Commentary on "The Alameda Neighborhood", "The Irvington Neighborhood" and Related Allegations Made by the Nomination Document for the Irvington Historic District Boundary Decrease

Written Testimony before the Portland Historic Landmarks Commission and the State of Oregon Advisory Committee on Historic Preservation

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Overview

The Boundary Decrease Document makes a number of inaccurate assertions relative to the development of Irvington, the neighboring Alameda Park tract, and their relationship to the modern Irvington and Alameda neighborhoods as currently recognized by the City of Portland Office of Neighborhood Involvement. This commentary addresses those inaccuracies to show that the actual historic facts do not support separating the subject area from the Irvington Historic District.

This commentary specifically examines the following 5 fundamental assertions in the Boundary Decrease document, which, if true, could be taken to show that the Boundary Decrease area was sufficiently unrelated to the rest of the Irvington District as to justify being removed from it:

Assertion 1: "The Boundary Decrease Area, as shown in Figure 1, developed as part of the Alameda Neighborhood and is recognized as such by its residents and historically throughout its existence." (Our emphasis)

Assertion 2: "The Boundary Decrease Area closely follows the historic development of the rest of the Alameda Neighborhood, rather than the Irvington Neighborhood."

The first two sections of the document make plain that the Boundary Decrease Area was either an actual part of the base Irvington plat as created by Elizabeth Irving, or one of several plats to the east whose promoters aligned their street grid with that of Irvington, were connected with the Irving family by business ties or blood, and that this area was regarded as "Irvington" by its residents, realtors, and prospective buyers throughout the Period of Significance as lot buyers continued to build homes in the area – which they almost universally regarded as "Irvington".

Assertion 3: "The Boundary Decrease Area of the Irvington Historic District is historically identified as part of the Alameda Neighborhood."

Implied by the first three assertions is the corollary assertion that there was an identifiable "Alameda Neighborhood" which embraced the Boundary Decrease Area starting in the Period of Significance as distinct from the Irvington Neighborhood. The fifth section of this document is devoted to this issue: The Alameda Neighborhood and Contemporary History of the Irvington District. It demonstrates conclusively that the current designation of the northeast corner of the Irvington Neighborhood as shared with the Alameda Neighborhood Association is a product of the 1970s, prior to which there was no ambiguity whatsoever as to the identification of the Boundary Decrease Area with Irvington.

Assertion 4: "The Alameda Park subdivision, as shown in Figure 5, adjoins the Boundary Decrease Area along NE Fremont St. and has a strong relationship to the Boundary Decrease Area because both the Alameda Park's and the Boundary Decrease Area's early development were dependent on the Alameda Land Company's funding of the streetcar's extension through the Boundary Decrease Area to it."

Assertion 5: "The Boundary Decrease Area is not a strong example of a "Streetcar Suburb" because it's early construction dates and locations do not closely follow the beginning of streetcar service in the area like the remaining Irvington Historic District does."

These last two assertions get to the fundamental association of the development of the Irvington Historic District with the availability of public streetcar transport from the development into the downtown core of Portland for shopping, work, and entertainment. The first assertion falls apart in light of the fact that the Broadway streetcar extension was pushed to completion towards Fremont Street by a combination of political pressure from Multnomah County and Irvington and Holladay Park property owners. While the Alameda Land Company did lend its weight to the argument, it was still promoting a speculative new tract, while the Irvington interests were promoting land already platted for sale along the proposed route.

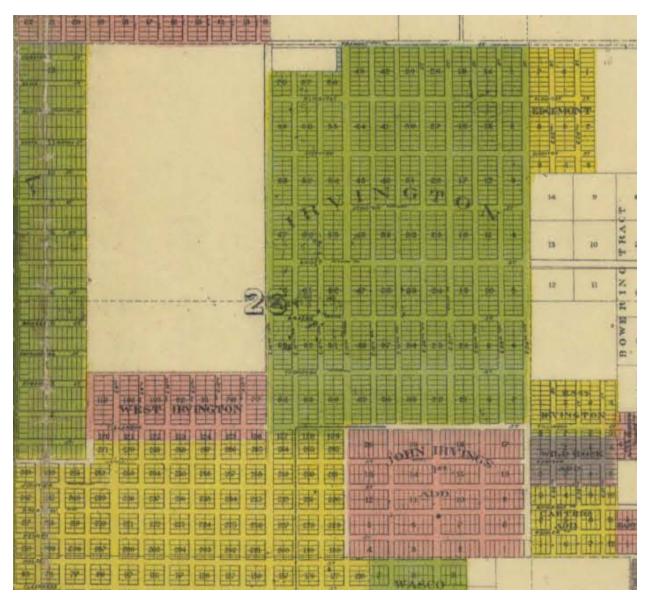
Assertion 5 reflects a misunderstanding of the lifespan of streetcar suburbs from the advent of streetcar line construction through the years immediately after World War II when streetcar service rapidly waned in importance. While some such suburbs were completely built out in the years immediately after the line's construction, many more were, like Irvington, over extended and took years to fill up. What changed as the 1920s saw ever cheaper and more plentiful automobiles is a change in the economic classes drawn to the streetcar suburbs. Prior to World War I, most new residents were upper or upper-middle class. As these classes came to own automobiles, they abandoned older streetcar suburbs to working and middle class buyers who still valued the availability of streetcar service and the avoidance of purchasing an automobile. This socio-economic change was very clearly at work in Irvington.

Section 4 of this document addresses the subject of streetcar service in considerable detail.

The remainder of this commentary is devoted to examining the historic facts which refute these assertions.

The Original Irvington Plat and the Boundary Decrease Area

As documented fully in the original nomination document for the Irvington Historic District, the portion of the District extending between 14th Avenue on the west to 24th Avenue on the east and from Fremont Street on the north to Tillamook Street was the Irvington Plat, sold for development by Elizabeth Irving to the Hughes interests in 1887 from her holdings of the original William Irving Donation Land Claim inherited from her late husband. A map of the Irving DLC is included as Appendix A, which clearly shows that it encompassed *all* of the Irvington Historic District west of 24th Avenue. A map of the plats as of 1906 is shown below:

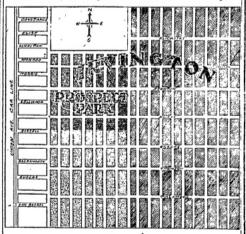


The northeastern-most 12 blocks of that original Irvington plat are embraced, rather curiously, as the western half of the Boundary Reduction Area, with the assertion that they were somehow historically associated with the "Alameda Neighborhood", which didn't even exist as of the time of this plat.

The Truth About Prospect Park

Way back in May, 1887, there was an agreement drawn up by the owners of IRVINGTON, as it was then platted, and the owner of that portion of IRVINGTON that is now designated and described as PROSPECT PARK, which agreement is on record, and is, in part, as follows:

"That, whereas the said parties are now the owners of that part of the Wm. Irving Donation Land Claim lying East of the town of Albina, and not heretofore laid off into lots and blocks, and it is deemed for the joint benefit of all parties that the same should be laid off uniformly . . . that the said first party (owning what is now called PROSPEOT PARK) not being desirous at this time of laying off or dedicating that part, desires to secure the laying of the part of the same owned by the other parties on such a plan as may be in conformity with the plan on which the owner of the first part



Note on the above plat that the diagonally ruled portion is IRVING-TOR, the cross ruled part helm; that part of Irvington called PROSPET PARK. Observe that PROSPECT PARK is just one block cast of the

desires when the same shall be laid off and dedicated as a Townsile.

I. said Elizabeth Irving, have and do hereby covenant and agree with (parties of the second part) that when the tract of land so now owned by me (which is the tract now designated as PROS-PEGT PARK) shall be laid off into lots and blocks, that it shall be laid off in accordance with the plat hereof herewith field, and not otherwise, as a part and parcel of said general plat of 'IRVING-TON,' and with numbering of Blocks and names of Streets as shown in the accompanying plat."

This agreement between the owners of the entire tract of IRVINGTON, definitely determines that the portion of IRVINGTON that was later platted and is now named PROSPECT PARK was included in the original platting of IRVINGTON.

The name PROSPECT PARK was given to this part of IRVINGTON by its cwners for the express purpose of distinguishing it from the rest of IRVINGTON—in advertising their property for sale, the owners wished to throw all of their energy upon this particular part of IRVINGTON, hence the name PROSPECT PARK.

PROSPECT PARK is the choicest part of IR-VINGTON. The open area to the west of the Irvington plat was retained by Elizabeth Irving for future development. (It was used as a race track by promoters who leased the land from Mrs. Irving until she took back use of the land in 1908.) Both West Irvington and John Irving's First Addition shown in pink in the map above were controlled by Mrs. Irving's children. The rectangular street grid of the Irvington plat itself appears to have been dictated by Mrs. Irving and enforced even after it was sold. This is suggested, in part by a remarkable advertisement which appeared in The Oregonian on November 29, 1908, in which the developers of an area promoted as "Prospect Park" in the open area in the map above, announced its connection to Irvington and the controls put in place by Elizabeth Irving as shown at the left.

The promoters are emphatic that their development was actually a part of Irvington. Further they quote their original agreement with Elizabeth Irving: "That, whereas the said parties are now the owners of that part of the Wm. Irving Donation Land Claim lying East of the town of Albina, and not heretofore laid off into lots and blocks, and it is deemed for the joint benefit of all parties that the same should be laid off uniformly... that the said first party (owning what is now called PROSPECT PARK) not being desirous at this time of laying off or dedicating that part, desires to secure the laying of the part of the same owned by the other parties on such a plan as may be inconformity with the plan on which the owner of the first part desires when the same shall be laid off and dedicated as a Townsite. ... I, said Elizabeth Irving, have and do hereby covenant and agree with (parties of the second part) that when the tract of land so now owned by me (which is the tract now designated as PROSPECT PARK) shall be laid off into lots and blocks, that it shall be laid off in accordance with the plat hereof herewith filed, and not otherwise, as a part and parcel of said general plat of 'Irvington,' and with numbering of Blocks and names of Streets as shown in the accompanying plat."

BEAUTIFUL IRVINGTON

Over 200 Homesites

IN THIS MOST EXCLUSIVE RESIDENTIAL SECTION.

The Location For Your Future Home

Practically all these lots are covered with green trees such as firs, dogwood and other evergreen shrubbery. We have for sale the remaining portion of IRVINGTON proper, the entire holdings of the late Ellis G. Hughes, covering more than 200 lots running from E. 14th to E. 24th, between Tillamook and Fremont streets, including entire blocks untouched. These lots are in the midst of the finest homes in Portland. The character and class is already established.

We are under contract to sell these lots at figures greatly reduced from previous prices asked. Watch our ads for definite prices and terms on particular lots and blocks.

IF YOU CONTEMPLATE IRV-INGTON, THE FIRST BUYERS WILL HAVE THE PICK.

RITTER, LOWE

& CO.

201-3-5-7 Board of Trade Bldg.

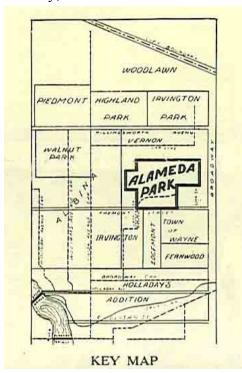
This clearly demonstrates how Elizabeth Irving exercised her control, even after selling off the property in the Irving DLC, to maintain her vision of a regular street grid consistent with that of the original Irvington plat. Given her emphasis on a street plan that was singularly "Irvington" in nature where she could influence it, it shouldn't be surprising that adjacent property owners wanting to exploit the cache of "Irvington" would impose an identical grid on their property. This we see all along the eastern boundary of the Irvington Plat.

