portland and Vancouver* book

- Develop an online pamphlet focusing on the replacement of the Burnside Bridge compatible with the format of The Big and Awesome Bridges of Portland and Vancouver book to be available to the public and educators.



Upcoming Land Use Reviews and Type IV Approval Criteria

Upcoming Land Use Reviews

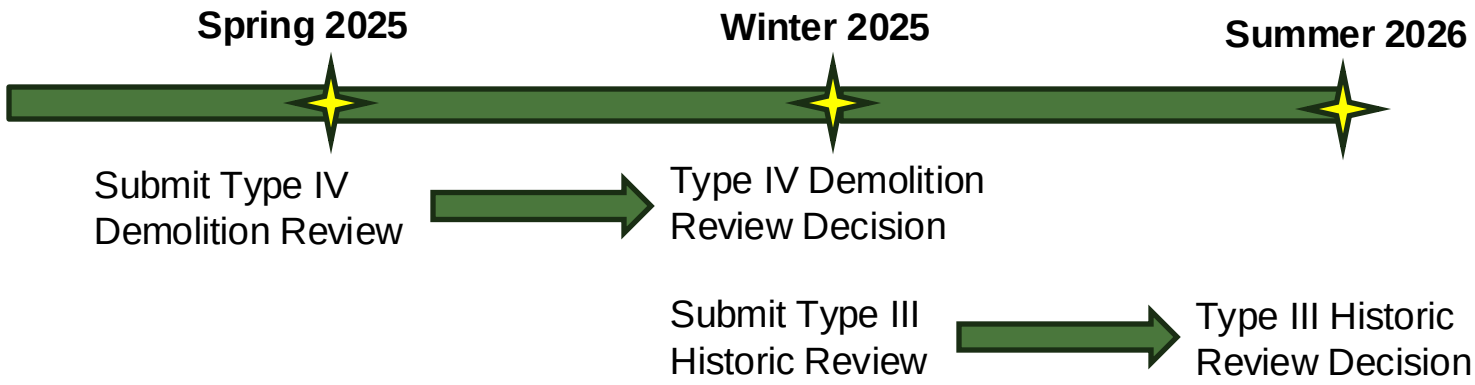
Type IV Demolition Review

- Required for demolition of the existing Burnside Bridge
- HLC provides a recommendation to the City Council

Focus of Today's DAR

Type III Historic Resource Review

- Required for proposed new bridge elements within the Portland Skidmore/Old Town Historic District
- Future Design Advice Request (DAR) with HLC
- HLC makes the decision



Type IV Demolition Review

APPLICABLE DOCUMENTS – APPROVAL CRITERIA

Portland Zoning Code section 33.846.080.C.1.a-f

Portland Comprehensive Plan 2035

Portland Central City 2035

SUPPORTING DOCUMENTS

National Register Nomination of Burnside Bridge (2012)

National Register Nomination for the Skidmore/ Old Town Historic District (1975)

Type IV 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 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. Historical value
   b. Economic consequences
   c Demolition Merits
   d. Re-development Merits
   e. Preservation Merits
   f. Proposed Mitigation

Type IV Demolition Review

APPLICATION NARRATIVE APPROACH

1. Describe the Project as it relates to demolition evaluation factors (1.a) through (1.f).
2. Determine which Comprehensive Plan and Central City Plan goals and related policies apply to this demolition request and how these policies relate to demolition evaluation factors (1.a) through (1.f).
3. Explain why, on balance, applicable Comprehensive Plan and Central City Plan goals and policies support the demolition and replacement of the Burnside Bridge.

Approval Criteria: 1.a Historical value

Factor 1.a	Approach
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	Demonstrate that impacts associated with demolishing this historic structure were thoroughly evaluated as part of the National Environmental Policy Act (NEPA) review process, including identification of mitigation.

Approval Criteria: 1.b Economic Consequences and 1.c Demolition Merits

Factors 1.b and 1.c	Approach
The economic consequences for the owner and the community; *The merits of demolition*	Demonstrate the benefit of replacement relative to a seismic retrofit as it relates to: • Use of public funds for long-term maintenance and repair costs over a 100-year service life • Reliability of performance during an earthquake, providing our community with the first seismically resilient vehicular bridge in downtown Portland

Approval Criteria: 1.d Re-development Merits

Factor 1.d	Approach
The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning	Focus on **functional improvements** of replacement bridge as presented earlier including: • Improvements to bike, ped, transit amenities both on an adjacent to bridge • Seismic resiliency

Approval Criteria: 1.e Preservation Merits

Factor 1.e	Approach
The merits of preserving the resource, taking into consideration the purposes described in Subsection A *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.*	Demonstrate that a Seismic Retrofit Alternative was thoroughly evaluated during the NEPA Phase

Approval Criteria: 1.f Demolition Mitigation

Factor 1.f	Approach
Any proposed mitigation for the demolition	Detail the mitigation commitments identified in the Section 106 National Historic Preservation Act Programmatic Agreement.

Comprehensive Plan and Central City Plan

2035 Comprehensive Plan Goals and Policies - Chapters

1: The Plan
2: Community Involvement
3: Urban Form
4: Design and Development
5: Housing
6: Economic Development
7: Environment and Watershed Health
8: Public Facilities and Services
9: Transportation
10: Land Use Designations and Zoning

"The particular policies that matter more will change from one decision to another. There is no set formula — no particular number of "heavier" policies equals a larger set of "lighter" policies. In cases where there are competing directions embodied by different policies, City Council may choose the direction they believe best embodies the plan as a whole." - *2035 Comprehensive Plan: How to Use the Plan*

Comprehensive Plan and Central City Plan

Five **Guiding Principles** to recognize that implementation of the Plan must be balanced, integrated and multi-disciplinary

- Economic Prosperity
- Human Health
- Environmental Health
- Equity
- Resilience

Discussion Questions

Questions

- Does the HLC have any concerns or recommendations regarding our overall **approach** to the Type IV application narrative?
- Are there specific **aspects of each factor** that the HLC would like to see highlighted in the application narrative?
- Are there certain Comprehensive Plan or Central City Plan **policies** or topics that the HLC would like to see considered in more detail in the application narrative?

33.846.080.C.1.a-f Approval Criteria Factors

(a) Historical value
(b) Economic consequences
(c) Demolition Merits
(d) Re-development Merits
(e) Preservation Merits
(f) Proposed Mitigation


Thank you

IN THE CITY COUNCIL OF THE
CITY OF
PORTLAND OREGON

IN THE MATTER OF AN APPLICATION
BY
Craig Lewis, Melvin Mark Companies
111 SW Columbia, Ste 1380
Portland, OR 97201

City Of Portland – The Portland Development Commission (Leased]
222 NW 5th Ave
Portland, OR 97209-3812

Kiernan Building, aka Dirty Duck Property
222 NW 5th Ave
Portland, OR 97209-3812

FOR A

Type 4 Demolition Review at 421-439 NW 3rd Avenue **LU 09-171258 DM**

FINDINGS AND CONCLUSIONS

ADOPTED BY THE CITY COUNCIL ON
March 3, 2010

(APPROVAL of a TYPE 4 Demolition Review)

IN THE CITY COUNCIL OF THE
CITY OF
PORTLAND, OREGON

IN THE MATTER OF AN APPLICATION
BY
Craig Lewis, Melvin Mark Companies
111 SW Columbia, Ste 1380
Portland, OR 97201

City Of Portland – The Portland Development Commission (Leased]
222 NW 5th Ave
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Kiernan Building, aka Dirty Duck Property
222 NW 5th Ave
Portland, OR 97209-3812

FOR A

Type 4 Demolition Review at 421-439 NW 3rd Avenue LU 09-171258 DM

FINDINGS AND CONCLUSIONS

The findings and conclusions of the City Council in this matter are set forth below.

I. GENERAL INFORMATION

Applicant: Craig Lewis, Melvin Mark Companies
111 SW Columbia, Ste 1380
Portland, OR 97201

City Of Portland – The Portland Development Commission (Leased]
222 NW 5th Ave
Portland, OR 97209-3812

Dirty Duck Property
222 NW 5th Ave
Portland, OR 97209-3812

Representative: John Smith, Joe Pinzone, SERA Architects, 503-445-7350
338 NW 5th Ave
Portland OR 97209

Site Address: 421-439 NW 3rd Avenue

Legal Description: BLOCK 25 LOT 5&8 LAND & IMPS SEE COUCHS ADD BLOCK 25; LOT 5&8; LAND & IMPS, COUCHS ADD

Tax Account No.: R180201710
State ID No.: 1N1E34CA 00300
Quarter Section: 2929

Neighborhood: Old Town-China Town, contact Carol McCreary at 503-984-4081.
Business District: Old Town Chinatown Business Association, contact Dorian Yee at 503-224-7066.
District Coalition: Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.

Plan District: Central City - NW Triangle
Other Designations: Contributing Building in the Chinatown/Japantown National Register Historic District

Zoning: CXd Central Commercial with design overlay

Case Type: DM - Demolition Review
Procedure: Type IV, following a public meeting before the Landmarks Commission there will be a hearing before City Council. The Landmarks Commission may offer comments or suggestions, in the form of a letter or testimony, to City Council. City Council makes the final decision on this matter.

II. INTRODUCTION AND PROCEDURAL HISTORY

Original Proposal:
The applicant requests Demolition Review approval for the demolition of the Historic Kiernan Building, a contributing structure in the Chinatown/Japantown National Register Historic District.

Demolition of the building is intended to allow for the construction of a new 3 to 4 story residential group living and soup kitchen building of the same 1/4 –block footprint, to serve the new Blanchet House of Hospitality. The existing Blanchet House of Hospitality, the only other remaining building on Block 25, is a primary contributing structure within the Historic District.

Because the proposal is to demolish a Contributing Building in the Chinatown/Japantown National Register Historic District, a Type IV Historic Design Review is required.

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:

- Section 33.846 Historic Design Review
- Section 33.846.070 Demolition Review

Procedural History:
The applicant submitted the current Type 4 application on November 13, 2009 and it was deemed complete on December 4, 2009. A "Notice of Proposal in Your Neighborhood" was mailed on December 18, 2009 to surrounding property owners and recognized organizations. No written responses were received from either the Neighborhood Association or notified property owners in response to the proposal prior to the Portland Historic Landmarks Commission meeting on January 11, 2010. Written

comments were submitted to the Commission [Exhibits H.1-H.5]. The City Council held a public hearing on the proposal on February 3, 2010 and additional written comments were submitted to the City Council at the hearing [Exhibits I.1-I.9]. At the February 3, 2010 hearing, the record was closed, and the applicant extended the 120-day clock for an additional 30 days to March 14, 2010. On February 3, 2010 the Council tentatively approved demolition of the Kiernan Building and continued the matter to February 24, 2010 for a final vote. At the February 24, 2010 hearing, Council postponed the adoption of findings to March 3, 2010, recommending approval as its decision and approved the demolition review.

III. ANALYSIS

Site and Vicinity:
The subject site lies within the Portland New Chinatown/Japantown Historic District, which was listed in the National Register of Historic Places on November 21, 1989. For ease of reference the shortened name Chinatown/Japantown Historic District will be used in the remainder of this report. The district documentation was prepared by John Southgate on behalf of the Portland Development Commission. The nomination was vetted by the State Historic Preservation Office, reviewed and forwarded by the governor-appointed State Advisory Committee on Historic Preservation, and accepted by the Keeper of the National Register

The National Register defines a Historic District as “"a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. In addition, historic districts consist of contributing and non-contributing properties. Historic districts possess a concentration, linkage or continuity of the other four types of properties. Objects, structures, buildings and sites within a historic district are usually thematically linked by architectural style or designer, date of development, distinctive urban plan, and/or historic associations."

Located on the west side of the Willamette River, the district lies in an older commercial, industrial, and transportation center, between NW Glisan and W Burnside, streets that connect respectively to the Steel and Burnside Bridges. NW Fourth Avenue forms the spine of the district. The Portland Skidmore-Old Town Historic District (Old Town), listed on the National Register of Historic Places on Dec 6, 1975 and as a National Historic Landmark on May 5, 1977, overlaps the southeastern corner of the district. The shared area is the eastern half of the blocks bounded by Burnside, Third, Davis, and Fourth, plus the southeastern quarter of the block bounded by Davis, Third, Everett, and Fourth.

The Chinatown/Japantown Historic District is a ten block area bounded by W Burnside Street to the south, NW Fifth Avenue to the west, NW Glisan to the north, and NW Third Avenue to the east. The majority of buildings within the district are used commercially or industrially, however, some buildings also contain residential units. At the time of the district’s nomination to the National Register, there were 45 buildings, two features and five vacant properties within the district. There are buildings by notable Portland architects within the district which date from the historic period, 1880-1943. There are 14 buildings dating from the first period of significance (l880-1909), 15 buildings dating from the second period (l910-1943), 9 historic non-contributing buildings, 4 compatible noncontributing buildings, 3 non-compatible non-contributing buildings, and 5 vacant lots. There are also two features [not building structures] within the district, the Simon Building facade, dating from the primary period, and the Chinatown/Japantown Gateway, constructed after the historic period. The district is significant in the

National Register Nomination Form under criterion A for its historical associations and American History, and C for its design and construction. The district's areas of significance noted in the National Register nomination are Asian Ethnic Heritage, Industry, Commerce and Architecture.

According to the National Register nomination "The Chinatown/Japantown Historic District is nationally significant under Criterion A for its history as the largest and most intact Chinatown in Oregon. It is locally significant as the largest remaining and most viable example of the Chinese ethnic community in Portland. As the City of Portland developed into a major seaport and railroad center, the use of this area changed from residential to commercial and industrial. Chinatown was the major Chinese immigration center in the state and represents the Chinese who lived and worked in the area. The Chinatown/Japantown Historic District portrays the traditional nature of Chinese social, political, cultural, and economic organizations. The majority of the buildings in the district were designed and built by some of Portland's best architects and builders of the period 1880-1943. The last date marks the year that Chinese were allowed to become naturalized citizens, and granted the right to vote and legally own land in the United States."

The one-story commercial Kiernan Building is rectangular in plan and has a flat roof. The corbelled brick cornice projects over a drip frieze. The building is constructed of buff brick in a common bond pattern. The main entrance, supported with a metal post, is recessed and cuts diagonally across the northeast comer of the building. The east elevation is divided into six bays. The northern bay consists of fixed pane storefront windows with diagonal board shutters, a brick bulkhead, and double entrance doors at the corner. The storefront windows on the adjacent bay to the south, have been boarded over and the transoms covered with diagonal boarding. A garage door has replaced the storefront and transom windows in one of the central bays. The storefront windows in the southern two bays have been covered with diagonal boarding and the brick bulkhead has been sandblasted. The transoms on this facade have been covered over. The north elevation is divided into three major sections. The windows in the eastern bay have been altered to large fixed pane mirrored glass windows flanked by shutters. A door with an arched label mold is located between the two storefront windows. The bulkhead is brick. Original multi-paned storefront windows and an entrance door with transom are located in the central bay and a large paneled garage door is in the west portion of the bay. The western bay is comprised of multi-paned storefront windows and transoms. A door is in the east end of this bay.

The building was designed in 1916 by the architectural firm of MacNaughton and Raymond for Frank Kiernan and built for $7,000. Prior to purchase by Kiernan Investment Company, the property was owned by the Morgan Land Company. Frank Kiernan retained ownership of the property until his death in 1943. The present owner, Mildred Schwab, purchased the building in 1967 from Kiernan's family. E.B. MacNaughton was born in Cambridge, Massachusetts on October 22, 1880. After graduating from MIT in 1902, MacNaughton came to Portland the following year and worked for Portland architect, Edgar Lazarus from 1903 to 1906. MacNaughton then formed a partnership with H.E. Raymond, his brother-in-law, and Ellis F. Lawrence. The partnership prospered with MacNaughton working as business manager, Raymond as engineer, and Lawrence as architect. They were responsible for many substantial architectural projects in Portland.

In 1911, MacNaughton and Raymond formed a corporation which lasted until 1919. MacNaughton was owner of the capital stock. It was during this association that the Kiernan Building, as well as Marshall Wells Warehouse #2, was constructed. MacNaughton gradually worked into managing and developing properties. In 1918,

MacNaughton joined with Robert H. Strong, manager of the Corbett Estate, to establish the firm of Strong and MacNaughton. This firm was responsible for design and construction of three buildings in Chinatown Resources Nos. 8, 9 and 31. The firm existed until 1925 when MacNaughton began his banking career as vice-president of Ladd and Tilton Bank, later the First National Bank. MacNaughton died in Portland in August of 1960.

Although constructed as a light industrial building, there were two small storefronts in the northeast corner of the building that contained a variety of tenants. One of the original businesses was Roy Cherkezoff & Sons Confectionery (1917-1944). The Western Machine Works (1916-1944), which manufactured punches, dies, and stamped sheet metal, occupied another portion of the building. The 1926 Sanborn Insurance Map indicates that Western Tool and Die Works, operated by Andy Fritz, shared the space with Western Machine Works. The western portion of the building contained the Portland Welders Supply Company (1924-1944). Edwin Frank Platt was president of the family owned company. Other businesses known to have occupied the building were a branch office of Air Reduction Sales Company and Western Union Telegraph Company (1920-1943).

The building is considered to be contributing within the district during its secondary period of significance because of its association with architects MacNaughton and Raymond. From existing research, the building does not appear to be directly associated with the Chinese community through ownership or occupancy.

Zoning:
The Central Commercial (CX) zone is intended to provide for commercial development within Portland's most urban and intense areas. A broad range of uses is allowed to reflect Portland's role as a commercial, cultural and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape.

Historic Resource Protection Overlay Zone [d-overlay] is intended to ensure the conservation and enhancement of the special characteristics of historic resources. This protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties

Land Use History:
City records indicate no prior land use reviews, but two recent applications for the site:
- EA 09-143543 – Pre-Application Conference, Exhibit G.3
- EA 09-143556 – Design Advice Request for Demolition of the Kiernan Building/Dirty Duck Tavern, Exhibit G.4

Agency Review:
A "Request for Response" was mailed **December 18, 2009**. The following Bureaus have responded with no issues or concerns:

- Bureau of Environmental Services
- Bureau of Transportation Engineering
- Water Bureau

• Site Development Section of BDS

Neighborhood Review:
A Notice of Proposal in Your Neighborhood was mailed on December 22, 2009.

IV. ZONING CODE APPROVAL CRITERIA AND FINDINGS

Historic Design Review
Chapter 33.445, Historic Resource Protection Overlay Zone, and
Chapter 33.846, Historic Reviews

33.445.010 Purpose of Historic Design Review
Historic Design Review ensures the conservation and enhancement of the special characteristics of historic resources. This chapter protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties

33.445.030 Types of Historic Resource Designations and Map Symbols
C. Historic District. This type of resource is a collection of individual resources that is of historical or cultural significance at the local, state, or national level. Information supporting a specific district's designation is found in the City's Historic Resource Inventory, its National Register nomination, or the local evaluation done in support of the district's designation.

33.445.330 Demolition of Historic Resources in a Historic District
Demolition of other historic resources within a Historic District requires demolition review to ensure their historic value is considered. The review period also ensures that there is an opportunity for the community to fully consider alternatives to demolition.

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

33.846.010 Purpose
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

A. Purpose. Demolition review protects resources that have been individually listed in the National Register of Historic Places and those that have been classified as contributing in the analysis done in support of a Historic District's creation. It also protects Historic Landmarks and Conservation Landmarks that have taken advantage of an incentive for historic preservation and historic resources that

have a preservation agreement. Demolition review recognizes that historic resources are irreplaceable assets that preserve our heritage, beautify the city, enhance civic identity, and promote economic vitality.

B. Review procedure. Demolition reviews are processed through a Type IV procedure.

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. Denial of a demolition permit would effectively deprive the owner of all reasonable economic use of the site; *or*

2. Demolition of the resource has been evaluated against and, on balance, has been found supportive of the goals and policies of the Comprehensive Plan, and any relevant area plans. The evaluation may consider factors such as:
   a. The merits of demolition;
   b. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
   c. The effect demolition of the resources would have on the area's desired character;
   d. The effect that redevelopment on the site would have on the area's desired character;
   e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
   f. Any proposed mitigation for the demolition

   Findings: The site is designated a contributing resource with a National Register Historic District. Therefore, demolition of the existing building requires Demolition Review approval.

The applicant has chosen to address Approval Criteria 2, therefore, the proposal has been evaluated against the:

1. **Comprehensive Plan Goals and Policies document [Oct 1980/July 2006];**
2. **Central City Plan document [March 1988];**
3. **The Chinatown/Japantown National Register Historic District [National Park Service, Sept 1989];**
4. **The Old Town/Chinatown Vision and Development Plans [1997, 1999, 2003]; and**
5. **Home Again – A 10-year plan to end homelessness in Portland [2004].**

In order to be approved, the proposal must be evaluated against and, <u>on balance</u>, found to be in support of the Comprehensive Plan and other relevant area plans.

The Council has broad discretion in establishing how to balance the relevant goals given a particular proposal and that property's location in a particular historic district. No code provision or city policy requires the Council to give equal weight in the balancing process to every Comprehensive Plan goal, nor does anything mandate that equal weight be given to every goal and policy found in other relevant area plans. The Council has the authority to give certain relevant goals and policies more weight and other relevant goals and policies less weight in reaching its final decision as to whether the proposal, on balance, supports the Comprehensive Plan and other relevant area plans.

Because a "balancing" test is required, the Approval Criteria are organized in the following way:

Pg. 9-19: Portions of the Proposal found to be in support of the Approval Criteria
Pg. 20-22: Portions of the Proposal <u>not</u> found to be in support of the Approval Criteria
Pg. 22-23: Summary

Portions of the Proposal found to be in support of the Approval Criteria

I. PORTLAND COMPREHENSIVE PLAN

GOAL 1: METROPOLITAN COODINATION
The Comprehensive Plan shall be coordinated with federal and state law and support regional goals, objectives and plans adopted by the Columbia Region Association of Governments and its successor, the Metropolitan Service District, to promote a regional planning framework.

Findings: *This criteria is not applicable.*

GOAL 3: NEIGHBORHOODS
Preserve and reinforce the stability and diversity of the City's neighborhoods while allowing for increased density in order to attract and retain long-term residents and businesses and insure the City's residential quality and economic vitality.

The proposed project is supportive of this goal and contributes towards the following associated policies and objectives: Social Conditions, Neighborhood Diversity and Neighborhood Involvement.

The proposal will provide needed neighborhood social services including providing no-cost daily meals to the homeless/low-income and providing no-cost housing to those recovering from alcohol and drug dependencies. The new facility will also allow the opportunity to provide for a chapel, library, health and other social services. Neighborhood involvement was extensive in informing the siting of the proposal. Furthermore, the projects program, including the decision to provide internal guest queuing, was driven by a public involvement process that resulted in the Old Town/Chinatown Plan. This process allowed residents and businesses the opportunity to have active input in the promotion and development of their neighborhood.

In providing supportive housing opportunities and community services, the project is able to protect and improve the livability and diversity of the neighborhood. The development of this project will also help foster the development of a complete neighborhood that supports business growth and employment opportunities within it. The mixture of supportive housing and services will provide opportunities to nurture and promote the growth of a diverse community.

This criteria is therefore met.

GOAL 4: HOUSING

Enhance Portland's vitality as a community at the center of the region's housing market by providing housing of different types, tenures, density, sizes, costs, and locations that accommodate the needs, preferences, and financial capabilities of current and future households.

Findings: The proposed project is supportive of this goal and contributes towards the following associated policies and objectives; Housing Availability, Sustainable Housing, Housing Safety, Housing Quality, Balanced Communities, Fair Housing, Housing Diversity, Housing Affordability, Housing Continuum and Neighborhood Stability.

The City of Portland's housing policies for downtown call for the preservation of units supporting very low income and special needs populations. A key feature of the development proposal agreement with the Portland Development Commission calling for the demolition of the Kiernan Building/Dirty Duck Tavern is that the housing portion of the new development will be subject to City Chapter 30.01, Ordinance 172259:

> ***30.01.090 City Subsidy Properties - Long-Term Affordability Requirements***
> ***A.*** *Properties that in the future request and receive a City subsidy from PDC or other City bureau or agency for the purpose of creating or preserving rental housing affordable to households below 80% of median family income, will be subject to a minimum of 60 year affordability contract requirements developed by PDC consistent with the implementing charge in 30.01.090 B.*
>
> ***B.*** *All City Bureaus and agencies administering affordable rental housing subsidy programs will be responsible for implementing this section. As the primary agency charged by the City to negotiate and confer affordable housing subsidies, PDC will develop implementing strategies consistent with the 60 year affordability principles contained in this section, the Administrative Procedures Implementing Title 30.01 and the approved 1998/99 Consolidated Plan, Principle III (Ordinance No. 172259).*

Recent and on-going development in the city has caused the loss of such housing through the conversion, demolition and re-development of properties, which have traditionally served this population. This project is the result of the efforts to develop housing and services to replace those units lost in Portland's neighborhoods and to qualitatively improve the living standard for low income and special need individuals.

The proposal will provide housing for very low-income people. The housing program's primary goal will be to provide an enriched living environment for independent tenants that require services, while providing a safe and stable environment. The proposal's goal is to assist residents through improved socialization space and amenities within the residential space of the building and to create a safe and stable housing asset. These services are critical to creating a balanced community and effective transitional housing. A safe and healthy built environment is dependent upon housing that serves all of Portland's citizens; at all income levels. This housing option provides the homeless population access to a transitional program that could eventually lead to permanent housing.

The development of a new and larger proposal will certainly enhance and upgrade the city's affordable housing stock, bring new life and activity to the streetscape and enhance the Old Town/Chinatown neighborhood by returning vibrancy and life to

this area. The vitality of the neighborhood is contingent on quality housing. The housing component will be designed to suit the needs of a specific population through the use of resource efficient design. This provides all residents with housing that has access to sunlight, fresh air and at the same time is accessible, safe and inviting.

This criteria is therefore met.

GOAL 5: ECONOMIC DEVELOPMENT
Foster a strong and diverse economy which provides a full range of employment and economic choices for individuals and families in all parts of the city.

5.1 Urban Development and Revitalization
Encourage investment in the development, redevelopment, rehabilitation and adaptive reuse of urban land and buildings for employment and housing opportunities.

Findings: The proposed project is supportive of this goal and contributes towards the following associated policies and objectives: Revitalization, Community-Based Economic Development, Infrastructure Development and Area Character and Identity within Commercial Areas.

The Old Town/Chinatown Development Plan, adopted in 1999, established the framework to restore economic vitality in the District by calling for a concentration of new development adjacent to the Classical Chinese Garden, maintaining its rich diversity and reducing the barriers at the district edges. The proposal promotes these objectives by strengthening the Northern gateway to the district, providing an array of necessary social services and improving the perception of pedestrian 'safety'. The current queuing of persons on sidewalks creates discomfort and conflict for other pedestrians. With the proposed redevelopment, meal lines will be located within the building, therefore improving the pedestrian experience and strengthening the opportunities for economic development. A safe and active street will enhance the character of the neighborhood and promote future development.

The proposed redevelopment provides needed investment in the revitalization of an urban cultural/business district and has the ability to foster further economic development, local jobs and tourism. The project has the ability to serve as a catalyst to generate new interest, investment, and revenue in Council-designated Urban Renewal Area. The project provides a diversity of housing and social service opportunities to meet the varied needs of individuals in this neighborhood. This project is an important step for Portland's commitment to end homelessness.

The proposed redevelopment has garnered consensus at the community and neighborhood levels which has been bolstered by public involvement and neighborhood support. The Old Town/Chinatown Development Plan, as adopted by City Council in 1999, indicates the demolition of the 'Dirty Duck' property for new development potential including the existing Blanchet House facility.

This criteria is therefore met.

GOAL 6: TRANSPORTATION
Develop a balanced, equitable, and efficient transportation system that provides a range of transportation choices; reinforces the livability of neighborhoods; supports a strong and diverse economy; reduces air, noise, and water pollution; and lessens reliance on the automobile while maintaining accessibility.

Findings: *This criteria is not applicable.*

GOAL 7: ENERGY
Promote a sustainable energy future by increasing energy efficiency in all sectors of the city by ten percent by the year 2000.

Findings: The proposed project is supportive of this goal and contributes towards the following associated policies and objectives; Energy Efficiency in Residential Buildings and Waste Reduction and Recycling.

Utilities are the single largest expense for the existing Blanchet House and can be upwards of $50,000 per year. To address this significant cost, which equals half of its entire budget, the proposal has identified energy and water conservation as a very important component for new development. Reduced operational costs over the lifecycle of the building will allow the organization to direct more of its resources towards its program and social mission. The proposal has targeted the United States Green Building Council's Leadership in Energy and Environmental Design Gold award as the baseline with a goal of Platinum. The project will use a combination of efficiency strategies to achieve significant energy savings. Currently, the proposed project is estimated to use 66% less energy than a comparable building.

Sustainable energy features of the proposal include high-performance walls and glazing, ground source closed loop heat pump, high-efficiency condensing gas water heaters, solar thermal water system, third-party photovoltaic's, and kitchen hood heat recovery.

This criteria is therefore met.

GOAL 8: ENVIRONMENT
Maintain and improve the quality of Portland's air, water and land resources and protect neighborhoods and business centers from detrimental noise pollution.

Findings: The proposed project is supportive of this goal and contributes towards the following associated policies and objectives; Air Quality and Water Quality.

The proposal has identified water conservation as a very important component for the development of their new facility. Reduced operational costs over the lifecycle of the building will allow the organization to direct more of its resources towards its program and social mission. Through an integrated design process, the project aims to develop a highly integrated water use strategy that achieves Net-zero municipal water use for the residential portion of the building. The project also plans to include the implementation of one of the City of Portland's first grey water reuse systems.

Sustainable environmental features of the proposal include managing storm water on site, minimizing potable water use, minimizing irrigation, reuse of storm water and limiting the use of materials that negatively impact air quality.

This criteria is therefore met.

GOAL 9: CITIZEN INVOLVEMENT
Improve the method for citizen involvement in the on-going land use decision-making process and provide opportunities for citizen participation in the implementation, review and amendment of the adopted Comprehensive Plan.

Findings: The applicant has complied with Title 33, Portland Zoning Code, which requires public notice, site posting, public meetings and a subsequent City Council Hearing.

This criteria is therefore met.

GOAL 10: PLAN REVIEW AND ADMINISTRATION
Portland's Comprehensive Plan will undergo periodic review to assure that it remains an up-to-date and workable framework for land use development. The Plan will be implemented in accordance with State law and the Goals, Policies and Comprehensive Plan Map contained in the adopted Comprehensive Plan.

Findings: *This criteria is not applicable.*

GOAL 11: PUBLIC FACILITIES
Provide a timely, orderly and efficient arrangement of public facilities and services that support existing and planned land use patterns and densities.

Findings: *This criteria is not applicable.*

II. CENTRAL CITY PLAN

Policy 1: ECONOMIC DEVELOPMENT
Build upon the Central City as the economic heart of the Columbia Basin, and guide its growth to further the City's prosperity and livability.

Findings: The Old Town/Chinatown Development Plan, adopted in 1999, established the framework to restore economic vitality in the District by calling for a concentration of new development adjacent to the Classical Chinese Garden, maintaining its rich diversity and reducing the barriers at the district edges. The proposal promotes these objectives by strengthening the Northern gateway to the district, providing an array of necessary social services and improving the perception of pedestrian 'safety'. The current queuing of persons on sidewalks creates discomfort and conflict for other pedestrians. With the proposed redevelopment, meal lines will be located within the building, therefore improving the pedestrian experience and strengthening the opportunities for economic development. A safe and active street will enhance the character of the neighborhood and promote future development.

In providing supportive housing opportunities and community services, the project is able to protect and improve the livability and diversity of the neighborhood. The development of this project will also help foster the development of a complete neighborhood that supports business growth and employment opportunities within it. The mixture of supportive housing and services will provide opportunities to nurture and promote the growth of a diverse community. The proposed redevelopment provides needed investment in the revitalization of an urban cultural/business district and has the ability to foster further economic development and tourism. The project has the ability to serve as a catalyst to generate new interest, investment, and revenue in Council-designated Urban Renewal Area.

This criteria is therefore met.

POLICY 2: THE WILLAMETTE RIVERFRONT

Enhance the Willamette River as the focal point for views, public activities, and development which knits the city together.

Findings: *This criteria is not applicable.*

POLICY 3: HOUSING
Maintain the Central City's status as Oregon's principal high density housing area by keeping housing production in pace with new job creation.

Findings: The City of Portland's housing policies for downtown call for the preservation of units supporting very low income and special needs populations. Recent and on-going development in the city has caused the loss of such housing through the conversion, demolition and re-development of properties, which have traditionally served this population. This project is the result of the efforts to develop housing and services to replace those units lost in Portland's neighborhoods and to qualitatively improve the living standard for low income and special need individuals.

The proposed facility will almost double the current housing capacity served by the existing Blanchet House on this block and will provide new kitchen and dining facilities allowing the facility to meet its programmatic needs.

The housing program's primary goal will be to provide an enriched living environment for independent tenants that require services, while providing a safe and stable environment. Very low income people are often isolated and sometimes homeless. The proposal's goal is to assist residents through improved socialization space and amenities within the residential space of the building and to create a safe and stable housing asset. These services are critical to creating a balanced community and effective transitional housing. A safe and healthy built environment is dependent upon housing that serves all of Portland's citizens; at all income levels. This housing option provides the homeless population access to a transitional program that could eventually lead to permanent housing.

The proposed development of a new and larger housing and social service facility will enhance and upgrade the city's affordable housing stock, bring new life and activity to the streetscape and enhance the Old Town/Chinatown neighborhood by returning vibrancy and life to this tired area. The vitality of the neighborhood is contingent on quality housing. The housing component will be designed to suit the needs of a specific population through the use of resource efficient design. This provides all residents with housing that has access to sunlight, fresh air and at the same time is accessible, safe and inviting.

The project provides a diversity of housing and social service opportunities to meet the varied needs of individuals in this neighborhood.

This criteria is therefore met.

POLICY 4: TRANSPORTATION
Improve the Central City's accessibility to the rest of the region and its ability to accommodate growth, by extending the light rail system and by maintaining and improving other forms of transit and the street and highway system, while preserving and enhancing the City's livability.

Findings: *This criteria is not applicable.*

POLICY 5: HUMAN SERVICES
Provide social and health services for special needs populations, and assist dependent individuals to become more independent.

Findings: The proposal intends to provide needed neighborhood social services including providing no-cost daily meals to the homeless/ low-income and providing no-cost housing to those recovering from alcohol and drug dependencies. The proposed facility will almost double the current housing capacity and will provide new kitchen and dining facilities allowing the facility to meet its programmatic needs. The new facility will also allow the opportunity to provide for a chapel, library, health and other social services.

The proposed project is designed to meet the unique and special needs of a targeted homeless or at-risk population, while providing a safe and stable environment which encourages workforce training and personal growth. The occupants of this building both live and work in the same structure. This creates a mixed use development that fosters individual opportunities and independence by promoting a range of social services including opportunities for job training and employment, daily meals and aid, and transitional housing.

This criteria is therefore met.

POLICY 6: PUBLIC SAFETY
Protect all citizens and their property, and create an environment in which people feel safe.

Findings: The redevelopment project promotes the objective of public safety by improving the public perception of pedestrian 'safety', decreasing the likelihood of actual crime and improving the safety of the building occupants and guests.

The current Blanchet House on this block has clearly outgrown its facility, demonstrated daily by the long queuing of persons on adjacent sidewalks which can create discomfort and/or conflict for other pedestrians. With the proposed redevelopment, meal lines will be located within the building, therefore improving the pedestrian experience and strengthening the overall environment within the larger community. The redevelopment will provide increased transparency at the pedestrian level which will allow pedestrians to view in, and share in the building's vibrant ground floor activities. The ground floor activities will provide continuous "eyes on the street" and will function to decrease the likelihood of crime.

This criteria is therefore met.

POLICY 7: NATURAL ENVIRONMENT
Improve the Central City's environment by reducing pollution, keeping the Central City clean and green, and providing opportunities to enjoy nature.

Findings: The proposed development intends to promote conservation and sustainable development patterns through the use of energy-efficient design and practices. These practices will educate the building's occupants and stimulate environmental stewardship. The proposal has identified energy and water conservation as a very important component for new development. Reduced operational costs over the lifecycle of the building will allow the organization to direct more of its resources towards its program and social mission. The Blanchet House has targeted LEED Gold as the baseline with a goal of Platinum.

The project will use a combination of efficiency strategies to achieve significant energy savings. Currently, the proposed project is estimated to use 66% less energy than a comparable building. Through an integrated design process, the project aims to develop a highly integrated water use strategy that achieves Net-zero municipal water use for the residential portion of the building. The project also plans to include the implementation of the City of Portland's first grey water reuse system, incorporating the new Statewide Alternate Means and Methods OPSC 08-02.