Given the strong evidence of Elizabeth Irving's influence over not only the original Irvington plat but also a major adjacent parcel sold some years later to a developer, and the outgrowth of these plats from the original Donation Land Claim acquired by her husband some 50 years before the advertisement above, it is ridiculous to suggest that the area of that Irvington plat, which constitutes approximately ½ of the Boundary Decrease Area, has been associated with a supposed "Alameda Neighborhood" from the earliest historic period.

As the historic record shows, the northern expanse of the Irvington plat filled in slowly, as it was the most distant from the streetcar service along Tillamook Street and 15th Avenue in the years immediately after 1890 when the cars first arrived in the neighborhood. Still, there was no doubt of what the plat was and what its associations were. As late as July 16, 1919, when the ad at left appeared in The Oregonian, this area was well known and understood as "Irvington" at a time when the last lots were put up for sale.

Ironically, even the Alameda Land Company, by 1912 busily promoting its new development Alameda Park, understood very well that it was Irvington that lay to the immediate south of its new development, and attempted to draw some of Irvington's established appeal to itself as shown in the text excerpted from an Alameda Park advertisement which appeared in The Oregonian on November 24, 1912 as shown on the following page.

Not only did the Alameda Company point out that Alameda Park adjoins Irvington on the north, but they reminded potential buyers that the Broadway carline which ran into Alameda Park furnished "the same service enjoyed by Irvington." They also emphasized that the commuting experience into downtown would be enhanced by the fact that much of the trip "you go through Irvington". This was evidently an advantage for Alameda buyers compared to those in other parts of the city, since: "The attractiveness of certain residence



sections is dimmed by undesirables crowding the cars during rush hours."

One must assume that it

LOCATION

ALAMEDA PARK adjoins Irvington on the north and is bounded by Fremont, Prescott, East 24th and East 33d streets.

ELEVATION

ALAMEDA PARK is on the highest ground between the rivers; and with St. Helens and Mt. Hood on the horizon, and the whole city spread out like a map to the west and south, its view is unsurpassed. The air is always fresh and pure.

ACCESSIBILITY

The Broadway carline runs to the center of the tract, furnishing the same service enjoyed by Irvington. With the routing of the line over the new Broadway Bridge, the present running time to ALAMEDA PARK will be greatly reduced. By automobile you reach the tract over hard-surfaced streets, through Portland's best developed residence section.

SURROUNDINGS

You cannot disregard the importance of surroundings in choosing your homesite. To reach ALAMEDA PARK you go through Irvington; the Broadway carline stops in the center of the Park, your fellow-passengers as people in circumstances similar to your own, with whom your wife or daughter can ride without annoyance or discomfort. The attractiveness of certain residence sections is dimmed by undesirables crowding the cars during rush hours.

was to cement its connection with the very desirable

of Alameda Park, which showed the proximity of Alameda Park to Irvington, as the one at left which

published on the website alamedahistory.org:

appears both in the Boundary Reduction nomination document and in the more detailed form seen here

Irvington neighborhood that the Alameda Land Company deliberately included an inset map in its promotional map

Edgemont and Gleneyrie, Adjacent Developments as the "Natural Outgrowth" of Irvington

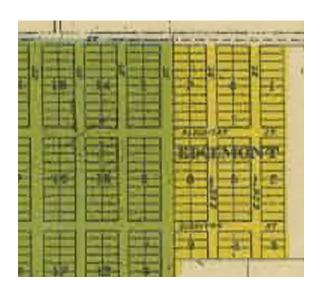
The two most extensive plats to the north of Knott Street and east of 24th Avenue in what is now the Irvington Historic District (and the Boundary Reduction Area) were Edgemont, platted in 1890 and Gleneyrie, platted in 1912. These plats were marketed as a "natural outgrowth" of Irvington, and through the years of the Period of Significance, were regarded as "Irvington" by the realtors and property owners who marketed homes in the area.

EDGEMONT

ADJOINING IRVINGTON.

Two lots for \$950; \$500 cash, balance in one year. Address EDGEMONT, Care Oregonian. While Edgemont was platted well before Gleneyrie, as Roy Roos points out in his book The History & Development of Portland's Irvington Neighborhood (p. 33), few lots were sold initially due to the distance from the end of the Irvington trolley line which reached 19th and Tillamook Street in the year Edgemont was platted. It would appear that Elizabeth Irving's extended family held substantial ownership of Edgemont, for as late as 1907, Oscar E. Heintz, her daughter's brother-in-law, still owned 23 of the 115 original platted lots (see Appendix A, 1907 Block Book Pages for Edgemont). As early as March 3, 1892, when the advertisement on the previous page appeared in The Oregonian, Edgemont was associated with Irvington. [It should be noted that Oscar E. Heintz was not just related by marriage to Elizabeth Irving's daughter Susan but in fact lived with her and her husband (his brother) for a period spanning over 22 years from 1908 to 1930, based on the census records and Portland City Directory listings.]

Edgemont clearly was platted to fit the Irvington street and block pattern. The detail of the 1906 Plat Map showing part of the Irvington plat and the Edgemont plat shows this clearly:



Gleneyrie (dubbed "Irvington's Neighbor" by its promoters), platted considerably later and adjoining Knott Street, was a shorter commute into downtown Portland, a ride that was facilitated by the construction of the Broadway Bridge in 1912-1913. Gleneyrie's development paralleled that of Dixon Place, farther to the west and mostly north of what is now the Irvington Historic District. Dixon Place was controlled by heirs and descendents of Elizabeth Irving, including the Shaver family connected by marriage. Dixon Place was actually named in honor of Sarah Dixon Shaver, Elizabeth Irving's sister. (See Appendix B, Gleneyrie and Dixon Place) Both Gleneyrie and Dixon Place were being promoted simultaneously by the Tate Investment Company, which had substantial holdings of lots in Gleneyrie under its own title.

The Tate firm began selling lots in Gleneyrie and Dixon Place in 1912 with the impending completion of the Broadway Bridge. As reported in an article in The Oregonian on April 14, of

that year:

"The Tate Investment Company has taken the selling agency for the remaining 40 acres in the old Allard Place, which was purchased from Alvin Allard by William Irvington, January 31, 1865, and five years later sold to George W. Shaver, and which has just been platted and will be known as Dixon Place, taking its name from Sarah Dixon Shaver, wife of George W. Shaver, who purchased this land December 20, 1870.

Dixon Place joins Irvington on the north, and has been subdivided into 220 lots....

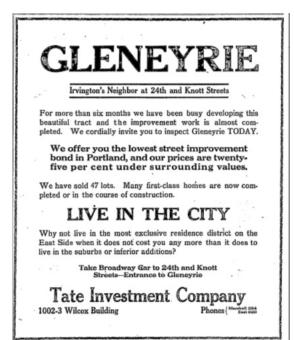
The Tate Investment Company is contemplating starting active operations at once towards selling this off. This addition will be two blocks from the end of the Irvington car and three

blocks from the Broadway car, and will be a restricted residence district.

Gleneyrie, which joins Irvington at East Twentyfourth and Knott streets, and which was platted last July, is rapidly forging to the front...."

Within weeks, the Tate firm began marketing the Gleneyrie tract as well, making it clear to its potential customers that Gleneyrie was essentially a next door to Irvington and would yield the same





benefits to buyers as Irvington buyers had enjoyed. This initial advertisement, shown above, appeared in The Oregonian April 28, 1912.

By 1913, the Tate company was making the connection to Irvington ever more strongly in its advertisements. On April 6, 1913, this ad appeared, as shown below left.

Note the language in the advertisement: "Adjoining Irvington at 24th and Knott, with \$5000 to \$50,000.00 homes within a radius of three blocks-" clearly linking

Gleneyrie to the development patterns in neighboring Irvington. Three days later, April 9, 1913, in celebrating the impacts of the soon-to-open Broadway Bridge and streetcar line, the Tate Company made its boldest tie in yet with the successful Irvington neighborhood next door to Gleneyrie.



Gleneyrie, the Tate company exclaims in the ad illustrated on the following page, "is the natural outgrowth of Irvington. Within a stone's throw of Gleneyrie are magnificent homes, costing from ten to fifty thousand dollars." Indeed the advent of direct-to-downtown trolley service via the Broadway Bridge was a boost to the entire "greater Irvington" area, as subsequent

ads for Gleneyrie suggested.

On April 23, 1913, the Tate firm even featured a drawing of the Broadway

Bridge in their advertisement (below left), and claimed that Gleneyrie:

"Is one of the last high-class close-in residence districts in Portland

• It has every advantage to offer that you would demand as a spot for YOUR home. Irvington's fine residences are within a radius of three blocks."

Clearly the influence of the Broadway carline and the new Broadway Bridge was expected to have a tremendous impact – as the Tate firm announced, the Broadway Bridge "brings Gleneyrie within 15 minutes of Portland's "Great White Way" – the heart of the theatre, shopping and hotel district." Thus the Irvington development itself and its satellite Gleneyrie were soon to see a strong growth of lot sales triggered by this



important new trolley car service.

As shameless a promotion as the Tate Company was waging, there was a practical logic to their assertions of the proximity and influence of neighboring Irvington. Gleneyrie residents, and potential home buyers, alike had to travel through Irvington on either the Irvington or Broadway car lines to get to their destinations in Gleneyrie. No wonder that the residents in fact considered themselves part of Irvington. This very point was emphasized in another advertisement which ran in The Oregonian on May 4, 1913, as shown below.



The Tate Company couldn't have made its message clearer: "GLENEYRIE is at Irvington's door – a minute's walk from the finest district in Portland."

Just a few months later, on July 6, 1913, the Tate firm was able to celebrate the construction of important new homes along 24th, 25th, and 26th Avenues north of Knott, which rivaled the larger homes found in neighboring Irvington. The four homes illustrated in the Oregonian article (shown on the following page) are said to be "Modern and Distinctive in Type". The headline announced: "Most of the Streets have been paved – The

Addition Adjoins Irvington". The Tate Company's vision of an "outgrowth of Irvington was speedily being realized in the territory just north and east of 24th and Knott.

This photo feature of Gleneyrie homes in July, 1913, marked the end of the Tate Company's advertising campaign. Home site sales had been strong, even though actual construction was

relatively limited. Only about 12 homes in the plat are identified in county tax records as having



been built in 1913 – a few more were built in 1914. Then World War I disrupted America's economy, and building didn't resume until around 1919, after which construction continued steadily until the Great Depression. But the identification of Gleneyrie with Irvington appears to have been cemented in place. As we will demonstrate in another part of this document, home sellers and realtors with properties in Gleneyrie almost never referred to their neighborhood as such in their advertisements – preferring the long-established "Irvington" designation.

Interestingly, a portion of Gleneyrie along 28th and 29th avenues was not included in the Irvington Historic District at the time of nomination, in part to maintain a consistent north-south border line, even though the overwhelming majority of the properties were built during the Irvington District Period of Significance. One might reasonably expect in future years that this exclusion of a part of Gleneyrie as part of the Irvington District might be corrected by an application for expansion of the District boundaries, thereby honoring the vision of Gleneyrie's creators and the Tate Investment Company that tied its fortunes to Irvington.