This criteria is therefore met.

POLICY 8: PARKS AND OPEN SPACES
Build a park and open space system of linked facilities that tie the Central City districts together and to the surrounding community.

Findings: *This criteria is not applicable.*

Policy 9: CULTURE AND ENTERTAINMENT
Provide and promote facilities, programs and public events and festivals that reinforce the Central City's role as a cultural and entertainment center for the metropolitan and northwest regions.

Findings: *This criteria is not applicable.*

POLICY 10: EDUCATION
Expand educational opportunities to meet the needs of Portland's growing population and businesses, and establish the Central City as a center of academic and cultural learning.

Findings: *This criteria is not applicable.*

Policy 13: PLAN REVIEW

Periodically review the progress of the Central City Plan.

Findings: *This criteria is not applicable.*

Policy 14: DOWNTOWN

Strengthen the Downtown as the heart of the region, maintain its role as the preeminent business location in the region, expand its role in retailing, housing, and tourism, and reinforce its cultural, educational, entertainment, governmental and ceremonial activities.

Findings: *This criteria is not applicable.*

Policy 15: GOOSE HOLLOW

Protect and enhance the character of Goose Hollow by encouraging new housing and commercial development which is compatible with a growing community.

Findings: *This criteria is not applicable.*

Policy 16: NORTH OF BURNSIDE

Extend downtown development toward Union Station and the Broadway Bridge while protecting existing housing and social services for the district's special needs populations.

Findings: The proposed development will enhance and upgrade the City's affordable housing stock, bring new life and activity to the streetscape and enhance the community by returning vibrancy and life to the Northern entrance to the Old Town/Chinatown District.

The proposal will provide needed neighborhood social services for the District's special needs population. The new facility will allow the opportunity to provide for a chapel, library, health and other social services. The program creates a facility that fosters individual growth and independence by promoting a range of social services including opportunities for job training and employment, daily meals and aid, and transitional housing.

One of the specific actions noted under this policy is to "increase the supply of housing for no and low-income individuals". The proposal will provide no-cost housing to those recovering from alcohol and drug dependencies. The proposal will almost double the current housing capacity and will provide new kitchen and dining facilities.

This criteria is therefore met.

Policy 17: NORTHWEST TRIANGLE

Preserve the district's character and architectural heritage while encouraging both industrial activity and mixed use development.

Findings: *This criteria is not applicable.*

Policy 18: LOWER ALBINA

Strengthen the economic development of the district as an industrial employment area while preserving its historic buildings and providing a connection for pedestrians to the Willamette River.

Findings: *This criteria is not applicable.*

Policy 19: LLOYD CENTER-COLISEUM

Reinforce the Lloyd Center as the eastern anchor of Central City retailing and locate the highest density new development in areas served by light rail.

Findings: *This criteria is not applicable.*

Policy 20: CENTRAL EASTSIDE

Preserve the Central Eastside as an industrial sanctuary while improving freeway access and expanding the area devoted to the Eastbank Esplanade.

Findings: *This criteria is not applicable.*

Policy 21: NORTH MACADAM

Develop the district as a mixed use neighborhood with significant residential development along the river bank and commercial development along Macadam and the Jefferson Street light rail line.

Findings: *This criteria is not applicable.*

III. OLD TOWN/CHINATOWN DEVELOPMENT PLAN
The goal of the Old Town/Chinatown Development Plan is: To develop Old Town/Chinatown into a vibrant, 24 hour, mixed-use, urban neighborhood, rooted in a rich historic past.

2.1 BLOCK 25 DEVELOPMENT
Acquire most of the block bounded by Glisan, Flanders, 3rd and 4th, undertake predevelopment work and prepare a development offering for the block that would include parking, housing, first floor retail and accommodation of the Blanchet House functions.

Findings: The redevelopment of this block has been the subject of an extensive public process. The demolition of this building and the redevelopment of the site have been called for in the numerous plans resulting from these planning efforts. Stakeholders consistently supported a redevelopment plan to develop a new facility on the current 'Dirty Duck' site. The Old Town/ Chinatown Development Plan "is designed to complement the spirit and implement the economic development objectives of the Vision Plan. This unique public and private partnership is built on a firm commitment to honor and preserve the historic and cultural character of the neighborhood".

In order to meet the stated goal of creating a vibrant urban neighborhood, the Old Town/ Chinatown Development Plan recognizes that existing underutilized buildings which are not in themselves historic "should be replaced with new structures."

The Old Town/ Chinatown Development Plan, as adopted by City Council in 1999, recommends the acquisition/development of Block 25 as the highest priority and worthy of immediate action. While the Kiernan Building/Dirty Duck Tavern is a contributing resource in the district, the building's lack of Asian ethnic heritage history, combined with this site being the location of future low-income housing, make redevelopment of this site consistent with this goal.

This criteria is therefore met.

IV. 10-YEAR PLAN TO END HOMELESSNESS IN PORTLAND AND THE SHELTER RECONFIGURATION PLAN

PLAN: HOUSING FIRST
These principles emphasize a "housing first" methodology for ending chronic homelessness and focus on shortening the length of homelessness experienced by anyone in our community.

Findings: The proposed Blanchet House is designed to meet the unique and special needs of a targeted homeless or at-risk population while providing a safe and stable environment which encourages workforce training and personal growth. The Blanchet House provides no cost daily meals to the homeless / poor and provides

no-cost housing to those recovering from alcohol and drug dependencies. The current facility houses 29 men and is currently at full capacity with a lengthy waiting list. The proposed building will almost double the current housing capacity and will provide new kitchen and dining facilities allowing the facility to greatly expand its meal service.

This housing option provides the homeless population access to a transitional program that could eventually lead to permanent housing. This project is an important step for Portland's commitment to address homelessness.

This criteria is therefore met.

GOAL: STREET PEOPLE
Some blame the missions and other shelters for people "hanging out" on the street, especially in front of their buildings. Some of this "problem" could be alleviated if the facilities could offer indoor accommodations for people who are waiting for services (e.g. shelter or meals).

Findings: The Blanchet House redevelopment addresses concerns listed above by providing queuing for persons off city sidewalks. Queuing on the sidewalk creates discomfort for other pedestrians and impacts the perception of the area. With redevelopment, meal lines will be moved within the building, providing: 1) An improved pedestrian experience; 2) Economic development opportunities by improving perceptions; and 3) A social service that serves people in a dignified manner (i.e. providing a comfortable place to wait).

This criteria is therefore met.

Portions of the Proposal found to not be in support of the Approval Criteria

COMPREHENSIVE PLAN Goal 2: URBAN DEVELOPMENT
Maintain Portland's role as the major regional employment, population and cultural center through public policies that encourage expanded opportunity for housing and jobs, while retaining the character of established residential neighborhoods and business centers.

Policy 2.20 Utilization of Vacant Land
Provide for full utilization of existing vacant land except in those areas designated as open space.

Findings: The stated goals and policies of the Comprehensive Plan and Central City Plan for Urban Development encourage retaining neighborhood character, utilization of vacant lands and adaptive reuse of urban land and building.

When reviewing for demolition of a contributing building in a historic district, the applicant must take into consideration that the subject site is also a part of a greater historic district, and the impact to the whole district must be taken into consideration. The number of eligible and contributing historic buildings in the District decreases from south to north; the number of vacant lots decreases as well. The northern portion of the District already has gaps in its historic street frontage with vacant lots and non-contributing buildings, and therefore is already a challenged end of the district with the existing historic buildings in place.

Particularly critical are block corners, as the Kiernan Building/Dirty Duck Tavern. Even more critical are edges of districts, for they are considered "gateways" that anchor the district's corner edge, and therefore perform an even more enhanced role as a district front door. The Kiernan Building was included within the boundaries of the Chinatown/Japantown Historic District, which is not only important for its Asian heritage, but for its significance in Industry, Commerce, and Architecture as well.

The applicant's proposal has primarily focused on the redevelopment of the specific ¼-block site of the Kiernan Building/Dirty Duck Tavern. Additionally, in response to the approval criteria above, the applicant provides the Blanchet House's public service as the primary reason to justify the demolition of the Kiernan Building. While its public service is an admittedly incredible contribution to the City of Portland, the applicant has provided very little apart from the proposed use to support the demolition.

Therefore, this criteria is not met.

COMPREHENSIVE PLAN Goal 12: URBAN DESIGN
Enhance Portland as a livable city, attractive in its setting and dynamic in its urban character by preserving its history and building a substantial legacy of quality private developments and public improvements for future generations.

CENTRAL CITY PLAN Policy 12: URBAN DESIGN
Enhance the Central City as a livable, walkable area that focuses on the river and captures the glitter and excitement of city living.

Additional Density and Bonus Provision Findings

130. These limits respect and protect the historic district by limiting the scale of new development both to be consistent with that of historic buildings in the district and to avoid density allowances that encourage removal of landmark and potential landmarks structures.

OLD TOWN/CHINATOWN DEVELOPMENT PLAN

The goal of the Old Town/Chinatown Development Plan is: To develop Old Town/Chinatown into a vibrant, 24 hour, mixed-use, urban neighborhood, rooted in a rich historic past.

4.1 PROPERTY ACQUISITION AND RENOVATION

Support public investments in properties either by acquisition or grants to owners to renovate, provide seismic upgrades, or redevelop.

4.3 BUILDING PRESERVATION

Support financing to existing building owners for required seismic upgrades. Increase financial support for building façade improvements and storefront restoration and rehabilitation.

Findings: The stated goals and policies for Urban Design promote the preservation of Portland's history and its urban character. The Central City Plan Urban Design policy addresses limits to density and bonus provisions in order to "respect and protect the historic district by limiting the scale of new development both to be consistent with that of historic buildings in the district and to avoid density allowances that encourage removal of landmark and potential landmark structures." Instead of demolishing the Kiernan Building, this policy would be better served through the rehabilitation of the existing resource.

Additionally, in order to meet the stated goal of creating a vibrant urban neighborhood, the Old Town/Chinatown Development Plan recognizes that existing underutilized buildings that are not in themselves historic "should be replaced with new structures." However, the Kiernan Building/Dirty Duck Tavern is a Historic Contributing Building in the Chinatown/Japantown Historic District.

The Old Town/Chinatown Development Plan, as adopted by City Council in 1999, recommends the development of most of Block 25 as the highest priority and worthy of immediate action. The only two structures on the site are contributing historic resources, the Kiernan Building/Dirty Duck Tavern, and the Yamaguchi Hotel/Blanchet House of Hospitality. The remainder of the site is surface parking, an otherwise non-historic and non-contributing feature in the district.

While stated by the applicant that the building has been altered over time and Critical to these criteria is the applicant's assertion that the current state of disrepair and non-compatible additions to the Kiernan Building/Dirty Duck Tavern justify demolition. Based on the information provided, the existing conditions are not cost-prohibitive, structural infeasible, or otherwise unreasonable to not justify preserving and restoring the historic resource.

Based on testimony and evidence provided by the applicant, and the subsequent response by the Historic Landmark Commission, the Kiernan Building/Dirty Duck Tavern appears to be no worse a state of disrepair that other historic buildings in the City that have be successfully renovated. Recently restored buildings from the residential to industrial scale include the Simon Benson House and the White Stag Building.

Given the goals above, it seems reasonable that restructuring of the existing agreement could be made to allow for the preservation of the contributing resource

[the Kiernan Building], and demolition of at least a portion of the non-contributing resource [the surface parking lot].

Therefore, these criteria are not met.

COMPREHENSIVE PLAN Goal 3: NEIGHBORHOODS
Preserve and reinforce the stability and diversity of the City's neighborhoods while allowing for increased density in order to attract and retain long-term residents and businesses and insure the City's residential quality and economic vitality.

Policy 3.4 Historic Preservation
Preserve and retain historic structures and areas throughout the city.

CENTRAL CITY PLAN Policy 11: HISTORIC PRESERVATION
Preserve and enhance the historically and architecturally important buildings and places and promote the creation of our own legacy for the future.

Findings: The applicant asserts that the current state of disrepair and non-compatible additions to the Kiernan Building/Dirty Duck Tavern justifies demolition. Based on testimony and evidence provided by the applicant, and the subsequent response by the Historic Landmark Commission, the Kiernan Building/Dirty Duck Tavern appears to be in no worse a state of disrepair than other historic buildings in the City that have been successfully renovated. Because the goal is to preserve the historic building when feasible, the current state of disrepair is not an overriding factor in the "on balance" analysis.

The proposal to demolish does not support criteria that advocate the preservation and enhancement of the district's architectural heritage and international character. Contributing historic buildings add value to the district's architectural integrity as well as its ethnic subculture, which is specifically addressed in the desired designation of Chinatown/Japantown as a historic district.

Therefore, these criteria are not met.

SUMMARY

The Portland City Council evaluated the proposal to demolish the Kiernan Building against the 1) Comprehensive Plan Goals and Policies document [Oct 1980/July 2006]; 2) Central City Plan document [March 1988]; 3) The Chinatown/Japantown National Register Historic District [National Park Service, Sept 1989]; 4) The Old Town/Chinatown Vision and Development Plans [1997, 1999, 2003]; and 5) Home Again – A 10-year plan to end homelessness in Portland [2004].

The proposed project is designed to meet the unique and special needs of a targeted homeless and/or at-risk population, while providing a safe and stable environment that encourages workforce training and personal growth. Redevelopment of the site will enhance and upgrade the City's affordable housing stock, bring new life and activity to the streetscape and enhance the community by returning vibrancy and life to the northern entrance to the Old Town/Chinatown District.

Council found that a new facility, encompassing low-income housing, a soup kitchen and other related social services, predicated on a Title 30.01 (which requires City Subsidized Properties to maintain a minimum 60-year low-income affordability requirement) is the best use for the site. Additionally, Council noted the strong public

support for the Blanche House's work, as well as the specific plan support for this use on this block.

Council also found that the lack of Asian ethnic heritage, favored a decision to demolish, and especially so considering the social benefit provided by the new proposal on the site. While Council did discuss the importance of historic buildings in the district, along with several criteria that address historic preservation and restoration, Council found these criteria to be of less significance than competing criteria for the purposes of evaluating this specific application.

In consideration of the Comprehensive Plan and relevant area plans, City Council finds that the proposal does, on balance, meet the approval criteria. Therefore, approval of the demolition of the Kiernan Building/Dirty Duck Tavern is granted.

DEVELOPMENT STANDARDS

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.

V. CONCLUSIONS

The Blanchet House's mission is highly revered and provides an extremely valuable service to the community. It is clear that the current facility needs improvements and expansion and that development of internal queuing is desirable for the neighborhood.

The applicant stated that proposed redevelopment of the Kiernan Building/Dirty Duck Tavern site is necessary to help mitigate the shortage of crucial social services and alleviate the scarcity of quality affordable housing in this neighborhood. City of Portland Housing Policies call for the preservation of units supporting very low income and special needs populations. The merits of the new development will quantitatively and qualitatively improve the living standard for low income and special needs individuals.

The proposed project is designed to meet the unique and special needs of a targeted homeless and/or at-risk population, while providing a safe and stable environment that encourages workforce training and personal growth. Redevelopment of the Blanchet House on the site will enhance and upgrade the City's affordable housing stock, bring new life and activity to the streetscape and enhance the community by returning vibrancy and life to the northern entrance to the Old Town/Chinatown District.

Council found that a new proposed facility, encompassing low-income housing, a soup kitchen and other related social services, predicated on Title 30.01 (which requires City Subsidized Properties to maintain a minimum 60-year low-income affordability requirement) is the highest and best use for the site.

Council also found that the lack of Asian ethnic heritage, favored a decision to demolish on balance, and especially so considering the social benefit provided by the new proposal on the site.

In consideration of the Comprehensive Plan and relevant area plans, City Council finds that the proposal does, on balance, meet the majority of the approval criteria. Therefore, approval of the demolition of the historic Kiernan Building/Dirty Duck Tavern is granted.

VI. DECISION

It is the decision of Council to: Approve the Demolition of the Kiernan Building/Dirty Duck Tavern in the National Register Chinatown/Japantown Historic District.

VII. APPEAL INFORMATION

Appeals to the Land Use Board of Appeals (LUBA)
This is the City's final decision on this matter. It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date of the decision, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have submitted written testimony during the comment period or this land use review. You may all LUBA at 1 (503) 373-1265 for further information on filing an appeal.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

A. Applicant's Statement:
   1. November 12, 2009 narrative
   2. January 4, 2010 revised narrative
B. Zoning Map (attached):
C. Plans & Drawings:
   1. Site Plan (attached)
   2. Site Photo (attached)
   3. Site detail photos (attached)
   4. Site vicinity photos (attached)
   5. Site vicinity photos (attached)
   6. Site vicinity photos (attached)
   7. Potential future development rendering (attached)
   8. Potential future development elevations (attached)
   9. Potential future development elevations (attached)
   10. Potential future development floor plan (attached)
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. Mailing list
   6. Mailed notice
E. Agency Responses:
   1. Bureau of Environmental Services
   2. Bureau of Transportation Engineering and Development Review
   3. Water Bureau
   4. Site Development Review Section of Bureau of Development Services
F. Letters: [None during comment period]
G. Other:

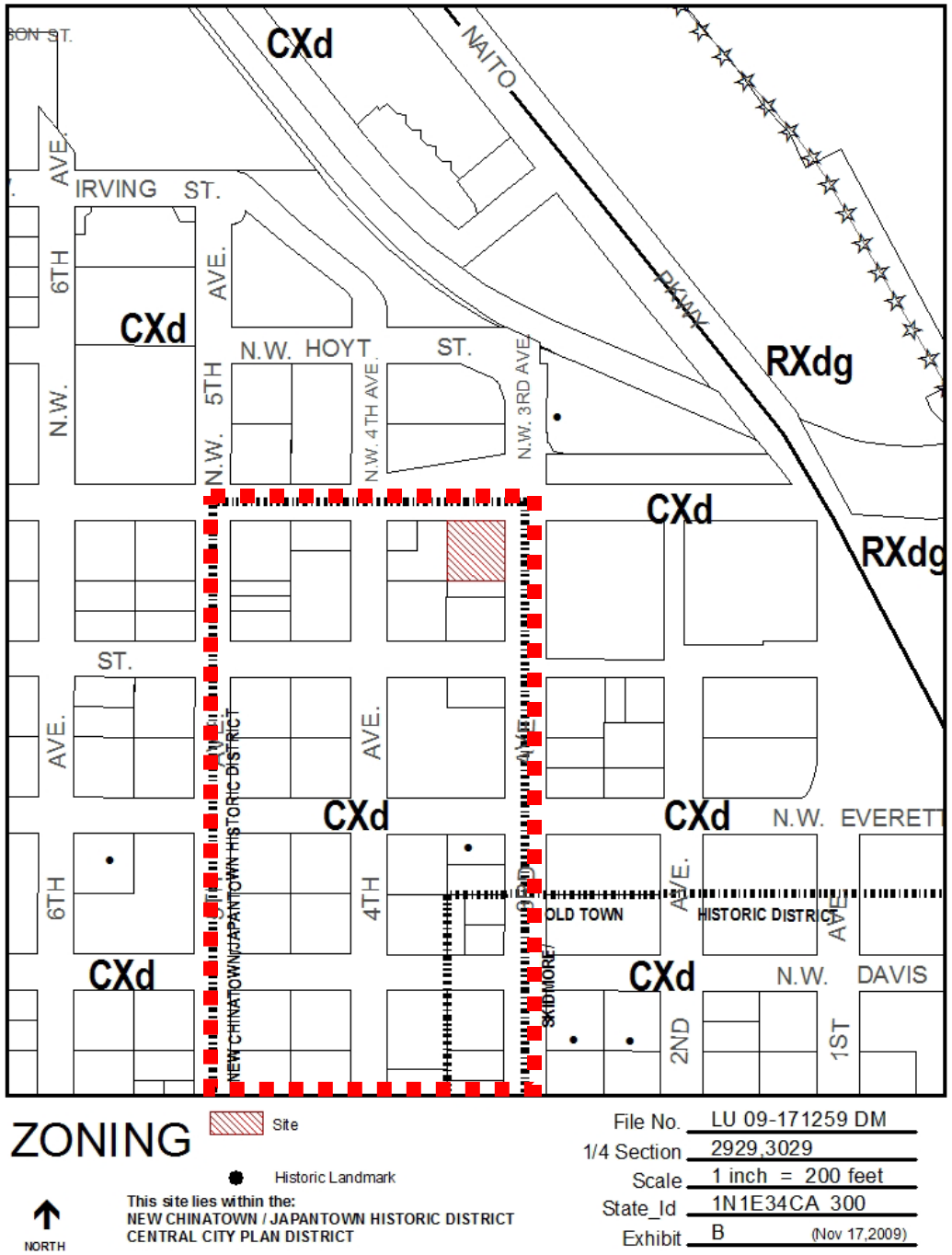
1. Original LUR Application
2. Site History Research
3. September 3, 2009 Preapplication Conference Summary Notes [August 18, 2009 meeting]
4. September 21, 2009 Design Advice Request Summary Notes [August 24, 2009 meeting]
5. September 22, 2010 Landmarks Commission letter to the Portland Development Commission
6. October 23, 2010 Portland Development Commission letter to the Landmarks Commission

H. January 11, 2010 Historic Landmarks Commission meeting
1. January 5, 2010 Staff Memo to Landmarks Commission
2. Staff PowerPoint to Landmarks Commission
3. January 8, 2010 email correspondence from Dustin Posner, support of demolition review
4. January 11, 2010 letter from Rich Ulrich, President, Blanchet House Board of Directors, support of demolition review
5. January 17, 2010 email correspondence from Laurie Washburn, against demolition
6. January 21, 2010 Commissioner's Assistant Memorandum
7. Staff Report and Recommendation to the Portland City Council
8. January 22, 2010 Landmarks Commission Letter to City Council

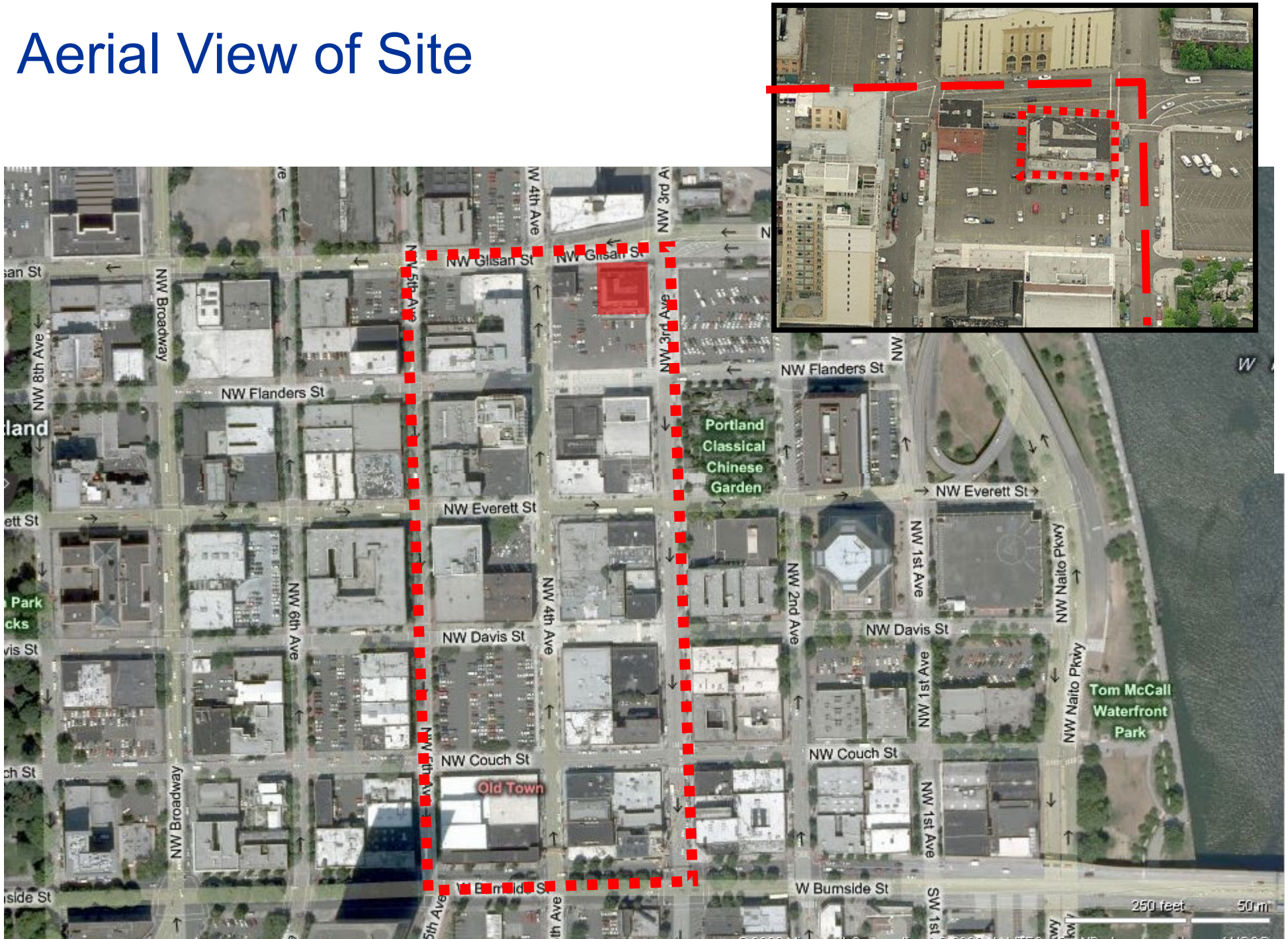
I. February 3, 2010 City Council Hearing
1. Staff Powerpoint to City Council
2. Testimony list
3. Applicant's Powerpoint to City Council
4. November 12, 2008 letter from the Portland Development Commission
5. February 1, 2010 letter from Keith Witocosky
6. February 2, 2010 letter from Richard Harris
7. February 2, 2010 letter and email from Paul Falsetto, AIA Historic Resource Committee
8. February 3, 2010 letter from All Johnson
9. February 3, 2010 Historic District Map from Art DeMuro

Existing Zoning

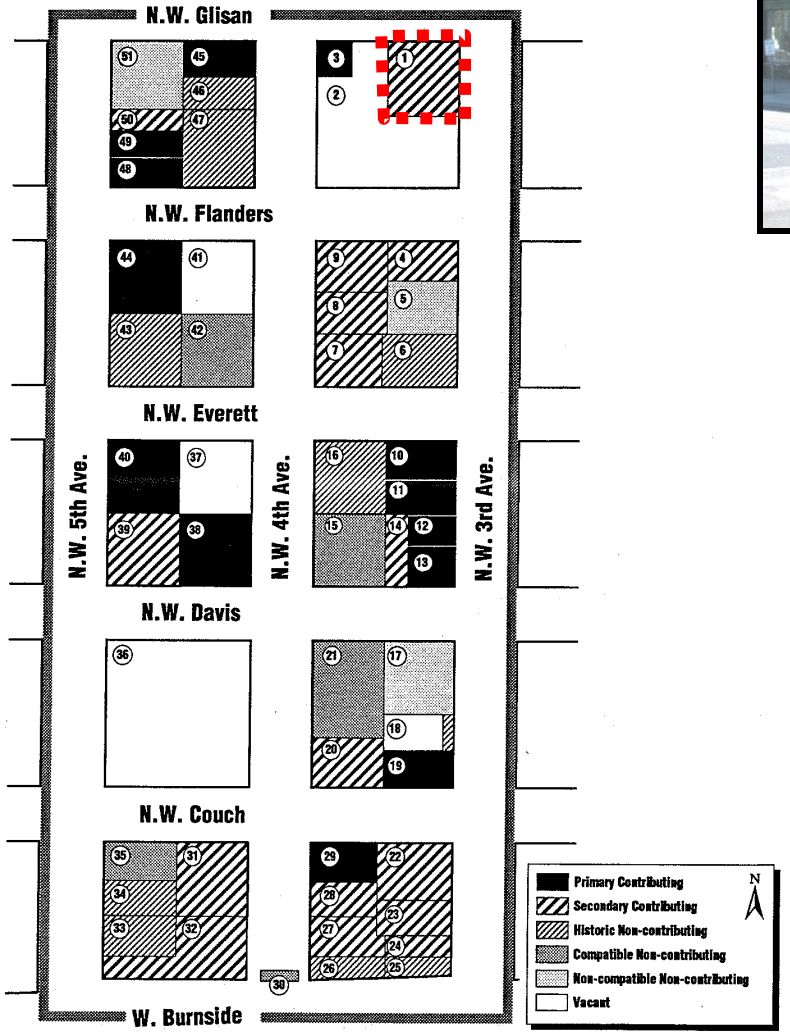
- CXd, Central Employment
- Chinatown/Japantown Historic District
- Central City Plan District
- River sub-District
- 9:1 FAR allowed
- 3:1 FAR Bonus potential
- 350’-0” Height limit
- +75’-0” Bonus potential

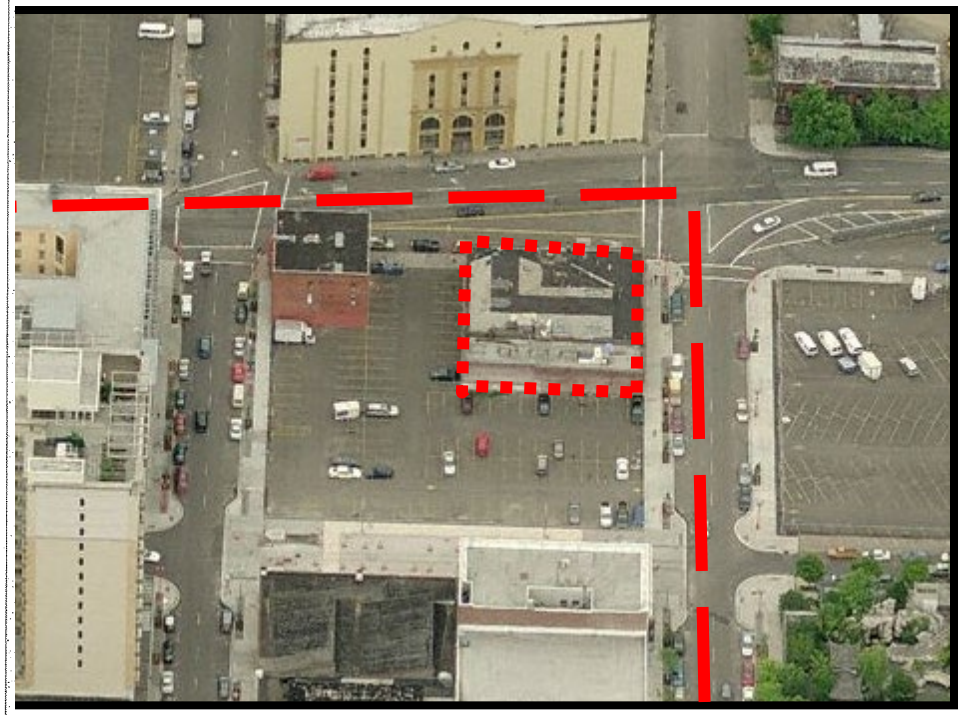


Aerial View of Site



Aerial View of Site





Site Photos


421
08/03/2009


CRACK PRESS
DIRTY DUCK
ONE WAY
08/03/2009


PRESS
08/03/2009


WESTERN TOOL & DIE WORKS
ANDY FRITZ. MGR.
ESTABLISHED 1893
NORTH 109 THIRD
WESTERN TOOL & DIE WORKS
WESTERN TOOL & DIE WORKS

City of Portland Historic Landmarks Commission Design Advice Request (DAR)

Date:	Monday, August 5, 2024		
To:	City of Portland Landmarks Commission	**From:**	Megan Neill, PE, Design Phase Project Manager, Multnomah County
Cc:	Tim Heron, Senior City Planner		
Subject:	City of Portland Historic Landmarks Commission Design Advice Request for Earthquake Ready Burnside Bridge		
Attachments/Enclosures:	Site/Vicinity Plan Map, Presentation		

INTRODUCTION

As discussed at the June 10, 2024, briefing, since 2016, Multnomah County has been working to create an Earthquake Ready Burnside Bridge (EQRB). The proposed project would replace the existing Burnside Bridge with a new movable bridge in approximately the same location and length as the existing bridge. The project area is shown on the attached figure. Project benefits include:

- The Project will build the first seismically resilient vehicular crossing in downtown Portland that will be immediately usable after a major earthquake.
- The new Burnside Bridge will support emergency relief efforts, reunite families, connect people to critical services, and serve an instrumental role in a faster, more efficient economic recovery for the region and state.
- The new bridge will have 17-foot-wide bicycle and pedestrian paths on each side of the bridge. Crash-worthy barriers separating motorized vehicles from active transportation users will significantly increase safety for pedestrians, bicyclists, and people with disabilities. Improved active transportation and transit options will support a healthier and more sustainable lifestyle.
- The Project will improve transit facilities, including upgrades to nearby bus stops and the retention of the eastbound bus-only lane. The new bridge will also be built to accommodate a future Portland Streetcar line.
- The Project will add new or improved ADA-compliant sidewalks that connect to nearby transit facilities, creating safer, more comfortable access for people with disabilities.
- Before construction begins, the Project will make permanent improvements to bicycle and pedestrian paths along detour routes.

This alternative (known as the “Replacement Long Span”) was selected because it has the fewest columns in unstable soil on the east side, has fewer columns and obstructions under the bridge in Waterfront Park, more space for bicyclists and pedestrians, the fewest impacts to natural resources, the least impact to the Burnside Skatepark, and is the least expensive among the bridge options studied.

Because the existing Burnside Bridge is a historic landmark, its removal requires a Type IV Demolition Review for which the HLC will be providing a recommendation to the City Council. At our upcoming DAR, the Project Team is seeking guidance from the HLC on the application of the approval criteria to this Project. In addition, as discussed at the briefing, we will also be sharing what we heard through the public engagement process in July. However, the focus of this DAR will not be on the design. At a separate land use review following City Council's decision on the demolition review, the HLC will consider the details of the proposed new bridge elements within the Portland Skidmore/Old Town Historic District, and the Project Team will schedule a second DAR with the HLC to discuss that Type III Historic Resource Review application.

DISCUSSION OF TYPE IV APPROVAL CRITERIA AND QUESTIONS FOR THE HLC

The approval criteria for a Type IV Demolition Review include the following:

- Portland Zoning Code section 33.846.080.C.1.a-f
- Portland Comprehensive Plan 2035
- Portland Central City 2035 (Central City Plan)

> ***33.846.080 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. – 3. [Not applicable]*

Reference documents that could further support the narrative response for context and background, but not the part of the approval criteria, include:

- National Register Nomination of Burnside Bridge (2012)
- National Register Nomination for the Skidmore/ Old Town Historic District (1975)

Overall Approach to the Application

Unlike more traditional development proposals (e.g., an alteration to a building on a lot), the EQRB Project has already been the subject of extensive analysis. As a transportation project that has received

USDOT funding, the Project is subject to the National Environmental Policy Act (NEPA) and Federal requirements protecting public or private historic sites. These regulations required Multnomah County to conduct a detailed evaluation of all feasible and prudent alternatives that avoid impacts to the historic bridge. As part of that evaluation, the County completed a wide range of technical reports on topics such as climate change, cultural resources, economic impacts, environmental justice, social/neighborhood, equity and health impacts. These project resources will also serve to address the City's Type IV approval criteria.

In order to provide a systematic approach to the multifaceted balancing effort outlined in the approval criteria, the Project Team is proposing a three-step analysis within the narrative:

1. Describe the Project as it relates to demolition evaluation factors (a) through (f).
2. Determine which Comprehensive Plan and Central City Plan goals and related policies apply to this demolition request and how these policies relate to demolition evaluation factors (a) through (f).
3. Explain why, on balance, applicable Comprehensive Plan and Central City Plan goals and policies support the demolition and replacement of the Burnside Bridge.

Question 1: Does the HLC have any concerns or recommendations regarding this approach?

Approval Criteria - Factors

Factor 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

In response to this factor, the application narrative will summarize information about the existing bridge related to its age, condition, historic integrity, historic significance, design or construction rarity, value to the community, and association with historically marginalized individuals or communities. Much of this information has already been documented as part of the NEPA review process and we will provide it to HLC for its consideration.

Question 2: Are there specific aspects of this factor that the HLC would like to see highlighted in the application narrative? For example, are there specific associations with historically marginalized individuals or communities that should be emphasized?

Factors b. and c. The economic consequences for the owner and the community and the merits of demolition

Factors b and c are closely related. Because the owner of the bridge is Multnomah County, the economic consequences for the owner also impact the community, and the economic benefits related to emergency response and disaster recovery are important merits of the proposal. Given that, the Project Team is considering addressing them together to avoid redundancy in the application. In response to these factors, the application narrative will summarize the costs and benefits of demolition relative to the alternatives, including no action and seismically retrofitting the existing bridge.

Question 3: Are there specific aspects of these factors (b and c) that the HLC would like to see highlighted in the application narrative or are there any concerns with the proposed approach?

Factor 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

In addition to seismic resilience, as noted in the introduction of this memorandum, there are many benefits associated with the proposed Project; for example, the proposed improvements to bicycle and pedestrian facilities are very supportive of the City's Comprehensive Plan and Central City Plan policies. The Type IV Demolition application narrative will describe the merits of the proposed bridge with a focus on function. The design details in the historic district will be the focus of a later Type III Historic Resource Review application. However, it has already been determined that the bridge design on the west side will use girders to avoid the need for any superstructures that would impact views to and from the Skidmore/Old Town national historic landmark district. This is consistent with the direction provided at the 2021 DAR.

Question 4: Are there specific aspects of factor d that the HLC would like to see highlighted in the application narrative?

Factor e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A

The potential to seismically retrofit the existing bridge was studied extensively during the NEPA process and, as a part of the Type IV Demolition application, we will be providing this information to HLC for your consideration. In summary, while a seismic retrofit of the existing bridge is technically feasible, it is very challenging, costly, and will have a detrimental impact on the historic character of the existing bridge. As a result of the necessary retrofit improvements, it would not preserve the historic status of the Burnside Bridge. It would require replacing much of the eastern approach, the entire bridge deck and bridge railings, the movable span mechanical and electrical elements, the east in-water pier, the iconic masonry control towers, and possibly even the movable span leaves. In addition, major retrofitted elements include: installing new foundations with large diameter concrete shafts; encasing the two major in-water bridge piers with thick concrete jackets; and conducting major retrofit to all of the other piers, bents, and structural elements. Because of these changes, the bridge would no longer be listed on the National Register of Historic Places. In addition, the Enhanced Seismic Retrofit Alternative is the only alternative that would remove the Burnside Skatepark, a National Register eligible resource.

Question 5: Are there specific aspects of this factor that the HLC would like to see highlighted in the Type IV Demolition application narrative?

Factor f. Any proposed mitigation for the demolition

Because the project is receiving federal funds, it was the subject of a NEPA review process, including a Section 106 Programmatic Agreement. The Programmatic Agreement documents the County's obligations to implement Section 106 of the National Historic Preservation Act.

Because of this, mitigation for historic resource impacts has already been identified. The Programmatic Agreement includes the following Mitigation for Adverse Impact to the Burnside Bridge:

- Salvage and Reuse
  - Exploring options to salvage and reuse components of the current Burnside Bridge (examples: railings, mechanical components, etc.).
- Interpretive Displays
  - Three displays to be located on the bridge, focusing on the Burnside Bridge history and significance including social and civic importance.
- Three-Dimensional Scanning
  - A three-dimensional scan will be made available to the public.
- Video Documentation
  - Four videos showing opening and closing operations, interior of the bridge cab and processes, internal bridge machinery in operation, and demolition and construction.
- Documentation
  - Historic American Engineering Record (HAER) documentation details and requirements will be prescribed by National Park Service.
- Archival Records
  - Inventory of manuscript and photographic holdings and review of unarchived materials resulting in digitizing and making new submissions to archive records for the Burnside Bridge.
- Publication
  - Scholarly publication including history of lower Willamette River crossings addressing precontact crossings, ferries, and bridges, including historical themes and major chronological periods. The publication will also include documentation of the bridge's civic and social importance.
- Public Event
  - A half-day event for the public will celebrate and acknowledge the history of the existing bridge.
- Three-Dimensional Model
  - The model will be at a scale of 1:500, designed for public display, and fabricated of durable materials.
- Wikipedia Entry
  - Update the Wikipedia entry to include the broader social and cultural context, corrected links, and link to the Multnomah County Burnside Bridge website.
- Oregon Encyclopedia Entry
  - Develop an entry for the online Oregon Encyclopedia including the role of the Burnside Bridge and its significance.
- Book Update
  - Develop an online pamphlet focusing on the replacement of the Burnside Bridge compatible with the format of *The Big and Awesome Bridges of Portland and Vancouver* book to be available to the public and educators.

Associated Requirements in the PA (not directly Section 106 Mitigation for Adverse Impact to Bridge)

- Avoid or minimize Construction Vibratory Effects on Built Historic Resources
  - Notification to SHPO and consulting parties and prepare a Treatment Plan
- Historic features of buildings and structures preserved in situ and protected from damage

- Contractor will prepare a Protection Plan

The mitigation will be described in detail and documented in the Type IV Demolition application for the HLC's consideration.

Question 6: Are there specific aspects of the mitigation that the HLC would like to see highlighted in the Type IV Demolition application narrative (factor f)?

Goals and Policies of the Comprehensive Plan and Central City Plan

The approval criteria require consideration of the relevant goals and policies of the Comprehensive Plan and relevant area plans (in this case, that includes the Central City Plan) with a finding that -- on balance -- the goals and policies have been found to be equally or more supportive of the demolition. The 2035 Comprehensive Plan (May 2023) provides a more detailed explanation of how Plan policies are weighed and balanced in decision-making, noting that:

> *The particular policies that matter more will change from one decision to another. There is no set formula — no particular number of "heavier" policies equals a larger set of "lighter" policies. In cases where there are competing directions embodied by different policies, City Council may choose the direction they believe best embodies the plan as a whole.*

To date, the Project Team has identified more than 150 Comprehensive Plan and Central City Plan policies that are potentially applicable to the Project. These policies elaborate on the Comprehensive Plan's Guiding Principles, which include the following ones directly applicable to this EQRB Project:

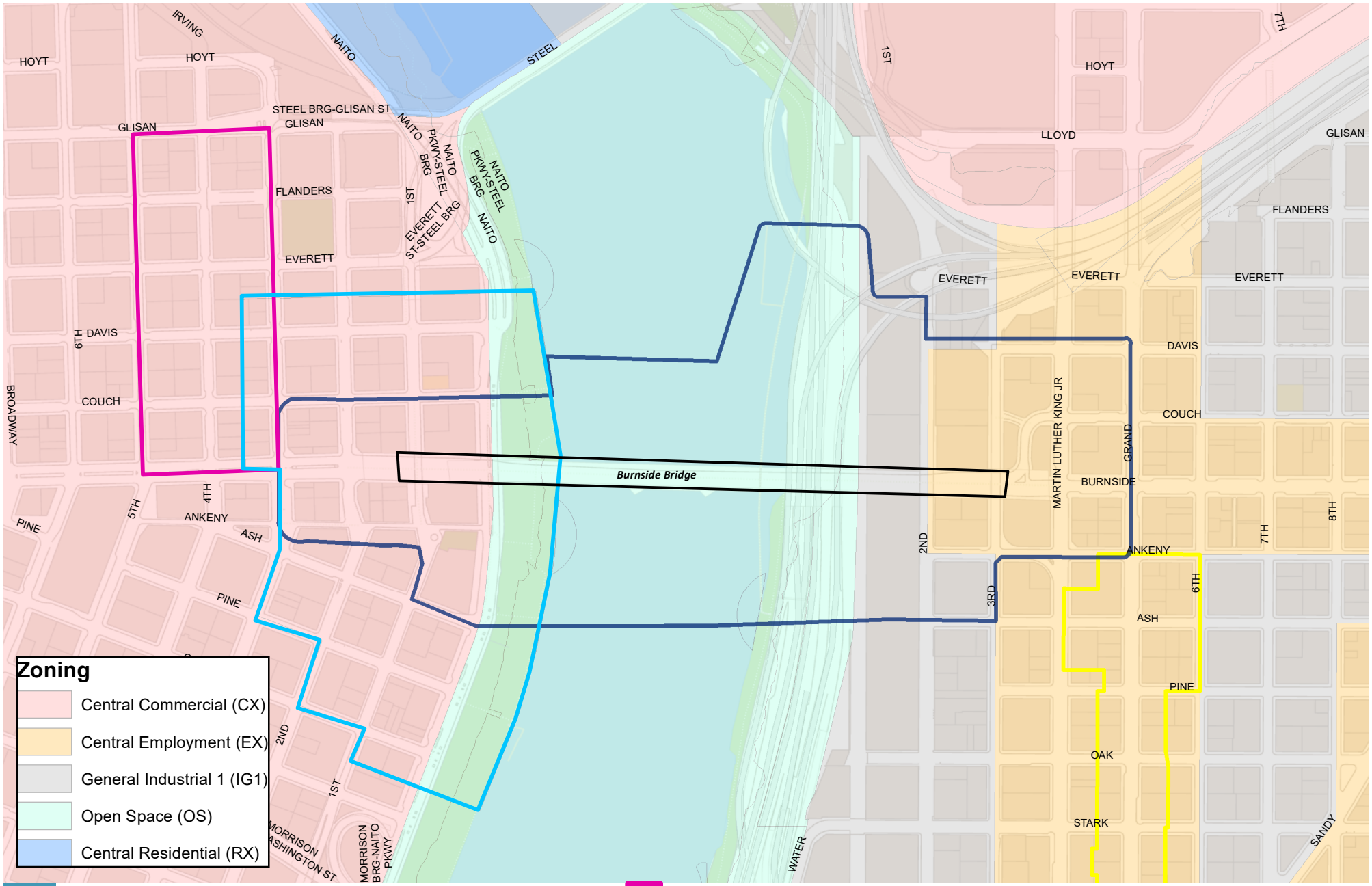
- ***Economic Prosperity**. Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.*
- ***Human Health**. Avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives.*
- ***Environmental Health**. Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water and land.*
- ***Equity**. Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and under- represented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history.*
- ***Resilience**. Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and built environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts.*
    - ***Invest to reduce risks** – The Comprehensive Plan, including the Citywide Systems Plan, identifies infrastructure investments to reduce risks of failure and increase the city's ability to withstand and respond to a natural disaster. Improvements are planned to protect Portland's critical infrastructure services such as drinking water, sewage*

treatment and bridges. These systems are necessary to protect Portlanders' safety and security and support the region's economy. For example, infrastructure investments planned for Portland's secondary groundwater supply in outer northeast Portland enables water to be provided when the primary Bull Run system needs to be supplemented.

Based on its preliminary analysis, the Project Team has found that the EQRB project is supportive of these principles and policies. For example, improving the City's ability to recover from a major earthquake, the Project supports the principles of "Economic Prosperity," "Resilience," and "Invest to Reduce Risks." The proposed improvements to transit, bicycle, pedestrian and ADA facilities would support the principles of "Human Health. "Environmental Health," and "Equity."

The Project Team realizes how challenging it can be to synthesize this amount of information, and will provide an analysis explaining why, on balance, the Project Team believes that the applicable Comprehensive Plan and Central City Plan goals and policies support the demolition and replacement of the Burnside Bridge.

Question 7: Are there certain Comprehensive Plan or Central City Plan policies or topics that the HLC would like to see explored in more detail in the application narrative?


Burnside Bridge
Zoning
Central Commercial (CX)
Central Employment (EX)
General Industrial 1 (IG1)
Open Space (OS)
Central Residential (RX)
Project Area
New Chinatown / Japantown Historic District
Skidmore / Old Town Historic District
East Portland / Grand Avenue Historic District
0
Feet
560
EQRB
HISTORIC DISTRICTS
PATH: C:\USERS\RBARKSDALE\DOCUMENTS\PROJECTS\EQRB FINAL DESIGN\GIS\HISTORICDISTRICTS.MXD - USER: RBARKSDALE - DATE: 7/2/2024

IN THE CITY COUNCIL OF THE
CITY OF
PORTLAND OREGON

IN THE MATTER OF AN APPLICATION
BY
Tom Carter, Applicant
Teresa Elliott, Applicant
City Of Portland, Owner
c/o Portland Water Bureau
1120 SW 5th Avenue Suite 600
Portland, OR 97204

Tim Brooks, Consultant
Winterbrook Planning
310 SW 4th, Ste 1100
Portland OR 97204

FOR A

Type IV Demolition Review at 2403 SW Jefferson Street (Washington Park)
LU 14-249689 DM

FINDINGS AND CONCLUSIONS

ADOPTED BY THE CITY COUNCIL ON
June 25, 2015

(APPROVAL** of a **TYPE IV DEMOLITION REVIEW**)**

IN THE CITY COUNCIL OF THE
CITY OF
PORTLAND, OREGON

**IN THE MATTER OF AN APPLICATION
BY TOM CARTER, PORTLAND WATER BUREAU, FOR A
Type IV DEMOLITION REVIEW at 2403 SW Jefferson Street LU 14-249689 DM**

FINDINGS AND CONCLUSIONS

The findings and conclusions of the City Council in this matter are set forth below.

I. GENERAL INFORMATION

Applicant: Tom Carter, Applicant
Teresa Elliott, Applicant
City Of Portland, Owner
c/o Portland Water Bureau
1120 SW 5th Avenue Suite 600
Portland, OR 97204

Tim Brooks, Consultant
Winterbrook Planning
310 SW 4th, Ste 1100
Portland OR 97204

Site Address: 2403 SW Jefferson Street – Washington Park

Underline indicates parcels that comprise the site for this application. Other parcels are also owned by the City of Portland.

Legal Description: TL 300 20.71 ACRES, SECTION 33 1N 1E; TL 100 24.03 ACRES, SECTION 32 1N 1E;
TL 100 24.98 ACRES, SECTION 05 1S 1E; TL 100 8.16 ACRES, SECTION 04 1S 1E; BLOCK 13 LOT 1-32, WEST END; BLOCK 15 LOT 1-8, WEST END; BLOCK 16 LOT 1-8, WEST END; BLOCK 17 LOT 1-10, WEST END; BLOCK 18 LOT 1-8, WEST END; BLOCK 19 LOT 1-17, WEST END; BLOCK 20 LOT 1-12, WEST END; BLOCK 21 LOT 1-14, WEST END; BLOCK 22 LOT 1-6 LOT 7&8 EXC PT IN ST, WEST END; BLOCK 4 LOT 1, WESTWOOD HILLS; BLOCK 4 S 35.94' OF LOT 2, WESTWOOD HILLS; TL 200 9.57 ACRES, SECTION 04 1S 1E; TL 500 40.94 ACRES, SECTION 05 1S 1E; TL 600 2.00 ACRES, SECTION 05 1S 1E; TL 800 107.18 ACRES, SECTION 05 1S 1E; TL 1200 3.65 ACRES, SECTION 05 1S 1E; TL 1100 6.89 ACRES, SECTION 05 1S 1E; TL 1400 60.69 ACRES, SECTION 05 1S 1E; TL 200 4.22 ACRES, SECTION 32 1N 1E; TL 200 21.12 ACRES, SECTION 05 1S 1E; TL 200 26.02 ACRES, SECTION 32 1N 1E; TL 1000 41.42 ACRES, SECTION 05 1S 1E; TL 700 2.38 ACRES, SECTION 05 1S 1E

Tax Account No.: R941321370, R941330040, R991050830, R991041020, R892801070, R892801560, R892801640, R892801720, R892801820, R892801900, R892802070, R892802190, R892802330, R902100870, R902100890, R991040170, R991050020, R991050100, R991050350, R991050720, R991050740, R991050750, R941321360, R991050840, R941321350, R991050800, R991050820, R991050020

State ID No.: 1N1E32 00100, 1N1E33C 00300, 1S1E05 01000, 1S1E04 00100,

	1S1E05A 00500, 1S1E04BB 06100, 1S1E04BC 05400, 1S1E04BC 05500, 1S1E05A 00400, 1S1E05A 00600, 1S1E05A 00300, 1S1E05A 00200, 1S1E04BC 05600, 1S1E05AC 00200, 1S1E05AC 00100, 1S1E04 00200, 1S1E05 00500, 1S1E05 00600, 1S1E05 00800, 1S1E05 01200, 1S1E05 01100, 1S1E05 01400, 1N1E32 00200, 1S1E05 00100, 1S1E05 00200, 1N1E32C 00200, 1S1E05 00700, 1S1E05 00500
Quarter Section:	3027, 3026, 3126, 3127, 3025, 3125, 3225, 3126, 3226
Neighborhood:	Arlington Heights, contact Shawn Wood at s.p.wood@comcast.net; Goose Hollow, contact Jerry Powell at 503-222-7173; Southwest Hills, contact Nancy Seton at nancyseton@comcast.net; Hillside, contact Peter Stark at 503-274-4111 Northwest, contact John Bradley at 503-313-7574 Sylvan-Highlands, contact Dave Malcolm at 503-805-9587;
Business District:	None
District Coalition:	Neighbors West/Northwest, contact Mark Sieber at 503-274-4111; Southwest Neighborhoods, Inc., contact Sylvia Bogert at 503-823-4592
Other Designations:	Contributing Resources in the Washington Park Reservoirs Historic District, listed in the National Register of Historic Places on January 15, 2004.
Zoning:	OSc, OSp – Open Space with Environmental Conservation and Environmental Protection overlays
Case Type:	DM – Demolition Review
Procedure:	Type IV, following a public meeting before the Historic Landmarks Commission there will be a hearing before City Council. The Historic Landmarks Commission may offer comments or suggestions, in the form of a letter or testimony, to City Council. City Council makes the final decision on this matter.

II. INTRODUCTION AND PROCEDURAL HISTORY

Original Proposal: On behalf of the City of Portland, and in response to the EPA's Long Term Enhanced Surface Water Treatment Rule (LT2) and to address seismic concerns and landslide pressures, the Portland Water Bureau requests Demolition Review to remove three contributing resources from the Washington Park Reservoirs Historic District. These resources include Reservoir 3 (built 1894), Reservoir 4 (built 1894), and the Weir Building (built 1946). The proposed replacement system includes a below-ground reservoir with a tiered reflecting pool in the same location and approximate footprint as the existing Reservoir 3 and a reflecting pool and stormwater swale in the same location as the existing Reservoir 4 but with a reduced footprint.

Because the proposal is to demolish Contributing Resources in the Washington Park Reservoirs Historic District, a Type IV Demolition Review is required.

Relevant 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:

- 33.846 Historic Resource Reviews
- 33.846.080 Demolition Review

III. ANALYSIS

Site and Vicinity: The Washington Park Reservoirs #3 and #4 are located within Washington Park, due west of the downtown commercial core. The park was developed from 40 acres purchased by the City from Amos and Melinda King in 1871, and originally known as City Park. In 1912, it was renamed Washington Park following a visit from John Charles Olmsted, who recommended a more distinguished name. Washington Park is located in the hills directly west of the King's Hill Historic District, bordered by W Burnside to the north, and north of Highway 26. West of the Park is the Arlington Heights neighborhood, Hoyt Arboretum and the Oregon Zoo.

As the City's population continued to grow and issues arose from shortages due to high demand and poor quality water obtained from the Willamette River and other sources, the City took up the task of creating a new high quality water supply. In 1885, a 15-member Water Committee was appointed made up of prominent business and civic leaders, who took on the task of consolidating the existing water supplies, identifying and acquiring the rights to a new supply, and constructing a system that would provide clean and abundant water to the citizens of Portland. Ultimately, Bull Run Lake was identified as the preferred source as it could provide pristine water through a gravity-fed system, thus nearly eliminating the need for cost-prohibitive pumping. Mt Tabor and Washington Park were identified as the locations to build storage facilities due to their elevations within the city.

The reservoirs were constructed during the City Beautiful movement, which arose in response to the industrialization of cities, and aimed to promote health and civic virtue through the creation of beautiful and inspiring works of architecture and planning. The character of the reservoirs and their accompanying structures, articulated in a Romanesque Revival style, nestled into natural ravines within the landscape embody these values.

The reservoirs were designed by Ernest Leslie Ransome, featuring patented "concrete and twisted iron" poured concrete construction, with the twisted iron placed at 10-foot intervals in each direction, and the façades of the structures featuring decorative designs molded by wooden formwork and tooled and hammered to resemble rusticated stone. Ransome's design is notable in that it was one of the first uses of reinforced concrete for a major work in the United States, at a time when reinforced concrete was just beginning to be employed in construction projects. The ornamental wrought iron fences and lampposts were designed by Whidden and Lewis, and crafted by Johann H. Tuerck of Portland Art Metal Works.

In January 2004, the Washington Park Reservoirs Historic District was listed in the National Register of Historic Places under Criteria A and C, as a locally significant resource. The areas of significance include community planning and development, architecture, engineering, and entertainment and recreation. Listed contributing resources include Reservoir 3, Dam 3, Gatehouse 3, the Weir Building, Reservoir 4, Dam 4, Gatehouse 4, Pump House 1, the Generator House, and two water fountains, one of which is damaged and currently in storage.

A detailed history of the Bull Run water system and a detailed account of the individual contributing resources are included in the Washington Park Reservoirs Historic District National Register nomination (Exhibit A-6).

Zoning: The Open Space (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 Environmental Protection Zone "p" overlay provides the highest level of protection to the most important resources and functional values. These resources and functional values are identified and assigned value in the inventory and economic, social, environmental, and energy (ESEE) analysis for each specific study area. Development will be approved in the environmental protection zone only in rare and unusual circumstances.

The Scenic Resource Zone "s" overlay is intended to protect Portland's significant scenic resources as identified in the Scenic Resources Protection Plan; 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 Resource 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.

The Historic Resource Protection overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks and protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

Land Use History: City records indicate that relevant prior land use reviews include:

- LU 05-138520 HDZ – Historic Design Review approval for Phase 1 of security and deferred maintenance projects;
- PC 06-173417 – Pre-Application Conference for security and deferred maintenance projects;
- LU 07-137990 HDZ – Historic Design Review approval for Phase 2 of security and deferred maintenance projects
- EA 13-162228 APPT – Early Assistance Appointment related to current proposal; and
- EA 13-200312 DAR – Design Advice Request with the Historic Landmarks Commission for the current proposal.
- EA 14-139549 PC – Pre-Application Conference for the current proposal.

Agency Review: A "Request for Response" was mailed February 9, 2015.

The following Bureaus responded with comments:
The **Bureau of Parks-Forestry Division** responded, noting that a tree preservation plan would be required, and suggested conditions of approval, including:

1. A tree preservation must be submitted to Portland Parks and Recreation/Urban Forestry for approval.
2. The applicant must include a tree protection plan and/or modified root protection plan (RPZ) per Title 33 and Title 11 requirements and specifications.
3. Mitigation plan for loss of canopy per Title 33 and Title 11 requirements and approved by Urban Forestry.

Please see Exhibit E-1 for additional details.

The following Bureaus have responded with no issues or concerns:

- Water Bureau
- Life Safety Division of the Bureau of Development Services
- Bureau of Environmental Services
- Fire Bureau
- Bureau of Transportation Engineering
- Site Development Section of BDS

Finding: Tree protection is not the subject of this review and is not relevant to demolition review. As noted above, a demolition permit will not be issued until a follow-up Type III Historic Resource Review has been approved. The Portland Water Bureau intends to provide a tree protection plan with the Type III application; the proposal's effect on trees within the project area will be considered during that review. For this reason, these conditions are premature and have not been included as part of this review.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on February 27, 2015. Written responses received include:

1. Susan Alpert Siegel, President of the Arlington Heights Neighborhood Association, on February 27, 2015, wrote **with concerns** regarding the routing of construction traffic through the neighborhood and the closure of Sacajawea Circle during the project's multi-year construction schedule. Please see Exhibit F-1 for additional details.
2. Nancy Seton, President and Land Use Chair of the Southwest Hills Residential League (SWHRL), on March 6, 2015 wrote in **support** of the proposal to demolish the existing historic reservoirs and with support for the proposed replacement development featuring reflecting pools a restored hillside, and improved access. Please see Exhibit F-2 for additional details.
3. Catherine Ellison, on March 7, 2015, wrote **with concerns** about Sacajawea Circle being closed during construction, stating it would be a tremendous inconvenience, and requesting that alternatives be considered. Please see Exhibit F-3 for additional details.
4. RoseMarie Opp, on March 8, 2015, wrote **with concerns** regarding the effect of buried reservoirs on health, cracks in the Powell Butte reservoir, negative impacts of construction on Washington Park, and concern that the Arlington Heights Neighborhood Association online calendar does not list the April 23rd City Council hearing date. Ms. Opp also provided a copy of the October 29, 2014 presentation to the Community Sounding Board and a copy of the City of Portland Public Involvement Principles, both received March 17, 2015. Please see Exhibit F-4 for additional details.
5. Katherine Stansbury, on March 9, 2015, wrote in **opposition** to the proposed disconnection of the Mt. Tabor Reservoirs, citing previous attempts to destroy the reservoirs and the City's failure to request extensions to the LT2 timeline,

and requesting the Historic Landmarks Commission intervene to delay the project until after the LT2 review. Please see Exhibit F-5 for additional details.

6. Scott Fernandez, on March 9, 2015, wrote in **opposition**, noting the benefits of sunlight, oxygenation, and open air on drinking water and stating that the "landslide characterization issues and reasons for the changes to Washington Park reservoirs have been overblown and portrayed incorrectly." Please see Exhibit F-6 for additional details.
7. Ann Witsil, on March 9, 2015, wrote **with concerns** regarding the temporary closure of Sacajawea Circle, suggesting limiting its closing to certain times of day. Please see Exhibit F-7 for additional details.
8. Eric Nagle, Community Sounding Board member, on March 16, 2015, forwarded a January 27, 2014 memo from the Community Sounding Board to the Historic Landmarks Commission in **support** of the proposal. Mr. Nagle also noted the need for design features that discourage skateboarding to ensure the continued tranquility of the place. Please see Exhibit F-9 for additional details.
9. Katherine Stansbury, on March 19, 2015, wrote in **opposition**, requesting that the Historic Landmarks Commission make a request to the governor and the Oregon Health Authority to delay the start of the project until January 1, 2017. Please see Exhibit F-9 for additional details.
10. Beth Giansiracusa, on March 19, 2015, wrote in **opposition** suggesting that the City's drinking water be treated rather than buried. Please see Exhibit F-10 for additional details.

Received prior to March 30, 2015 Historic Landmarks Commission meeting:

11. Jeffrey E. Boly on March 19, 2015, wrote in **opposition**, stating that the applicant cannot meet the first approval criteria option and suggesting alternative options for Reservoirs #3 and #4. Please see Exhibit F-11 for additional details.
12. Susan Alpert Siegel, President of the Arlington Heights Neighborhood Association, on March 24, 2015, wrote **with concerns** that the proposed restoration efforts are not sufficiently described in the proposal drawings and suggesting the demolition permit drawing must also show the preservation work proposed. Please see Exhibit F-12 for additional details.
13. Joanne Stainbrook, AIA Historic Resources Committee, on March 20, 2015, wrote in **support**, stating the applicant had met with them three times and that they found the level of mitigation proposed is appropriate. Please see Exhibit F-13 for additional details.
14. Floy Jones, on March 29, 2015, provided the Washington Park Reservoirs Historic Structures Report. Please see Exhibit F-14 for additional details.
15. Mary Ann Schwab, on March 30, 2015, wrote **with concerns** regarding construction traffic and location of posting boards. Please see Exhibit F-15 for additional details.
16. Dee White, on March 29, 2015, wrote in **opposition**, stating that the citizen Involvement goal was not met as the public was never given the opportunity to discuss alternatives to demolition. Please see Exhibit F-16 for additional details.
17. Floy Jones, Friends of the Reservoirs, on March 29, 2015, wrote in **opposition**, stating that the applicant has not met Goal 9 Citizen Involvement, and has defied a 2004 City Council ordinance (#36267) which required stakeholder input on future plans for the reservoirs. Please see Exhibit F-17 for additional details.
18. Katherin Kirkpatrick, on March 30, 2015, wrote in **opposition**, stating that demolition of the resources results in a failure to preserve the historic character and function of the resources, and stating that the applicant has not met the EPA's public notification rules. Please see Exhibit F-18 for additional details.

Received at the March 30, 2015 Historic Landmarks Commission meeting:

19. Chris Kent, on March 30, 2015, provided oral testimony in **support**.
20. John Czarnecki, on March 30, 2015, provided oral and photographic testimony in **support** and suggesting that the maintenance structures east of Reservoir 4 should also be removed.
21. Scott Fernandez, on March 30, 2015, provided oral and written testimony in **opposition**, stating that the landslide and seismic concern are not as bad as have been presented and the negative effects of buried reservoirs is of greater concern.
22. Joe Walsh, on March 30, 2015, provided oral testimony in **opposition**
23. RoseMarie Opp, on March 30, 2015, provided oral and written testimony in **opposition**, stating that buried reservoirs result in negative health effects and with concerns regarding construction traffic.
24. Floy Jones, on March 30, 2015, provided oral testimony in **opposition**.
25. Dee White, on March 30, 2015, provided oral testimony in **opposition**.
26. Jeffrey Boly, on March 30, 2015, provided oral testimony in **opposition**, stating there was less consensus among the community stakeholders than has been presented.
27. Beth Giansiracusa, on March 30, 2015, provided oral testimony in **opposition**.
28. Eileen Brady, on March 30, 2015, provided oral testimony encouraging the Historic Landmarks Commission to attend the Mt. Tabor Appeal hearing at City Council.
29. Mark Wheeler, on February 17, 2015, wrote in **opposition**. These comments were forwarded by Teresa Elliott, Portland Water Bureau.

Received following the March 30, 2015 Historic Landmarks Commission meeting:

30. Floy Jones, on April 16, 2015, wrote in **opposition** and submitted a 2006 letter from Chet Orloff to City Council. Please see Exhibit I-1 for additional details.
31. Teresa Elliott, Portland Water Bureau, on April 16, 2015, submitted comments received in **opposition** by Sabrina Louise. Please see Exhibit I-3 for additional details.
32. Tana and David Cahill, on April 19, 2015, wrote in **opposition**. Please see Exhibit I-4 for additional details.
33. Brenna McDonald, on April 20, 2015, wrote in **opposition**. Please see Exhibit I-5 for additional details.
34. Catherine Klebl, on April 20, 2015, wrote in **opposition**. Please see Exhibit I-6 for additional details.
35. Ian Keeber, on April 21, 2015, wrote in **opposition**. Please see Exhibit I-7 for additional details.
36. Floy Jones, on April 21, 2015, wrote in **opposition** and submitted a letter, a City Council Resolution, Water Bureau construction figures into the record. Please see Exhibit I-8 for additional details.
37. Mark Bartlett, on April 22, 2015, wrote in **opposition**. Please see Exhibit I-9 for additional details.
38. Jeffrey Boly, on April 22, 2015, wrote in **opposition**. Please see Exhibit I-10 for additional details.
39. Elizabeth Callison, on April 21, 2015, wrote in **opposition**. Please see Exhibit I-11 for additional details.
40. Floy Jones, on April 22, 2015, wrote in **opposition**. Please see Exhibit I-12 for additional details.
41. Dee White, on April 22, 2015, wrote in **opposition** and submitted a 2004 Portland Alliance article about the Mt. Tabor Reservoirs Independent Review Panel. Please see Exhibit I-13 for additional details.
42. Floy Jones, on April 22, 2015, submitted data for a covered Nevada tank. Please see Exhibit I-14 for additional details.
43. Floy Jones, on April 22, 2015, submitted documents including a letter from the Federal Energy Regulatory Commission to Frank Galida, City of Portland,

regarding the Mt. Tabor Reservoirs, pages from the November 2001 Open Reservoir Study by Montgomery Watson Harza, and a February 4, 2013 from Commissioner Steve Novick to the Oregon Health Authority requesting an extension to the LT2 compliance deadline. Please see Exhibit I-15 for additional details.

44. Floy Jones, on April 22, 2015, submitted documents including a Portland Water Bureau 2012 security report regarding criminal mischief at Reservoir #7 at Mt. Tabor Park. Please see Exhibit I-16 for additional details.
45. Floy Jones, on April 22, 2015, wrote in **opposition**. Please see Exhibit I-17 for additional details.
46. Katherin Kirkpatrick, on April 23, 2015, wrote in **opposition** and submitted the Portland Water Bureau's 2011 and 2012 Drinking Water Quality Reports. Please see Exhibit I-18 for additional details.
47. Katherin Kirkpatrick, on April 23, 2015, wrote in **opposition** and submitted a report by Tectonophysics related to the potential of increased radon exposure due to seismic activity. Please see Exhibit I-19 for additional details.
48. Katherin Kirkpatrick, on April 23, 2015, wrote in **opposition** and submitted a May 2014 document entitled "Scientific and Public Health Basis to Retain Open Reservoir Water System for the City of Portland, Oregon" by Scott Fernandez. Please see Exhibit I-20 for additional details.
49. Katherin Kirkpatrick, on April 23, 2015, wrote in **opposition** (see Exhibit I-19). Please see Exhibit I-21 for additional details.
50. Katherin Kirkpatrick, on April 23, 2015, submitted an April 19, 2015 letter by Floy Jones, Friends of the Reservoirs, and March 19, 2015 letter by Jeffrey Boly. Please see Exhibit I-22 for additional details.
51. Katherin Kirkpatrick, on April 23, 2015, submitted a copy of her January 10, 2015 public records request, which remains outstanding. Please see Exhibit I-23 for additional details.
52. Suzanne Sherman, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-24 for additional details.
53. Katherin Kirkpatrick, on April 23, 2015, submitted Dee White's March 30, 2015 testimony in opposition and the March 29, 2015 testimony in opposition by Floy Jones of Friends of the Reservoirs. Please see Exhibit I-25 for additional details.
54. Jeya Arenson, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-26 for additional details.
55. Scott Fernandez, on April 22, 2015, wrote in **opposition**. Please see Exhibit I-27 for additional details.
56. Dee White, on April 22, 2015, wrote in **opposition** and submitted her March 30, 2015 testimony to the Historic Landmarks Commission, the June 2004 Portland Alliance article regarding the Mt. Tabor Reservoirs Independent Review Panel. Please see Exhibit I-28 for additional details.
57. Katherin Kirkpatrick, on April 22, 2015, wrote in **opposition** and submitted survey results regarding options for Mt. Tabor Reservoirs. Please see Exhibit I-29 for additional details.
58. RoseMarie Opp, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-30 for additional details.
59. Jeya Arenson, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-31 for additional details.
60. Seven Stevens, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-32 for additional details.
61. Dan Berger, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-33 for additional details.

Received at City Council hearing April 23, 2015

62. Jessica Engeman, Historic Landmarks Commission, provided oral testimony in **support**.
63. Harris Matarazzo, Historic Landmarks Commission, provided oral testimony in **opposition**.
64. Terri Davis, Portland Parks and Recreation, provided oral testimony in **support**.
65. Eric Nagle, Community Sounding Board, provided oral testimony in **support**.
66. Annie Mahoney, Community Sounding Board, provided oral and written testimony in **support**. Please see Exhibit I-36 for additional details.
67. Chris Kent, Community Sounding Board, provided testimony in **support**.
68. Mary Eng provided testimony in **opposition**.
69. Ben Pickering provided testimony in **opposition**.
70. Scott Fernandez provided oral and written testimony in **opposition**. Please see Exhibit I-37 for additional details.
71. Dee White provided testimony in **opposition**.
72. Michael Wallace provided testimony in **opposition**.
73. Michael Conley, Concordia NA, provided testimony in **opposition**.
74. RoseMarie Opp provided testimony in **opposition**.
75. Daniel Berger provided testimony in **opposition**.
76. Floy Jones, Friends of the Reservoirs, provided testimony in **opposition**.
77. Charles Johnson provided testimony in **opposition**.
78. John Czarnecki provided oral and written testimony in **opposition**. Please see Exhibit I-38 for additional details.
79. Mary Ann Schwab provided testimony in **opposition**. Please see Exhibit I-39 for additional details.
80. Steven Entwhistle provided testimony in **opposition**.
81. Herschel Sole provided testimony in **opposition**.