In the meantime, the parallel development in Dixon Place was being coordinated by the Tate Investment Company as well. On October 6, 1912, it was reported in The Oregonian that: "Improvement work is progressing in Dixon Place, consisting of grading and laying cement sidewalks... In Dixon Place there are 220 lots and 40 have been sold. Eighteen were bought by the Anderson Construction Company, which has already started the erection of three modern homes."

As with Gleneyrie, Dixon Place was marketed by the Tate Investment Company as an extension of Irvington with the tag-line: "Dixon Place, Irvington's Neighbor". Priced comparably with

Gleneyrie, Dixon Place provided a lower price point for the rapid growing middle class to buy into a "respectable" suburb accessible to downtown by streetcar. In the case of Dixon Place, the streetcar was the Irvington line which was extended north on 15th Avenue from Tillamook toward Fremont and ultimately to Prescott in 1913 and 1914. As it had with the Broadway Bridge, the Tate Company made sure that potential lot buyers knew about the on-going construction of the extension of the Irvington carline with Oregonian ads in 1913 as illustrated below.

The blatant tie-ins between these two developments and Irvington might almost seem parasitic

THE extension of the Irvington carline through DIXON PLACE forward at top speed. Steel is already laid for several blocks. be running within 40 to 50 days. This Spring and Summer will see the greatest activity in DIXON PLACE of any subdivision in Portland. Large Sites-50x100 to 50x206 ft. at \$950, \$1000, \$1050, \$1100, in ---and on the Easiest Terms At these prices, sites in DIXON PLACE are greatly under value. Adjoining property in Irvington is held at \$200 to \$400 a lot more than DIXON PLACE. And in new districts, miles farther out, you are asked as much as in this desirable, close-in district. NOW is the time to INVEST in DIXON PLACE! Lots are bound to advance after the carline is completed. Improvements will be of highest grade, including cement sidewalks, sewerage, electricity, hard-surfaced Come out to DIXON PLACE today! It begins two blocks from present ter-minus of Irvington carline. Representative on tract. Or phone Marshall 284, and go out in our machine. ate investment Company 1002-1003 Wilcox Building Phone Marshall 284 t Side Office, 15th and East Broadway.

and an invitation for a lawsuit by Irvington's developers and investors. One must assume, however, that the close ownership and management connections between Mrs. Irving and the various developers of these tracts facilitated what must in fact have been "cross marketing", as the attractive nature of Irvington was constantly being touted in these ads. The ad at left appeared April 27, 1913.



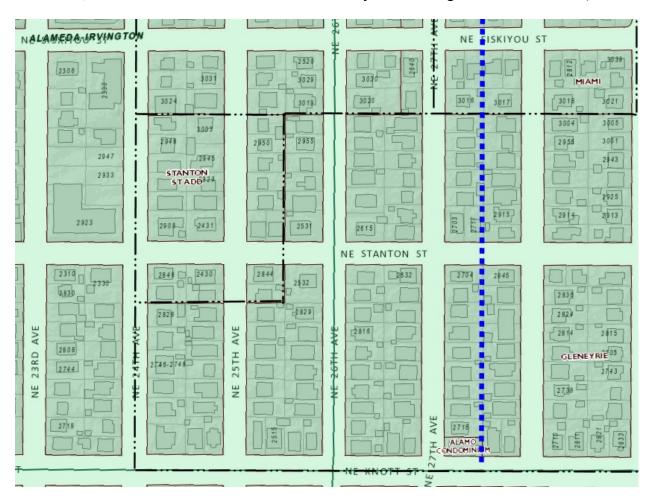
The Tate ad on the right, which appeared May

4, 1913, proclaims the ride on the Irvington carline to Dixon Place runs through "Portland's most beautiful residence district."

Unfortunately, Dixon Place evidently was too far from downtown and too distant from the core of Irvington to be fully successful as "Irvington's Neighbor". The Tate Investment Company's marketing campaign produced some sales, but by April 26, 1914, the Shaver estate put the entire tract on the market. Only three partial blocks of the old Dixon Place were included in the Irvington Historic District, those being the small part of the tract south of Fremont Street and contained in the original William Irving Donation Land Claim.

This illustrates that real estate marketing effort alone will not cement one plat area to another, to make it be considered part of a cohesive whole, but when the combination of geography, consumer acceptance and investor enthusiasm fall together, as they did with Gleneryie, the development of the adjacent plat can and will reflect the growth and evolution of its larger neighbor.

To complete the case for Gleneyrie's tight connection with Irvington, we can note the block and lot patterns of the plat compared to those of neighboring Irvington in this map derived from Multnomah County's DART mapping system (The black dashed lines designate the historic plat boundaries, the dashed blue line is the eastern boundary of the Irvington Historic District.):



Lest anyone think that the irregular sizes of the lots in some blocks along 24th Avenue were the

result of platting which differed from the rules laid down by Elizabeth Irving, a check with the County Assessor's data in PortlandMaps.com shows that the underlying lots were almost invariably the same 50' by 100' found throughout Irvington, but were evidently allowed to be sold to owners in combinations which allowed the construction of larger homes found in Irvington on double lots. This should not be surprising along 24th Avenue as this was the route of the Broadway streetcar line, making it highly desirable for higher-end buyers. Lots farther to the east, with less attractive distance from the streetcars, were typically sold as standard 50' by 100' parcels to their middle class buyers.

Finally, the Stanton Street Addition was for all intents and purposes an adjunct of Gleneyrie, as its owner/developer was one of the partners in the larger Gleneyrie tract.

The "Irvington" District in the Minds of Owners and Realtors During the Historic Period

The sections above in this commentary make it clear that blocks in the Boundary Decrease Area were solidly associated with Irvington and the suburban concept developed by Elizabeth Irving and her relatives and associates at the end of the 19th Century and the first years of the 20th Century. In this regard they had much in common with other areas, like Prospect Park, that were developed after the core of Irvington, but were shaped by the rules established by Elizabeth Irving either by legal agreement or by force of the real estate success of the Irvington area. But the question remains, did this association with Irvington continue after the founding of Alameda Park and during the 1920s building boom which saw these areas fill in almost completely?

To test the degree to which the "Irvington" identity remained in place in the years after the initial platting and land sales, we turned to the online Historical Oregonian archives, a full-text searchable index to digital images of every page of The Oregonian from 1861 to 1980 and available through the Multnomah County Library. Starting with the pre-1931 addresses and continuing with the modern addresses, we searched for the address of every residential property in the Boundary Decrease Area for the years 1900 through 1948. The vast majority of the "hits" from this search were for real estate classified advertisements for the houses in this area.

We then coded every instance of a classified advertisement based on what area or neighborhood was mentioned, if any, and how it was designated – by neighborhood name or by reference to the schools serving the property. Altogether a total of 365 distinct advertisements were discovered for this time period. Note that these are only the advertisements for properties in the Boundary Decrease Area that included the address. Many real estate advertisements both then as now, carry only the contact information for the real estate company – usually in the expectation that a potential buyer can be steered to an available property if the one in the advertisement has already been sold. When the same advertisement ran multiple times with essentially the same wording, it was still counted only once in our analysis. Counting the duplicates, we examined 638 historic real estate advertisements covering the Period of Significance for the Boundary Decrease Area.

The following table presents the counts of the type of neighborhood reference and typical examples of the labels found in the advertisements:

Type of Location Identifier	Count of Distinct	Typical Label Texts
	Advertisements	
Address Only	72	"684 E. 26 th N."
Alameda School District	32	"Alameda, Madeleine, Grant HS"
Alameda Neighborhood	14	"Alameda Colonial"
Broadway Car	1	"Broadway Carline"
Grant	15	"Grant HS"
Irvington Neighborhood	207	"Irvington Bungalow"
Irvington/Alameda	8	"Irvington-Alameda Special"
Neighborhood		
Irvington District	11	See Note below
Madeleine	1	"Madeleine School"
Other	4	"Northeast District"
Total	365	

Note: It isn't clear if these ads were referring to the Irvington School District or the more common term at the time "Irvington District" meaning the entire territory popularly considered to be "Irvington". For purposes of this analysis we assume that these refer to the school district.

If we disregard the 72 advertisements that had no reference to a neighborhood and those that make reference strictly to schools like Grant High School, plus the few minor examples like "Broadway Car", we are left with a total of 229 relevant examples that make explicit and unambiguous reference to a neighborhood. Of these 207, or 90% refer to Irvington, 6% to Alameda, and 4% to both.

These statistics clearly demonstrate that buyers, sellers, home owners advertising their own properties, and the real estate community overwhelming considered the Boundary Decrease Area to be Irvington during the Period of Significance. Evidently the marketing efforts of the Tate Investment Company and its peers had paid off in establishing a conception of an "Irvington Neighborhood" or, as often mentioned at the time, an "Irvington District" including this northeast corner of the Historic District.

Appendix D shows a number of examples of the actual advertisements included in the statistics above. As can be seen in reading through them, not only was this area referred to overwhelmingly as Irvington, but in some instances the owner even listed it as "The Heart of Irvington" as seen in the ad for a home at 3325 NE 26th in 1941. Also shown are some examples of references to the streetcar service, including one at 3424 NE 26th, as late as April 18, 1944 – a matter addressed further in a later section of this document.

The preceding three sections taken together clearly refute the first two assertions of the Boundary Decrease Document:

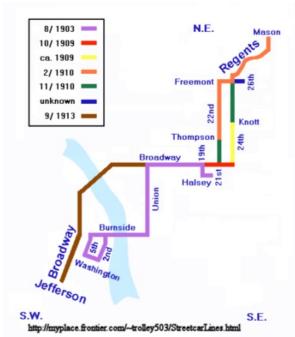
Assertion 1: "The Boundary Decrease Area, as shown in Figure 1, developed as part of the Alameda Neighborhood and is recognized as such by its residents and *historically throughout its*

existence." (Our emphasis)

Assertion 2: "The Boundary Decrease Area closely follows the historic development of the rest of the Alameda Neighborhood, rather than the Irvington Neighborhood."

The Broadway Streetcar in the Development of Northeast Irvington

The developers of Gleneyrie, Alameda Park, and others in the period from 1900 to 1915 appear



to have understood the importance of streetcar connections to downtown Portland for access to jobs, entertainment, and shopping. This is clear from the advertisements we have seen in the pages above. The streetcar line which served the Boundary Decrease Area was the Broadway Car, which started operations in 1903, according to sketches in the muchreferenced Vintage Trolley, Inc., website http://myplace.frontier.com/~trolley503/HistM aps.html. The line ran from a downtown loop on 5th and 2nd Avenues, thence across the Burnside Bridge to Union. Running north on Union until Broadway, it then turned east and ran to a turnaround between 19th and 21st Avenues between Broadway and Halsey. The

website's color coded map is shown above left.

By late in 1909 an extension had been built north along 24th Avenue to Thompson street from the end of a five block extension east on Broadway. At this point, public pressure began to mount for a significant extension of the line northward into Irvington.

An article which appeared on Dec. 12, 1909, in The Oregonian reported that, "Recent statistics prepared by County Clerk F. S. Fields show that the population of the Irvington district has increased faster than nearly any other section of the East Side, and especially between East Eighth and East Twenty-fourth streets. These statistics were prepared to show that streetcar service had not kept up with the growth of the district. Beyond East Twenty-fourth street building operations are in progress, and that section promises to build up rapidly." The paper further reported in that same article that the Portland Railway, Light & Power Company will start building northward along 24th Avenue from Thompson Street to Fremont, with a loop planned for return along 15th Avenue (the latter reference to a loop to 15th Avenue may either have been a typo or a reference to a route plan that was later changed, as the Broadway and Irvington carlines never did connect.)

According to The Oregonian in an article on January 20, 1910, the progress being made by the

streetcar company constructing its northward extension of the Broadway carline toward Alameda was due to a meeting on November 16, 1909, of representatives of the Irvington and Holladay Park clubs with the company and representatives of the Alameda Land Company at the Irvington Club. At that time the company agreed to add more cars to the service and to press on with northward construction in response to demands for more and better service.

While the Boundary Decrease Document implies that the construction north from Thompson Street was entirely at the instigation of the Alameda Land Company and that the Alameda Land Company paid for most of it, the historic evidence doesn't support that assertion. Clearly there was powerful pressure from influential Irvington property owners. There is also proof that the streetcar company itself funded the entire route from Thompson Street to Fremont. In an April 3, 1910, report to the City of Portland on its \$1.3 million budget as published in The Oregonian, the Portland Railway, Light & Power Company announced plans to build two extensions deeper into Irvington: one an extension of the 15th Avenue line from Tillamook Street to Siskiyou Street, and the other northward from Thompson Street along 24th to Fremont and back on 22nd Avenue opening up "considerable new territory". Since (as mentioned below) service was reported to have opened to Fremont as early as February of 1910, the 22nd Avenue route must have been completed first, with the loop around on 24th being completed sometime after April, 1910.

Unfortunately for the Alameda Land Company, this extension on 24th and 22nd Avenues would only just reach the southern border of Alameda Park, leaving residents to walk the considerable up-hill distance to their homes in the center of the Park. To address this shortfall in the route, the Alameda Land Company had announced as early as February 3, 1910, in an advertisement in the Oregonian, that service on the Broadway car to Fremont had begun and that they had paid the streetcar company \$12,000 to extend the line into Alameda Park via Regents Drive and 29th Avenue to Mason Street. This extension would ultimately be operational during the fall of 1910 (A news article on April 29, 1910, announced that rails for the extension had not yet been laid. We were unable to find an announcement of the actual date service started, but the Vintage Trolley, Inc., website indicates that full service was in place by November, 1910.)

While the Alameda Land Company's investment in streetcar service for that last climb into the heart of Alameda Park no doubt was pivotal in ensuring lot sales and home construction in their development, it clearly had no impact whatsoever on the extension of streetcar service into Irvington and the sales of lots in that area. Further, it is clear that it was not simply a request by the Alameda Land company to build north that impelled the streetcar company to build the 24th Avenue extension, but it was significant political pressure from property owners and residents of Irvington and Holladay Park, not to mention from the City (presumably, as the entity that franchised the streetcar services) and County as reported above, that induced the streetcar company to build the Broadway carline north into the developing areas of northeast Irvington.

Given the presence of a "high profile" (as described by the Vintage Trolley, Inc. website) streetcar running through northeast Irvington, the resulting continuing growth was not surprising.

especially after the opening of the Broadway Bridge in 1913 resulted in significant shortening of the route into downtown and a several minutes reduction in the travel time. Unfortunately, the advent of World War I in August, 1914, just a year after the bridge opened, resulted in economic disruptions which continued until the end of hostilities with the Armistice in November, 1918, and normal building activity didn't resume until the 1920s.

An issue has been raised in the Boundary Decrease Document that suggests that a neighborhood can only be considered a Streetcar Neighborhood as designated in the Irvington Historic District Nomination, if the residential construction was completed very quickly after the opening of the streetcar route. They argue that the southern part of Irvington was built out quickly after the introduction of streetcar service in 1903 and therefore qualifies as a "Streetcar Neighborhood", but that there was nearly a decade delay in the appearance of the next significant round of construction in the northeast part of Irvington after the Broadway line was extended to Fremont Street and Alameda Park, disqualifying it for "Streetcar Suburb" or "Streetcar Neighborhood" status. Is this a valid argument?

In response, we turn to the description of "Streetcar Suburbs" in the National Register Multiple Property Listing titled Historic Residential Suburbs in the United States, 1830-1960 (MPL), under which the Irvington Historic District was nominated for listing on the National Register. In Section E, Pages 4 and 5, the description of Streetcar Suburbs characterizes them thus: "Concentrated along radial streetcar lines, streetcar suburbs extended outward from the city, sometimes giving the growing metropolitan area a star shape. Unlike railroad suburbs which grew in nodes around rail stations, streetcar suburbs formed continuous corridors. Because the streetcar made numerous stops spaced at short intervals, developers platted rectilinear subdivisions where homes, generally on small lots, were built within a five- or 10-minute walk of the streetcar line. Often the streets were extensions of the gridiron that characterized the plan of the older city."

This description closely fits all of Irvington, which was served by three north-south streetcar lines along Union Avenue (one block west of the district boundary), 15th Avenue, and the 22nd Avenue/24th Avenue couplet, plus the east-west Broadway line from the Broadway Bridge to 24th Avenue. The service areas of these four corridors overlapped, ensuring ultimate build-out of the entire neighborhood during a period where streetcar service was still a critical part of Portland's transportation mix, as it was (as we shall explain below) until at least 1948.

Further, the MPS document points out that the socio-economic role of the streetcar suburb changed gradually during the 1920s as automobiles became more affordable (MPL, Section 3, p. 5): "Streetcar use continued to increase until 1923 when patronage reached 15.7 billion and thereafter slowly declined. There was no distinct break between streetcar and automobile use from 1910 to 1930. As cities continued to grow and the demand for transportation increased, the automobile was adopted by increasing numbers of upper-middle to upper-income households, while streetcars continued to serve the middle and working class population."

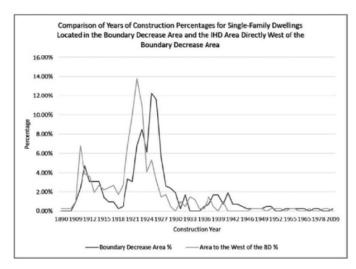
This demographic trend is seen in the smaller sizes of the homes built throughout Irvington in the 1920s compared to those built prior to World War I. Irvington transitioned from a neighborhood for the upper classes to one for middle and working class home buyers who still valued the proximity of convenient streetcar service. The Boundary Decrease Document notes this change in house sizes between the southern section of Irvington and the northern section above Knott Street, but fails to recognize that it affected all of the northern section of the neighborhood, not just the northeast corner. The last section of this document addressing the history of the Irvington Community Association and its newer sibling, the Alameda Neighborhood Association, shows in a 1938-vintage map, the extent to which by that date Irvington was no longer a "high class" neighborhood, and had become solidly middle class and working class in its entirety.

In the 1920s, typical of many streetcar neighborhoods as suggested by the MPL, upper bracket home owners began leaving Irvington in favor of newly developing areas opened up by automobile access. One notable example was the move by Clarissa Inman from her home in Irvington at 1914 NE 22nd Avenue, built originally for Robert Lytle in 1912 for the immense sum of \$40,000 (See National Register Nomination, Robert F. Lytle House). In 1926, she moved to a brand new, even larger and more palatial version of that house designed by the same architect at 2884 NW Cumberland Road in Westover Terraces with gorgeous views of downtown Portland, taking all of her furnishings with her (Classic Houses of Portland, Oregon 1850-1950, Hawkins and Willingham, p. 338). The grandly scaled Lytle House still stands as the largest and most expensive surviving home in Irvington – serving as a bed and breakfast.

Let's consider the role of streetcars in Portland's transportation mix during the remaining years of the Period of Significance. If streetcars can be shown to be an essential part of the transportation mode mix in Portland through the period of continuing development of the Boundary Decrease Area, it follows that the existence of the streetcar contributed to the continued appeal of the area to home buyers – especially the working and middle class buyers who could not yet afford an automobile. Those home buyers certainly were less concerned about how long the streetcar tracks had been there than they were that the tracks were there in the first place. Further, as the streetcar company continued building lines into Portland's suburban areas in response to builder pressure and growing demand, it would not be surprising if there had been overbuilding and a larger inventory of buildable lots than could be immediately absorbed by the market immediately after streetcar line construction. Consequently neighborhoods more distant from downtown (and selling for higher prices) would likely see development move more slowly than those along close-in routes.

This is certainly the pattern we see in the northern part of Irvington – and not just in the Boundary Decrease Area but throughout the Historic District north of Knott Street as is displayed clearly in the chart at the left, Figure 10 "Comparison of Years of Construction Percentages for Single-Family Dwellings Located in the Boundary Decrease Area and the IHD Area Directly West of the Boundary Decrease Area" in the Boundary Decrease Nomination

Document itself. This chart shows corresponding peaks in construction in the 1909-1910 period



and in the 1920-1925 period in both the Boundary Decrease Area and the rest of the northern section of the Irvington Historic District. If anything, the western end of the area shows development about a year or two before the eastern end, and one might reasonably speculate this is attributable to the greater distance of the eastern corner of Irvington from the downtown core and the resulting longer commutation times.

For an understanding of the role of the

electric streetcar in Portland during the Period of Significance we turn to the exhaustively researched and wide reaching Doctoral Disseration *Private Profit Versus Public Service:* Competing Demands in Urban Transportation History and Policy, Portland, Oregon, 1872-1970, by Martha Janet Bianco, completed in 1994 for the Urban Studies Program at Portland State University.

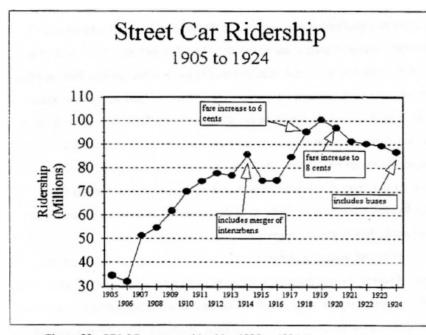


Figure 20. PRL&P streetcar ridership, 1905 to 1924.208

Bianco includes two useful charts showing streetcar ridership during the Period of Significance of the Irvington Historic District. These are reproduced at the left. The first, Figure 20, in the document from page 256, illustrates the remarkable growth of streetcar ridership between 1906 and its all-time pre-World War II peak of 100 million riders in 1919. This peak was followed by a long period of very gradual decline apparently triggered by a combination of fare

increases (indicated in the chart) and the emerging use of automobiles for personal transport among the upper middle class.

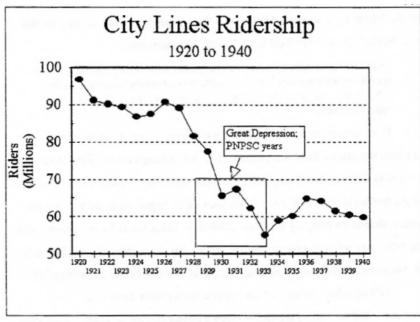


Figure 28. City lines ridership, 1920 to 1940.72

million annual trips except for the deep Depression year of 1933.

Bianco follows this chart with Figure 28, which continues the ridership trends until 1940. This chart displays the impact of auto competition in the last years of the 1920s, the plunge in ridership caused by the Great Depression, and then sustained traffic during the rest of the 1930s as economic constraints sent riders back to public transport. Note the scale: even in the 1930s transit ridership was still above 60

The advent of the automobile certainly had an effect on transit ridership and on the decisions home buyers could make relative to location choices. But it is important to remember that automobile usage was low until fairly late in the Period of Significance. Bianto asserts (p. 14) that in 1915 just 3% of the Portland population had access to a car. While this number had increased to 60% by 1930 (Bianco, p. 368), that statistic suggests that a significant percentage of the population was still dependent on public transit, which still meant streetcars on most routes.