Received following the April 23, 2015 City Council hearing

82. Valerie Hunter, on April 23, 2015, wrote in **opposition**. Please see Exhibit I-40 for additional details.
83. Ben Asher, on April 24, 2015, wrote in **opposition**. Please see Exhibit I-41 for additional details.
84. Andrea Kampic, on April 26, 2015, wrote in **opposition**. Please see Exhibit I-42 for additional details.
85. Mark Wheeler, on April 27, 2015, wrote in **opposition**. Please see Exhibit I-43 for additional details.
86. Robert Stabbert, on April 27, 2015, wrote in **opposition**. Please see Exhibit I-44 for additional details.
87. Carolyn Stuart, on April 27, 2015, wrote in **opposition**. Please see Exhibit I-45 for additional details.
88. Mark Bartlett, on April 27, 2015, wrote in **opposition**. Please see Exhibit I-46 for additional details.
89. MaryAnn Amann, on April 27, 2015, wrote in **opposition**. Please see Exhibit I-47 for additional details.
90. Floy Jones, on April 29, 2015, wrote in **opposition** and provided copies of contracts for prior work at Washington Park Reservoirs. Please see Exhibit I-48 for additional details.
91. Michael Wallace, on April 30, 2015, wrote in **opposition**, stating that the chance of a landslide is overstated and with concerns about construction traffic. Please see Exhibit I-49 for additional details.
92. Nancy Newell, on April 30, 2015, wrote in **opposition**, stating that the landslide and earthquake concerns are inaccurate. Please see Exhibit I-50 for additional details.
93. Dee White, on April 30, 2015, wrote in **opposition** and provided copies of the following: Derek Conforth's "Seven Deadly Sins of Landslide Investigation, Analysis, and Design", Nejan Huvaj-Sarihan's "Evaluation of the rate of

movement of a reactivated landslide", and Oregon Department of Land Conservation and Development's "Planning for Natural Hazards: Landslide TRG [Technical Resource Guide]". Please see Exhibit I-52 for additional details.

94. Laurel Crissman, on April 30, 2015, wrote in **opposition** expressing disappointment for the disregard of scientific arguments in favor of retaining the open reservoirs. Please see Exhibit I-54 for additional details.
95. Mark Bartlett, on April 30, 2015, wrote in **opposition** with questions regarding ownership of the property. Please see Exhibit I-55 for additional details.
96. Floy Jones, on April 30, 2015, wrote in **opposition** and provided an article: "Battling Nitrification with Blacklights" by Brian White and Martin Adams. Please see Exhibit I-56 for additional details.
97. Leslie Rose, on April 30, 2015, wrote in **opposition** citing concerns with disregard for historic structures, taxpayer money, and the lack of public involvement. Please see Exhibit I-57 for additional details.
98. Daniel Berger, on April 30, 2015, wrote in **opposition** with concerns about land ownership, radon, and suggesting additional study on the landslide and better stewardship of the historic reservoirs. Please see Exhibit I-58 for additional details.
99. Katherin Kirkpatrick, on April 30, wrote, in **opposition** stating the City had not met the requirements for a Type III historic resource review and conditional use review and that the proposal will remove the resource's fundamental use. Please see Exhibit I-59 for additional details.
100. Floy Jones, on April 30, 2015, wrote in **opposition**, stating that the City's public involvement principles have not met and alternatives have not been considered. Please see Exhibit I-60 for additional details.
101. Dee White, on April 30, 2015, provided a copy of the City of Portland Public Involvement Principles. Please see Exhibit I-61 for additional details.
102. Dee White, on April 30, 2015, provided a copy of "Battling Nitrification with Blacklights" by Brian White and Martin Adams. Please see Exhibit I-62 for additional details.
103. Scott Fernandez, on April 30, 2015, wrote in **opposition**, rebutting PWB comments regarding landslide activity, precipitation events, and rebar from April 23, 2015 City Council hearing. Please see Exhibit I-63 for additional details.
104. Mary Ann Schwab, on April 30, 2015, wrote in **opposition** with concerns about public process. Please see Exhibit I-64 for additional details.

Received During 2nd 7-day period, ending 5pm on May 7, 2015

105. John Czarnecki, on April 30, 2015, wrote in **opposition** to demolition of Reservoir 4. Please see Exhibit I-65 for additional details.

Findings: The Council agrees with BDS staff's responses to the public concerns, which are summarized below.

Construction impacts: While concern about construction traffic is understandable, the Type IV Demolition Review is not the appropriate review in which to address this concern. The focus of this review is whether or not the proposal to demolish the contributing historic resources is consistent with the goals and policies of the Comprehensive Plan. Review of the construction plan and potential neighborhood impacts of the demolition and construction is most relevant and appropriate at the time of the Type III review when the specific details of the replacement proposal and construction plan will be presented and potentially mitigated through conditions in the final decision. It is the approval criteria for these later reviews that require the PWB to address the impacts of the replacement proposal, including construction impacts, on the surrounding neighborhood. Issuance of demolition permits and actual demolition of

the resources will not occur until a Type III Historic Resource Review for these replacement facilities has been approved.

Process and Public Involvement: Opponents have argued that the Type IV Demolition Review cannot be approved without approval of the replacement proposal. Opponents have also argued that the public involvement was inadequate and failed to provide adequate opportunity for public comment. The applicant provided a summary of public involvement (Exhibit H-15) that credibly demonstrates that the applicant carried out a thorough public involvement process through a Community Sounding Board, open houses, and public tours. The applicant also worked with the Historic Landmarks Commission through the voluntary Design Advice process to develop a replacement proposal and adequate mitigation prior to submittal of this Type IV application. On May 12, 2015, the Water Bureau submitted Historic Resource Review, Conditional Use Review, Environmental Review, and Tree Review applications for the agreed upon replacement proposal and mitigation. All of these reviews will have a public notification, comment, and hearing process associated with them. A demolition Permit will not be approved until the replacement proposal receives final approval and the construction permit for the replacement proposal is issued. Based on a reading of the applicable approval criteria, Council finds that approval of a Type IV Demolition Review does not require approval of the replacement proposal as a prerequisite. Based on the credible evidence of a thorough public involvement program, Council finds that the applicant's public involvement program supports city policies and goals and is sufficient for the proposal. (Also see the findings for Policy 3.5 Neighborhood Involvement, Objective C of Policy 12.3 Historic Preservation, and Goal 9 Citizen Involvement, below.)

Lot Consolidation: Opponents asserted that the Type IV Demolition Review could not proceed without the underlying platted lots being consolidated through a re-platting process. Neither the Portland Zoning Code, nor any other regulation, requires lot consolidation as part of a land use review. City Council finds that lot consolidation is not required for the proposal.

Property ownership is not proven. Opponents stated that Washington Park consists of multiple underlying platted lots purchased in some cases for non-Water purposes. They assert that because of this, the Portland Water Bureau lacks authority to obtain permits and work on the questioned lands. The Water Bureau provided evidence (Exhibit I-51) that a) the entire park is owned by the City of Portland, a municipal corporation, and that individual bureaus do not own real estate; b) that the Zoning Code allows "ownerships"—that is, contiguous lots under single ownership—to be considered as a single property; and c) that the City assigns management responsibilities for city-owned property to individual bureaus. Council finds the Water Bureau's evidence credible and persuasive, and based on this evidence, finds that the City is the owner and the Portland Water Bureau is authorized to file the application.

Consideration of Alternatives: The Water Bureau met with the Historic Landmarks Commission four times to discuss the overall proposal, before applying for the formal land use review. During those meetings, the Commission asked if there were alternatives to demolition and the Water Bureau responded, noting that four "drivers" create the impetus for the proposal. The four drivers are 1) the presence of an active landslide that damages the existing reservoirs; 2) the requirements of a federal drinking water quality rule promulgated in 2006 (the Long Term 2 Enhanced Surface Water Treatment Rule, or "LT2"); 3) the age and condition of the existing infrastructure; and 4) the susceptibility of the historic structures and infrastructure to earthquake damage. The drivers are thoroughly explained in Exhibits A-7, H-2, and H-14. Exhibit A-7 also presents the alternatives to demolition, which are 1) to make no alterations and instead lobby the EPA to change the rule; 2) to cover the existing reservoirs; 3) to build covered

water storage elsewhere; or 4) to provide treatment facilities at the reservoirs' outlets. The Water Bureau discussed these alternatives in Exhibits A-7 and I-51 and showed that they were passed over because none of them addressed the requirements of the four project drivers. The Historic Landmarks Commission considered the public comments and voted 3-1 to recommend approval of the demolition. Likewise, the same concerns and suggestions for alternatives were raised during the City Council hearing. City Council finds the Portland Water Bureau's evidence credible and persuasive, and based on this evidence, Council finds that alternatives to demolition were adequately considered during the Type IV review, and rejects the alternatives for the reason that none of them will satisfy all four project drivers—the requirements that created the need for the proposal.

Concerns for Future Water Quality: The Portland Water Bureau aims to provide the highest quality water and this goal is reinforced by the goals and policies of the Comprehensive Plan, which requires that the Water Bureau continue to exceed state and federal water quality standards. The Environmental Protection Agency is requiring all open finished drinking water reservoirs to be either covered or treated at the point of discharge in order to continue to meet new federal standards for water quality. The proposal is PWB's response to these new standards; non-compliance would be a violation of the federal regulation and the City's Comprehensive Plan. In addition, the evidence presented by project opponents on water quality is not persuasive; for example, asking the City Council to rely on the 1902 statement of a microbiologist, or on the description of an anti-nitrification project in another city, rather than actual conditions in Portland. Instead, the City Council relies on the more persuasive, credible and specific information presented by the applicant.

Loss of Historic Use: Some opponents have argued that because the reservoirs have a historic use, they cannot be demolished because it would result in the loss of that use. The historic use of a historic resource is not required in perpetuity for any National Register-listed property. Historic resources are often adapted for alternative use in order to extend their meaningful life. The State Historic Preservation Office noted that demolition of Reservoir 3 and Reservoir 4 constituted an adverse effect but also found that the demolition would not compromise the district's listing on the National Register (Exhibit A-11). As the applicant explains in Exhibit A-7, the historic use of the site for Basic Utilities will continue with the new Reservoir 3. Furthermore, the proposed design of the replacement surface features, together with preservation or restoration of many of the remaining historic structures, will maintain the sense of history and historic use of the site (see discussion under Goal 12, below). Based on a reading of the applicable sections of the Zoning Code and the credible evidence presented by the applicant, City Council finds that the historic use of the reservoirs does not prohibit the termination of that use, nor does the historic use prohibit their demolition.

Landslide Characterization: The record shows a long history of landslide movement at this site. Despite the reduced rate of movement over the years, the landslide still presents an active threat on the reservoirs, particularly in the event of a major earthquake. The record also shows that the basins were reinforced with rebar at 10 feet on center, sufficiently less than would be required today to protect the health and safety of citizens. These two factors must be considered together; disregarding these two known factors would be irresponsible. Project opponents testified that the slowing movement of the landslide indicates that it is under control and poses little hazard, and/or that the degree of the hazard has been inflated by the applicant. The applicant provided site-specific explanations by qualified and licensed geotechnical and civil engineers establishing that although landslide movement has indeed slowed, the landslide remains active and a danger to the existing reservoirs, and that the proposed design will significantly mitigate that danger. The City Council finds the explanation of

the engineers to be credible and persuasive, and finds that the landslide hazard is significant and that the design of the new reservoir will address this project driver (also see findings for Policy 11.28 Maintenance.

Reservoirs no longer needed and so should not be replaced. Citizens commented that the four-year construction period, during which neither of the two reservoirs will be in use, proves that they do not need to be replaced, but instead could be preserved in place. Evidence in the record shows that water use has declined somewhat over the years, reducing the need for total water storage. Nevertheless, this evidence also shows that the specific location of the Washington Park reservoirs provides significant advantages to efficient and effective operation of the water system (see discussion of Goal 11E, especially Policy 11.29). It also shows that water demand changes seasonally and in response to events (e.g., large fires, pipeline breaks, etc.), and that demands on the system are not always entirely predictable. The applicant contends that the risk of operating without reservoirs in this location during construction is acceptable in order to gain the advantages of the new reservoir when it is completed. One advantage is that the new covered reservoir will be constructed beyond the toe of the landslide in a way that will allow some landslide movement without damaging the reservoir. Another advantage is that the new reservoir and the major pipes that connect to it will be made resistant to earthquake damage. These two advantages will make the water system significantly more resistant to damage and therefore more reliable and resilient for many decades into the future, which supports Goal 11E Water Service and Policy 11.28 Maintenance. Based on this credible evidence, the City Council finds that the proposed new reservoir is needed to replace the old reservoirs in this location, and that the period between demolition and construction of the replacement where there will be no reservoir capacity at the site does not in and of itself make a compelling case that the replacement is not necessary.

The City of Portland should take a different approach to complying with the "LT2" federal water-quality regulations, or should obtain a waiver, or should delay compliance pending regulatory review at the federal level. Many citizens made comments regarding LT2 compliance or the validity of the LT2 requirements. As the applicant documented, the City made multiple efforts to seek a waiver or exception to the rules, all of which were unsuccessful. The current approach to LT2 compliance has been publicly considered and was previously adopted by the City Council. This topic is not germane to this review.

Additional concerns have been addressed in the comments below.

Procedural History: The application was submitted on December 15, 2014 and deemed complete on January 26, 2015. The initial Notice of Proposal and Posting Notices identified a City Council hearing date of April 23, 2015 and a Historic Landmarks Commission meeting date of March 23, 2015. The March 23rd meeting had to be rescheduled to March 30, 2015 for lack of quorum. Notices were reissued with a new Historic Landmarks Commission meeting date of March 30, 2015. At the March 30, 2015 Historic Landmarks Commission meeting, four Commissioners were present. Following the staff and applicant's presentation, public testimony was received. Two members of the public spoke in support and nine spoke in opposition. The Commission deliberated with one Commissioner wondering why we would demolish historic resources and then build something new in an active landslide area when we have enough drinking water storage capacity, suggesting the reservoirs could be preserved for aesthetic purposes. This commissioner asserted that the reservoirs have been allowed to deteriorate, which amounts in his opinion to demolition by neglect and expressed concern for the long-term preservation of the other resources. The majority of the Commission noted that the presentation and communication from the Water

Bureau has been outstanding, comprising several meetings with the Historic Landmarks Commission and noting that the current proposal is based on feedback received, is reasonable, and the level of mitigation is impressive. The Commission voted 3-1 to accept the staff report and to write a letter expressing their support and concerns. This letter is included in the record as Exhibit H-18. Commissioner Harris Matarazzo subsequently wrote a separate letter expressing the dissenting opinion; this letter is in the record as Exhibit I-2.

The application was presented to City Council and the Council heard public testimony on April 23, 2015. The record was held open until 5pm on April 30, 2015, with an additional 7-day response period ending at 5pm on May 7, 2015. At a continued hearing on May 13, 2015, the City Council tentatively voted 5-0 to approve the proposal. A return hearing of June 10, 2015 was set to adopt the Final Findings and Decision. The Council subsequently postponed the return hearing to June 25, 2015 at 2:00 p.m.

IV. ZONING CODE APPROVAL CRITERIA AND FINDINGS

Chapter 33.445, Historic Resource Protection Overlay Zone, and Chapter 33.846, Historic Reviews

33.445.030 Types of Historic Resource Designations and Map Symbols

C. Historic District. This type of resource is a collection of individual resources that is of historical or cultural significance at the local, state, or national level. Information supporting a specific district's designation is found in the City's Historic Resource Inventory, its National Register nomination, or the local evaluation done in support of the district's designation.

33.445.330 Demolition of Historic Resources in a Historic District

Demolition of other historic resources within a Historic District requires demolition review to ensure their historic value is considered. The review period also ensures that there is an opportunity for the community to fully consider alternatives to demolition.

33.846.010 Purpose

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

A. Purpose. Demolition review protects resources that have been individually listed in the National Register of Historic Places and those that have been classified as contributing in the analysis done in support of a Historic District's creation. It also protects Historic Landmarks and Conservation Landmarks that have taken advantage of an incentive for historic preservation and historic resources that have a preservation agreement. Demolition review recognizes that historic resources are irreplaceable assets that preserve our heritage, beautify the city, enhance civic identity, and promote economic vitality.

B. Review procedure. Demolition reviews are processed through a Type IV procedure.

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. Denial of a demolition permit would effectively deprive the owner of all reasonable economic use of the site; *or*

2. Demolition of the resource has been evaluated against and, on balance, has been found supportive of the goals and policies of the Comprehensive Plan, and any relevant area plans. The evaluation may consider factors such as:
   a. The merits of demolition;
   b. The merits of development that could replace the demolished resource, either as specifically proposed for the site or as allowed under the existing zoning;
   c. The effect demolition of the resources would have on the area's desired character;
   d. The effect that redevelopment on the site would have on the area's desired character;
   e. The merits of preserving the resource, taking into consideration the purposes described in Subsection A; and
   f. Any proposed mitigation for the demolition

   Findings: The site is listed as a National Register Historic District, and the reservoir basins and the Weir building are designated contributing resources in the district. Therefore, demolition of the existing reservoir basins and Weir building requires Demolition Review approval.

The applicant has chosen to address Approval Criterion 2, therefore, the proposal has been evaluated against the:

1. **Comprehensive Plan Goals and Policies document [Oct 1980/November 2011];**
2. **Scenic Resources Protection Plan [1991], incorporated into the Comprehensive Plan;**
3. **Washington Park Master Plan [1981]**
4. **Washington Park Reservoirs Historic District [2004].**

The PWB addressed the evaluation factors (a through f above) in analyzing the demolition and redevelopment proposal in its application and supporting submittals. Because of the thorough discussion of the effects of the proposals on the historic district as well as the surrounding park and neighborhoods, the City Council generally finds credible and persuasive PWB's conclusions about how and whether the proposal supports the Comprehensive Plan goals and policies as explained below.

COMPREHENSIVE PLAN

GOAL 1: METROPOLITAN COORDINATION
The Comprehensive Plan shall be coordinated with federal and state law and support regional goals, objectives and plans adopted by the Columbia Region Association of Governments and its successor, the Metropolitan Service District, to promote a regional planning framework.

Findings: While this goal speaks to the coordination of the Comprehensive Plan with state and federal law to promote a regional planning framework, rather than the coordination of specific projects with state and federal law, Policy 1.4 *Intergovernmental Coordination* states: "Insure continuous participation in intergovernmental affairs with public agencies to coordinate metropolitan planning and project development and maximize the efficient use of public funds.

In addition to addressing structural concerns, such as seismic liability and landslide pressures on the aging reservoirs, the proposal to demolish the historic reservoirs (#3 and #4) at Washington Park is, in part, in response to the Environmental Protection Agency's Long Term 2 Enhanced Surface Water Treatment Rule (LT2). This federal regulation requires that all public water systems that store water in open reservoirs must either cover the reservoirs or treat the reservoir discharge in order to reduce the incidence of disease associated with pathogenic microorganisms. Because the proposal for demolition of the existing reservoirs includes replacement with a new covered reservoir, this proposal complies with federal and state water quality regulations. In addition, the Portland Water Bureau (PWB) has entered into a compliance agreement administered by the Oregon Health Authority (OHA), and this agreement provides a framework for regular communication and coordination with the OHA.

PWB applied to the Oregon State Historic Preservation Office (SHPO) for review of the project. SHPO provided interim advice that although the demolition will adversely affect the historic district, it appears unlikely to affect the district's listing on the National Register of Historic Places (Exhibit A-11). Because the project involves demolition of contributing resources, SHPO requires mitigation that will help interpret and explain the historic resources and preserve the historic values of the site. PWB has entered negotiations with SHPO to establish appropriate mitigation measures for the site. This ensures that the project will be coordinated with state and federal historic preservation laws.

This goal is met.

GOAL 2: URBAN DEVELOPMENT
Maintain Portland's role as the major regional employment, population and cultural center through public policies that encourage expanded opportunity for housing and jobs, while retaining the character of established residential neighborhoods and business centers.

Findings: The policies and objectives for this goal are primarily related to the development and use of urban lands for housing, employment, and transportation. However, Policy 2.6 *Open Space* states: "Provide opportunities for recreation and visual relief by preserving Portland's parks, golf courses, trails, parkways and cemeteries…" The proposed replacement development, as discussed during three Design Advice Request meetings with the Historic Landmarks Commission and described in the narrative and drawing set, includes increased public access to the walkways surrounding the proposed reflecting pools, as well as increased public access to the historic resources proposed to remain.

One of the areas of significance for the Historic District is "entertainment and recreation." In part, this is because the reservoirs were originally open to park visitors and constituted one of the park attractions. Currently, the public lands immediately surrounding the reservoirs are closed to public access. The

proposed redevelopment will reopen and thereby increase public access to these areas, providing more passive recreational opportunities within Washington Park.

This, in turn, will support Washington Park's existing role as a regional attraction and enhance the amenities available to residents of nearby neighborhoods and visitors to nearby business centers. In this way, the proposal will help to maintain Portland's role as the major regional employment, population, and cultural center.

The proposal supports this goal.

GOAL 3: NEIGHBORHOODS
Preserve and reinforce the stability and diversity of the City's neighborhoods while allowing for increased density in order to attract and retain long-term residents and businesses and insure the City's residential quality and economic vitality.

Findings: Policy 3.5 *Neighborhood Involvement* states: Provide for the active involvement of neighborhood residents and business in decisions affecting their neighborhood and business associations…" Before applying for this Type IV Demolition Review, PWB participated in a more than year-long public outreach process. This process included meetings with a sounding board made up of representatives of the nearby neighborhood associations and business coalitions, meetings with nearby neighborhood associations, site visits, open houses, and other outreach efforts activities. This outreach program provided the opportunity for PWB to inform the public of the challenges of site, PWB's approach to these challenges, receive feedback from the public and various stakeholder groups, and receive design advice from the Historic Landmarks Commission on the proposed replacement development and recommended mitigation for the loss of historic resources. Through the course of this project, this policy has been implemented.

Policy 3.1 *Physical Conditions* states: "Provide and coordinate programs to prevent the deterioration of existing structures and public facilities." Policy 3.4 *Historic Preservation* states: "Preserve and retain historic structures and areas throughout the city." The structural stability of the reservoirs has been continuously compromised by a landslide that was triggered during the original construction of the facility. Over the past 120 years, PWB has repaired sections of the basins and parapet walls of the reservoirs multiple times; however, the persistent pressure of the landslide continues to damage the aging facilities. PWB indicated that even if the City opted to cover the existing reservoirs in place (in response to LT2), the landslide would continue to damage the basins. The Exterior Building Assessment (Exhibit A-4), prepared as part of this application by Peter Meijer Architect in consultation with AECOM, on page 25 states, "Given the degree and type of damage to the parapet basin walls, combined with the amount of previous repairs as a result of landslide damage, the basin walls cannot be effectively repaired."

As stated above, before filing this application, PWB engaged the Historic Landmarks Commission for advice on the proposal, appearing before the Commission a total of four times. The Historic Landmarks Commission expressed a strong desire to mitigate the loss of Reservoir 3 and Reservoir 4 with preservation and restoration of the other contributing resources within the district, including the dams, gatehouses, Pump House 1, fencing, lighting, and the drinking fountain. Much of this work is described in Table 1.1 on pages 13-

19 of Exhibit A-1, the Washington Park Reservoir Improvements Project Application for Historic Demolition Review (revised January 26, 2015 and included in the record as Exhibit A-7). Implementation of an interpretation program and restoration of historic views was also recommended by the Historic Landmarks Commission; these aspects are briefly described on page 43 and pages 88-90 of Exhibit A-7, with views indicated on Sheet 3.0 Preliminary Design Concept. Ultimate approval of the proposed restoration and interpretation activities will require Type III Historic Resource Review approval; however, the proposed work, as indicated above, is based on the recommendations of the public, stakeholder groups, and the Historic Landmarks Commission. In addition, the Historic Landmarks Commission has indicated that the relatively utilitarian 1946 Weir Building is incongruous with the rest of the contributing resources on the site, which are designed in a Romanesque Revival style, and noted that its demolition would not compromise the integrity of the historic district.

While Policy 3.4 states that the City should retain historic structures throughout the city, the practicality of preserving structures perpetually compromised by the overwhelming natural forces—like the landslide that has historically affected the reservoirs--should also be considered. The Washington Park Reservoirs have served the City well for over 100 years, however, this service has not been without complications, as is evidenced by historical reports of landslides, cracking, and leakage from the beginning, as described in Section 1-3 of Exhibits A-1 and A-7. As noted above, the proposal for demolition of Reservoirs 3 and 4 and the Weir Building, also includes, as mitigation, restoration measures for the six (6) contributing structures to remain as well as development of an interpretation program.

On balance, and with consideration of the unique natural forces undermining the structural stability of the historic reservoir basins, the Council finds that the proposal supports this goal.

GOAL 4: HOUSING
Enhance Portland's vitality as a community at the center of the region's housing market by providing housing of different types, tenures, density, sizes, costs, and locations that accommodate the needs, preferences, and financial capabilities of current and future households.

Findings: This goal applies to the development of housing opportunities, not the redevelopment of existing open space or utility infrastructure.

This goal is not applicable.

GOAL 5: ECONOMIC DEVELOPMENT
Foster a strong and diverse economy which provides a full range of employment and economic choices for individuals and families in all parts of the city.

Findings: This goal applies to the development of employment opportunities, not the redevelopment of existing open space or utility infrastructure.

This goal is not applicable.

GOAL 6: TRANSPORTATION
Develop a balanced, equitable, and efficient transportation system that provides a range of transportation choices; reinforces the livability of neighborhoods; supports a strong and

diverse economy; reduces air, noise, and water pollution; and lessens reliance on the automobile while maintaining accessibility.

Findings: Objective E of Policy 6.22 *Pedestrian Transportation* states: "Develop a citywide network of pedestrian trails that increases pedestrian access for recreation and transportation purposes and links to schools, parks, transit, and shopping as well as to the regional trail system and adjacent cities." As noted above, the existing reservoirs are largely restricted from public access for safety, liability, and water quality reasons. However, the reservoirs were originally designed with promenades around their perimeter, as was common in the era of the City Beautiful movement, which aspired to encourage civic pride (and moral virtue) through the construction of beautiful public works that indirectly promoted healthy social engagement through the beautification of the city. The proposed redevelopment will restore access to and through the site, as shown in Figure 36 on page 81 of Exhibits A-1 and A-7, providing increased public access for pedestrians and non-motorized vehicles adjacent to the reflecting pools and throughout the reservoirs historic district. The new access and circulation routes will also connect the interior of the historic district to the regional 40-mile trail, which passes through Washington Park. This will allow increased opportunities for pedestrians and bicyclists to experience the historic resources proposed to remain through physical proximity as well as the interpretation program proposed as part of the mitigation. It will also increase the choices available to pedestrians and bicyclists with regard to routes through the park, as well as viewing and resting opportunities within Washington Park.

The proposal supports this goal.

GOAL 7: ENERGY
Promote a sustainable energy future by increasing energy efficiency in all sectors of the city by ten percent by the year 2000.

Findings: Objective K of Policy 7.2 *Energy Efficiency in City-Owned Facilities* states: "Where practicable, exceed the energy efficiency standards of the Oregon building code for new municipal buildings, facilities and major improvements. Cost-effective energy efficiency measures shall be taken, such as energy efficient lighting, high-efficiency motors and appliances, district heating and cooling systems, and the use of renewable resources." The Washington Park Reservoirs were listed in the National Register of Historic Places, in part, due to their innovative engineering as gravity is the primary force providing water from a mountain water source 30 miles east to residences and businesses within the city. Thus, the existing water system is extremely energy efficient and, because pumping is limited, also cost-effective.

In order to address the landslide and seismic concerns of the existing aging reservoirs, as well as respond to the LT2 regulations, the existing reservoirs are proposed for demolition so that a new buried reservoir can be constructed within a significant portion of the existing Reservoir 3 footprint. While other sites were analyzed in 2002 as potential locations for new underground reservoirs on the west side, the existing site was determined to be the most practical with regard to energy and cost efficiency in part because much of the area for the new underground reservoir will require relatively little excavation and the presence of the existing conduit infrastructure. Placing the new reservoir at this site will also preserve the ability to operate the water system primarily by gravity and will avoid the need to add pumping capacity, which would consume more energy than today's system.

In addition, demolition of Reservoir 4 allows the opportunity to reinforce the western hillside with additional earth mass in order to slow the continued movement of the landslide and provides an area, adjacent to the reduced footprint Reservoir 4 reflecting pool, to construct a bioswale for stormwater retention and filtering, thereby avoiding the need for a more energy-consumptive response to stormwater management.

The proposal supports this goal.

GOAL 8: ENVIRONMENT
Maintain and improve the quality of Portland's air, water and land resources and protect neighborhoods and business centers from detrimental noise pollution.

Findings: Goal 8.5 *Interagency Cooperation – Water Quality* states: "Continue cooperation with federal, state and regional agencies involved with the management and quality of Portland's water resources." The Environmental Protection Agency's LT2 regulation requires that all open reservoirs be covered or treated at the point of discharge. Despite a protracted effort to obtain either a variance from this regulation or an extension to the agreed-to deadline for compliance, the City was ultimately faced with the responsibility of ensuring its compliance with this regulation. In order to meet the compliance schedule entered into with the U.S. Environmental Protection Agency and Oregon Health Authority, PWB moved forward with application for this proposal. The compliance agreement continues to be a centerpiece of PWB's cooperation with federal and state agencies concerning water quality. Although LT2 compliance is a factor in the proposal for demolition of the Washington Park Reservoirs, geologic forces play perhaps a more significant role in the request.

Policy 8.13 *Natural Hazards* states: "Control the density of development in areas of natural hazards consistent with the provisions of the City's Building Code, Chapter 70, the Floodplain Ordinance and the Subdivision Ordinance." Also, Objective B *Slope Protection and Drainage* of Policy 8.16 *Uplands Protection* states: "Protect slopes from erosion and landslides through the retention and use of vegetation, building code regulations, erosion control measures during construction, and other means." As noted above, construction of the reservoirs in 1894 triggered an ancient landslide that has, since that time, been the cause of persistent damage and resultant maintenance concerns. Indeed, a December 30, 1894 Oregonian article entitled "Cracks in Reservoir" noted within days of the reservoirs' first watering, cracks that had apparently been noticed, but not reported, prior to the water being turned on.

> *"The water was run out as rapidly as possible. The examination which followed showed many cracks in the cement, near the bottom of the sides on the west side, from the dam to the buttress. In some places the earth had the appearance of being pushed out. In places on the bottom the cement was squeezed or buckled up and cracked clear through, and some water escaped by reason thereof. It is certain the water does not come from below, for that is impervious to water. There is one of two causes at work.*
> *"First – Either water is collecting under the lining, and not being able to escape forces its way through the cement; or,*
> *"Second – The whole mass of earth on the west side, resting on an underlying stratum of clay, is sliding in. The pressure is due to a lateral or horizontal force and must be one of the two above mentioned.*

"If it is due to the former, the remedy will be by drainage and heavy retaining walls; if to the latter, the remedy will be hard to find for the pressure will be almost resistless."

The reservoirs remained empty for the first ten years of their existence while the City attempted to dewater the hillside and slow the progression of the landslide. Even at present, however, the landslide continues to move. Removal of the existing reservoirs will provide the opportunity to restore the earth slope to the west of Reservoir 4, which will help to slow the movement of the landslide due to the reintroduction of earth mass at this location. Reinforcement of this slope will also help protect upland resources including the International Rose Test Garden and the Japanese Garden which are located within the footprint of this slide, as is shown on page 21 of Exhibits A-1 and A-7. Demolition will also allow the opportunity to construct a new buried reservoir with a footprint shifted slightly east of the existing Reservoir 3 footprint. This will achieve two purposes. First, it will place the new reservoir completely beyond the toe of the landslide, which puts it outside the area in which the ground is shifting. Second, it will allow space between the new reservoir and the adjacent hillside to introduce a compressible material which will serve as a cushion for the persistent landslide. These two measures are designed to protect the new reservoir from landslide damage for decades, thus extending its useful life. Removal of the existing reservoirs and construction of a new earthquake-resistant buried reservoir will also protect downslope residences and the city's water supply from a potentially catastrophic earthquake event. In addition, demolition of the 1946 Weir Building will allow access for the construction of the new buried reservoir in the proposed location in a manner that minimizes impacts to other historic and natural resources on the site. The proposal will therefore support Policies 8.13 and 8.16 by removing the reservoir basins (the structures most severely damaged by the landslide) and replacing them with better-protected structures designed to modern standards and building codes. In addition, by restoring the slope above Reservoir 4, the entire site (including the remaining historic structures) will face less risk of damage due to the additional mitigation of the landslide.

Policy 8.14 *Natural Resources* states: "Conserve significant natural and scenic resource sites and values through a combination of programs…Balance the conservation of significant natural resources with the need for other urban uses and activities through evaluation of economic, social, environmental, and energy consequences of such actions." The City adopted environmental and scenic overlay zoning in this area in 1992 (through adoption of the Southwest Hills Resource Protection Plan) to implement this policy when considering development in the area. The proposal supports Objective C, *Impact Avoidance*, because the proposed demolition and redevelopment will occur in previously disturbed areas with minimal incursion into environmental and scenic resource areas.

Two other objectives under Policy 8.14 apply directly to the scenic resources at the site. Objective K, *Enhancing View Corridors* applies to the Sacajawea scenic corridor and the view from the Grand Stairway, both of which will be opened to allow views across the historic district. Objective F *Pruning to Maintain and Enhance Views* states: "Actively manage the pruning and cutting of trees and shrubs on public lands or on non-public areas with scenic designations to maintain and enhance scenic views which may be impacted by vegetation." While restoration of the scenic views noted in the Olmsted Plan or the Scenic Resources Protection Plan is not contingent on demolition of the historic resources, it is worth noting that this aspect of the proposal meets this policy.

Policy 8.17, *Wildlife Habitat,* seeks to conserve existing areas and create new ones in order to increase the variety of fish and wildlife throughout the urban area. Policy 8.16, *Uplands Protection,* is intended to conserve significant upland areas and values related to wildlife, aesthetics and visual appearance, and views and sites (among other purposes). The demolition of Reservoir 4 will allow the upland slope to be restored to its approximate configuration before the reservoirs were constructed in 1894. In addition, a new "lowland habitat" area will be created within the footprint of today's Reservoir 4 as part of the proposed stormwater facility. The lowland habitat and the restored slope will approximate types of habitat that once existed in the immediate area. This aspect of the proposed redevelopment will support these two policies by creating new wildlife habitat where today there is none and by preserving views, sites, aesthetics, and wildlife values generally on the site.

The proposal supports this goal.

GOAL 9: CITIZEN INVOLVEMENT
Improve the method for citizen involvement in the on-going land use decision-making process and provide opportunities for citizen participation in the implementation, review and amendment of the adopted Comprehensive Plan.

Findings: Policy 9.1 *Citizen Involvement Coordination* states: "Encourage citizen involvement in land use planning projects by actively coordinating the planning process with relevant community organizations, through the reasonable availability of planning reports to city residents and businesses, and notice of official public hearings to neighborhood associations, business groups, affected individuals and the general public." Prior to making application for this Type IV Demolition Review, the Portland Water Bureau embarked on an extensive public outreach campaign which included stakeholder interviews, nine Community sounding Board meetings, four meetings with the Historic Landmarks Commission, American Institute of Architects Historic Resources Committee Briefings, several walking tours, and face-to-face as well as online open houses. This engagement process helped to shape the design concept presented as the proposed replacement for the existing reservoirs. During this process several key values were identified, including the retention of large expanses of open water, retention of as much historic character as possible, provision of interpretive elements, quiet spaces, and habitat, and responsibility for ratepayers' money. Section 1-4 *Public Involvement, Community Values & Design Options* in Exhibits A-1 and A-7 describes this process in detail. The Portland Water Bureau also posted and regularly updated project information on its website, including the application materials and information about providing comments for this demolition review. These activities provided active coordination with relevant community organizations and made public reports and plans readily available to residents, businesses, and any interested members of the public.

In addition, as part of this process the Bureau of Development Services issued notice of the March 23rd Historic Landmarks Commission meeting, later rescheduled to March 30th, and the April 23rd City Council hearing to neighborhood associations, business groups, and neighbors.

Taken together, these activities demonstrate the proposal supports this goal.

GOAL 10: PLAN REVIEW AND ADMINISTRATION
Portland's Comprehensive Plan will undergo periodic review to assure that it remains an up-to-date and workable framework for land use development. The Plan will be implemented in accordance with State law and the Goals, Policies and Comprehensive Plan Map contained in the adopted Comprehensive Plan.

Findings: This goal relates to the periodic review and implementation of the Comprehensive Plan in accordance with state law. As such, it speaks to a higher level of planning and is not applicable to this specific land use application.

This goal is not applicable.

GOAL 11: PUBLIC FACILITIES
Provide a timely, orderly and efficient arrangement of public facilities and services that support existing and planned land use patterns and densities.

Findings: Goal 11E *Water Service Goal & Policies* states: "Insure that reliable and adequate water supply and delivery systems are available to provide sufficient quantities of high quality water at adequate pressures to meet the existing and future needs of the community, on an equitable, efficient and self-sustaining basis."

Policy 11.26 *Quality* states: "Maintain the quality of the water supply at its current level, which exceeds all state and federal water quality standards and satisfies the needs of both domestic and industrial consumers." While the City maintains water service of exceptional quality, largely due to the protections on the Bull Run Watershed which provides our source water, the federal government has mandated additional protections for water quality, requiring our reservoirs to be either covered or treated at the point of discharge. The City Council made the decision to provide covered storage in previous public processes in part because the Council determined point-of-discharge treatment was found to be infeasible and more expensive. Without constructing covered drinking water storage, Portland will no longer meet all state and federal water quality standards. The proposal to demolish the existing reservoirs and construct a new buried reservoir in approximately the same location is, in part, a response to this regulation and supports Policy 11.26.

Policy 11.28 *Maintenance* states: "Maintain storage and distribution facilities in order to protect water quality, insure a reliable supply, assure adequate flow for all user needs, and minimize water loss." Aside from the federal regulations, other factors provide impetus for the proposal. For one, the Council, like PWB, considers this policy applicable to the entire water system and recognizes that aging infrastructure must be replaced as it approaches the end of its useful life. Also, and as noted above, construction of the reservoirs in 1894 triggered an ancient landslide that has ever since imposed significant pressure and deformation on the reservoirs due to persistent sliding. This has created considerable maintenance needs over the past 120 years, which are of greater concern as the seismically susceptible reservoirs continue to age. PWB states that retrofitting the existing facilities to withstand the continued pressures of the landslide would be costly and inefficient, and the efforts would ultimately be futile. To overcome this problem, the proposed replacement reservoir will be positioned east of the existing Reservoir 3 and outside of the toe of the landslide. In addition, significant fill is proposed to reconstruct the slope of the hillside above and within a portion of the existing footprint of Reservoir 4, which is intended to further slow the encroaching landslide. The proposed demolition

(and redevelopment) will greatly reduce maintenance requirements at this site while increasing the reliability of supply, thus supporting this policy.

Policy 11.29 *Storage* states: "Maintain city storage capacity of at least three times the average daily use of city users. Additional storage capacity contracted by outside-city water users will also be maintained." Since the time this policy was adopted, PWB developed its groundwater supply field, which provides a large quantity of water (much more than a three-day supply) that functions within the system as stored water. In addition, the total demand for water held at the Reservoir 4 elevation has declined due to the reduction in industrial water demand along the Willamette River in northwest Portland. As a result, PWB has stated that their current water needs are met, even without replacing the capacity of Reservoir 4 on the site. The new buried reservoir to be located in approximately the same location as the existing Reservoir 3, combined with other storage sites within the City, will be sufficient to meet the city's needs, and therefore supports this policy.

Policy 11.31 *Design and Community Impact* states: "Design water facilities to be compatible with the area in which they are located." The design of the proposed replacement development is the result of community participation and advice from the Historic Landmarks Commission and other stakeholders. The proposed development includes a buried reservoir with a cascading reflecting pool in approximately the same location and footprint as the existing Reservoir 3. This reflecting pool will ensure that visible water is present adjacent to Gatehouse 3 and the Dam and at approximately the same elevation as with the historic condition. Similarly, at Reservoir 4, while there will be no buried reservoir, there will be a reflecting pool adjacent to Gatehouse 4 and the Dam in order to preserve the historic character of these features.

In addition, the reservoirs are currently restricted from public access due to liability concerns. The proposed redevelopment will incorporate greater connectivity to the visible water features and the remaining historic resources, as well as increased opportunities for passive recreation throughout the site. An interpretation program will be developed to tell the story of the Washington Park Reservoirs and the Bull Run water delivery system. These aspects of the proposal will ensure that the new facility will be compatible with the area in which it is located - a public park - where nature, beauty, and opportunities for passive recreation are part of its essential character. The provision of surface water features, public access, and interpretive materials ensures that the proposed demolition and redevelopment will support this policy.

Policy 11.36 *Water Pressure* states: "Provide water at standard pressures (40 to 110 lbs. per square inch) to all users whenever possible." By proposing to locate the new buried reservoir in essentially the same location and at the same elevation as the existing Reservoir 3, existing water pressure that meets this standard will be maintained. The proposal thus supports this policy.

Goal 11F, *Parks and Recreation,* states: "Maximize the quality, safety, and usability of parklands and facilities through the efficient maintenance and operation of park improvements, preservation of parks and open space, and equitable allocation of active and passive recreation opportunities for the citizens of Portland."

Policy 11.38, *Master Development Plans,* states: "Maintain master development plans for city parks that address user group needs, development priorities, development and maintenance costs, program opportunities, financing strategies, and citizen involvement." The Washington Park Master Plan is the master development plan for Washington Park, and as described below, the proposal supports Policy 3, which deals with the reservoirs site (see discussion of Washington Park Master Plan below). In addition, the proposal for demolition and redevelopment was prepared in cooperation with Portland Parks and Recreation, and has considered explicitly many of the policies of concern to the master plan, including user group needs, development priorities, development and maintenance costs, program opportunities, and citizen involvement. In these ways, the proposed demolition and redevelopment support this policy.

Policy 11.39, *Maintenance,* states: "Provide programmed preventive maintenance to all city park and recreational facilities in a manner which reduces unplanned reactive maintenance and emphasizes the use of scheduled service delivery." The current proposal supports both Goal 11F *Parks and Recreation* and Policy 11.39 *Maintenance* because the area currently closed to public access will be opened and attractive modern facilities will be constructed. For example, the chain-link fence below Sherwood Boulevard will be moved to a less-conspicuous location, improving the view. The proposal will also reduce future maintenance costs by demolishing the deteriorating reservoirs, further stabilizing the landslide, and preserving or rehabilitating the remaining historic structures in the district. Pedestrian access and the Grand Stairway will improve the safety and usability of this portion of the park. Finally, the proposed redevelopment does not change the balance between passive and active recreational experiences available in Washington Park or the amount of open space in the park. It simply improves the recreational opportunities in this part of the park while reducing ongoing maintenance costs for these deteriorating structures. Therefore, the proposed demolition and redevelopment will support Goal 11F and this policy.
This will maximize the quality and usability of the park generally and of the park improvement managed by the Water Bureau within the historic district.

For the reasons stated above, the proposal supports this goal.

GOAL 12: URBAN DESIGN
Enhance Portland as a livable city, attractive in its setting and dynamic in its urban character by preserving its history and building a substantial legacy of quality private developments and public improvements for future generations.

Findings: Policy 12.1 *Portland's Character* states: "Enhance and extend Portland's attractive identity. Build on design elements, features and themes identified with the City. Recognize and extend the use of City themes that establish a basis of a shared identity reinforcing the individual's sense of participation in a larger community." The Washington Park open reservoirs have served our City for more than 100 years, providing an essential service as well as beautiful vistas of the intersection of architecture, utility, and nature. The structures have become symbolic of Portlander's appreciation and embrace of nature and are much beloved by the majority of the population aware of their existence and a source of pride for the City.

Unfortunately, the overwhelming forces of nature have not been kind to these structures and the preservation of these facilities has been an ongoing challenge since before their initial completion. As described above, the continued preservation of the existing historic reservoirs, with the persistent landslide

pressures continuing to compromise their structural stability, appears to be unsustainable in the long run. Through cooperation with the Community Sounding Board, the Historic Landmarks Commission, and a number of other stakeholders, PWB has proposed a replacement facility that is both attractive and engaging, providing the opportunity for the City to build a new legacy. Although the original reservoir basins are to be demolished, the proposal will retain the important Romanesque gatehouses and dams. The proposed redevelopment will reconnect citizens with the reservoirs in a new way through: (a) restoration of and reconnection with the historic resources to remain; (b) educational programming; and (c) restored views toward the city and the Bull Run watershed beyond, referred to as the Olmsted View. The proposal, by building upon the existing historic themes and preserving many features of the site, supports Objective B.

Objective B of Policy 12.1 states: "Preserve and enhance the character of Portland's neighborhoods. Encourage the development of attractive and unique characteristics which aid each neighborhood in developing its individual identity." While the reservoirs, as publicly-owned facilities belong to the general public, they are located within the Arlington Heights neighborhood and are a rather unique characteristic of this neighborhood and a part of its unique identity. Members of the Arlington Heights Neighborhood Association, as well as members of neighboring neighborhoods, participated in the Community Sounding Board discussions and helped to shape the development of the proposal for replacement facilities. Throughout this process, the participation and cooperation between the public and PWB has demonstrated the best of collaborative community planning. The resulting proposal for redevelopment will retain the most visible and striking of the historic structures in the historic district. This, along with views across open water, will help preserve the contribution of this historic district to the identity and character of the nearby neighborhood. The new access to the reservoir area will make the historic district even more significant than it is today in contributing to the unique characteristics of these neighborhoods. The proposed demolition and redevelopment therefore support this Objective of Policy 12.1.

Objective C of Policy 12.1 states: "Enhance the sense Portlanders have that they are living close to nature…Design new development to enhance the natural environment that is so much a part of Portland's character." Objective H states: "Preserve and enhance existing public viewpoints, scenic sites and scenic corridors. As new development occurs, take advantage of opportunities to create new views of Portland's rivers, bridges, the surrounding mountains and hills, and the Central City skyline." As noted above, the proposed replacement development will provide increased pedestrian access to the water features. Within the footprint of the redeveloped Reservoir 4, a grassy swale will provide additional wildlife habitat adjacent to the lower reflecting pool. The City's Scenic Views, Sites, and Corridors Resource Protection Plan lists certain scenic views, sites, and drives worthy of protection. While some of these are within Washington Park, none specifically describe views that include the existing reservoirs; therefore these designated views and drives will not be affected by the proposal. However, as noted above, the Olmsted view to the Bull Run watershed area will be restored. The proposal thereby retains elements of the Olmsted concept of "nature in the city" and enhances and restores to the historic district public viewpoints and the sense of "living close to nature," which support Objectives C and H of Policy 12.1.

For the reasons explained above, the proposal supports this policy.

Policy 12.3 *Historic Preservation* states: "Enhance the City's identity through the protection of Portland's significant historic resources. Preserve and reuse the historic artifacts as part of Portland's fabric. Encourage development to sensitively incorporate preservation of historic structures and artifacts." It is without question that the Washington Park Reservoirs are among the City of Portland's most significant historic resources. The construction of the Bull Run water delivery system in 1894, with the reservoirs serving as the grand finale, helped provide clean and safe drinking water to the citizens of a rapidly growing city. Indeed, the reservoirs were one of the first and grandest public works projects initiated and completed by the City. As the National Register nomination states:

> *"The layout of the reservoirs, on the east and west side of the Willamette River, was one of the early connections to the two sides of Portland divided by the river. The result of a government-business paradigm for public works, funding the creation of Portland's Bull Run water system, of which the reservoirs are an integral part serving as the water storage and delivery system, was a landmark process for Oregon's legislature that illustrated a commitment to public health and an adequate supply of high quality water using a cost effective delivery design. Consequently, subsequent and similar public-private investments ensued, such as the funding and construction of Portland City Hall in 1895, the development of park planning, and the installation of public drinking fountains, the Benson Bubblers in 1912, in downtown Portland."*

Consideration of the future of the reservoirs has been a decades-long question, with the 1981 Washington Park Master Plan noting the federal government had previously urged the covering of all open reservoirs, and therefore acknowledging this was a possibility. As reported in the December 30, 1894 Oregonian article "Cracks in the Reservoir", one commenter suggested that *"nothing could save either of them and…it would be better for the taxpayers to shut them down."* Instead, the City did its best to keep the reservoirs in service for over 100 years. These same techniques could probably continue to extend the life of the reservoirs a few more decades, however, the federal government now requires that the water in existing open reservoirs be either covered or treated at the point of discharge. Given these options, and with consideration of the history of nature's influence on the site, the decision was made to seek approval for the construction of a new buried reservoir and reinforcement of the hillside, with demolition of the existing historic reservoirs as a consequence.

While the basins and parapets walls of Reservoirs 3 and 4 and the Weir Building are proposed to be demolished, the applicant proposes as mitigation for their loss restoration activities to the contributing resources proposed to remain, educational programming, and increased access and accessibility. The proposed restoration activities include the following: rehabilitation of Dam 3, including repair and reconstruction (as needed) of the parapet wall and balustrade, and removal of unnecessary piping and equipment; rehabilitation of Dam 4, including repair and reconstruction (as needed) of the parapet wall and balustrade, and removal of unnecessary piping and equipment; restoration of windows to Pump House 1, affording interior views to "Thumper" (the historic water pump inside); structural upgrade, roof replacement, replacement of non-historic metal doors with more appropriate doors, and removal of unnecessary

equipment to Gatehouse 3; replacement of non-historic metal doors with more appropriate doors and removal of unnecessary equipment to Gatehouse 4; cleaning of the Generator Building and all other buildings and structures to remain; plus patching of holes, and crack and spall repair on all contributing buildings and structures to remain. In addition, retention and rehabilitation of the historic fencing along Dams 3 and 4 and along the east and south edges of Reservoir 4, rehabilitation of the historic light post ironwork, renovation of 3 decorative concrete urns, and removal of non-historic incompatible lighting and introduction of new visually unobtrusive lighting is also proposed. While Reservoirs 3 and 4 and the Weir Building are proposed for demolition, the remaining historic resources will be rehabilitated and incorporated into the new design.

Objective A of Policy 12.3 states: "Preserve and accentuate historic resources as part of an urban environment that is being reshaped by new development projects." As noted above, the remaining historic resources will be rehabilitated and incorporated into the new development. While a significant portion of the new development will be underground, new reflecting pools, pedestrian paths, and lighting are proposed. These new elements will be juxtaposed against the remaining historic resources, adding contrast while still being compatible. In addition, interpretive programming, proposed as mitigation, will highlight the historic resources, informing the public of their history and significance.

Objective B states: "Support the preservation of Portland's historic resources through public information, advocacy and leadership within the community as well as through the use of regulatory tools." This Demolition Review meets the regulatory aspect of this policy. Active preservation of the historic resources to remain, restoration of deteriorated historic features, and the development of interpretive programming, as is proposed as the mitigation for the loss of Reservoirs 3 and 4 and the Weir Building, meets the other aspects of this objective.

Objective C of Policy 12.3 states: "Maintain a process that creates opportunities for those interested in the preservation of Portland's significant historic resources to participate in the review of development projects that propose to alter or remove historic resources." The Type IV Demolition Review process affords the public the opportunity to comment on the proposed demolition and replacement development. A subsequent Type III Historic Resource Review will provide additional opportunity for the public to comment as the redevelopment proposal continues to become more specific and refined. In addition to the official public involvement and notification processes, the PWB engaged in an extensive public outreach campaign to help develop the general concepts for this proposal. That outreach, combined with design advice by the Historic Landmarks Commission, significantly shaped the current proposal.

Demolition of the historic Reservoirs 3 and 4, as well as the Weir Building, when considered out of the context of the overall development proposal, appears not to meet the City's Historic Preservation goal. In conjunction with the proposal to rehabilitate the remaining historic resources, implement interpretive programming, and increase public accessibility to these remaining historic resources, *when combined with these mitigation provisions*, the Council finds that the City's Historic Preservation goals are met.

Although this proposal doesn't support every aspect of the policy, the Council finds that on balance and with PWB's proposed mitigation the proposal supports this policy.

Objective B of Policy 12.4 *Provide for Pedestrians* states: "Enhance the environment occupied by Portland's pedestrians. Seek to enrich these places with designs that express the pleasure and hold the pleasant surprises of urban living." As noted above, the redevelopment proposal includes increased pedestrian accessibility to the proposed reflecting pools and the historic resources to remain, as well as introduces interpretive programming and provides additional routes for pedestrians and bicyclists. Currently the reservoirs and much of the land around them is restricted from public access for liability reasons. As a result of the proposed redevelopment, these lands will be reopened, affording new opportunities for passive recreation and surprise.

For the reasons stated above, the proposal supports this policy.

On balance, and with consideration of the unique natural forces undermining the structural stability of the historic reservoir basins described under Policy 12.1and with the mitigation measures described under Policy 12.3the Council finds that the proposal is sufficiently supportive of this goal.

WASHINGTON PARK MASTER PLAN

RECOMMENDATION 3: RESERVOIRS

A. *Move the chain-link fence around the reservoirs to a less unsightly position lower on the slope.*
B. *If the reservoirs are covered, flood the covered area with shallow water to preserve their traditional attractive appearance.*

Findings: Currently, chain link fencing remains along the upper elevation portions of Sherwood Avenue. Some fencing was replaced with iron fencing in 2005 and 2007. PWB indicates that as part of the redevelopment proposal, portions of the existing chain-link fencing will be moved, which will allow for increased accessibility adjacent to the proposed replacement water features and the historic resources proposed to remain. As noted under "B", covering of the reservoirs was anticipated more than 30 years ago. Consistent with "B,"As suggested, the proposed redevelopment will include a reflecting pool over a new buried Reservoir 3 as well as a reflecting pool adjacent to the Reservoir 4 dam and gatehouse, in a reduced footprint of the existing Reservoir 4.

Based on the explanation and findings above, the Council finds that PWB's proposal satisfies the approval criterion for demolition review contained in PCC 33.846.080.C.2.

OTHER TECHNICAL REQUIREMENTS

V. CONCLUSIONS

The Washington Park Reservoirs were constructed in 1894 within a natural ravine in what was then called City Park. Unfortunately, the shape of the natural ravine was enhanced with excavation that led to the awakening of an ancient landslide that has exerted its pressure on the reservoirs, resulting in cracking and compromised integrity

since before they were even completed. Herculean efforts were undertaken that have allowed the reservoirs to serve the City for over 100 years; however, the force of gravity persists and compromises the reservoirs' ability to withstand a more unpredictable events such as a significant earthquake. In addition, the Environmental Protection Agency has mandated that drinking water in open reservoirs be either covered or treated at the point of discharge, which ultimately has prompted the City's proposal to demolish the reservoirs and build a new buried reservoir at this point in time, rather than at some later point in time.

Prior to this Demolition Review, there have been only two other Demolition Reviews in the City's history. In the first Demolition Review (LU 09-171258 DM), the City Council also found that it has broad discretion in deciding how to balance applicable comprehensive plan goals and policies, and specifically that "The Council has the authority to give certain relevant goals and policies more weight" and others less in deciding whether the proposal, on balance, supports the Comprehensive Plan and other relevant area plans.

The proposed demolitions are *not* fully supportive of the two historic preservation policies in the Comprehensive Plan: Neighborhoods Policy 3.4 Historic Preservation and Urban Design Policy 12.3 Historic Preservation. However, the goal of preserving the reservoirs was to preserve two essential characteristics: (1) the storage and distribution of high quality water using a gravity-fed system; and (2) open and accessible water that provides aesthetic, spiritual and recreational value to park visitors seeking solace and respite from urban living. In fact, the covering of Reservoir 3 at its current location is necessary to maintain the first characteristic (water quality), at least to the satisfaction of federal and state regulators; and the second characteristic (open and accessible water) is impossible to achieve if the existing reservoirs are closed to the public.

The City Council finds that on balance, the provision of key public facilities and services is a public necessity and must be given great weight in the review process. Based on the analysis of "project drivers," the Portland Water Bureau has no reasonable choice but to demolish Reservoir 3, Reservoir 4, and the Weir Building. The alternative is to maintain aging infrastructure that violates state and federal rules, which require that these reservoirs be covered. At the same time, the Water Bureau would also be keeping a critical part of the city's water supply in reservoirs that have been and will continue to be vulnerable to damage by an active landslide or seismic events. This approach would hold the public at risk of losing vital water supplies and experiencing downstream flooding as these facilities continue to age and deteriorate, or as a result of a major seismic event.

In both of the prior Historic Demolition cases (LU 09-171259 DM and LU 14-210073 DM), the City Council indicated that in order for a Demolition Review to be approved, the replacement development must provide a significant public benefit in order to make up for the loss of the historic resource.

In this case, the historic resources are considerable and the public benefit must be comparable. As outlined above, the construction of a new buried reservoir will protect downslope properties from a potentially catastrophic event such as an earthquake, while the reinforcement of the slope west of Reservoir 4 will help to slow movement of the landslide, thus protecting upland resources such as the International Rose Test Garden. Neither of these aspects of the proposal are possible if the existing reservoirs are kept in their current configuration. In addition, decommissioning of the existing reservoirs and construction of a new buried reservoir slightly east of the existing Reservoir 3 will require less maintenance over time as it will not be subject to the persistent force of the landslide compromising its integrity. As mitigation, the City

proposes substantial rehabilitation work on the existing historic resources proposed to remain, interpretive programming, and increased accessibility for pedestrians and bicyclists, which will integrate the historic district more fully into Washington Park and allow the public to enjoy this long-closed-off area and its historic resources. These are substantial and significant public benefits.

On balance, City Council finds that the proposal to demolish Reservoirs 3 and 4 and the Weir Building and redevelop the site as proposed in the applicant's narrative (Exhibits A-1 and A-7), is supportive of the relevant goals and policies of the Comprehensive Plan, and therefore warrants approval.

VI. DECISION

It is the decision of Council to: Approve the PWB's application to demolish Reservoir 3, Reservoir 4, and the Weir Building, all contributing resources in the National Register Washington Park Reservoirs Historic District, consistent with Exhibits C-1 through C-3.

VII. APPEAL INFORMATION

Appeals to the Land Use Board of Appeals (LUBA)
This is the City's final decision on this matter. It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date of the decision, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have appeared orally or in writing during the local proceedings for this land use review. You may call LUBA at 1 (503) 373-1265 for further information on filing an appeal.

EXHIBITS NOT ATTACHED UNLESS INDICATED

A. Applicant's Statement:
    1. Application for Historic Demolition Review, dated December 2014 (98 pages)
    2. Changes Over Time (4 sheets)
    3. Original Drawings (3 sheets)
    4. Exterior Building Assessment
    5. Pre-Application Conference Summary Memo, dated June 9, 2014
    6. Washington Park Reservoirs National Register nomination
    7. Revised Application, received January 26, 2015 (98 pages)
    8. Revised Proposed Demolition sheet, dated January 23, 2015
    9. AIA Letter of support
    10. Community Sounding Board Letter of support, dated January 27, 2014
    11. Comments forwarded from Jason Allen, at the State Historic Preservation Office (SHPO), dated March 9, 2015, stating that SHPO found the demolition to adversely affect the historic district, but did not believe the demolition would affect the district's listing on the National Register of Historic Places.
B. Zoning Map (attached)
C. Plans & Drawings:
    1. Existing Site Conditions (attached)
    2. Proposed Demolition (attached)
    3. Preliminary Design Concept (attached)
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 Mailing list
6. Mailed notice
7. Revised Posting Notice
8. 2nd Certification form
9. Revised Notice
10. Revised Notice Mailing List
11. Map of Posting Notice Locations

E. Agency Responses:
1. Bureau of Parks, Forestry Division
2. Water Bureau
3. Life Safety Division of BDS
4. Bureau of Environmental Services
5. Fire Bureau
6. Bureau of Transportation Engineering and Development Review
7. Site Development Review Section of Bureau of Development Services

F. Letters:
1. Susan Alpert Siegel, President of the Arlington Heights Neighborhood Association, on February 27, 2015, wrote with concerns regarding the routing of construction traffic through the neighborhood and the closure of Sacajawea Circle during the project's multi-year construction schedule.
2. Nancy Seton, President and Land Use Chair of the Southwest Hills Residential League (SWHRL), on March 6, 2015 wrote in support of the proposal to demolish the existing historic reservoirs and with support for the proposed replacement development featuring reflecting pools a restored hillside, and improved access.
3. Catherine Ellison, on March 7, 2015, wrote with concerns about Sacajawea Circle being closed during construction, stating it would be a tremendous inconvenience, and requesting that alternatives be considered.
4. RoseMarie Opp, on March 8, 2015, wrote with concerns regarding the effect of buried reservoirs on health, cracks in the Powell Butte reservoir, negative impacts of construction on Washington Park, and concern that the Arlington Heights Neighborhood Association online calendar does not list the April 23rd City Council hearing date. Ms. Opp also provided a copy of the October 29, 2014 presentation to the Community Sounding Board and a copy of the City of Portland Public Involvement Principles, both received March 17, 2015
5. Katherine Stansbury, on March 9, 2015, wrote in opposition to the proposed disconnection of the Mt. Tabor Reservoirs, citing previous attempts to destroy the reservoirs and the City's failure to request extensions to the LT2 timeline, and requesting the Historic Landmarks Commission intervene to delay the project until after the LT2 review.
6. Scott Fernandez, on March 9, 2015, wrote in opposition, noting the benefits of sunlight, oxygenation, and open air on drinking water and stating that the "landslide characterization issues and reasons for the changes to Washington Park reservoirs have been overblown and portrayed incorrectly."
7. Ann Witsil, on March 9, 2015, wrote with concerns regarding the temporary closure of Sacajawea Circle, suggesting limiting its closing to certain times of day.
8. Eric Nagle, Community Sounding Board member, on March 16, 2015, forwarded a January 27, 2014 memo from the Community Sounding Board to the Historic Landmarks Commission in support of the proposal. Mr. Nagle also noted the need for design features that discourage skateboarding to ensure the continued tranquility of the place.
9. Katherine Stansbury, on March 19, 2015, wrote in opposition, requesting that the Historic Landmarks Commission make a request to the governor and the Oregon Health Authority to delay the start of the project until January 1, 2017.

10. Beth Giansiracusa, on March 19, 2015, wrote in opposition suggesting that the City's drinking water be treated rather than buried.
11. Jeffrey E. Boly on March 19, 2015, wrote in opposition, stating that the applicant cannot meet the first approval criteria option and suggesting alternative options for Reservoirs #3 and #4.
12. Susan Alpert Siegel, President of the Arlington Heights Neighborhood Association, on March 24, 2015, wrote with concerns that the proposed restoration efforts are not sufficiently described in the proposal drawings and suggesting the demolition permit drawing must also show the preservation work proposed.
13. Joanne Stainbrook, AIA Historic Resources Committee, on March 20, 2015, wrote in support, stating the applicant had met with them three times and that they found the level of mitigation proposed is appropriate.
14. Floy Jones, on March 29, 2015, provided the Washington Park Reservoirs Historic Structures Report.
15. Mary Ann Schwab, on March 30, 2015, wrote with concerns regarding construction traffic and location of posting boards.
16. Dee White, on March 29, 2015, wrote in opposition, stating that the citizen Involvement goal was not met as the public was never given the opportunity to discuss alternatives to demolition.
17. Floy Jones, Friends of the Reservoirs, on March 29, 2015, wrote in opposition, stating that the applicant has not met Goal 9 Citizen Involvement, and has defied a 2004 City Council ordinance (#36267) which required stakeholder input on future plans for the reservoirs.
18. Katherin Kirkpatrick, on March 30, 2015, wrote in opposition, stating that demolition of the resources results in a failure to preserve the historic character and function of the resources, and stating that the applicant has not met the EPA's public notification rules.

G. Other:
1. Original LUR Application
2. Incomplete Letter, dated January 14, 2015
3. Applicant Drawing Set for Historic Landmarks Commission meeting March 30, 2015
4. Applicant's Supplementary Materials

H. Historic Landmarks Commission meeting March 30, 2015
1. Staff Presentation to Historic Landmarks Commission, dated March 30, 2015
2. Applicant Presentation to Historic Landmarks Commission, dated March 30, 2015
3. Chris Kent, on March 30, 2015, provided oral testimony in support
4. John Czarnecki, on March 30, 2015, provided oral and photographic testimony in support and suggesting that the maintenance structures east of Reservoir 4 should also be removed.
5. Scott Fernandez, on March 30, 2015, provided oral and written testimony in opposition stating that the landslide and seismic concern are not as bad as have been presented and the negative effects of buried reservoirs is of greater concern.
6. Joe Walsh, on March 30, 2015, provided oral testimony in opposition
7. RoseMarie Opp, on March 30, 2015, provided oral and written testimony in opposition, stating that buried reservoirs result in negative health effects and with concerns regarding construction traffic.
8. Floy Jones, on March 30, 2015, provided oral testimony in opposition
9. Dee White, on March 30, 2015, provided oral testimony in opposition
10. Jeffrey Boly, on March 30, 2015, provided oral testimony in opposition, stating there was less consensus among the community stakeholders than has been presented.

11. Beth Giansiracusa, on March 30, 2015, provided oral testimony in opposition
12. Eileen Brady, on March 30, 2015, provided oral testimony encouraging the Historic Landmarks Commission to attend the Mt. Tabor Appeal hearing at City Council.
13. Mark Wheeler, on February 17, 2015, wrote in opposition. These comments were forwarded by Teresa Elliott, Portland Water Bureau.
14. Portland Water Bureau Memo to City Council, dated April 9, 2015
15. Portland Water Bureau Public Involvement Summary, dated April 2015
16. Type IV Land Use Hearing Meeting Packet, dated April 23, 2015
17. Application Materials resubmitted for City Council hearing
18. Historic Landmarks Commission letter to City Council, dated April 13, 2015
19. Staff Report and Recommendation to City Council, dated April 13, 2015

I. City Council Hearing

1. Floy Jones, on April 16, 2015, wrote in opposition and submitted a 2006 letter from Chet Orloff to City Council
2. Historic Landmarks Commissioner Harris Matarazzo, on April 17, 2015, wrote in opposition
3. Teresa Elliott, Portland Water Bureau, on April 16, 2015, submitted comments received in opposition by Sabrina Louise.
4. Tana and David Cahill, on April 19, 2015, wrote in opposition
5. Brenna McDonald, on April 20, 2015, wrote in opposition
6. Catherine Klebl, on April 20, 2015, wrote in opposition
7. Ian Keeber, on April 21, 2015, wrote in opposition
8. Floy Jones, on April 21, 2015, wrote in opposition and submitted a letter, a City Council Resolution, Water Bureau construction figures into the record
9. Mark Bartlett, on April 22, 2015, wrote in opposition
10. Jeffrey Boly, on April 22, 2015, wrote in opposition
11. Elizabeth Callison, on April 21, 2015, wrote in opposition
12. Floy Jones, on April 22, 2015, wrote in opposition
13. Dee White, on April 22, 2015, wrote in opposition and submitted a 2004 Portland Alliance article about the Mt. Tabor Reservoirs Independent Review Panel
14. Floy Jones, on April 22, 2015, submitted data for a covered Nevada tank
15. Floy Jones, on April 22, 2015, submitted documents including a letter from the Federal Energy Regulatory Commission to Frank Galida, City of Portland, regarding the Mt. Tabor Reservoirs, pages from the November 2001 Open Reservoir Study by Montgomery Watson Harza, and a February 4, 2013 from Commissioner Steve Novick to the Oregon Health Authority requesting an extension to the LT2 compliance deadline
16. Floy Jones, on April 22, 2015, submitted documents including a Portland Water Bureau 2012 security report regarding criminal mischief at Reservoir #7 at Mt. Tabor Park
17. Floy Jones, on April 22, 2015, wrote in opposition
18. Katherin Kirkpatrick, on April 23, 2015, wrote in opposition and submitted the Portland Water Bureau's 2011 and 2012 Drinking Water Quality Reports
19. Katherin Kirkpatrick, on April 23, 2015, wrote in opposition and submitted a report by Tectonophysics related to the potential of increased radon exposure due to seismic activity
20. Katherin Kirkpatrick, on April 23, 2015, wrote in opposition and submitted a May 2014 document entitled "Scientific and Public Health Basis to Retain Open Reservoir Water System for the City of Portland, Oregon" by Scott Fernandez
21. Katherin Kirkpatrick, on April 23, 2015, wrote in opposition (see Exhibit I-19)
22. Katherin Kirkpatrick, on April 23, 2015, submitted an April 19, 2015 letter by Floy Jones, Friends of the Reservoirs, and March 19, 2015 letter by Jeffrey Boly

23. Katherin Kirkpatrick, on April 23, 2015, submitted a copy of her January 10, 2015 public records request, which remains outstanding
24. Suzanne Sherman, on April 23, 2015, wrote in opposition
25. Katherin Kirkpatrick, on April 23, 2015, submitted Dee White's March 30, 2015 testimony in opposition and the March 29, 2015 testimony in opposition by Floy Jones of Friends of the Reservoirs
26. Jeya Arenson, on April 23, 2015, wrote in opposition
27. Scott Fernandez, on April 22, 2015, wrote in opposition
28. Dee White, on April 22, 2015, wrote in opposition and submitted her March 30, 2015 testimony to the Historic Landmarks Commission, the June 2004 Portland Alliance article regarding the Mt. Tabor Reservoirs Independent Review Panel
29. Katherin Kirkpatrick, on April 22, 2015, wrote in opposition and submitted survey results regarding options for Mt. Tabor Reservoirs
30. RoseMarie Opp, on April 23, 2015, wrote in opposition
31. Jeya Arenson, on April 23, 2015, wrote in opposition
32. Seven Stevens, on April 23, 2015, wrote in opposition
33. Dan Berger, on April 23, 2015, wrote in opposition

Received at City Council hearing April 23, 2015

34. BDS Staff Presentation to City Council, dated April 23, 2015
35. Portland Water Bureau Presentation to City Council, dated April 23, 2015
36. Annie Mahoney, Community Sounding Board, provided oral and written testimony in support
37. Scott Fernandez provided oral and written testimony in opposition
38. John Czarnecki provided oral and written testimony in opposition
39. Mary Ann Schwab provided oral and written testimony in opposition

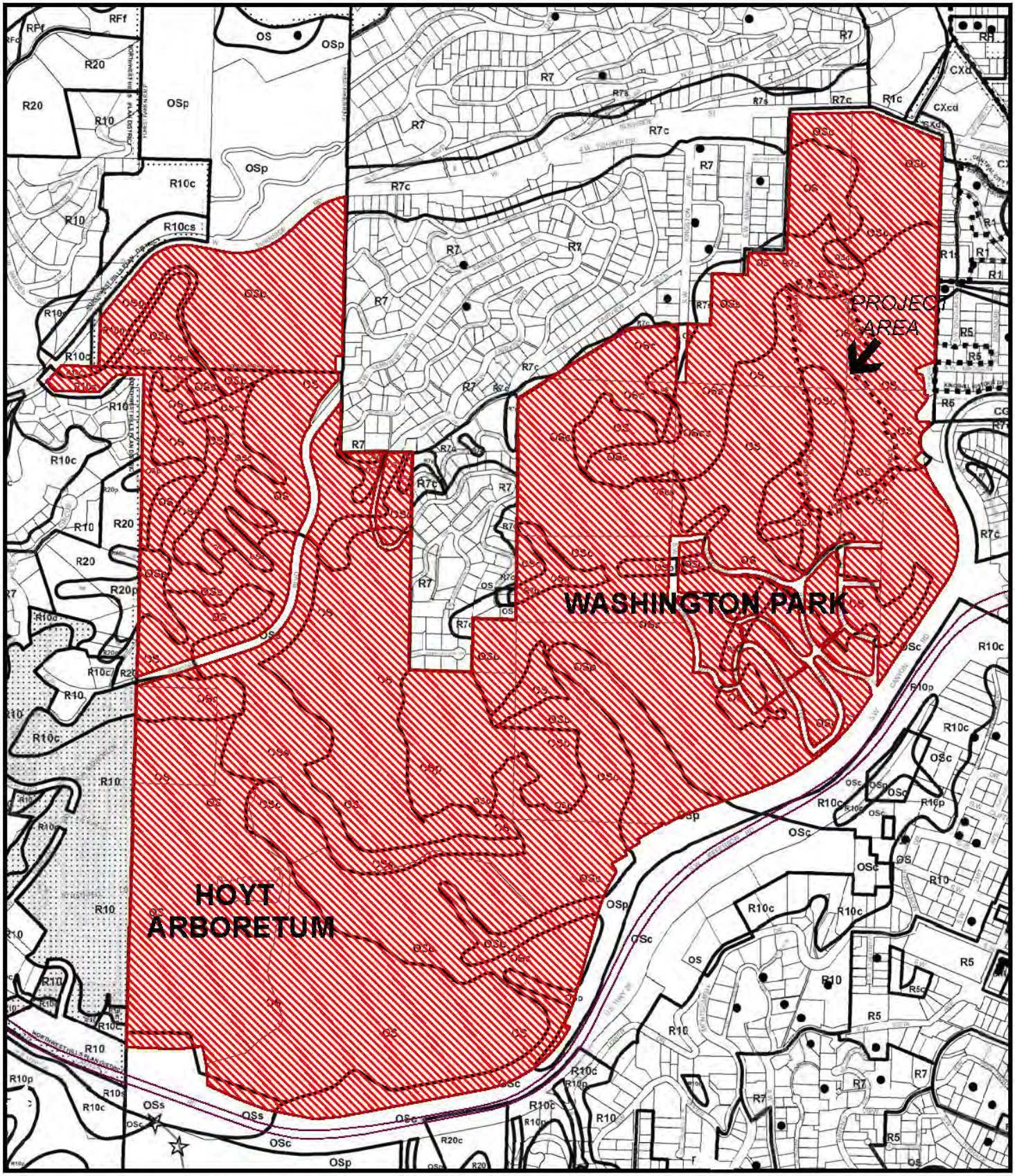
Received during 1st 7-day period, ending 5pm on April 30, 2015