As one measure of continued transit dependence in Irvington, despite the relative affluence of the residents throughout the district, as late as 1924 in the area bounded by Fremont, Siskiyou, 23^{rd} Avenue, and 27^{th} Avenue, only $1/3^{rd}$ of the houses are shown as having garages in the Sanborn Insurance map (see Appendix E).

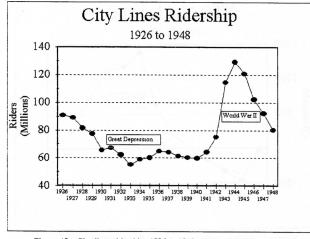


Figure 40. City lines ridership, 1926 to 1948.121

Having a car, of course, didn't suggest that the owner actually used it for daily commuting and could completely dispense with public transport. In 1929, auto traffic from the East Side crossing the bridges to downtown was actually heavier on Saturday than on weekdays, suggesting that many car drivers used their autos for shopping and leisure trips, not for commuting (p. 332, Bianco). With the straightened economic times of the 1930s and the gasoline shortages

during World War II, streetcar transport continued to play an important role in Portland well into the automobile era. This is displayed in the last of the traffic charts included in the Bianco dissertation, Figure 40 on the previous page.

Notably during World War II, ridership reached its all time peak in Portland of nearly 130 million riders. By 1948, and the end of streetcar service on the Broadway carline into Irvington, total system ridership was still an impressive 80 million riders.

From these statistics, we can conclude that as Irvington became more middle class, streetcar ridership remained strong during the Period of Significance, and proximity to streetcar service would continue to relevant to housing location decisions of families who settled there through the 1940s. Thus, we argue that it is correct to characterize Irvington throughout the Period of Significance as a "Streetcar Suburb" and that the assertions of the Boundary Decrease Document are false.

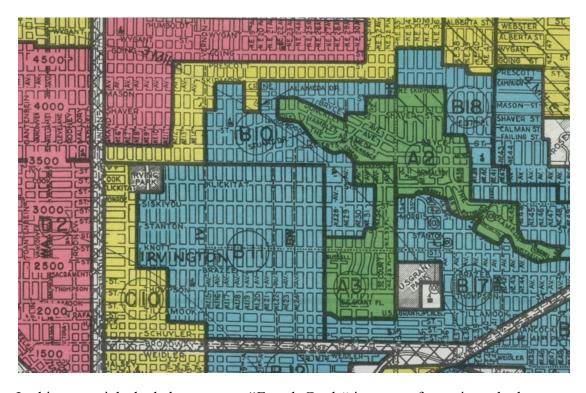
The Alameda Neighborhood and Contemporary History of the Irvington District

The Boundary Decrease Document makes repeated reference to the "Alameda Neighborhood", making assertions that such a designation has roots deep in the area's past. We have already refuted this claim, showing that the Boundary Decrease Area was referred to as "Irvington" by residents and home buyers through the Period of Significance, but it is certainly true that there is a modern Alameda Neighborhood as recognized by the Portland Office of Neighborhood Involvement (ONI). Further, a portion of the territory designated by ONI as Alameda is also designated as Irvington by ONI as well. That "overlap" area, represented by both the Irvington Community Association and the Alameda Neighborhood Association based on ONI rules, constitutes the entirety of the Boundary Decrease Area, suggesting that the preparers of the Boundary Decrease Document placed more weight of historic significance on this "overlap" of neighborhood territory than on historic development trends. If it can be proved that this Alameda designation dates to the Period of Significance, at least some credence could be given to the claim that this area is properly thought of as an area separate from Irvington and not appropriately a part of the Irvington Historic District.

As it turns out the Boundary Decrease Document makes no attempt to establish a basis for their argument that the Boundary Decrease Area is a part of "Alameda" and has been so throughout history. To find the source of this overlapping modern designation we have to consider the history of Irvington and Alameda in contemporary times. We have already pointed out that Irvington's population became much more middle and working class in the 1920s as the automobile gave the upper classes freedom to move to newer exclusive areas. This demographic change is notable in "Residential Security Map" of Portland published in 1938 by the Appraisal Department of the Home Owners' Loan Corporation (HOLC), a New Deal government entity set up to make home ownership more affordable to the middle class. According to the Wikipedia article on this entity, the practice of redlining black neighborhoods was introduced in the HOLCs

Residential Security Maps.

The portion of 1938 HOLC map showing Irvington and Alameda is reproduced on the following page.



In this map, pink shaded areas were "Fourth Grade" in terms of security – the lowest score, yellow was "Third Grade", blue, "Second Grade", and green "First Grade" – the highest and most desirable security grade. Note how the "B11" section, including most of Irvington, extends to an eastern boundary of 27^{th} Avenue. Also note the "C10" section, including the rest of Irvington and its southwest corner is assigned Third Grade. Equally significant, is the assignment of First Grade to the core of Alameda Park up on the ridge where good views appear to have cemented the well-to-do in place and the Grant Park development where proximity to the City's Grant Park provided an amenity that the upper classes found attractive.

To the west of Irvington lay the Albina neighborhood, once the separate city of Albina before being absorbed by Portland. Nearly all of that was categorized as Fourth Grade – essentially too risky for prudent bank lending – the first redlining of that area had appeared.

In the succeeding years the economic fortunes of Alameda Park with its curving streets up on the ridge overlooking the city, and Irvington with its regular gridiron of blocks continued to diverge economically and racially. The story is told in searing detail in an article which appeared in Volume 15, Number 1, pages 3-25 of the journal *Transforming Anthropology*, titled "Bleeding Albina: A History of Community Disinvestment, 1940-2000" by Karen J. Gibson, an associate professor of urban studies and planning at Portland State University. In her paper she addresses

the redlining and racist real estate sales practices which impacted the eight neighborhoods comprising greater Albina: Eliot, Irvington, Lloyd, Boise, Humboldt, King, King-Sabin, and Woodlawn.

According to Rogers, the influx of southern Blacks to northern cities during World War II had affected Portland due to the huge shipyards operated by the Kaiser Company along the Columbia River. In 1948, when a major flood wiped out the temporary housing in Vanport where most of the workers lived, roughly 1000 Black families moved south into the Albina neighborhood which had been a center of Portland's Black community since before 1900. This migration was joined by other Blacks seeking employment opportunities in Portland. By the end of the 1950s, the Black population of the Albina neighborhoods had increased by roughly 7,500 and the White population had declined by 23,000. During this period the racial composition of the western half of Irvington changed dramatically. Black families moved out of the crowded Eliot and Boise neighborhoods in search of better housing – but found they had to rent, as banks would not lend mortgage money in the west half of Irvington, as they would not in Eliot and Boise.

As shown in the Rogers paper, by 1970, the western half of Irvington had become 43% Black, housing and economic discrimination had worsened, and the racial unrest of the late 1960s had been experienced as what had been reported as a "race riot" in Irving Park in the northwest corner of the Irvington neighborhood in 1967.

The Irvington Community Association grew out of a public meeting held on January 7, 1965, at the Irvington School Auditorium in response to emerging concerns about blight and crime. Upwards of 400 attendees were reported by The Oregonian in its coverage the next day. The following year, the ICA and the City announced an 8-point plan for rejuvenation of this "Once Graceful Area" as reported on Dec. 11, 1966. In that article, Irvington's boundaries were described: "Irvington's boundaries, determined by some sort of mystical reasoning understood by none and recognized by all who live there, are NE Broadway on the south, NE Fremont Street on the north, 26th Avenue to the east, and NE Seventh Avenue to the west." In addition, the article further acknowledged the shift in the population: "Most of the wealthy are gone now, having succumbed either to the grim reaper, the suburbs, or the plush hills across the river (not necessarily in that order)." Throughout this period, the ICA was a racially integrated organization and emphasized neighborhood improvement and self-help, it was reported in The Oregonian.

Within a few years, neighborhood organization became a priority for Portland, and a District Planning Organization Task Force was created to explore formalizing the roles of neighborhood associations which had emerged informally across the city. The <u>Task Force Report</u>, dated December 28, 1972, (Download from the Office of Neighborhood Involvement website) made recommendations for an organization that would ultimately become the Office of Neighborhood Involvement, which would facilitate the creation of neighborhood associations where they didn't already exist. Participating in that task force were all the neighborhood associations in the City

of Portland already in existence including the Irvington Community Association, the Eliot Neighborhood Program Association and many others, but no Alameda Neighborhood Association is listed.

According to the report Neighborhood Accomplishments in Portland, Oregon, 1976-1983 by the Office of Neighborhood Associations (Download, ONI website), by 1983, 77 neighborhood associations had been formed. One of these, the Alameda Neighborhood Association was formed "during the period from 1973 to December 1974." At the time of its founding, no part of the city was allowed to be part of multiple neighborhood associations, so there was no question of any "overlap" with Irvington. In 1976, a few years after the creation of the Alameda Neighborhood Association, the Bureau of Planning published its map of Irvington which confirmed the boundaries adopted informally by the ICA in 1966. This map is reproduced in Appendix F.

By 1976, the economic and social challenges being faced by Irvington threatened to spill over into still-affluent Alameda. In an article in The Oregonian on January 23, 1976, several Alameda residents were quoted as describing being discouraged from buying in Alameda by subtle references to "Blacks moving into the area". Some reported being told that they shouldn't buy property west of 33rd Avenue, which would have included all of the original Alameda Park tract and the newly formed Alameda Neighborhood Association.

With overlapping boundaries of neighborhood associations having been approved by City Council in November, 1975 (The Oregonian, Nov. 27, 1975), it was perhaps inevitable that some residents of the eastern, largely White portion of Irvington would look for ways to distance themselves from the urban problems of the rest of Irvington by associating with the more stable Alameda neighborhood to the north and east. Accordingly in the 1981 Portland Neighborhood Association Map clearly shows the overlap area shared by the Irvington Community Association and the Alameda Neighborhood Association. A copy a portion of that map showing Irvington and Alameda is presented in Appendix G.

The overlap of Alameda and Irvington areas continues to this day, but as late as 1993, in the formulation of the Irvington Plan, adopted by the Portland City Council as part of the larger Albina Community Plan the boundaries of Irvington are clearly those of its original designation back in 1967, as shown in the map from the 1993 Irvington Plan in Appendix H.

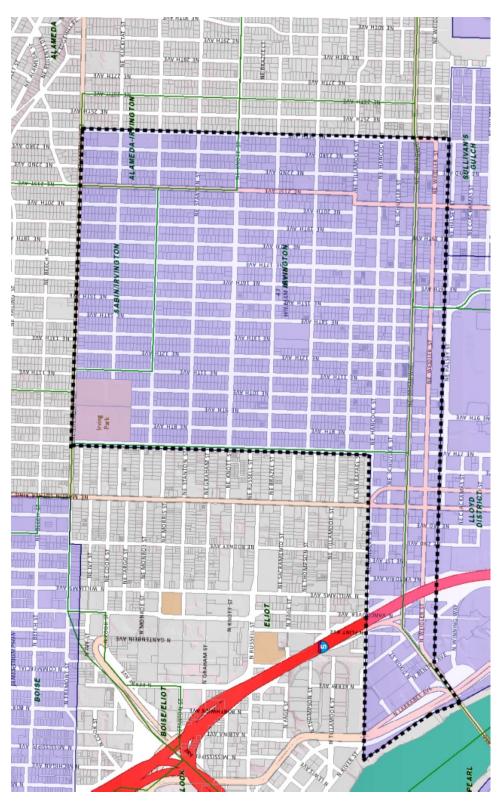
As an important postscript to this discussion, it was the 1993 Irvington Plan which resulted in the creation of the Irvington Historic Conservation District, the predecessor of today's Irvington Historic District. That Historic Conservation District still exists (although is dormant due to the National Register designation) and includes three full blocks of the Boundary Decrease Area. Should the Boundary Decrease be approved, the Historic Conservation District will resume its efficacy in those blocks. The October, 1993, map of the "Irvington Historic Design Zone" is shown in Appendix I.