40. Valerie Hunter, on April 23, 2015, wrote in opposition
41. Ben Asher, on April 24, 2015, wrote in opposition
42. Andrea Kampic, on April 26, 2015, wrote in opposition
43. Mark Wheeler, on April 27, 2015, wrote in opposition
44. Robert Stabbert, on April 27, 2015, wrote in opposition
45. Carolyn Stuart, on April 27, 2015, wrote in opposition
46. Mark Bartlett, on April 27, 2015, wrote in opposition
47. MaryAnn Amann, on April 27, 2015, wrote in opposition
48. Floy Jones, on April 29, 2015, wrote in opposition and provided copies of contracts for prior work at Washington Park Reservoirs
49. Michael Wallace, on April 30, 2015, wrote in opposition, stating that the chance of a landslide is overstated and with concerns about construction traffic
50. Nancy Newell, on April 30, 2015, wrote in opposition, stating that the landslide and earthquake concerns are inaccurate
51. Tom Carter, PWB, on April 30, 2015, provided comments responding to issues raised by public comments
52. Dee White, on April 30, 2015, wrote in opposition and provided copies of the following: Derek Conforth's "Seven Deadly Sins of Landslide Investigation, Analysis, and Design", Nejan Huvaj-Sarihan's "Evaluation of the rate of movement of a reactivated landslide", and Oregon Department of Land Conservation and Development's "Planning for Natural Hazards: Landslide TRG [Technical Resource Guide]"
53. Jaymee Cuti, PWB, wrote on April 30, 2015, responding to Katherin Kirkpatrick's records request (Exhibit I-23)
54. Laurel Crissman, on April 30, 2015, wrote in opposition expressing disappointment for the disregard of scientific arguments in favor of retaining the open reservoirs

55. Mark Bartlett, on April 30, 2015, wrote in opposition with questions regarding ownership of the property
56. Floy Jones, on April 30, 2015, wrote in opposition and provided an article: "Battling Nitrification with Blacklights" by Brian White and Martin Adams
57. Leslie Rose, on April 30, 2015, wrote in opposition citing concerns with disregard for historic structures, taxpayer money, and the lack of public involvement
58. Daniel Berger, on April 30, 2015, wrote in opposition with concerns about land ownership, radon, and suggesting additional study on the landslide and better stewardship of the historic reservoirs
59. Katherin Kirkpatrick, on April 30, wrote, in opposition stating the City had not met the requirements for a Type III historic resource review and conditional use review and that the proposal will remove the resource's fundamental use
60. Floy Jones, on April 30, 2015, wrote in opposition, stating that the City's public involvement principles have not been met and alternatives have not been considered
61. Dee White, on April 30, 2015, provided a copy of the City of Portland Public Involvement Principles
62. Dee White, on April 30, 2015, provided a copy of "Battling Nitrification with Blacklights" by Brian White and Martin Adams
63. Scott Fernandez, on April 30, 2015, wrote in opposition, rebutting PWB comments regarding landslide activity, precipitation events, and rebar from April 23, 2015 City Council hearing
64. Mary Ann Schwab, on April 30, 2015, wrote in opposition with concerns about public process

Received During 2nd 7-day period, ending 5pm on May 7, 2015

65. John Czarnecki, on April 30, 2015, wrote in opposition to demolition of Reservoir 4
66. Extension to 120-day Review Period, dated May 5, 2015
67. Portland Water Bureau Rebuttal, dated May 7, 2015
68. Extension to 120-day Review period, dated May 20, 2015



ZONING

Site

Historic Landmark

NORTH

File No. LU 14-249689 DM

1/4 Section 3025,3026,3027,3125,3126,3127,3225,3226

Scale 1 inch = 800 feet

State_Id 1S1E05 500

Exhibit B (Feb 05,2015)

APPENDIX E

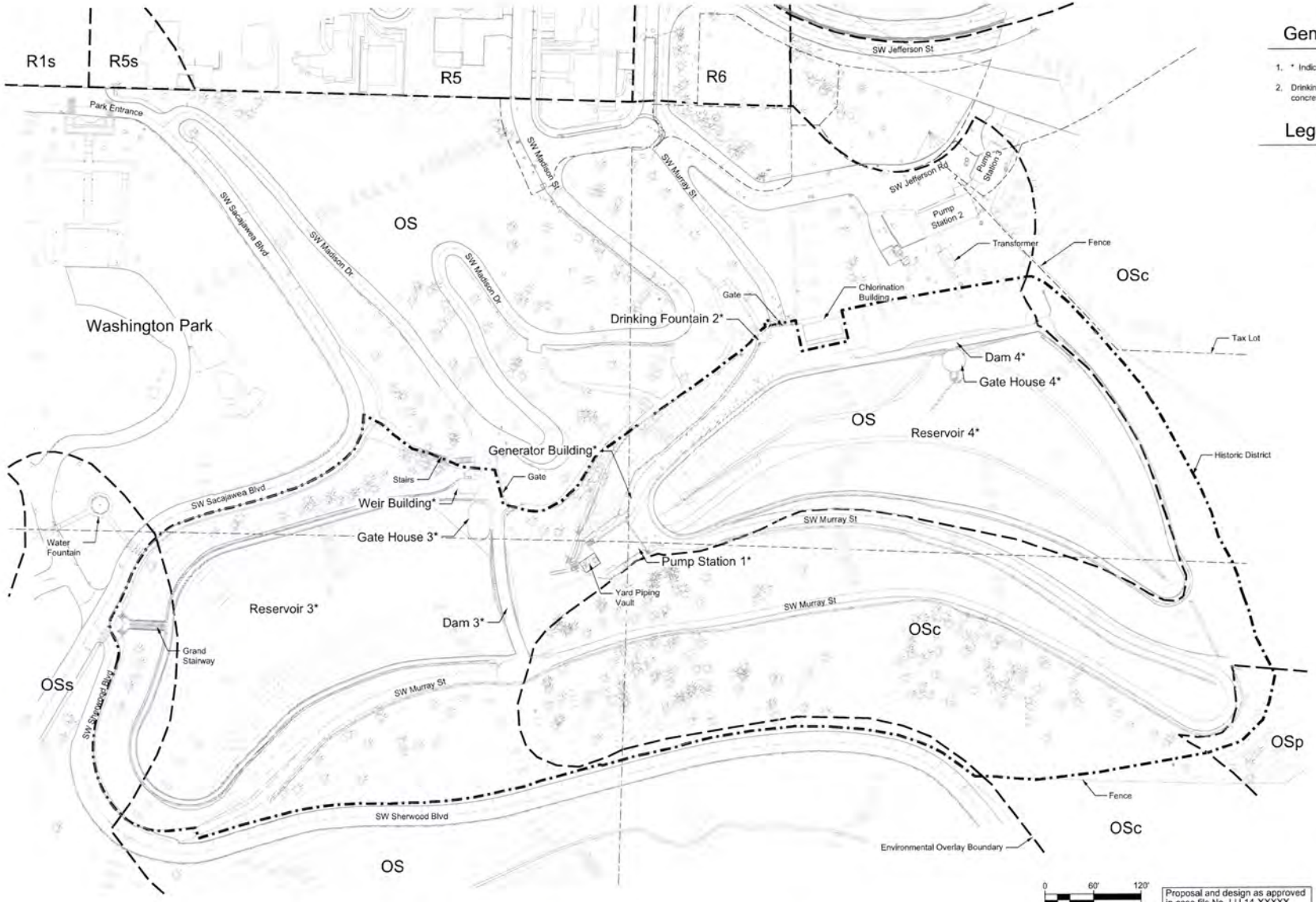
LU 14-249689-DM

General Notes

1. * Indicates items that are contributing resources
2. Drinking fountain 1 (Contributing Resource) not shown. It is a concrete "remnant" only.

Legend

- Tax Lots
- Washington Park Reservoirs Historic District
- Zoning Boundary
- Coniferous Tree
- Deciduous Tree



0 60' 120'
1" = 60'

Proposal and design as approved in case file No. LU 14-XXXXX. No field changes allowed.

Verify Scale: 0 1" Bar measures one inch at full size. If not one inch then adjust scales accordingly.

No	Date	Description	Appd
		Revision	
Survey		Book	Page

Plot Driver = PWB_Half_BW_pdf.pltcfg Pentable = PWB_Half_BW_pdf.tbl

AECOM
111 S.W. Fifth Avenue, Suite 1150,
Portland, Oregon 97204
(503) 227-1042 tel (503) 227-1048 fax

Designed By	Program Mgr
CEN	KW
Drawn By	Const Mgr
	ML
Checked By	Design Supvr
	MW
Project Mgr	Date
JM	

Draft Land Use Review

PORTLAND WATER BUREAU
FROM FOREST TO FAUCET

Preliminary

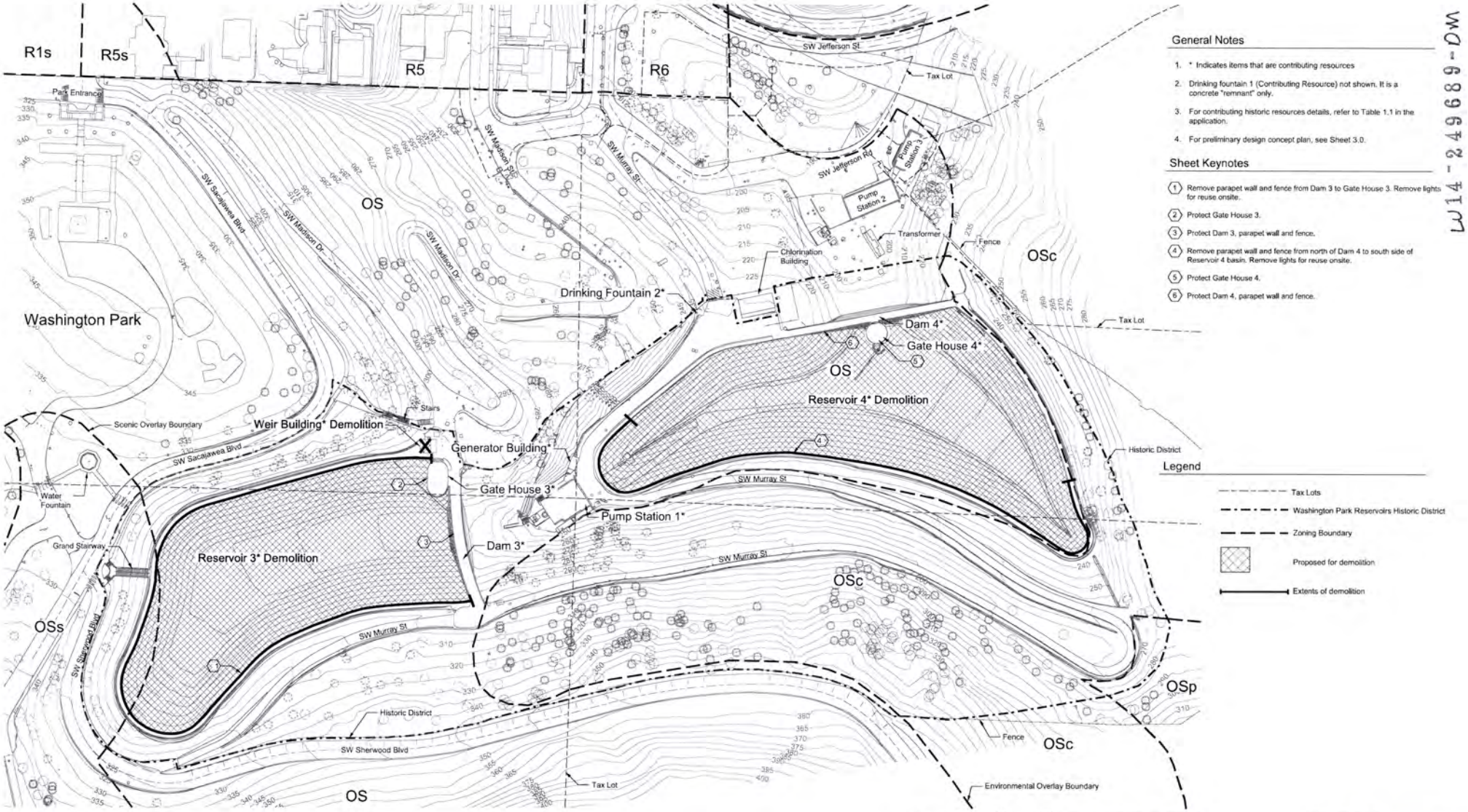
Teresa Elliott, Principal Engineer, PE No 19174 (OR) Date

Washington Park Reservoir Improvements

Existing Site Conditions

Overall Site Plan

SAP Project No	W01402
1/4 Section	3026, 3027, 3126, 3127
Drawing No	Sheet 1.0
Sheet No	of



General Notes

1. * Indicates items that are contributing resources
2. Drinking fountain 1 (Contributing Resource) not shown. It is a concrete "remnant" only.
3. For contributing historic resources details, refer to Table 1.1 in the application.
4. For preliminary design concept plan, see Sheet 3.0.

Sheet Keynotes

1. Remove parapet wall and fence from Dam 3 to Gate House 3. Remove lights for reuse onsite.
2. Protect Gate House 3.
3. Protect Dam 3, parapet wall and fence.
4. Remove parapet wall and fence from north of Dam 4 to south side of Reservoir 4 basin. Remove lights for reuse onsite.
5. Protect Gate House 4.
6. Protect Dam 4, parapet wall and fence.

Legend

- Tax Lots
- Washington Park Reservoirs Historic District
- Zoning Boundary
- Proposed for demolition
- Extents of demolition

LU 14 - 249689 - WO

Proposal and design as approved in case file No. LU 14-XXXXX. No field changes allowed.

Verify Scale: 0 1" Bar measures one inch at full size. If not one inch then adjust scales accordingly.

No	Date	Description	Appd
Revision			
Survey		Book	Page

AECOM
111 S.W. Fifth Avenue, Suite 1150.
Portland, Oregon 97204
(503) 227-1042 tel (503) 227-1048 fax

Designed By: CEN	Program Mgr: KW		
Drawn By:	Const Mgr: ML		
Checked By	Design Supvr: MW		
Project Mgr: JM	Date		

Draft Land Use Review

PORTLAND WATER BUREAU
FROM FOREST TO FAUCET

Preliminary

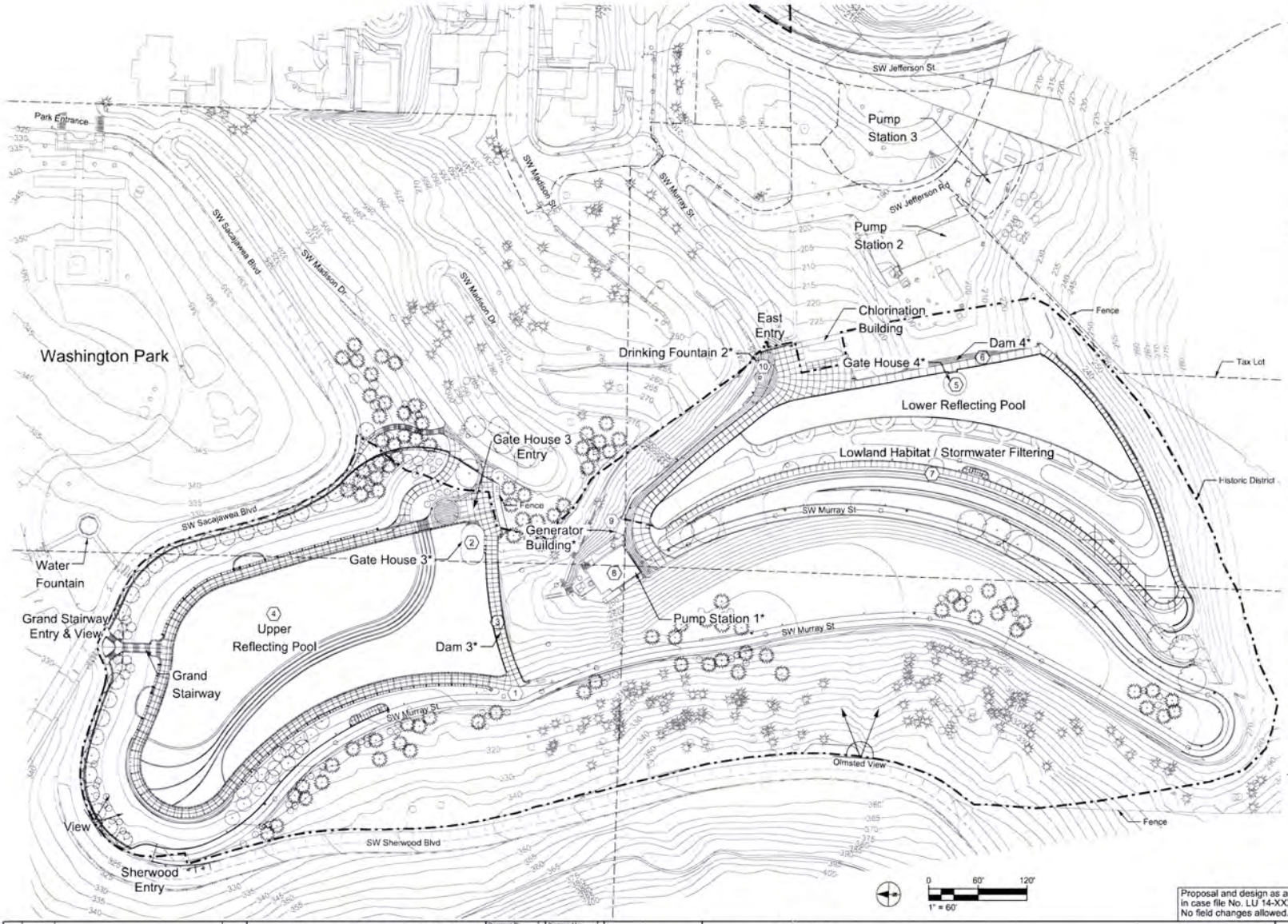
Theresa Elliott, Principal Engineer, PE No 19174 (OR) Date

Washington Park Reservoir Improvements

Proposed Demolition

Overall Site Plan

SAP Project No	W01402
1/4 Section	3026, 3027, 3126, 3127
Drawing No.	Sheet 2.0
Sheet No	of



General Notes

1. * Indicates items that are Contributing Resources
2. Drinking fountain 1 (Contributing Resource) not shown. It is a concrete "remnant" only.

Sheet Keynotes

Proposed Preservation/Rehabilitation Actions

(1) Overall Site
- Restore public access to site, including entries at Grand Stairway, Sherwood Blvd, Dam 4 and Gate House 3
- Restore historic views (Grand Stairway, Sherwood and Olmsted View - SHPO mitigation)
- Remove contemporary pole light fixtures, extraneous piping, and equipment
- Install interpretive features at entries and within site (SHPO mitigation)

(2) Gatehouse 3
- Clean exterior
- Repair concrete spalls and patch holes on exterior
- Structural upgrade
- Replace double doors with historically appropriate doors
- Paint and repair existing windows
- New roof

(3) Dam 3
- Rehabilitate parapet wall and remove extraneous conduit and piping
- Rehabilitate historic fence on top of Dam parapet wall
- Rehabilitate concrete balustrade
- Reconstruct missing historic lamp posts and function (SHPO mitigation)
- Grind down asphalt topping on dam surface and pour new concrete topping

(4) Reservoir 3 Area
- Rebuild Grand Stairway and preserve two urns at top
- Rehabilitate urn west of Dam 3 and reinstall in original location
- Rehabilitate historic perimeter fencing and adaptively reuse (shorten)
- Rehabilitate historic basin perimeter lights and adaptively reuse

(5) Gatehouse 4
- Clean exterior
- Repair concrete spalls and patch holes on exterior
- Repair and paint existing windows
- Replace double doors with historically appropriate doors

(6) Dam 4
- Rehabilitate parapet wall and remove extraneous conduit and piping
- Rehabilitate historic fence on top of Dam parapet wall
- Rehabilitate concrete balustrade
- Reconstruct missing historic lamp posts and function (SHPO mitigation)
- Grind down asphalt topping on dam surface and pour new concrete topping

(7) Reservoir 4 Area
- Rehabilitate or replace in kind the concrete parapet wall north and south of Dam 4
- Rehabilitate and reinstall historic perimeter fence where parapet wall is rebuilt north and south of Dam 4
- Rehabilitate historic perimeter basin pole lights and adaptively reuse

(8) Pump Station 1
- Repair and paint existing windows
- Install two front windows in existing openings matching historic windows.
- Replace front doors with historically appropriate doors

(9) Generator Building
- Clean exterior

(10) Drinking Fountain 2
- Rehabilitate fountain and restore function (SHPO mitigation)

Legend

- Tax Lots
- Washington Park Reservoirs Historic District
- Proposed public access

Proposal and design as approved in case file No. LU 14-XXXXX. No field changes allowed.

Verify Scale: Bar measures one inch at full size. If not one inch then adjust scales accordingly.

No	Date	Description	Appd
Revision			

Survey | Book | Page

Plot Driver = PWB_Half_SW_pdf.pltcfg Pentable = PWB_Half_SW_pdf.tbl

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Designed By: CEN	Program Mgr: KW
Drawn By:	Const Mgr: ML
Checked By:	Design Supvr: MW
Project Mgr: JM	Date:

Draft Land Use Review

PORTLAND WATER BUREAU
FROM FOREST TO FAUCET

Preliminary

Theresa Elliott, Principal Engineer, PE No 19174 (OR) Date

CITY OF PORTLAND OREGON 1851

Washington Park Reservoir Improvements

Preliminary Design Concept

Overall Site Plan

SAP Project No: W01402

1/4 Section: 3026, 3027, 3126, 3127

Drawing No: Sheet 3.0

Sheet No of

United States Department of the Interior
National Park Service

National Register of Historic Places
Listed 11-14-2012
No. 12000931
in SHPO

National Register of Historic Places Registration Form

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 Burnside Bridge

Other names/site number

2. Location

street & number Spanning the Willamette River at RM 12.7 ☐ not for publication

city of town Portland ☐ Vicinity

State Oregon code OR county Multnomah code 051 zip code 97209

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this 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 X meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___ **national** X **statewide** ___ **local**

Signature of certifying official/Title: Deputy State Historic Preservation Officer — Date 9.20.12

Oregon State Historic Preservation Office
State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of commenting official — Date

Title — State or Federal agency/bureau or Tribal Government

4. National Park Service Certification

I hereby certify that this property is:

___ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:)

Signature of the Keeper — Date of Action

Burnside Bridge
Name of Property

Multnomah Co., OR
County and State

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
- ___ site
- **X** structure
- ___ object

Number of Resources within Property
(Do not include previously listed resources in the count.)

Contributing	Non-Contributing	
		buildings
		sites
1		structures
		objects
1	0	Total

Name of related multiple property listing
(Enter "N/A" if property is not part of a multiple property listing)

Willamette River Highway Bridges of Portland, Oregon

Number of contributing resources previously listed in the National Register

None

6. Function or Use

Historic Functions
(Enter categories from instructions)

TRANSPORTATION: Road-Related, Bridge

Current Functions
(Enter categories from instructions)

TRANSPORTATION: Road-Related, Bridge

7. Description

Architectural Classification
(Enter categories from instructions)

NO STYLE

Materials
(Enter categories from instructions)

foundation: CONCRETE
walls: N/A
roof: N/A
other: STEEL

Narrative Description

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

Summary Paragraph

The Burnside Bridge opened to traffic in May 1926 and spans the Willamette River in downtown Portland, Oregon, at River Mile 12.7, just upstream from the Steel Bridge, within the core of the central commercial district of the city. A steel deck truss with a central, double leaf Strauss bascule, the bridge measures 788 feet long between the abutment walls (i.e., not including the approach spans). The first bascule bridge to rely upon a concrete deck for its movable span, at 5000 tons (according to Wortman, 2000), the Burnside is one of the heaviest bascule bridges constructed in the United States. The Burnside Bridge design was initially the work of Ira G. Hedrick and Robert E. Kremers, with some modification and construction supervision by Gustav Lindenthal. The bridge is owned and maintained by Multnomah County.

Narrative Description

The Burnside Bridge has been well documented in recent years, with most studies related to repair and upgrade projects that have allowed the structure to remain a viable element of the Portland area transportation system. In 2000, Sharon Wood Wortman updated and augmented the existing Historic American Engineering Record documentation of the bridge. That document, HAER No. OR-101, serves as the primary basis for the following information, much of which is taken verbatim from Wood Wortman's exhaustively researched narrative.[1]

Setting

Located at River Mile 12.7, the Burnside Bridge connects West Burnside Street and East Burnside Street across the Willamette, and serves as the geographic center of the city as defined by an orderly, gridded, street system and by the Willamette River.[2] The bridge's east side approach spans three city blocks, crossing the Union Pacific Railroad's main line and Interstate 5 before terminating at the intersection of NE and SE Martin Luther King, Jr. Boulevard (formerly Union Avenue), a major north–south route through east Portland. On the west end of the Burnside Bridge, the approach structures span the Portland Harbor Wall, Tom McCall Waterfront Park, and the SW Naito Parkway (formerly Front Street), as well as the Metropolitan Area Express (MAX) line, Portland's light rail mass-transit system.

The Burnside Bridge is an important trans-Willamette River link within the Portland street system, connecting the downtown core on the west with the business and residential uses of east Portland. The bridge also plays an important role in the city's waterfront development, with the area under its western approach spans serving as the locale of a popular and long-running Saturday market.

[1] Sharon Wood Wortman. *Burnside Bridge, Historic American Engineering Record [HAER No. OR-101].* (HAER/ODOT in cooperation with Multnomah County, 2000).

[2] Burnside Street divides the city's north and south halves, while the Willamette River divides the city east–west, creating four directional quadrants that help define virtually all of Portland's streets.

Design

The Burnside Bridge is generally described as a steel deck truss with a double-leaf bascule, rising from concrete piers. There are three steel deck spans and two side spans. The bridge's main movable span, a Strauss bascule, is divided into two halves or leaves that rise vertically to create approximately 200 feet of horizontal clearance. By 1926, the Strauss bascule had become the dominant form of movable-bridge spans, the survivor of a group of bascule designs that had been in competition during Portland's earlier bridge construction era.[3] The Burnside Bridge's height above the river is 64 feet. The Burnside's road deck is solid concrete 4¾ inches thick, and believed to be the first bascule span in the United States to have been constructed with a concrete deck.

> A recent far-reaching departure in bascule bridge design just introduced by the Strauss Company is the provision of a concrete floor on the moving leaf. This has been successfully accomplished for the first time under Strauss patents, in the Burnside Street Bridge at Portland, Oregon, which is further distinguished by being the largest double leaf deck bascule yet built.[4]

The main span of the bridge, the bascule or draw span, is 252 feet long between the trunnions, with its two leaves each 126 feet long and built of riveted steel. At the time of its completion the Burnside Bridge was the largest double-leaf bascule bridge that had ever been built, each leaf weighing some 930 tons and balanced by a 1,700-ton counterweight. The total weight on each trunnion pin, which are 28" in diameter and 7'-11" long, is 1,315 tons. The Burnside Bridge remains one of the heaviest lift bridges in the United States, weighing more than twice the bascule spans of the Morrison Bridge, built two decades later.[5] The lift is operated via a span drive powered by two electric motors, each with double extended shafts.[6]

Two steel deck truss side spans, each 268 feet long, flank the operable bascule. The side span trusses are double-intersection Warren trusses, also called lattice trusses, subdivided by vertical posts that turn from the top chords to the diagonal intersections, making them sub-verticals. This is an extremely rare truss type in Oregon that includes among its few examples the Ross Island and Sellwood bridges, both in Portland and both designed by Gustav Lindenthal as part of the same contract as the Burnside.

The Burnside Bridge has 34 approach spans, including 19 concrete spans on the west side and seven concrete and eight steel spans on the east side. The approach spans link the bridge itself to surface streets on either bank of the river and, while clearly related to the Burnside Bridge itself, are not considered to be part of the main bridge structure. According to the HAER documentation the total length of the Burnside Bridge between the abutment walls, without the approach spans, is 788 feet.[7]

Two octagonal "operators" towers are located at the upriver interior piers, flanking the bascule span. Designed by the Portland architectural firm of Houghtaling and Dougan,[8] the towers are highly detailed

[3] The choice of bascule design had played a major role in the construction of Portland's first bascule span, the Broadway Bridge, completed in 1913. There two variations on the Strauss design had lost out to the less-expensive Rall Bascule form, largely due to patent costs. Although the Rall Bascule has proven reliable at the Broadway Bridge, the Strauss design eventually became the most common bascule form.

[4] A. B. Reeve's rare publication, *The Story of Strauss Bridges*, published by the Strauss Bascule Bridge Company (Chicago, June 1925:41), as cited in Wood Wortman (2000:9).

[5] Wood Wortman, 2006:47.

[6] A trunnion is a large shaft or axle that carries moving parts in a movable bridge. In the Burnside Bridge, trunnions are found in the hinge assemblies that support the bascule spans as they open and close.

[7] Sharon Wood Wortman. *Burnside Bridge, HAER No. OR-101,* 2000.

[8] Chester A. Houghtaling (1882–1940) held Oregon Architect License No. 12 and arrived in Portland in 1913, joining Luther Lee Dougan (1883–1983, License No. 9) in an architectural partnership that continued until 1925. The Houghtaling and Dougan firm

compared to the remainder of the structure, rising from corbelled supports off the bridge piers. Finned bracket-like castings, each finely detailed at top and bottom, form a series of three arched openings on either side of a scroll-decorated cantilevered bracket below the tower itself. Perhaps as the result of engineer Lindenthal's comments on the appearance of Portland's bridges (that they were the ugliest he had seen), the Burnside Bridge has been described as the first of the Willamette River bridges to benefit from the impact of the so-called City Beautiful Movement, an effort in the early decades of the 20th century to improve the appearance of the American urban environment.[9]

Each of the two eight-sided tower rooms are 11 feet across, with the entry quadrant devoted to a stairwell. The west tower is the only one that is actually used for bridge operation, containing the control mechanisms for raising and lowering the bascule leaves. A small bathroom is located to the left of the main entry door with a circular stairwell leading to the uppermost and lowermost levels. The east tower is similarly configured but without a bathroom, and is essentially an empty shell that is used for storage. At the upper floor a doorway leads from each tower to an outside walkway, about 15 feet long and 5 feet wide. Other architectural treatment of the Burnside Bridge includes an ornate spindle type balustrade concrete railing, with cast-steel and cast-iron ornamental railing on the center span. The ornamental tile of the tower roofs is original and was supplied by Gladding McBean & Company of Auburn, Washington.

A solid brass name plate is located outside and to the left of the west tower entrance, in a recessed area made especially for the plate. The nameplate is 3 feet high and 2.5 feet wide. It lists the names of the Board of Multnomah County Commissioners and the district attorney who were in office at the time the bridge was opened. Following the commissioners are the names of all the engineers, including Gustav Lindenthal (engineer-in-chief), Hedrick and Kremers (consulting engineers), Hans Rode (assistant engineer), M. E. Reed (principal assistant engineer), and John Zoos (assistant engineer). Also named are the bridge contractors and primary subcontractors.

The Burnside Bridge, despite it tumultuous history and shared design between Hedrick, Kremers, and then Lindenthal, has served the Portland area well. Perhaps consciously, as an antidote to Lindenthal's 1924 dismal assessment of the appearance of Portland's then-existing bridges, the Burnside Bridge is considered to be among Portland's most attractive.[10]

Modifications Since 1926

When the Burnside Bridge was completed, the structural steel elements were painted with a primer coat of red lead and graphite, followed by two coats of light gray, as per the modification made by Lindenthal to reduce heat absorption. It is unknown when the present scheme of yellow/beige, red and green was applied to the operator towers but in the 1990s both were repainted in what have become the bridge's trademark colors for those features. Before that, the bridge superstructure was painted a yellow ochre to harmonize with its surroundings, as stated by Lewis Crutcher, the architect hired by the county in the 1960s to provide assistance in choosing colors for the Burnside and other Willamette River bridges. Some references indicate that prior to 1966 the Burnside Bridge superstructure was either entirely, or trimmed, in green.

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designed many Portland landmarks, including the Elks Club, Washington High School, and the Medical Arts Building. Richard Ritz, in his book *Architects of Oregon*, credits Houghtaling as the architectural designer of both the Ross Island and Burnside bridges. Houghtaling and Dougan were hired to improve the appearance of the Burnside Bridge design, signing a contract with the county on July 31. (Ritz, 2002:193–94).

[9] Sharon Wood Wortman. *Burnside Bridge, HAER No. OR-101,* 2000:27.

[10] Dwight Smith, James B. Norman, and Pieter T. Dykman. *Historic Highway Bridges of Oregon* (2nd, Revised Ed.). Portland, OR: Oregon Historical Society Press, 1986:114.

There have been a series of changes to the Burnside's sidewalk railings since 1928, most affecting the connections between the bridge approaches and the adjacent buildings that flank them. The stairs at the bridge's west end were modified in 1994–95, part of changes in the connections between S.W. Naito Parkway and the Saturday Market that occurs beneath the approaches. These changes have also been the result of modifications from the proximity of the MAX Light Rail line that runs on First Street in this area.

When the Burnside Bridge was opened, it boasted six traffic lanes—four for motor vehicles and two to serve Portland's trolley system. Eventually the trolley lanes were converted to vehicle usage. In 1995 the bridge was re-striped, with one lane converted to bicycle use, leaving five vehicle lanes, three eastbound and two west. Other changes, as detailed in the HAER documentation, include modest alteration and repair to the towers, periodic resurfacing of the wear surface as is typical of all roadways, and repairs to the bridge mechanism and the electrical system that controls it. None of the documented changes appear to have made a major impact on the key elements of the original design.

In the mid-1990s Burnside Street was declared a Regional Emergency Transportation Route, making the bridge the one non-freeway span identified for use by public agencies to route emergency vehicles, equipment and supplies across the Willamette River in the event of an earthquake or other disaster. In 2002 the Burnside's approaches were given a new driving surface and the bridge underwent a was seismic retrofit. The Phase 1 seismic upgrade added steel connections between the deck sections. Both the approach surface and seismic work were designed by David Evans & Associates, with Mowat serving as the primary contractor for the $2.1 million project. Two years later Heil Electric replaced outdated wiring, removing early equipment and replacing it with modern touch-control screens, as well as creating the opportunity for remote control of the bridge mechanism. In 2007 the concrete deck on Burnside's lift span was removed and replaced, along with repair and replacement of portions of the bridge mechanism. This included the replacement of one of the original leaf hinges (the east). This work was designed by OBEC Consulting Engineers, with Hardesty & Hanover, Mechanical Engineers. The contractor for this $9 million project was Advanced American Construction.

Bridge lights were added to the Burnside by the Willamette Light Brigade, a private citizen's group that has commissioned lighting designs for most of downtown's bridges. Portland artist Bill Will was selected to design the lighting concept for the Burnside. "Will's design highlights the graceful, expansive spans of this central bridge with floodlights on the central piers and the bridge truss, the central draw structure (bascule) and the bridge's most notable, appealing, architectural features, its two cantilevered turreted operators houses."[11]

Summary

The Burnside Bridge opened in 1926. Hedrick and Kremers completed the original design for Multnomah County. After a politically charged recall election of commissioners directly related to the bridge program, the county invited noted bridge engineer Gustav Lindenthal to oversee the Burnside's construction and serve as its engineer-in-chief. Primary contractor for the bridge was the Pacific Bridge Company, a long-time Portland-based firm. Multnomah County financed the bridge's construction and has since owned and maintained it.

The Burnside Bridge is one of three draw or bascule bridges across the Willamette River in Portland, one of two Strauss Bascules, and is among the largest of that type of bascule ever built. Beyond its size, the design is notable as the first such span with a concrete road surface, a major element in accounting for the fact that the Burnside Bridge is considered one of the heaviest bascule bridges in the world.

[11] www.lightthebridges.org

Largely remaining “as built,” with modifications limited to the repair and maintenance of the wear surfaces, electrical and control equipment, and other minor changes, the Burnside Bridge retains very high integrity with respect to its original design and appearance as completed in May 1928. The Burnside Bridge effectively conveys its original character and the associations that make it significant.

Burnside Bridge
Name of Property

Multnomah Co., OR
County and State

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 owed 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 old or achieving significance within the past 50 years.