The foregoing clearly demonstrates the fallacy of the Boundary Decrease Document's assertion that: "The Boundary Decrease Area of the Irvington Historic District is historically identified as part of the Alameda Neighborhood."

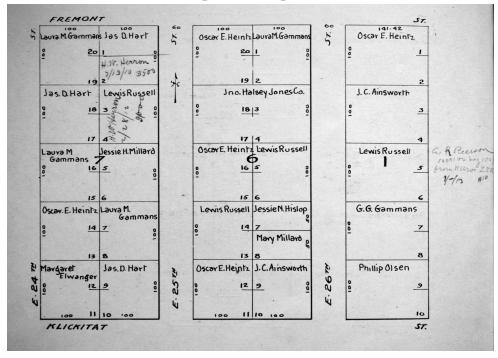
Also fallacious is the corollary assertion that there was an identifiable "Alameda Neighborhood" which embraced the Boundary Decrease Area starting in the Period of Significance as distinct from the Irvington Neighborhood. Demonstrably, the inclusion of the Boundary Decrease Area in a portion of the Alameda Neighborhood Association is an artifact of modern times and is unrelated to the criteria by which the Irvington Historic District was nominated to the National Register.

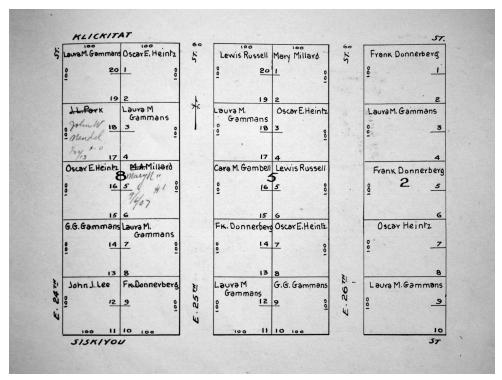
Appendix A – William Irving's Donation Land Claim Mapped to Current Streets by Multnomah County DART System, 2015

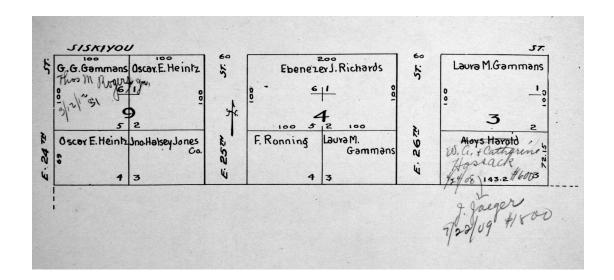
(Donation Land Claim bounded by dashed line)



Appendix B - 1907 Block Book Pages for Edgemont







ALLARD FARM PLATTED

NEW RESIDENCE DISTRICT TO BE CALLED DIXON PLACE.

Forty-Acre Tract Near Irvington Will Be Converted Into Modern Homesites.

The Tate Investment Company has taken the selling agency for the remaining 49 acres in the old Allard Place, which was purchased from Alvin Allard by William Irving, January 31, 1865, and five years later sold to George W. Shaver, and which has just been piatted and will be known as Dixon Place, taking its name from Sarah Dixon Shaver, wife of George W. Shaver, who purchased this land December 20, 1870.

Dixon Place joins Irvington on the north, and has been subdivided into 220 lots. All the streets in this tract will be improved at once, and the old buildings and fences which have stood on the place for years will be torn down. This is one of the last close-in tracts of land remaining to be sold.

The Tate Investment Company is

The Tate Investment Company is contemplating starting active operations at once towards selling this off. This addition will be two blocks from the end of the Irvington-car and three blocks from the Broadway car, and will be a restricted residence district.

Gleneyrie, which joins Irvington at East Twenty-fourth and Knott streets, and which was platted last July, is rapidly forging to the front. The improvement work which has been going on for the last six months is almost completed. There are six houses in the course of construction, some of which are nearly completed, ranging in price from \$4000 to \$6000 each. Anumber of lots have been purchased in this addition on account of its nearness to the city, and many of the prospective purchasers are contemplating building homes this Summer. There have been nearly 40,000 yards of earth removed, besides the clearing of stumps and undergrowth.

The Tate Investment Company also has completed the improvements in Tate's Addition, at East Thirty-third and Ainsworth avenue. This tract, which joins Irvington Park on the east, consists of 21½ acres and was formerly a fruit ranch.

VLis firm has also taken the selling agency for George Place.

Appendix D – Examples of Historic Irvington Real Estate Advertisements in *The Oregonian* for Residences in the Boundary **Decrease Area from the Period of Significance**

IRVINGTON—Beautifully furn. 6 rms. garage. 744 Klickitat, bet. 22d and 23d.

2214 NE Klickitat, May 8, 1932 (old 744)

R. IRV.—Lovely brick home, oli ht., rm. for 2, 1 bik, car. 2306 NE Siskiyou. TR 1792. 204 NW 22d place. Front car. Front 2306 NE Siskiyou, July 29, 1940

"IRVINGTON-GRANT HIGH IRVINGTON—GRANT HIGH
NEW, 6 RMS. AND DOUBLE GARAGE.
ALL THED AND WEATHER-STRIPPED.
T91 KLICKITAT, COR. 24TH ST.
Completely weather-stripped and shower completely titled. This home is beautifully finished throughout: workmanship and material are the beat that money can buy. Come out today. Price \$3950. on terms. Open evenings. C. J. Johnson. owner and builder. TR 5011.
PORTLAND HEIGHTS
2403 NE Klickitat, Aug. 23, 1931

(old 791)

T. A. KEAD, BUILDER, TR 0880. Irvington, Grant High OPEN SUN. AND MON.

Madeleine, Alameda and Grant high schools just an ensy walk. Man left alone will give you real buy on this mod, home only few years old; 6 large runs, including 3 bedrins, large breakfast nook, and full basement, Automatic oil heat, else, water heater, mahogany; glazed tile all around and over the bath tuh; paved cor, lot and did, gar, 2403. NE Klickitat, cor, of NE 24th ave, Rumaell & Barr.

DE ALTYLY SED VICE 418 SW Stars. REALTY SERVICE 410 SW Stark

2403 NE Klickitat, Aug. 31, 1941

O388.
A NEW IRVINGTON HOME.
NEAR THE MADELEINE SCHOOL.
198 KLICKITAT. NEAR 24TH.
ENGLISH—SHAKE EXTERIOR.
108 LARGE ROOMS. ATTIC.
THE PRODUCT OF AN ARCHITECTENGLISH—AN ATTRACTIVE PLAN.
A PERFECT HOME—A REASONABLE
PRICE.
58500.
YOURS—IF YOU WANT IT—TODAY.
DEATHTIFIT AT A METIA
2411 NE Klickitat, May 8, 1928

37th and Clinton St. Prome 1A 2122.

6-ROOM Colonial, Irvington. Completely furnished, Oriental rugs. electric stove, \$85, 830 Klickitat. GA 9568.

E. VELTERATON HOME 5-rm. Dutch Colonial. 2610 NE Klickitat, May 28, 1928 (old 830)

\$9750. 901 Talbot road. Owner. H. Philips. Irvington-Grant Hi Dist. New English type brick home, all large rooms, Open evennigs, 564 E. 25th st. N., cor. Knott.

2710 NE 25th, May 30, 1930

(old 554) (old 564)

Broadway 2045. 325-327 Board of Trade. Broadway 2045. 320-327 Board of Trade.

RVINGTON BUNGALOW.

579 E. 25th N. 6 rooms, splendidly finished in old ivory, white enamel kitchen and bath, hardwood floors throughout, Gasco furnace, wired for electric range; exceptionally convenient on lot 53x100 facing east. Beautiful yard, shrubbery, fruit and flowers, ornamental fence inclosing back yard; agrage; best of neighbors; an altogether desirable place. Phone East 1862.

4-ROOM BUNGALOW—NEW

2733 NE 26th, May 22, 1922

(old 579)

(old 579)

AT 5073. USING, \$12.50. Walk disc. 605 2d. IRVINGTON, 7 rooms, sun parlor, double plumbing, double garage, newly decorated, beautiful yard, 583 E. 25th N. GA 2852. DESILABLE house, 6 large modern rooms, 2745 NE 25th, Aug. 28, 1931 (old 583)

BE 2581.

MODERN 5 rooms, Irvington, breakfast nk., hardwood floors, fireplace, furnace, double garage, \$35. TR. 3781, 583 E. 27th N. 2745 NE 27th, Sept. 27, 1931 (old 583)

FRANK L. McGUIRE—Open 3 to 5.

Irvington bungalow. 2814 NE 28th ave., between Knott and Stanton. Every feature desired in a well-arranged and modern a walk to Grant high; good bus service. 2 bedrooms and bath down, 2 extra rooms up, large living room, tile kitchen and nook. Fenced rear yard with patio and open fireplace, bar-B-Q. Quick possession. I Priced for quick sale. \$7500; convenient terms. Contact C. F. Kernon personally, or call him only, AT 7171.

FRANK L. McGUIRE—Open 5 to 7.

2814 NE 28th Ave, April 18, 1944 (Not in Boundary Delict Area but to the east outside of it.)

Delist Area but to the east outside of it.)

IRVINGTON HOME
7. ROOMS—\$5500.

2826 NE 26th st. nr. Knott, VACANT NOW. 4 bedrooms (3 up, 1 down), double plumbing, fireplace, nook, wired for elect. range, Basement, furnace, hot water heater, garage, shrubs, trees. ALL HARDWOOD FLOORS. Spendid location.
To inspect, phone: Vancouver 3485.

IRVINGTON BARGAIN.

Brand new, 6-room bungalow, finished in lyory, oak floors, papered and decorated throughout, tile bath and drain boards, best of plumbing, fireplace, furnace, beautiful lighting fixtures, Dutch kitchen, attic, garage; this house is strictly modern and up to the minute; come out and see it today; terms. Located at 730 East 22d st. N. Owner, Wdin. 6341.

3434 NE 22nd, April 9, 1922

House open, 2602 N Willamette, MU 5379. 2836 NE 24th Ave., Irvington
8350 down, \$30 mo. 8 rms., hdwd. firs.,
fireplace, dbl. phimb., sawdigs heat, on
cor. close to school. Open 2 to 4 F. M. 2836 NE 24th, April 5, 1942

IRVINGTON—Pleasant well-furn front rm., garage, \$15. 611 E. 27th N. GA 7445.

NICE clean rms. \$2.75 and up. walk. dist.

2915 NE 27th, June 5, 1932 (old 611)

IRVINGTON BUNGALOW 619 E. 25th N., 3 bedrooms, double 5: plumbing, \$50 FACTMORET AND 2929 NE 25th, June 6, 1930

(old 619)

NE 21st. Miss Grieve, AT 6251.

OPEN 1-5. Irvington bargain; beautiful 3-bdrm. home, lovely cond. Auto. oil heat; 1-2-car gar. Dbl. plumbing; 75x100 lot. Hwd. firs. Only \$7050; terms. 2945 NE 25th. Stuaffer, MU 0105.

IN EXCLUSIVE IRVINGTON.

ENGLISH COTTAGE OF ORIGINAL DESIGN JUST FINISHED. EAST FRONT
OCCUPIED BY OWNER, WHO NEEDS
MONEY AT ONCE.

27th NEAR BRAZEE—NEAR BROAD—
WAY CAR.

ANYONE WHO CAN PAY \$1406 CASH
BALANCE \$2500 AT ABOUT \$40 MO.
INCLUDING INTEREST. SHOULD INSPECT THIS PROPERTY.

5 large, well lighted rooms; thoroughly
modern, artistically designed; furnace
heat, fireplace, built-in bookcases, paneled dining-room, built-in buffet, Dutch
kitchen, electric fixtures, shades, cemented
basement; a, beautiful home. Telephone
East 6151, 527 East 27th st. North.

Not in Boundary Delist Area but on 27th just south of

2527 NE 27th, July 9, 1911. (old 527) Note reference to proximity to Broadway Car (streetcar)

always hot w. 617 E. 13th N. GA 4533.
IRVINGTON—Pleasant well-furn front rm., garage, \$15, 611 E. 27th N. GA 7445.
NICE clean rms., \$2.75 and up, walk, dist.
2915 NE 27th, June 5, 1932 (old 611)

IRVINGTON home; genuine sacrifice. See it today and make offer. 618 E. 24th st., near Stanton. must be sacrificed this

2930 NE 24th, Sept. 8, 1912

3. street, garden and fruit, TR 4808.
1. TRVINGTON 5 rooms, garage, 632 E. R 26th N.; adults; \$45. GA 2328.
26th N.; adults; \$45. GA 2328.
3004 NE 26th, Feb. 15, 1931 (old 632)

BARGAIN—Irvington bungalow, 5 rooms, nock and floored attle; hardwood, furnace, fireplace, 631 East 27th, st. N. BR 5510.

LAURELHURST, 1168 E. Davis: Spanish-(old 631)

Five (or 7) ROOMS, IRVSA250 Five (or 7) ROOMS, IRVINGTON, right at 25th and
Sisklyou, near churches, car
line and schools. Modern, immaculately redecorated; 2 bedrooms down;
tiled bath, tiled drains, OIL HEAT; dbl.
garage; splendid corner; splendid district
for your family; easily a \$5500 value, 647
E. 25th N., Mr. Miner, BE 5576.

3041 NE 25th, March 26, 1933 (old 647)

Magnificent new bungalow, up to the minute in every way; somothing different inside. Make an inspection and be convinced. 660 E. 26th N.
OWNER, EA 4216.

3122 NE 26th, May 24, 1925 (old 660)

RVINGTON, \$5250

FOR SALE BY OWNER.
Six-room house, large living room and dining room, good-sized kitchen with built-ins and nook, full concrete basement and garage, 680 East 24th st. N., near Kilckitat. Owner on premises 2 to 5 P. M. today, For week-day appointment call BE 5257.

Titied Summary Rungalogs:

3226 NE 24th, May 12, 1929

(old 680)

GIVE THE YOUNGSTERS a chance.
Open 2 to 5. Drive to 3233 NE 25th ave.
One of the better Irvington locations.
See this Dutch colonial with reception hall, liv. and din. rm., modern kit. and bkfst. nock. 3 good-sized bedrooms, all hdwd. firs., oil heat, elec. water heater; vacant. Priced by out-of-town. Owner to sell at \$13,500. MR. WORKMAN, TR 0821 Monday AT 9691.
VALUE ALWAYS WANTED a home 3233 NE 25th, March 2, 1947

TITE N. W. Bank Blog.

NEW PRVINGTON BUNGALOW. 704 E. 24th St. N., Broadway car. This place has all to be desired in a home. You are welcome to see it. Owner on premises dally. Phone WA home.

3324 NE 24th, May 3, 1925 (old 704)

NEW TODAY-REAL ESTATE



BEAUTIFUL HOME In Heart of Irvington District

3325 NE 26th Between Klickitat-Fremont

\$3750 1 large rms. Dinette, 2 bedrooms. Large finished attic. Fireplace, hdw., autom. heat, garage. 14 biks. to Madeleine and Alameda schools. See this, 1-6, Sunday. Owner.

3325 NE 26th, March 30, 1941

IRVINGTON.
\$1850.
TERMS.
Modern five-room bungalow; hardfloors, fireplace, Dutch kitchen, paneled,
dining, buset, all bulti-in effects; street
improvements in.
Broadway car to Klickitat st., three
blocks east.
717 E. 27TH ST. N.
Phone Sellwood 75.

3335 NE 27th, Aug. 22, 1915 (old 717)

UPPER IRVINGTON—3 BDRMS.
Bungalow type, 2 bedrms. main fir., frpic., hdwd. firs., auto. gas heat, 50x100 lot, gar. 3344 NE 25th. \$10,950 half cash. MILLS AND MEDONALD.
AT 0430 Sun.-Eves. LA 0021

A BEAUTIFUL HOME.

3344 NE 25th, Feb. 29, 1948

IRVINGTON 5 rms. 2 bdrms. hdwd firs. tile bath and drainboards, auto heat, full bsmt., fireplace, brkist, nook, near high and grade schools, 2 blocks street car and stores, \$5975. Owner 3424 NE 26th ave. GA 8519.

2-BEDRM. home in NE dist.: hdw. firs.. 3424 NE 26th, April 18, 1944

Irvington-Edgemont **OPEN SUNDAY 2-5**

3425 NE 26TH AVE.

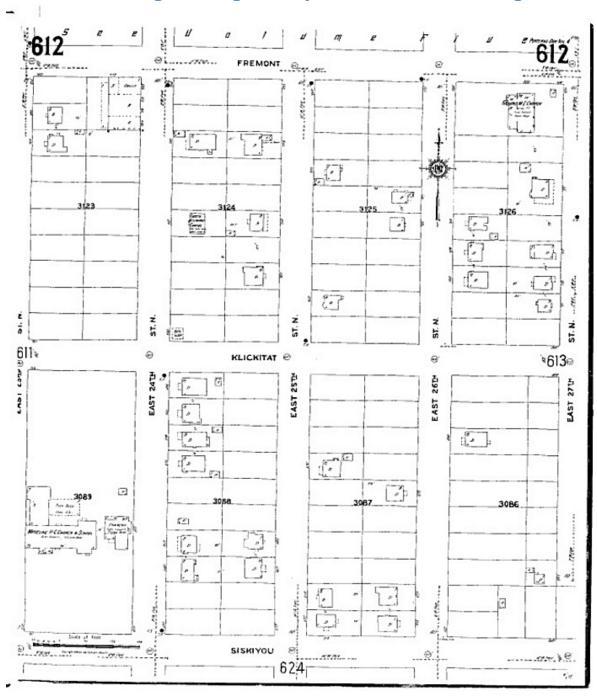
Take Fremont to NE 26th, south to signs. Main floor 2 bdrms, I bath, living room, irpkc, dining area, modern kitchen with nook. Upstairs I targe bdrm with ½ bath. Street level basement with single garage, workshop and large den, utility room and full bath. New wiring, privacy yard on 100x50 lot. ½ block to bus. Only \$72,500.

BERNARD REALTY INC

238-9710

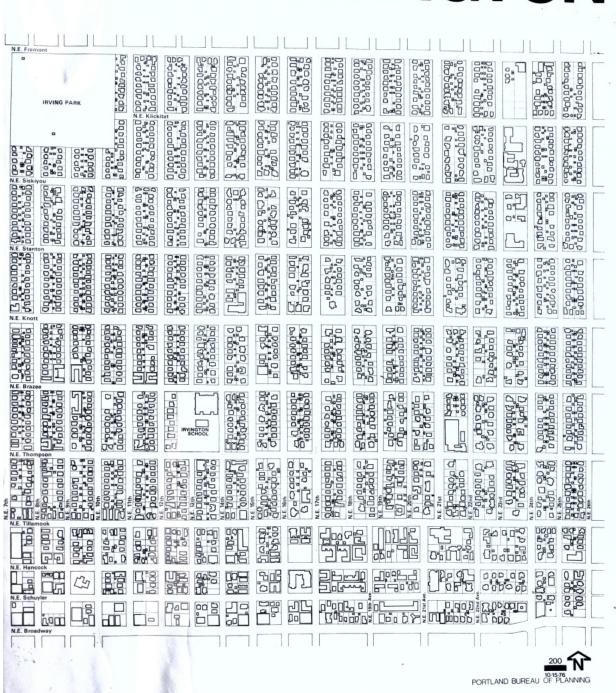
3425 NE 26th, March 25, 1979 (Out of the period of significance, but still refers to Irvington and Edgemont)

Appendix E – Sanborn Map of Eight Blocks in Northeast Irvington Showing Prevalence of Garages on Single Family Lots (Volume 6, 1924, Page 612)

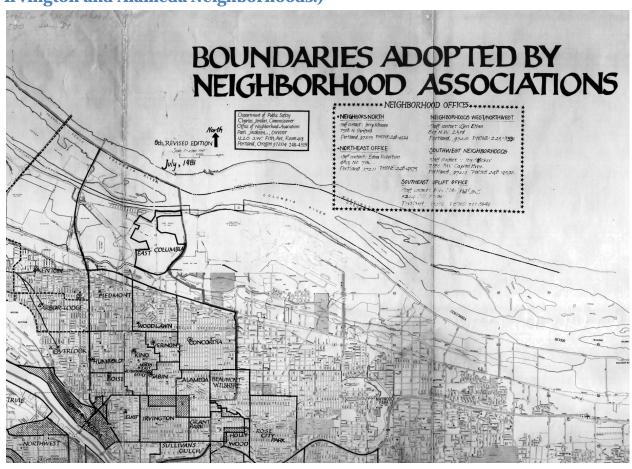


Appendix F – Bureau of Planning Map of Irvington, Oct. 15, 1976, Confirming ICA-Designated Boundaries

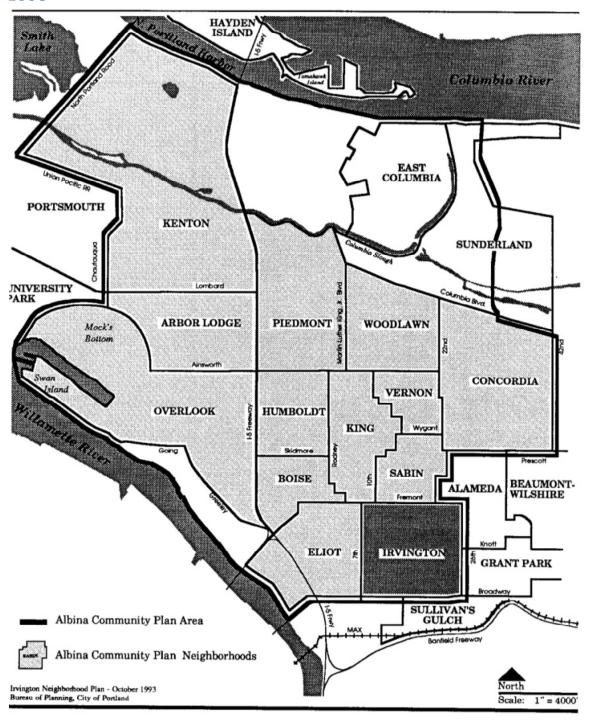
IRVINGTON



Appendix G – Boundaries Adopted by Neighborhood Associations, 1981, Published by Portland Department of Public Safety (Downloaded from City of Portland Office of Neighborhood Involvement website. Partial Image Showing Irvington and Alameda Neighborhoods.)