Areas of Significance
(Enter categories from instructions)

COMMUNITY PLANNING & DEVELOPMENT
TRANSPORTATION
ENGINEERING

Period of Significance

1926–73 (Criterion A)
1926 (Criterion C)

Significant Dates

May 28, 1926, Opened

Significant Person
(Complete if Criterion B is marked above)

N/A

Cultural Affiliation

N/A

Architect/Builder

Ira G. Kendrick/Robert E. Kremers
Gustav Lindenthal, New York City, NY
Joseph B. Strauss (Bascule), Chicago
Lindstrom & Feigenson, Booth & Pomeroy

Period of Significance (justification)

The period of significance begins with the completion of the Burnside Bridge in 1926 in response to the increasing need for cross-river transportation and ends in 1973, spanning the entire context for the Multiple Property Document entitled Willamette Highway River Bridges of Portland, Oregon.

Criteria Considerations (explanation, if necessary) N/A

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance and applicable criteria.)

The Burnside Bridge, a major element in Portland's multi-bridge bond-funded bridge expansion in the mid-1920s, was completed in May 1926 and is intrinsically linked to the city's long history of transportation and development. Built following a political controversy over its original contract, the span was designed by Ira G. Hedrick and Robert E. Kremers and then, after their removal from the project, modified and constructed under the direction of Gustav Lindenthal. The Burnside Bridge, located at the center point of Portland's character-defining geographic street quadrants, remains a key element in the city and continues to function as originally intended, with high integrity with respect to its original design. One of the busiest bridges, in terms of vehicular traffic, in Oregon, the Burnside Bridge was declared a "Regional Emergency Transportation Route" in the mid-1990s.[12]

Narrative Statement of Significance (Provide at least **one** paragraph for each area of significance.)

Nominated under the framework of the Willamette River Highway Bridges MPD and built within the middle period of bridge development as defined by that document, the Burnside Bridge is of statewide significance under National Register eligibility Criterion A, Community Planning and Development and Transportation, for its association with the development of Portland and its transportation network between its construction in 1926 and the close of the period of significance for the MPD document in 1973. The Burnside Bridge is also of statewide significance under Criterion C, Engineering, as one of the heaviest bascule bridges in the United States and as the first such bridge to rely upon a concrete deck surface for its movable span. The Burnside Bridge meets all the general and the necessary specific registration requirements for listing under the MPD.

Developmental history/additional historic context information (if appropriate)

Bridges in Portland

Portland's first trans-Willamette Bridge—the first Morrison Bridge—was a wooden swing-span that was built by private interests in 1887 to connect Portland with the separate incorporated city of East Portland. Four years later those two communities along with Albina, another independent city in what is now North Portland, voted resoundingly to consolidate, forming a united municipality lining both sides of the Willamette River. Six more bridges followed, including vehicular and railroad spans. Some of these had to be replaced due to poor construction between 1891 and 1910, when the Hawthorne Bridge was completed.

The important shipping and port traffic on the Willamette made each of the trans-Willamette crossings controversial, and direct and easy vehicular connection competed with the need to maintain an open river channel. The city's earliest spans were uniformly of swing-span design, meaning a portion of the bridge could rotate on a fixed center pier, turning 90 degrees from its normal cross-river orientation to run parallel with the water flow, creating two open channels on either side of the "swing" or pivoting span. Aside from the mechanical issues inherent in the operation of swing spans during this era, the slow speed at which the bridges could be opened or closed proved irksome to both vehicular and river traffic. The latter was additionally constrained by the comparatively narrow passage afforded on either side of the central pivot point. For the Hawthorne Bridge, completed in 1910, the city chose a new form of movable bridge, a vertical-lift span. When the Oregon Railroad and Navigation Company determined to replace its 1888 Steel Bridge, it too decided to use the vertical lift technology as developed and patented by the firm of Waddell & Harrington of

[12] Wood Wortman, Sharon, with Ed Wortman. *The Portland Bridge Book* (3rd Edition). Portland, OR: Urban Adventure Press, 2006:49.

Kansas City, Missouri, who developed and held most of the patents on that bridge type. Portland's first effort to create a new, rather than a replacement, bridge connection across the river was the Broadway Bridge, Portland's first draw or bascule bridge.[13]

With the completion of the Broadway (1913) and rebuilt Steel (1912) bridges, Portland's bridge system remained unchanged for over a decade, a period in which automobile use in the city increased dramatically. While reliance on Portland's laudable trolley system remained strong, demand for improved capacity across the Willamette River led to renewed interest in bridge construction that found voice at the ballot box, in the form of bond requests, by the early 1920s.

Designers

The initial design for the Burnside Bridge was the work of Ira G. Hedrick and Robert E. Kremers, a hurried partnership put together by Kremers (1882–1962), the former Multnomah County bridge engineer, who joined with the far more experienced Hedrick (1868–1937), of Kansas City, Missouri, to secure the contract from Multnomah County following voter passage of a funding bond in March 1924. Irregularities in the award of that contract culminated with the May 1924 recall of several members of the board of commissioners, as described in more detail below, and ultimately led to the replacement of Hedrick and Kremers as the engineers of the Burnside project with Gustav Lindenthal, arguably the "Dean" of American bridge engineering during much of the early 20th century.[14] While generally retaining the Hedrick and Kremers plan, Lindenthal made several modifications to the design, and then served as the chief engineer, managing the construction of the bridge under contract to the county. The Burnside Bridge's movable span is a double-leaf bascule designed by the Strauss Bascule Company under the direction of Joseph Strauss, who designed and held the patent on this particular form of bascule. Although best known as the overall designer of the Golden Gate Bridge spanning the entrance to the San Francisco Bay, Strauss initially gained fame for his work in the design of movable bridges, perfecting the "Strauss-type" of bascule while working as an assistant in the firm of Ralph Modjeski, another prominent early-20th century engineer.[15]

Hedrick, brought to Portland to provide skill and large-bridge design background to the firm of Hedrick and Kremers, was an experienced bridge designer, having been the partner of John Alexander Low Waddell in the firm of Waddell and Hedrick from 1899 to 1907 before setting off on his own.[16] While responsible for railroad bridges in the Midwest and the design of the Boston Elevated Railroad, Hedrick is primarily of note in the Northwest for his short and ill-fated partnership with Kremers.[17] Kremers, who had come to Portland in 1911,

[13] Prior to the construction of the Broadway Bridge, Portland's trans-Willamette bridges were all swing spans, in which a middle section of the bridge pivoted 90 degrees on a fixed point, swinging from a cross-river orientation to an inline river one, creating two channels for ship passage on either side. The main concern with swing spans, aside from mechanical and structural issues, was the narrowness of the created channel, each by definition only half the width of opening, separated by central pier. These narrow channels, seen as obstacles to navigation, led Portland to seek other, more modern, movable bridge forms such as the vertical lift or bascule, each of which, when open, created a much larger opportunity for ship passage.

[14] Lindenthal (1850–1935), based in New York City, was responsible for the design of many significant bridge spans over the course of his long career. His reputation was further enhanced by the work of his former assistants, Othmar Ammann and David Steinman, each of whom became hugely influential bridge designers in their own right. Steinman, for example designed Portland's St. Johns Bridge, among many other notable works.

[15] Modjeski designed Portland's Broadway Bridge, as well as several of the railroad bridges over the Columbia River, during a long and productive career.

[16] Waddell, another highly regarded 19th century bridge engineer, was based in Kansas City, Missouri. He is best remembered today as one the key designers of the vertical lift bridge, as well as work on Portland's Interstate, Hawthorne and Steel bridges, all done as head of the firm Waddell & Harrington.

[17] The HAER documentation on the Burnside Bridge identifies Hedricks' partner as Robert C. Kremers; however, this may be an error. Numerous period accounts in the *Oregonian,* both before and after the Burnside Bridge controversy, document "E" as the correct middle initial. Robert E. Kremers, born in Michigan and married to Jessie F. Kremers, is listed in the 1920 U.S. Census as resident of Multnomah County, Oregon, along with the couple's three young daughters and an elderly woman, presumed to be his mother-in-law.

worked as a building inspector and then as city engineer and chief of the highway and bridge department for the city. In 1923, with funding for a new Burnside Bridge passed by the voters, the Board of Multnomah County Commissioners hired Kremers to oversee its ambitious bridge program.[18] Kremers resigned his position with the city to take the job. When his lack of experience was raised as an issue, Kremers formed a quick partnership with Ira G. Hedrick, a respected and experienced bridge designer who relocated to Portland from Kansas for the work. The new firm finished its designs in June 1923. After voters passed another funding measure in March 1924 to pay for the street-level connections, bids were opened for the bridge construction on April 1, 1924, April Fool's Day. As it worked out, the day was perhaps prescient, since almost immediately irregularities in the bid process created a huge controversy that ended with Kremers' indictment and the recall of three members of the board of commissioners (see below for more detail).

In the wake of the recall, the new and continuing members of the board of commissioners turned to Gustav Lindenthal of New York to oversee the bridge program, including the Burnside Bridge as well as the Ross Island and Sellwood spans that had been designed and funded concurrently. Lindenthal was a much-needed "big gun," a highly skilled and experienced designer who could step into the process mid-stream in the wake of the bridge scandal, would be both capable and willing to produce three long-span bridges simultaneously in short order, and could do so within a budget already reduced by the irregularities of the process. Lindenthal was almost universally praised as the perfect man for the job.

Gustav Lindenthal, born in what is now the Czech Republic, was an entirely self-taught engineer. He began building bridges in Austria and Switzerland before emigrating to the United States in 1874. Shortly after his arrival, Lindenthal established himself as a major engineering talent, quickly garnering clients and projects of note. In 1902 he was appointed commissioner of New York bridges and in that capacity designed the Manhattan Bridge. In 1916 he designed the Hells Gate Bridge, probably his most famous work, which at the time of its completion was the longest and heaviest steel bridge in the world. Lindenthal later served in various capacities for the City of New York and played an important role in designing multiple spans of note in that city. By the time Lindenthal was asked to come to Portland and sort through the work of Hedrick and Kremers, he was among the most respected bridge designers in the world. Lindenthal died in 1935, at eighty-five years of age. The three Portland bridges with which he is strongly connected—the Ross Island and Sellwood (both which are credited as Lindenthal designs), in addition to the Burnside—were the last major spans of Lindenthal's long and distinguished career.

Construction Process

Lindenthal signed a contract with Multnomah County on June 4, 1924, and his first order of business was to review the work of Hedrick and Kremers and make recommendations on their designs for the Burnside, Ross Island, and Sellwood bridges. Rumors flew as to whether Lindenthal would find anything of value in the existing plans, with many expecting "drastic" changes. "Aside from claiming Portland's existing bridges were the ugliest he has seen anywhere,…Dr. Lindenthal has been close-mouthed about his findings"[19] Ultimately Lindenthal proposed entirely new designs for both the Ross Island and the Sellwood. For the Burnside, where the project involved replacing an existing and much-used span rather than creating an entirely new river crossing, Lindenthal largely accepted the Hedrick and Kremers plan.

On July 9, 1924, Hedrick and Kremers released their rights in all previous designs for the Burnside Bridge in return for a payment of $25,000. Two days later, Lindenthal was hired to finalize the plans for the Burnside, as well as to completely redesign the Ross Island and Sellwood spans. Within two weeks, on Lindenthal's

[18] In addition to the Burnside Bridge, voters also approved construction of the Ross Island Bridge and laid the groundwork for what would become the Sellwood Bridge between 1923–24.

[19] *Oregonian*, 5-July-1924, 9:5–7.

recommendation, the county contracted with Pacific Bridge Company to build the new Burnside Bridge. Lindenthal's team reviewed and finalized the Burnside Bridge designs, still relying upon Hedrick and Kremers' work, and even re-hiring many of the same designers that the earlier partnership had employed on the project. The changes Lindenthal did make focused upon redesigning the bridge foundations and the addition of an architect to incorporate a more pleasing appearance in the design. Lindenthal noted, with regard to the original plans, that "…the squatty massiveness of the piers in the middle of the river will appear in silhouette strangely out of proportion to the framed steel trusses resting on them."[20] Lindenthal also elected to change the paint color of the bridge, from Hedrick and Kremers' choice of black, to a lighter grey tone that would reduce the heat absorption of the steel and diminish the potential for differential temperature stresses.

Upon Lindenthal's recommendation, the county awarded the main contract for constructing the Burnside Bridge to the Pacific Bridge Company on July 21, 1924. Demolition of the old Burnside span began a week later.[21] Pacific Bridge was an established and highly regarded bridge contractor in the northwest. It began in California in 1869 and relocated to Portland in 1880. Seven years later it was the primary contractor for the first Morrison Bridge, the first trans-Willamette crossing in Portland. Charles F. Swigert, Pacific Bridge's president, worked with the company in California, came with the owners to Portland, and then purchased the firm in 1886, giving him more than four decades of bridge-building experience at the start of the Burnside project. Pacific Bridge's bid on the Burnside, at $2,390,173, was the only bid received that was below Lindenthal's estimate. Two other contractors were also involved with the construction of the Burnside Bridge. Lindstrom and Feigenson built the approach spans, while NePage McKenny was responsible for the lighting. At Lindenthal's suggestion, Houghtaling and Dougan, a Portland-based architectural firm, was brought into the project for design advice.

In November 1924, the final designs for the bridge's superstructure were sufficiently completed that Lindenthal's resident engineer-in-chief, Hans H. Rode, released a new drawing of the span to the public, a full-page-width drawing that was published in the *Oregonian* under a headline reading "Engineer's New Drawing of Burnside Bridge Gives Idea of How Impressive Span Will Look When Draw is Open for Ships."[22] Construction of the river piers for the Burnside Bridge relied upon four timber cribs or caissons that were built on shore and then towed and sunk into the river and sealed at the edges to allow underwater excavation. These were large structures—two were 78 × 68 feet in area and more than 80 feet tall. The two smaller caissons for the abutment piers were 68 × 36 feet in area and 55 feet tall. The first concrete was placed in the lower portion of one of the larger caissons in late November 1925. "In just eight days, with the work going on night and day, the job was completed." Work on the rest of the massive piers continued throughout the winter and into the spring.[23]

By April 1925, piling was in place to support the east end of the temporary supports for the overhead girders at the bridge's east end and work on the east-end pier was nearly done.[24] The next day Engineer Rode reported that the Burnside project was progressing on schedule, expressing the expectation that the work could be completed in about sixteen months. "Steel, he said, was being laid on the east approach and the bascule spans."[25] Some 3,900 tons of bridge steel arrived in Portland aboard the *Atlantic*, in the service of the Argonaut Line, "…which arrived in the harbor last night…from Baltimore…via the Panama Canal."[26]

[20] Commissioners Journals, "Burnside and Ross Island Bridges," 11-July-1924, as cited in Wood Wortman (2000:47).
[21] Portions of the 1894 Burnside Bridge were salvaged and reused as fixed spans in other area locations, a typical practice during this period. The 300-foot-long eastern span was placed at Dodge Park, spanning the Sandy River and the 240-foot-long west truss spans the Bull Run River, near the former site of Roslyn Lake (see Smith et al, 1989:118).
[22] *Oregonian,* 23-November-1924,24:1–8.
[23] *Oregonian*, 31-December-1924, 44:1–8.
[24] *Oregonian*, 24-April-1925, 11:2.
[25] *Oregonian*, 25-April-1925, 8:3.
[26] *Oregonian*, 6-May-1925, 22:1, 13-May-1925, 7:3–4.

In early June 1925, the main machinery for the bascule spans arrived from Pennsylvania, also shipped through the Panama Canal. It would be stored off-site until construction progress on the spans was sufficient for the mechanism to be installed at the bridge.[27] Soon thereafter the original plan to build the Burnside's Strauss bascule in the vertical, or open, position, often done to allow easy river navigation during construction, was abandoned. The span would instead be constructed on the "cantilever" principle, working outward toward the center of the two leaves, across the opening, in the "closed" position.[28]

By the end of August, the main counterweights for both the east and west bascule leaves had been placed and, once they had fully cured, steelwork on the bascule spans themselves would begin. "Mr. M. E. Read, Assistant County Bridge Engineer, explained that it was necessary to have the counterweights in place so that the steel of the bascule span might be supported as additional weight is added over the stream."[29] By November 1925, the bascule spans were essentially finished and moved to the upright position. Lindenthal's team was to have the bridge completed by May 1926.[30]

At the end of April 1926, work on the Burnside Bridge was reported as being 99 percent complete, and the plans for the formal dedication of the span were underway. The dedication festivities were held May 28, 1926, culminating with the bridge being opened to public traffic at 7:00 that evening.[31]

The Burnside Bridge

As early as 1920 the Oregon State Highway Department, having evaluated the capacity of Portland's existing bridges, reported that the original Burnside Bridge, built in 1894, was in dire need of replacement. The report suggested that the 1894 Burnside Bridge, a steel through-truss with a central swing span, was notably slow to open or close. The report concluded that the existing bridge was structurally inadequate and deemed its replacement "urgent."[32] It called for a new Burnside Bridge across the Willamette River at the location of the existing structure. However, it "considered that the new bridge could not be constructed in less than five years, allowing for bond issues."[33]

Supporters of bridge improvements attempted to pass a funding bond in late 1920 but that effort stalled when the noted bridge engineer John Lyle Harrington found the Burnside's structural condition more positive than had the state. Nevertheless, generous county voters approved $5.5 million for funding for a new span in November 1922, then expected to be a concrete span designed by Oregon's State Bridge Engineer Conde McCullough. While the bond passed, in March 1923 the county retained the services of Robert Kremers, an engineer of considerably less experience than McCullough and without any experience whatsoever in so-called "Large Bridge" construction, to design the Burnside project. In response to public outcry over this choice of engineer, Kremers immediately brought in Ira G. Hedrick as his partner.[34]

The typical political machinations that characterize much of Portland's bridge development during the early 20th century delayed final funding for the Burnside for more than a year until March 1924, when City of

[27] *Oregonian,* 9-June-1925, 7:1.
[28] *Oregonian*, 21-June-1925, 16:3–5.
[29] *Oregonian,* 30-August-1925, 16:2–5.
[30] *Oregonian*, 20-November-1925, 23:2.
[31] *Oregonian,* 28-May-1926:1
[32] *Oregonian,* 29-June-1920.
[33] *Oregonian*, 20-April-1920, 12:1.
[34] Hedrick and Kremers, in addition to the Burnside Bridge, were also to be responsible for the design of entirely new bridges at Ross Island and Sellwood, although at this time many thought portions of the 1894 Burnside Bridge could be reworked for installation at the Sellwood location.

Portland voters approved funds to build the approach spans for a new Burnside Bridge.[35] Less than a month later the county awarded contracts to local firms to build three new bridges, including the Burnside span, for a total cost of more than $5 million dollars. Work on the new Burnside Bridge, at $2.8 million, was awarded to J. H. Tillman Company. The contract for the Ross Island Bridge was awarded to Parker and Banfield, while the Sellwood Bridge was to be built by the Union Bridge Company. These films were not entirely independent. According to the *Oregonian*,

> The three firms…were linked into an inseparable triumvirate. It was a condition of their bidding that the three tenders on the three structures must be accepted or rejected, or else all of them must be rejected. This brought about a situation where the commissioners were confronted by two bids on the Burnside Bridge, one of which was, on the face of things, $480,000 higher than the other. The Tillman bid was the higher and that of the Pacific Bridge Company, a Portland firm, was the lower of the two.[36]

Since there was only a single bid on either the Sellwood or the Ross Island, the commissioners were presented with something of a dilemma, given the all-or-nothing structure of the winning bids. With all the various elements, add-ons, and stipulations, the calculated difference between the winning Tillman bid for the Burnside project and the losing bid from Pacific Bridge was $529,827. The county, in accepting the Tillman bid, as part of the all-or-nothing proposal, was going to end up paying more than 20 percent above the lower bid.

As might be expected, Pacific Bridge Company, with a long tradition of bridge building in the Pacific Northwest, having presented a qualified bid that was over half a million dollars lower in cost than the winner, was not pleased with the county's decision. On April 4, 1924, Pacific Bridge filed an injunction suit, designed to throw out the contract award, claiming the process violated state law in several ways and the all-or-nothing agreement between the three successful companies was "tantamount to collusion."[37]

Soon, however, the possible collusion among the winning bidders took a backseat to a far more explosive issue: the charge of possible wrong-doing by the commissioners themselves. While details were initially scarce, it soon became apparent that there was some concern the commissioners were involved with kick-backs and similar "pay-to-play" dealings that skewed their judgment. So serious were the claims that within a week of the bid announcement on the bridge contracts that a "group of responsible business and professional men" began to prepare a recall campaign to remove the commissioners from office.[38] At a special Saturday meeting, the commissioners, responding to the growing public outcry over the situation, unanimously voted to withdraw the contracts. This was in no small part precipitated by the county attorney's blunt statement that he could not defend the multiple irregularities of the Tillman contract against the Pacific Bridge Company complaint and would not do so. "I will not defend the contracts awarded by the commissioners, this is a suit for which they must get special counsel," said Mr. Myers, the District Attorney.[39] It was the *Oregonian's* opinion that, "In withdrawing their signatures from the bridge contracts, which are rightly condemned by public opinion, the county commissioners chose the only reasonable way out of a serious dilemma."[40]

[35] Bridge funding during this era was complicated by numerous political and financial factors, most notably that the county was responsible for the bridges across the river (subject to review by both Army Corps of Engineers and the Port of Portland), whereas the City of Portland was responsible for funding the approach spans that connected any trans-Willamette bridge to the city street grid. This required at least two different bond elections, which had to be coordinated in order to build the structure as designed. Minor modifications in alignment, costs, or design could, at least in theory, void an earlier approval.

[36] *Oregonian*, 1-April-1924, 1:1.

[37] *Oregonian*, 4-April-1924, 1:8.

[38] *Oregonian*, 5-April-1924, 8:3.

[39] *Oregonian*, 6-April-1924, 1:1.

[40] *Oregonian*, 7-April-1924, 8:1.

But even as the commissioners attempted to backtrack, questions about the irregular contract procedures grew. The governor of Oregon, Walter Pierce, directed State Attorney General Van Winkle to launch an investigation of the issue to determine if any laws had been broken and the issue consumed the interest of the local press, with daily stories of new findings amid growing public anger. The recall process continued and by mid-month, less than three weeks after the contracts had first been awarded and just two weeks since a group had formed to discuss the possibility, more than 18,000 voters signed recall petitions on commissioners Walker, Rudeen, and Rankin. Fully 14 percent of all registered voters in the county, 500 more than were required, had already signed the petition, far more than were needed to assure an election on the recall question.

Stories of corruption circulated through the community. By April 20, 1924, charges of impropriety against the commissioners and the inexperienced bridge engineer Robert E. Kremers surfaced, claiming that irregularities regarding insurance bonds and collusion between the commissioners, Kremers, and the bidders were involved in the unusual award of bridge work. In mid-May, five days before the scheduled recall election, the Grand Jury announced an inquiry into Commissioners Walker and Rudeen, as well as Kremers. Early reports suggested that the engineering contract, estimated to amount to $200,000 had been "hawked about for $50,000," accounting for the fact that Kremers had not won the job solely on merit, especially in the face of "formidable competition."[41] According to the *Oregonian*, "It is alleged, in the grand jury findings, that the two officials, on January 26, 1923, corruptly received from Robert E. Kremers a "certain gift, gratuity and valuable consideration…of the value of more than $10,000 of lawful money."[42]

After a week of testimony, no charges had been issued, and somewhat irregularly none were made prior to the recall election. The issue would, instead, be resolved at the ballot box before the grand jury finished its work. Commissioners Walker, Rankin, and Rudeen were recalled by a wide margin, replaced by three new members specifically proposed by those incensed over the bridge contract process. A few days later, based upon what were widely considered technicalities, the three recalled commissioners, as well as Kremers, were acquitted by the grand jury. Most review of the situation left little doubt that the board of commissioners, while determined innocent, had not operated in the public's best interest. According to E. Kimbark MacColl, "A sordid tale of influence pedaling was related (at the trial), depicting each commissioner holding out his hand for some kind of pay-off, but the state had a difficult time establishing any direct connections involving bribery."[43]

The newly elected commissioners pledged to provide a new, and presumably unquestionable, process that would get these much needed bridges under construction. They quickly retained Gustav Lindenthal to review the status of the plans prepared by Hedrick and the now-disgraced Kremers. As detailed in Section 7, Lindenthal elected to design new structures for Ross Island and Sellwood but, with only minor changes, decided to follow the Hedrick and Kremers plans for the Burnside Bridge. By July 1924, the county was again ready to award a contract for the construction of a new Burnside Bridge. Pacific Bridge, the wronged party in the earlier contract award, this time prevailed with a bid of $2,390,173, the same amount it had bid in April. It is not clear if the Tillman Company participated in the bidding process.

Construction of the Burnside Bridge proceeded within the 500-working-day completion schedule that had been a key stipulation in the Pacific Bridge Company proposal. Public excitement over the city's large-scale bridge expansion, with three major spans across the Willamette under construction during 1925, was somewhat whetted in December when the new Sellwood Bridge opened. In early January 1926, looking forward to the

[41] *Oregonian*, 1-May-1924, 8:1
[42] *Oregonian,* 11-May-1924, 1:1
[43] MacColl, E. Kimbark. *The Growth of a City: Power and Politics in Portland, Oregon 1915–1950*. Portland, OR: The Georgian Press, 1979:265.

completion of the Burnside and Ross Island bridges, J. P. Newell, a consulting engineer hired to review Portland's bridge network, expected that the county's bridge-building program would virtually double existing capacity and relieve traffic congestion, especially during the morning and afternoon commute, for the next ten years. The *Oregonian* speculated that "Portland's bridge equipment, as it will stand at the beginning of 1927, will be sufficient to handle the city's traffic until 1936. Then, it is estimated, the city will have a population of 518,000 with peak traffic of 219,000 vehicles, requiring an hourly capacity of 17,500."[44]

By late April 1926, plans were being readied for the formal opening of the new Burnside Bridge. Concurrently, the 1926 Rose Festival was canceled due to the construction of a new Multnomah Stadium, the venue where many of its events were hosted.[45] W. C. Culbertson, the executive secretary of the general committee charged with planning the bridge events, along with individuals associated with the Portland Rose Festival, saw the opening of the Burnside Bridge as an appropriate substitute for the cancelled festival. The committee determined to make the event a statewide celebration, inviting marching bands from all over Oregon to participate, as well as the "Prunarians" from Vancouver, Washington.[46] In mid-May, the *Oregonian* announced,

> Friday May 28 has been set as the date of the official opening. Erwin A. Taft, county commissioner, is chairman of the committee in charge of the celebration plans, which will include a parade on each side of the river, to meet at the bridge center, and a day of general festivity….Engineers say that the Burnside Bridge is one of the most beautiful and most practicable, from the viewpoint of utility, west of the Mississippi River.[47]

The formal opening ceremonies began at noon, with a luncheon in the Crystal Room of the Benson Hotel, held by the City Club of Portland. The two parades started at 2:00, with the marine parade, through the open bascule spans, commencing at 2:30. As the span was closed, leaders from both east and west Portland, along with the assembled crowds, met at the bridge's center and the Burnside Bridge was formally dedicated to the public. Radio station KEX broadcast the events, and mill and factory whistles around the city were blown in near unison between 2:30 and 2:35. After a marine regatta and motorboat racing, and a display by Portland's fire boat fleet, Amedee M. Smith, chair of the board of commissioners, formally opened the bridge to public traffic at 7:00. It was the *Oregonian's* opinion that,

> The opening of the new Burnside bridge will doubtless constitute one of those memorable and significant events from which citizens delight to reckon the flight of time. And, indeed, the completion of this fine modern structure, beautiful in design and modern in every detail, is of considerable moment to the city. The bridge is not only the greatest of the three bridges approved by the voters, when the urgency of improved trans-river facilities was presented to them, but is one of the finest bridges of the country and represent a most admirable achievement in construction...
>
> Some day, when the river is clean and all its frontage sightly, all the bridges will be beautiful and the Willamette will flow like a song through the heart of the city. That, if it pleases you, is one of the promises the new bridge extends.[48]

Registration Requirements

[44] *Oregonian,* 8-January-1926, 1:4
[45] Weisensee, http://www.oregonencyclopedia.org/entry/view/portland_rose_festival/, visited 23-Nov-2010.
[46] *Oregonian,* 27-April-1926, 1:3
[47] *Oregonian*, 16-May-1926, 24:1
[48] *Oregonian*, 28-May-1926, 12:2

The Burnside Bridge is being nominated to the National Register under the Willamette River Highway Bridges of Portland, Oregon, Multiple Property Document (MPD). Evaluation of the bridge within the registration requirements of Section F of that document finds the following:

The Burnside Bridge meets the Minimum Eligibility Requirements:

- The bridge is located on the Willamette River, at River Mile 12.4, entirely within the City of Portland, Multnomah County, Oregon.
- The bridge's primary function is to provide highway/vehicular needs within the city's transportation system although it also provides for bike and pedestrian use as well as auto, truck, and bus traffic. Historically the bridge was also an element of Portland's street railway system.
- The bridge is owned and maintained by Multnomah County. The county authorized and funded the construction of the bridge and has been responsible for its maintenance since completion.
- The bridge was completed in May 1926 and so meets the temporal context of the MPD. It is the only movable span within the four bridges constructed during the middle, auto-related, subgroup (1925–31) of that context.
- Additionally, the Burnside Bridge is intrinsically connected to the history of Portland and Multnomah County through its role in the 1926 "bridge scandal" that culminated in the recall election of three commissioners and their replacement with a new slate of candidates devoted to completing the county's bridge program.

The Burnside Bridge meets the Minimum Integrity Requirements:

- The bridge remains on its original piers and its original alignment.
- The bridge remains substantially "as-built" with very high integrity with respect to its original steel and concrete elements. Identified modifications, including serial replacement of the wear surface, maintenance and upgrade to the bascule mechanism and control, and modifications to lane alignments to allow for increased bike and pedestrian use, do not in any serious fashion alter the overall integrity and historic character of the span.
- The bridge retains a very high level of integrity in feeling and association, effectively relating its original character, design and appearance so as to convey its relationship to the history of Portland, Oregon.

As a result of the above, the Burnside Bridge meets the eligibility requirements for listing on the National Register under Criterion A, as defined by the Willamette River Highway Bridges of Portland MPD.

In addition to eligibility under Criterion A, the Burnside Bridge is considered to have significance under Criterion C. Evaluation under the registration requirements finds the following:

- The Burnside Bridge is a large and historically significant example of the Strauss-type bascule, as designed and patented by Joseph B. Strauss.
- The Burnside Bridge is the first-known Strauss bascule to utilize a concrete deck surface, adding to its impressive scale and making the bridge among the heaviest such structures ever erected.
- The Burnside Bridge was among the last major works of noted bridge engineer Gustav Lindenthal.
- The Burnside Bridge retains a high degree of integrity in both design and workmanship and, as such, is a exemplar of its type, representing one of the four major patented bascule forms that were developed during the late 19th and early 20th centuries.

As a result of the above, the Burnside Bridge—in addition to its already demonstrated eligibility under Criterion A, and relationship to the history of Portland and Multnomah County—is also identified as having design and

technological significance related to the Strauss-type bascule, maintaining sufficient integrity to accurately relate that association, as required for eligibility under National Register Criterion C.

9. Major Bibliographical References

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

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Previous documentation on file (NPS):

- [X] 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 #_____
- [X] recorded by Historic American Engineering Record # OR-101

Primary location of additional data:

- [ ] State Historic Preservation Office
- [X] Other State agency
- [ ] Federal agency
- [X] Local government
- [ ] University
- [ ] Other

Name of repository: OR Dept of Trans, Multnomah Cty

Historic Resources Survey Number (if assigned): N/A

Burnside Bridge | Multnomah Co., OR
Name of Property | County and State

10. Geographical Data

Acreage of Property Less than one acre

UTM References
(Place additional UTM references on a continuation sheet)

	Zone	Easting	Northing		Zone	Easting	Northing
1	10	526080	5040915	3			
2				4			

Verbal Boundary Description
(Describe the boundaries of the property on a continuation sheet)

The nominated area includes the entire Burnside Bridge structure, above the river bed and between the approach spans that connect the structure to the road system on either side of the Willamette River.

Boundary Justification
(Explain why the boundaries were selected on a continuation sheet)

The nominated area encompasses the entirety of the historic Burnside Bridge, while excluding the adjacent non-contributing public streets and structures.

11. Form Prepared By

name/title George Kramer, M.S., Senior Presrevation Specialist
organization Heritage Research Associates, Inc. date
street & number 1997 Garden Ave telephone (541) 482-9504 / (541) 485-0454
city or town Eugene state OR zip code 97403

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)

Burnside Bridge | Multnomah Co., OR
Name of Property | County and State

Photographs:

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map.

Name of Property: Burnside Bridge

City or Vicinity: Portland

County: Multnomah, Co. **State:** OR

Photographer: George Kramer
Heritage Research Associates, Inc. (Eugene, OR)

Date Photographed: April 2011

Photo 1 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0001)
Upstream view, looking NE, from west side bike path

Photo 2 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0002)
Upstream view, looking NW, from Vera Katz Esplande

Photo 3 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0003)
Downstream view, looking west, toward downtown Portland, from Vera Katz Esplande

Photo 4 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0004)
Downstream view, Operator's tower

Photo 5 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0005)
Upstream view, looking south, showing pier and bascule detail (Morrison Bridge in distance)

Photo 6 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0006)
Downstream view, showing bascule in operation (Steel bridge in distance)

Property Owner

name Multnomah County Bridge Section, attn: Ian Cannon, County Bridge Service Manager
street & number 1403 SE Water Street telephone (503) 988-3757
city or town Portland state OR zip code 97214

Documents

Figure 1: Project Location Map, ODOT, City of Portland Quadrangle, Annotated

Figure 2: USGS, Portland 7.5 Quadrangle, 1990, Annotated

Figure 3: Burnside Bridge Boundary Map

Figure 4: Five Bridges Over the Willamette River, looking north, circa 1927
author's collection (Burnside Bridge at image center)

Figure 5: Aerial View of Portland, circa 1927, author's collection, Burnside Bridge at image center

Figure 6: Postcard Image, circa 1927, author's collection

Figure 7: Postcard Image, circa 1927, author's collection

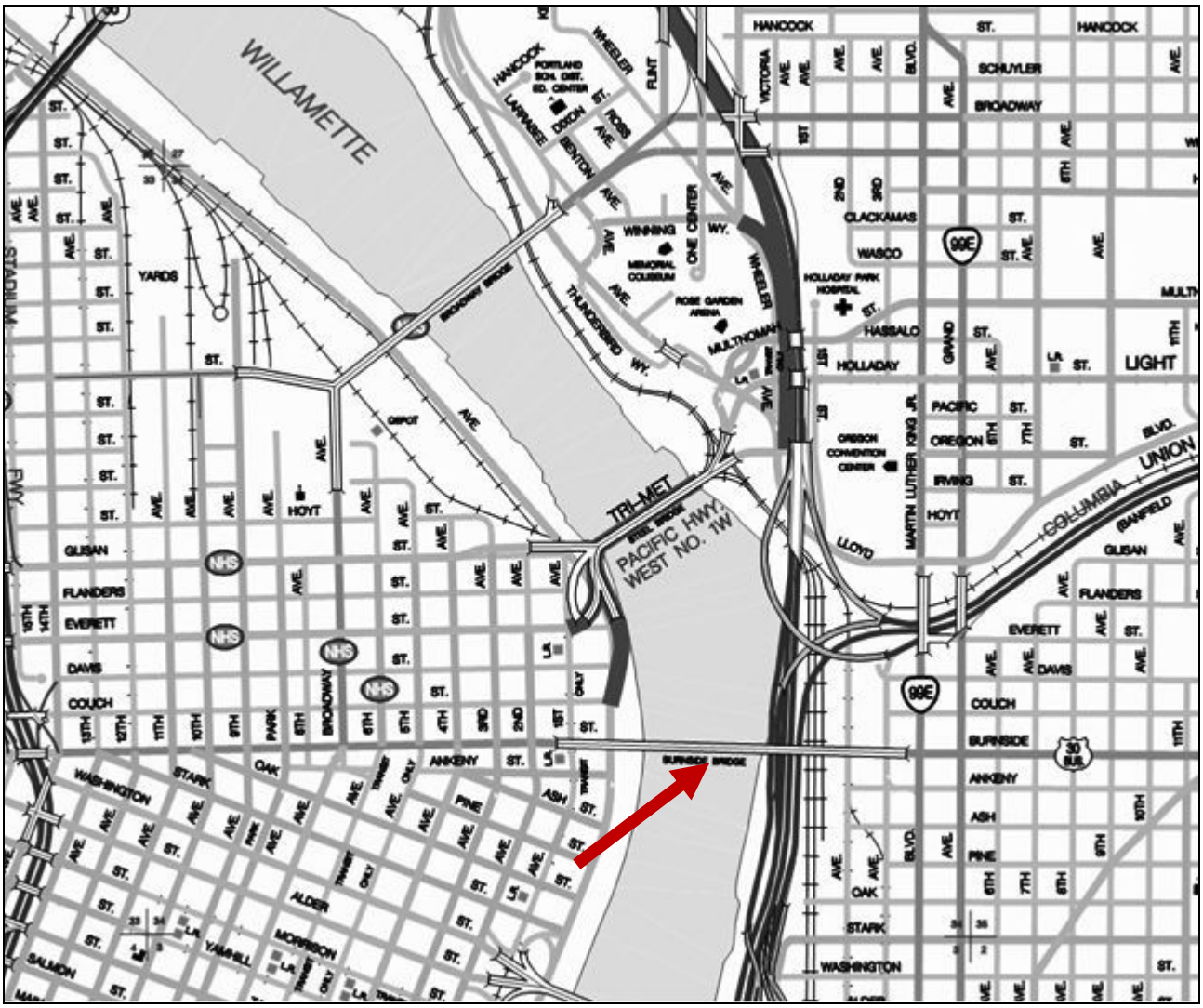
Figure 8: Postcard Image, circa 1950, author's collection

Figure 9: Postcard Image, circa 1927, looking West, author's collection

Figure 10: Postcard Image, circa 1927, author's collection

Figure 11: Postcard Image, looking West, circa 1940, author's collection

Figure 1: Project Location Map, ODOT, City of Portland Quadrangle, Subject property indicated with arrow



United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

Burnside Bridge	Name of Property
Multnomah Co., OR	County and State
Willamette River Highway Bridges of Portland, Oregon	Name of multiple listing (if applicable)

Section number Documents Page 24

Figure 2: USGS, Portland 7.5 Quadrangle, 1990, Subject property indicated with arrow

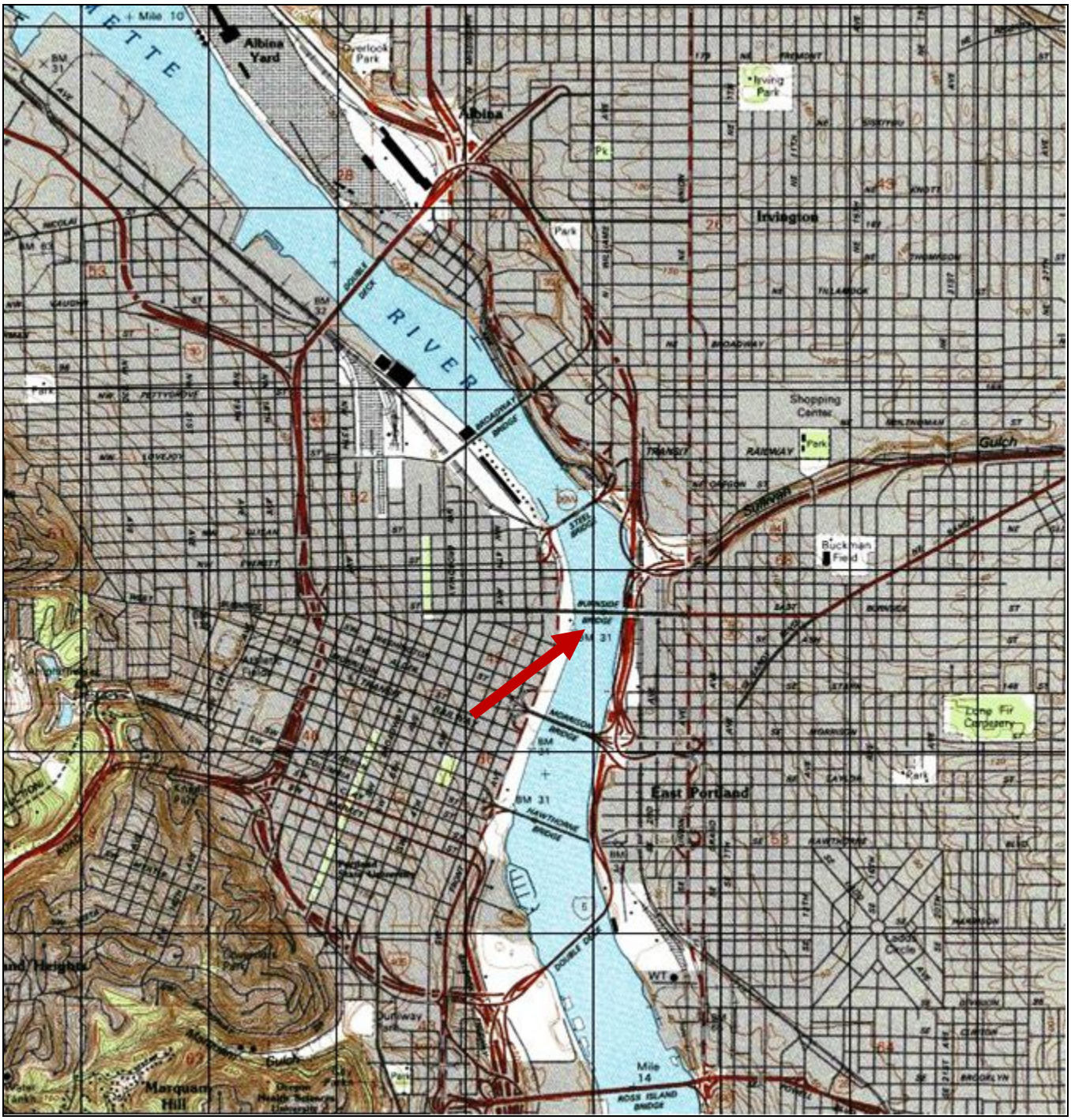


Figure 3: Burnside Bridge Boundary Map, Boundary marked with black line

Figure 4: Five Bridges Over the Willamette River, looking north, circa 1927
author's collection (Burnside Bridge at image center)

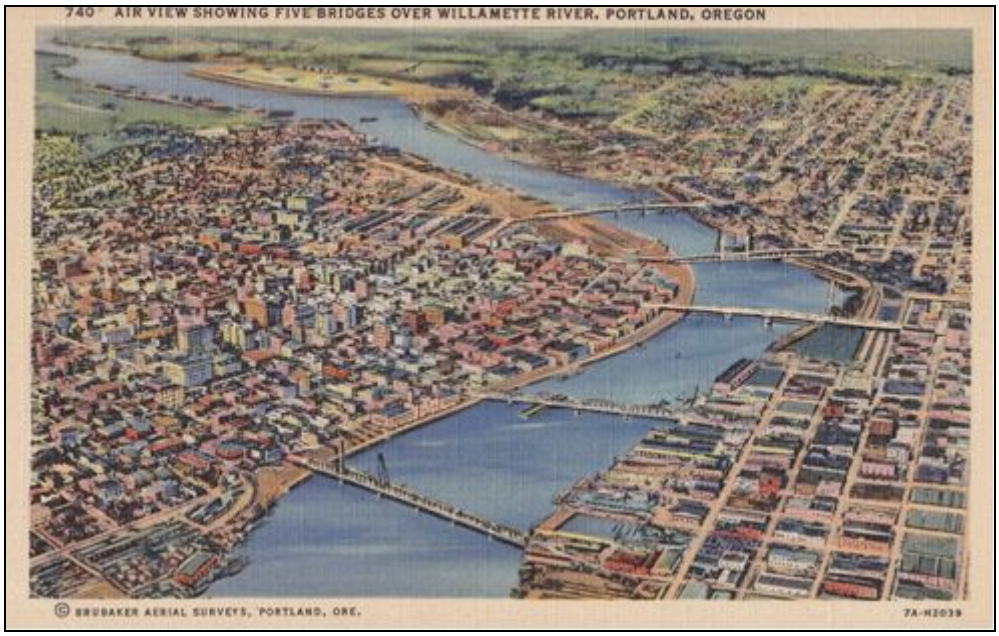


Figure 5: Aerial View of Portland, circa 1927, author's collection, Burnside Bridge at image center

Figure 6: Postcard Image, circa 1927, author's collection

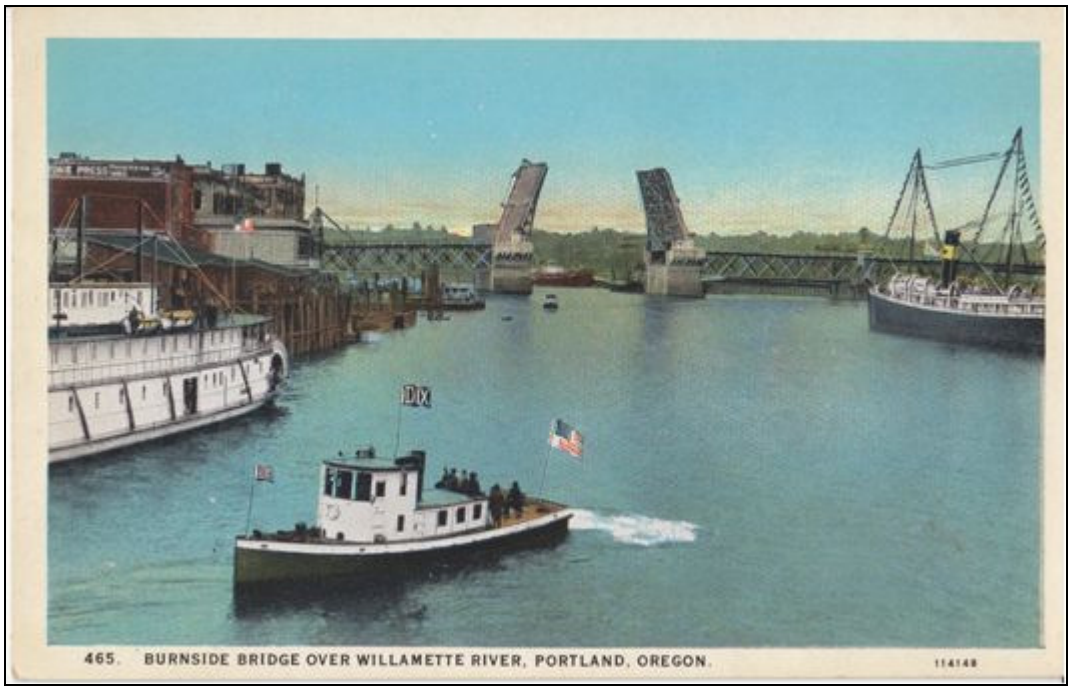


Figure 7: Postcard Image, circa 1927, author's collection

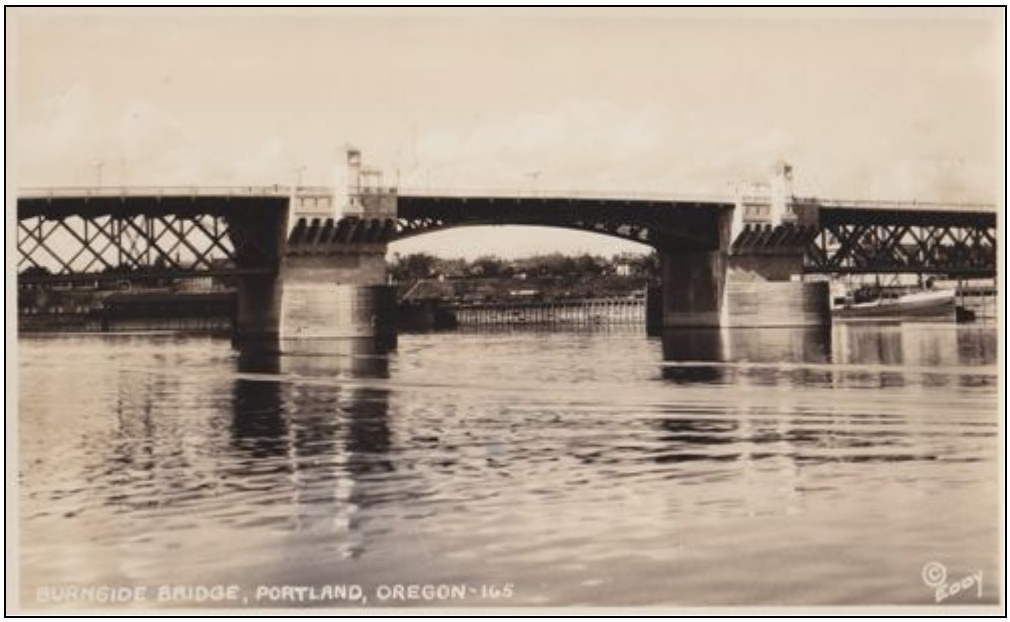


Figure 8: Postcard Image, circa 1950, author's collection

Figure 9: Postcard Image, circa 1927, looking West, author's collection

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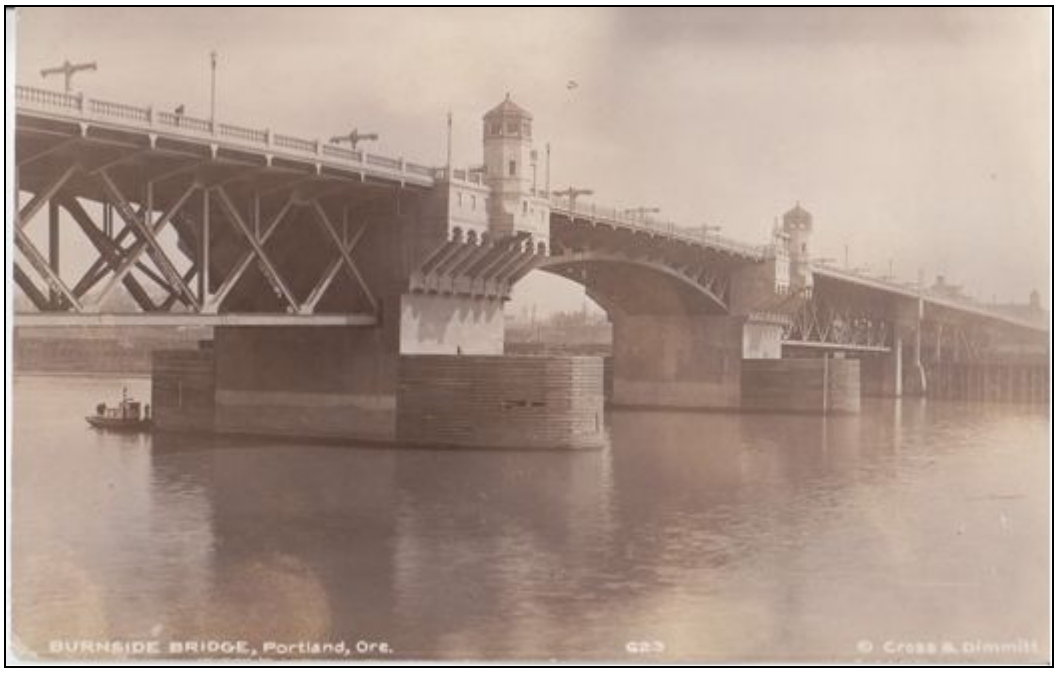


Figure 11: Postcard Image, looking West, circa 1940, author's collection

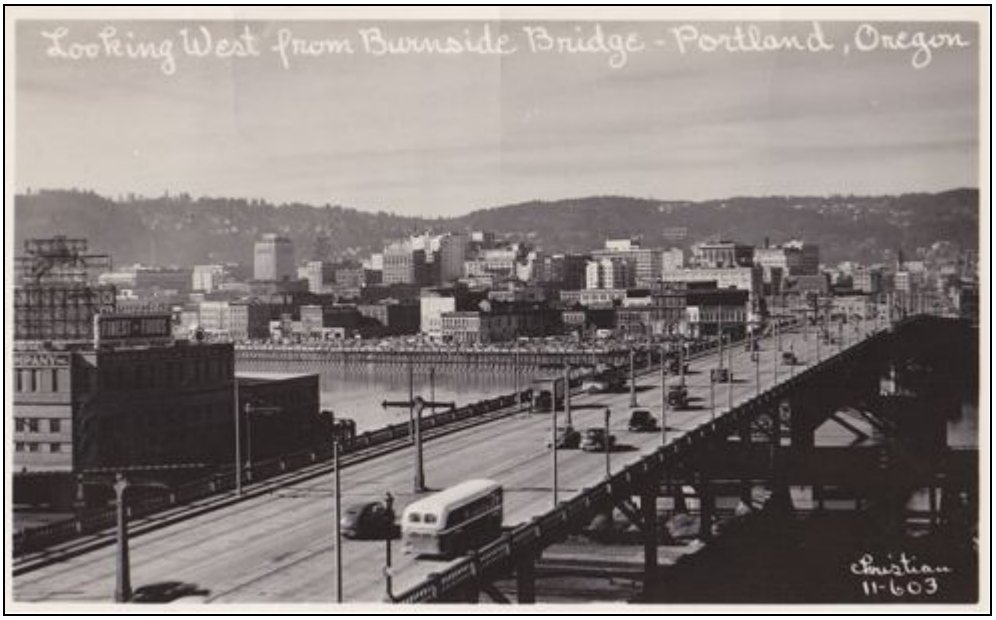


Photo 1 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0001)
Upstream view, looking NE, from west side bike path

Photo 2 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0002)
Upstream view, looking NW, from Vera Katz Esplande

Photo 3 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0003)
Downstream view, looking west, toward downtown Portland, from Vera Katz Esplande

Photo 4 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0004)
Downstream view, Operator's tower

Photo 5 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0005)
Upstream view, looking south, showing pier and bascule detail (Morrison Bridge in distance)

Photo 6 of 6: (OR_MultnomahCounty_WillametteHwyBridgesMPD_BurnsideBridge_0006)
Downstream view, showing bascule in operation (Steel bridge in distance)

Form No. 10-300 (Rev. 10-74)

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES INVENTORY -- NOMINATION FORM

DATA SHEET

FOR NPS USE ONLY
RECEIVED SEP 30 1975
DATE ENTERED DEC 6 1975

SEE INSTRUCTIONS IN *HOW TO COMPLETE NATIONAL REGISTER FORMS*
TYPE ALL ENTRIES -- COMPLETE APPLICABLE SECTIONS

1 NAME

HISTORIC: Portland Skidmore/Old Town Historic District

AND/OR COMMON: Same

2 LOCATION

STREET & NUMBER: Roughly bounded by Harbor Dr., E Everett, 3rd, & Oak St. ___ NOT FOR PUBLICATION

CITY, TOWN: Portland ___ VICINITY OF

CONGRESSIONAL DISTRICT: Third - Robert Duncan

STATE: Oregon CODE: 41

COUNTY: Multnomah CODE: 051

3 CLASSIFICATION

CATEGORY	OWNERSHIP	STATUS	PRESENT USE	
X DISTRICT	___ PUBLIC	___ OCCUPIED	___ AGRICULTURE	___ MUSEUM
___ BUILDING(S)	X PRIVATE	___ UNOCCUPIED	X COMMERCIAL	___ PARK
___ STRUCTURE	___ BOTH	___ WORK IN PROGRESS	___ EDUCATIONAL	___ PRIVATE RESIDENCE
___ SITE	**PUBLIC ACQUISITION**	**ACCESSIBLE**	___ ENTERTAINMENT	___ RELIGIOUS
___ OBJECT	___ IN PROCESS	X YES: RESTRICTED	___ GOVERNMENT	___ SCIENTIFIC
	___ BEING CONSIDERED	___ YES: UNRESTRICTED	___ INDUSTRIAL	___ TRANSPORTATION
		___ NO	___ MILITARY	___ OTHER:

4 OWNER OF PROPERTY

NAME: Multiple Ownership

STREET & NUMBER:

CITY, TOWN: ___ VICINITY OF

STATE:

5 LOCATION OF LEGAL DESCRIPTION

COURTHOUSE, REGISTRY OF DEEDS, ETC.: Multnomah County Courthouse

STREET & NUMBER: 1021 SW 4th Avenue

CITY, TOWN: Portland

STATE: Oregon 97201

6 REPRESENTATION IN EXISTING SURVEYS

TITLE: Statewide Inventory of Historic Sites & Buildings

DATE: December 30, 1974 ___ FEDERAL X STATE ___ COUNTY ___ LOCAL

DEPOSITORY FOR SURVEY RECORDS: Parks & Recreation Section, Oregon State Highway Building

CITY, TOWN: Salem

STATE: Oregon 97310

7 DESCRIPTION

CONDITION		CHECK ONE	CHECK ONE
__EXCELLENT	__DETERIORATED	__UNALTERED	X ORIGINAL SITE
__GOOD	__RUINS	X ALTERED	__MOVED DATE_____
X FAIR	__UNEXPOSED		

DESCRIBE THE PRESENT AND ORIGINAL (IF KNOWN) PHYSICAL APPEARANCE

Skidmore/Old Town Historic District was once the center of commerce and entertainment in Portland and contains the city's largest remaining collection of mid to late 19th century business buildings. The district is an area of approximately 20 blocks centered on Burnside Street and bordered by the Willamette River on the east. The district is known throughout the United States for its Italianate architecture. The wooden cornices, masonry bearing walls, and the use of architectural cast iron in the street level facades once typified the streets of Portland and are well represented in the present Skidmore/Old Town Historic District. The focal point and source of the district name is the Skidmore Fountain built in 1888 and donated to the city by Stephen G. Skidmore.

The Skidmore Fountain was conceived and executed by Olin J. Warner, a sculptor of national reputation. It consists of an ornate bronze basin eight feet in diameter held aloft by an ionic shaft and two bronze caryatids of classical form and drapery. An octagonal granite pool 20 feet in diameter collects the splashing water from above and lion heads below spout small streams of water into the four horse and dog troughs. Metal drinking cups hung below the pool until the first years of the twentieth century when they were removed in the interest of public safety.

The New Market Theater, located about 100 feet southwest of the fountain, was built by pioneer seaman and merchant Alexander Ankeny in 1872. W. W. Piper, Oregon's first professional architect, designed the three-story brick building in the North Italian mode of the Renaissance Revival. The handsome structure housed an arcaded street level public market, a small restaurant and Portland's grandest theater between 1872 and 1884. The building retains its original east and west facades except for six cornice urns which have been removed and an 1884 remodeling of the theater's east entrances. The interior of the first level is restorable but the theater is now used for automobile parking and has been severely altered.

The New Market Alley Building was constructed soon after 1872 and housed the city council in 1879. This small two-story masonry building covered the alley entrance on the south side of the New Market Theater. The two arches on the street level allowed access to the alley, one for incoming and one for outgoing wagons. The building was constructed in the Italianate style although it shares the same cornice with the neighboring High Victorian Italianate Poppleton Building to the south.

The Poppleton Building, probably constructed in 1873, is composed of cast iron pilasters and thresholds, plastered brick, and wooden windows and cornice detail. This corner building now houses a modern specialty shop and has been altered structurally to allow access between the three original divisions.

The New Market Annex abuts both the Poppleton Building and the New Market Theater, and is considered the city's best example of Richardsonian Romanesque Architecture. The Annex was built in 1889 and, as originally, supports mixed

8 SIGNIFICANCE

PERIOD	AREAS OF SIGNIFICANCE -- CHECK AND JUSTIFY BELOW			
__PREHISTORIC	__ARCHEOLOGY-PREHISTORIC	__COMMUNITY PLANNING	__LANDSCAPE ARCHITECTURE	__RELIGION
__1400-1499	__ARCHEOLOGY-HISTORIC	__CONSERVATION	__LAW	__SCIENCE
__1500-1599	__AGRICULTURE	__ECONOMICS	__LITERATURE	__SCULPTURE
__1600-1699	X ARCHITECTURE	__EDUCATION	__MILITARY	__SOCIAL/HUMANITARIAN
__1700-1799	X ART	__ENGINEERING	__MUSIC	X THEATER
X 1800-1899	X COMMERCE	__EXPLORATION/SETTLEMENT	__PHILOSOPHY	__TRANSPORTATION
__1900-	__COMMUNICATIONS	__INDUSTRY	__POLITICS/GOVERNMENT	__OTHER (SPECIFY)
		__INVENTION		

SPECIFIC DATES

BUILDER/ARCHITECT

STATEMENT OF SIGNIFICANCE

Portland's Skidmore/Old Town Historic District incorporates several valuable cultural assets for the city, the state, and the nation. Architecturally, the district includes the Italianate, the High Victorian Italianate, the Renaissance Revival, the Richardsonian Romanesque, and the Sullivanesque styles. The use of cast iron to express architectural style is extensive throughout the district. Several structures from this district stand out as among the finest on the west coast. The New Market Theater, designed by W. W. Piper, is a fine example of the North Italian Mode of the Renaissance Revival style, the Blagen Block is used by Marcus Whiffen in his American Architecture Since 1780 as a prime example of High Victorian Italianate, and the Skidmore Fountain designed and executed by Olin J. Warner, was considered one of the more excellent fountains in the country when it was constructed in 1888.

By the early 1850s, Portland became the primary community in Oregon. Two factors contributed to its primacy. International shippers discovered that the Willamette River was unnavigable for oceangoing vessels beyond Portland during most of the year, leading to the decline of the upstream rival communities of Milwaukie and Oregon City. In 1852, the completion of the Portland and Tualatin Valley Plank Road (or the "Great Plank Road" as it was locally called), by which agricultural products could be more easily transported from the rich Tualatin Valley, firmly established Portland as the primary shipping point in Oregon. These two factors hastened the development of industry in Portland, which by 1850 included a tannery, a steam powered sawmill, and various commercial enterprises.

Portland had grown to a population of 821 residents by 1860, and evidences of permanent settlement were more apparent by that time. Several brick buildings were constructed near the waterfront, suggesting that Portland was becoming a more permanent commercial city. Of these buildings, the Hallock and McMillan Building and the Delschneider Building remain within the Skidmore/Old Town Historic District. By the late 1860s, Portland was beginning to gain national recognition for its development. Samuel Bowles, editor of the Springfield Republican and editorial mouthpiece for Jay Cooke's Northern Pacific Railroad, remarked in 1869:

> "Oregonians, have builded what they have got more slowly and more wisely than the Californians; they have . . . less to unlearn; and they seem sure, not of organizing the first state on the Pacific Coast, indeed, but of a steadily prosperous healthy and moral one--they are in the way to be the New England of the Pacific Coast."

9 MAJOR BIBLIOGRAPHICAL REFERENCES

Baird, Joseph A., Jr., "New Market Block and Theater: Photograph--Data Book Report" Historic American Building Survey, June: 1964.

Johansen, Dorothy O. and Gates, Charles M., Empire of the Columbia: A History of the Pacific Northwest, New York: 1957.

10 GEOGRAPHICAL DATA

UTM ok-ww 12-22-75

ACREAGE OF NOMINATED PROPERTY 44 acres

UTM REFERENCES

	ZONE	EASTING	NORTHING
A	10	525700	5041100
B	10	525940	5041120
C	10	525750	5040630
D	10	525940	5040480

VERBAL BOUNDARY DESCRIPTION

LIST ALL STATES AND COUNTIES FOR PROPERTIES OVERLAPPING STATE OR COUNTY BOUNDARIES

STATE	CODE	COUNTY	CODE
STATE	CODE	COUNTY	CODE

11 FORM PREPARED BY

NAME / TITLE

Gregg Olson/Robert K. Sutton, State Historic Preservation Staff

ORGANIZATION: Oregon State Parks

DATE: September 4, 1975

STREET & NUMBER: State Highway Building

TELEPHONE: (503) 378-6118

CITY OR TOWN: Salem

STATE: Oregon 97310

12 STATE HISTORIC PRESERVATION OFFICER CERTIFICATION

THE EVALUATED SIGNIFICANCE OF THIS PROPERTY WITHIN THE STATE IS:

NATIONAL XX STATE ____ LOCAL ____

As the designated State Historic Preservation Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the National Park Service.

STATE HISTORIC PRESERVATION OFFICER SIGNATURE: David G. Talbot

TITLE: Oregon State Historic Preservation Officer

DATE: Sept. 19, 1975

FOR NPS USE ONLY

I HEREBY CERTIFY THAT THIS PROPERTY IS INCLUDED IN THE NATIONAL REGISTER

Acting Jerry L. Rogers

DIRECTOR, OFFICE OF ARCHEOLOGY AND HISTORIC PRESERVATION

DATE 12/6/75

ATTEST: A. Mundy

KEEPER OF THE NATIONAL REGISTER

DATE DEC 4 1975

GPO 892-453

PORTLAND SKIDMORE OLDTOWN HISTORIC DISTRICT

The Portland Skidmore/Old Town Historic District is primarily significant for its collection of late 19th Century architecture. In addition, the district contains a number of post-1900 buildings which also contribute to the architectural traditions of the immediate area. This statement will place the 20th Century buildings within district boundaries in the context of the overall development of the city and, thus, more clearly establish their contributing status.

Boosterism in the prosperous city of Portland at the turn of the century led to the creation of the Lewis and Clark Centennial Exposition of 1905. The exposition received national attention and attracted large amounts of investment capital to the city after it closed. Increased developmental interests resulting from the healthy economic climate encouraged construction of many commercial and residential buildings in Portland.

Most of the new commercial development occurred west of the Yamhill and Skidmore/Old Town Historic Districts. To the north and east of the new commercial core, numerous three to five story buildings were constructed, most often as residential hotels with commercial storefronts at the ground level. Most of these buildings were constructed in brick and most displayed a modicum of historic detailing on their elevations.

A number of these 20th Century buildings were constructed within the boundaries of the Skidmore/Old Town Historic District. Most are still standing, and most were given conservative compatible rankings in the original rankings in the original National Register nomination document. Only one 20th Century building, the George Lawrence Building (1902), was given a secondary ranking in the documentation, primarily due to its association with the leading Portland architectural firm of Whidden & Lewis. The George Lawrence leather goods manufacturing firm is among the city's significant historic businesses, however. Today, all these buildings are considered of secondary significance.

A small number of buildings ante-dating the First World War are within the district boundaries, and are considered compatible, having been constructed in materials, scale, and design similar to their earlier 20th Century neighbors. The 1930 end date for the period of 20th Century significance corresponds to the general cessation of commercial development in the city in advance of the Depresssion.

Additional copies

VICTOR ATIYEH
GOVERNOR

Department of Transportation

STATE HISTORIC PRESERVATION OFFICE

Parks and Recreation Division

525 TRADE STREET S.E., SALEM, OREGON 97310

May 1, 1985

Carol D. Shull
Keeper of the National Register
National Park Service
PO Box 37127
Washington, D.C. 20013-7127

Dear Ms. Shull:

Enclosed please find supplemental information on the Portland Skidmore/Old Town Historic District nomination.

The Continuation Sheet, Item 8, page 3, is offered to more firmly establish the contributing status of buildings within the district which ante-date 1900. In addition, we request that "1900-" be checked under "Period" on the first page of Item 8.

Thank you for your attention to this matter. Please phone me at (503) 373-7694, if you have additional questions.

Sincerely,

James Hamrick

James M. Hamrick
Preservation Specialist

JMH:sqh
Enclosure

cc: Paul W. Alley, WRO

Form 734-3122

Rec'd 5-15-85


VELTES

#2

NPS Number 12/6/75

Title: Portland Skidmore/Old Town
Historic District
Multnomah County, Oregon

Loc. View Market Block from
SW


ONE WAY

#3 1969

SKIDMORE

NPS Number 12/6/75

Title: Portland Skidmore / Old Town Historic District

Multnomah County, Oregon

Loc. New Market Block from SE. Pucher Scott Bldg + Skidmore Fountain in background.

3 of 25


J.T. HOLLINGSWORTH CO.

#6

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. Looking SE down Second Avenue


SEAL O
HUNTER-DAVISSON INC.
HUNTER-DAVISSON, INC.

#4

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

ac. Looking NE from Corner of Pine & Second Ave.

1425

#8

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. Looking SE down First Ave

8 of 25

#14

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. Intersection of Second & Ankeny St. from E


CROSS
WALK

#15

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. East facade of Block #20


LIGHT
SPECIALTIES

#16

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore / Old Town Historic district

Multnomah County, Oregon

Loc. Intersection of Couch St + First Ave Looking S

10/25


FRANK'S TOOL & SUP

#17

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. W facade of Block #9 (Frank's Tool & Supply with Blagen Block in foreground

17 of 25

#18

#80

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. NW corner of Block #9 (Blagen Block)

18 of 25

#22

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. Looking S down Second Ave from Couch St.

22 of 25


STATE FAIR
UNITED CLOTHING CO

#23

PROPERTY OF THE NATIONAL REGISTER

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District

Multnomah County, Oregon

Loc. Intersection of 4th and Burnside from the South

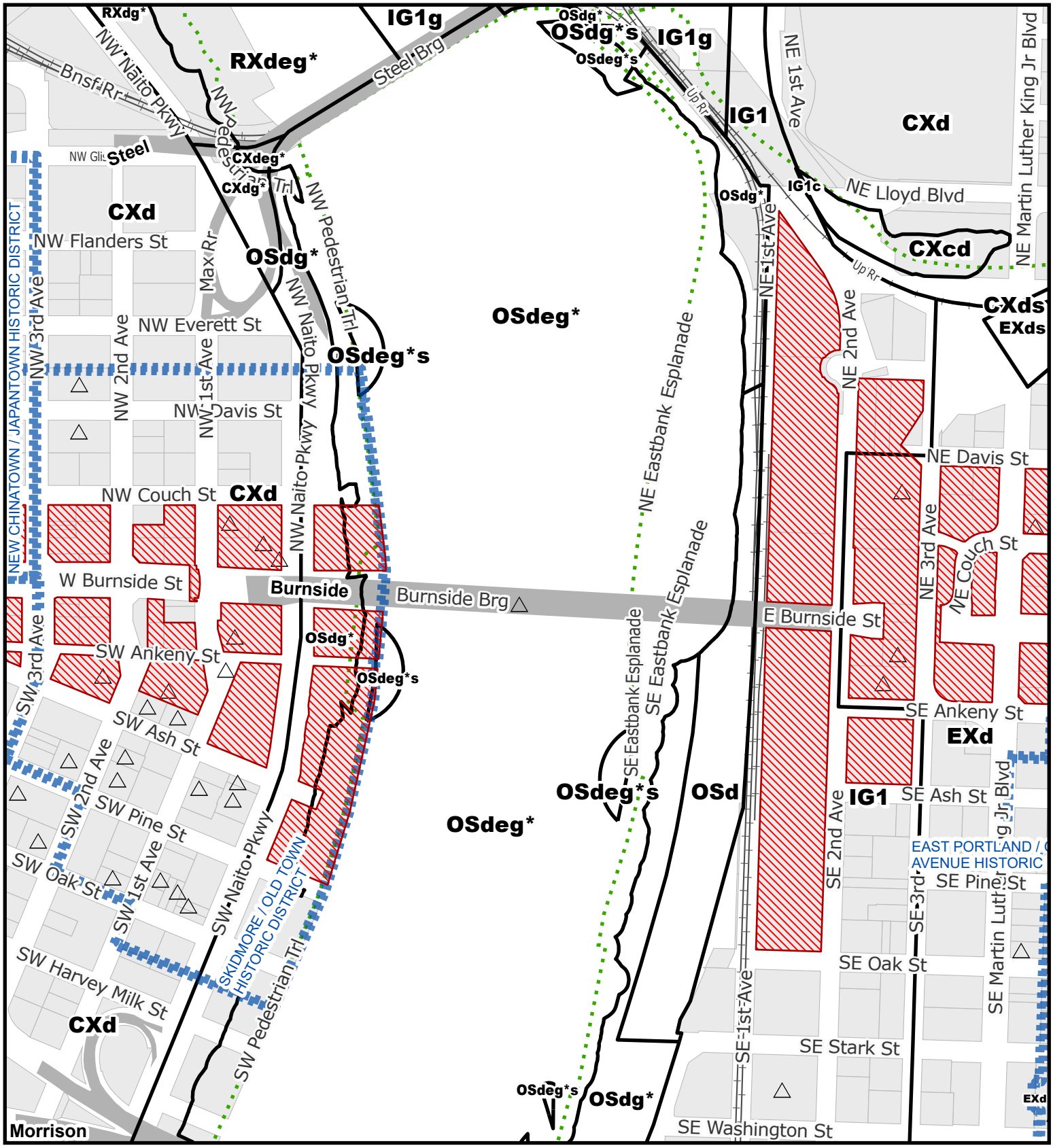

KIDA CO.

#25

NPS Number 12/6/75

Title: Portland Skidmore/Old Town Historic District
Multnomah County, Oregon

Loc. Northwest corner of Third and Davis.



For Zoning Code in Effect Post October 1, 2022

ZONING

THIS SITE LIES WITHIN THE:
CENTRAL CITY PLAN DISTRICT
CENTRAL EASTSIDE, DOWNTOWN &
OLD TOWN / CHINATOWN SUBDISTS
MULTIPLE HISTORIC DISTRICTS

- Site
- Historic District
- △ Historic Landmark
- Recreational Trails

File No.	EA 24 - 060617 DA
1/4 Section	3030,3031,3029
Scale	1 inch =400 feet
State ID	1N1E34DC 100
Exhibit	B Jul 15, 2024