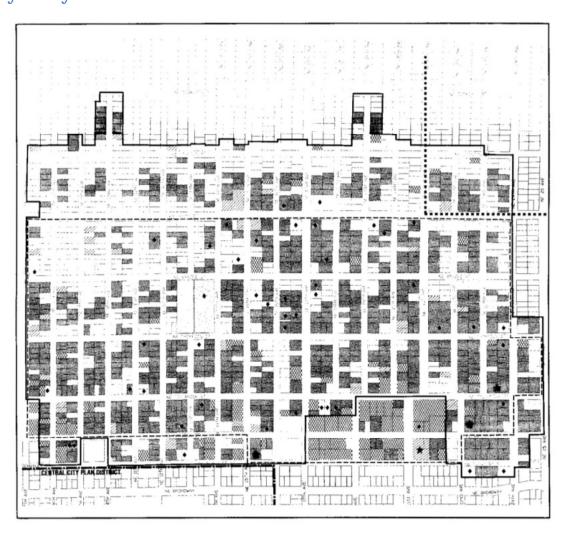


Appendix H – Overall Map of Albina Community Plan Neighborhoods, with Irvington Highlighted. Irvington Plan as Adopted by City Countil, October, 1993



Irvington Neighborhood

Appendix I - Map of Irvington Historic Design Zone as Defined in the Irvington Plan, Part of the Albina Community Plan - Showing Boundary Decrease Area by Heavy Dashed Line in North East Corner







Scale in Feet

Bureau of Planning, City of Portland, Oregon

IRVINGTON HISTORIC DESIGN ZONE

LEGEND

Primary Historical Significance (Contributing) 1884-1913

Secondary Historical Significance (Contributing) 1914-1940 Compatible/Non-Contributing Non-Compatible/Non-Contributing

Vacant Land: Surface Parking; Outdoor storage: Garden Space Site listed in 1984 Portland Historic Resources Inventory Designated Landmark and/or listed on National Register

Proposed Historic District Boundary

Boundary Suggested in 1984 Historic Resources Inventory



AECOM
111 SW Columbia Street
Suite 1500
Portland, OR 97201
www.aecom.com

503 222 7200 tel 503 222 4292 fax

MEMORANDUM

TO: Portland Historic Landmarks Commission

FROM: Kirk Ranzetta, Senior Architectural Historian, AECOM

DATE: February 3, 2015

RE: Irvington Historic District (Boundary Decrease)

On December 31, 2014, I received notice from Mr. Ian Johnson that a new National Register of Historic Places (NRHP) nomination had been submitted to decrease the boundary of the original Irvington Historic District, which was listed in the NRHP on October 22, 2010 by the Keeper of the National Register.

In order to demonstrate that this decrease is warranted according to the regulations governing the listing of properties in the NRHP (36 Code of Federal Regulations (CFR) § 60.14(2)), the nomination proponents must demonstrate that one of four things has occurred:

- A) Professional error in the initial nomination;
- B) Loss of historic integrity;
- C) Recognition of additional significance: or
- D) Additional research documenting that a larger or smaller area should be listed.

Although not stated plainly, one can infer from the submitted nomination materials that the proponents are arguing that there was professional error and that additional research has been undertaken to justify a smaller designated area.

It is my recommendation that these arguments are pure codswallop.

Professional Error

In order to support the idea that there is professional error, the proponents must prove that the original nomination preparers erred. Prior to the approval of the nomination by the Keeper of the National Register, the nomination was reviewed by the Portland Historic Landmarks Commission (PHLC) (and its staff), Oregon State Historic Preservation Office (SHPO) (and its staff), and the State Advisory Commission on Historic Preservation (SACHP). Following the SACHP's recommendation that the nomination be forwarded to the Keeper of the National Register, the Oregon State Historic Preservation Officer certified that the nomination was "adequately documented and technically, professionally, and procedurally correct and sufficient and in conformance with the National Register criteria" (See 36 CFR 60.6(k)). Lastly, the Boundary Decrease nomination's evidence would have to demonstrate that the National Park Service (and its staff at the NRHP) also failed in their professional capacities to catch a significant error – that 437 properties within a district of 2,608 properties are not historically associated. That would amount to a substantial professional error that, in the words of NPS NRHP staff, would be "unprecedented."

The original Irvington Historic District nomination is well researched. It includes 101 footnotes and references historic newspapers, historic maps, primary and secondary



sources, dissertations, National Register documents, university archives, and personal communications. The incorporated information is attributed correctly, and none of that information has been removed from the Boundary Decrease nomination.

Additional Research Documenting That a Smaller Area should be Listed

In order to assail the original nomination, the Boundary Decrease proponents must provide additional research to prove that a smaller area should be listed. Typically, the NRHP requires that nomination preparers use primary and secondary sources to document and evaluate a property. This may include books, journals, magazine articles, interviews, oral history tapes, planning documents, historic resource studies, census data, newspaper articles, deeds, wills, correspondence, business records, and diaries. Eschewing the wisdom of sound historical research that justifies and cross-references historical fact, the proponents provide a bibliography that is particularly telling of the weakness of their argument.

As the centerpiece of their reputable sources, the proponents selectively utilize

- 1) a local historian's website (that at times even undermines the decrease nomination's argument),
- 2) present-day Multnomah County assessor data that includes home square footage,
- 3) the original Irvington NRHP nomination (by the author of this Memorandum),
- 4) a historic photograph of the former Alameda Grocery Store,
- 5) a streetcar map of the Broadway Line, and
- 6) present-day GIS data from the City of Portland and Multnomah County.

These sources are used to justify the following statements:

- a) The Boundary Decrease Area is more closely tied to the development of Alameda Park to the north;
- The Boundary Decrease Area more closely physically resembles the Alameda Neighborhood to its east more than it resembles the remaining Irvington Historic District; and
- c) The Boundary Decrease Area developed as part of the Alameda Neighborhood and is recognized as such by its residents, historically and throughout its existence.

Rather than go point-by-point through these assertions, I will provide at least two instances in which the very sources that the proponents use tend to undermine their own arguments – most notably that the Boundary Decrease Area is recognized as a part of the Alameda Neighborhood historically throughout its existence.

The Garfield Building/Pacific Telephone Exchange Building

The proponents use the 1922 Garfield Building/Pacific Telephone and Telegraph Exchange Building at the corner of NE 24th and NE Stanton as a prime example of how Alameda residents rose up in protest at the prospect of a potential commercial building that could rise in their midst and ruin the residential character of the neighborhood.

The Boundary Decrease Memorandum notes that:



The Alameda Neighborhood had a strong sense of identity as shown by their protest to having only the Kennedy and Beaumont public schools serving their neighborhood. This protest led to the creation of the Alameda Park School at NE 25th Ave. and NE Fremont St. in 1914, and a similar protest led to the Garfield Telephone Exchange building's non-commercial exterior appearance.

The Garfield Telephone Exchange, which is in the Boundary Decrease Area and cited in the original Nomination, was built with a non-commercial exterior appearance for reasons other than restrictive covenants. It was a separate act by then Portland mayor George Baker and the City Council on January 14, 1920 that tightened restrictions on the Garfield Telephone Exchange building. The existing building codes and land use ordinances allowed for the construction of commercial buildings in the neighborhood, but many residents objected to the Garfield Telephone Exchange being built at NE 24th Ave. and NE Stanton St. The city's intervention allowed public input to craft the exterior appearance of the building to better blend in with the surrounding Alameda Neighborhood. This compromise allowed the telephone company to open the exchange in 1924 at the location that was most conducive to serving the Irvington and Alameda neighborhoods.

There are three key inaccuracies embedded within these statements. First, the residents who protested the Garfield Telephone Exchange were not from Alameda, but from Irvington. When one visits the website referenced in this passage from the Boundary Decrease nomination, both the historian's narrative as well as the *Oregonian* articles he uses fail to mention that Alameda residents had such an aversion to the Garfield Building. The website and newspaper articles instead, note that it was residents from Irvington who did not approve of the potential new edifice. It is therefore curious as to why the proponents would provide a citation that directly contradicts their conclusion that the Alameda residents were the originators of discontent. Maybe the Irvingtonians were actually erstwhile Alamedans?

The second inaccuracy is that the city's intervention allowed public input to craft the exterior appearance of the building to better blend into the *Alameda* Neighborhood [emphasis added]. Again, the *Oregonian* articles about this affair, as well as the original nomination state that Irvington resident and noted architect A.E. Doyle was retained to design the Garfield Building. After the building was completed in 1922, the Pacific Telephone and Telegraph Company went on to boast that it had spent \$1,000,000 on the new facility which they curiously say serves the "large Irvington district." Maybe they didn't know where they were when they built this very expensive building.

The last inaccuracy is that the Garfield Telephone Exchange building had nothing to do with restrictive covenants, but rather was a function of the city's intervention to allow public input on this public project. It is true that restrictive covenants were in force within the Irvington plat only until 1916, however, the nomination clearly discloses that on page 17 – so this statement is not particularly revelatory. Unfortunately, the proponents fail to recognize the role the initial restrictive covenants played in ensuring the stability of Irvington, even after they no longer existed. Lacking the legal tools to privately enforce the terms of deeded covenants, Irvington residents became exceptionally active in civic affairs. Such that, in 1916 with the sunset of the restrictive covenants, residents banded together and voluntarily entertained the option to extend the restrictive covenants for an additional period as a result



of several multi-family and commercial building proposals that were proffered in Irvington in the late 1910s. As the original nomination notes:

Despite demand for commercial and multi-family property in the area, the expansion of these businesses was often controversial. In 1916 prospects arose for more widespread commercial development as the first of the restrictive covenants were set to expire and merchants stood ready to take advantage of the lapse. In a sign of just how important these covenants were to the residents of Irvington, 450 concerned citizens attended a meeting to discuss the issue after a rumor emerged that a small grocery store was set to be built in the middle of Irvington.

Despite citizen threats of a boycott, the Schafer & Vinton grocery store was erected, but it was designed to look like a house in response to citizen concerns. In order to minimize the threat of commercial development in the future, citizens devised a scheme to re-issue their deeds through a trust company with another set of restrictive provisions. Even though not all owners in Irvington took this step, the Schafer & Vinton store would have a profound effect upon residential development in the neighborhood. In another incident in 1918-1919, in one of the first matters handled by the newly formed Portland Planning Commission, an auto garage planned to open in the middle of Irvington. After holding public meetings, the Planning Commission managed to convince the garage developer to move to another location outside of the residential neighborhood.

The conflicts over the grocery store and auto garage symbolized a broad recognition within the community of a need to segregate land uses in order to preserve property values and neighborhood character. When the grocery store was designed to look like a house it reflected the profound impact of citizen involvement in Irvington and the prevailing desire for architectural design to minimize changes in land use. Other subtle expressions of architectural illusion emerged throughout the 1910s and 1920s as other buildings throughout the neighborhood were designed to look like homes. The fire department, for instance, met resistance when a fire house was planned on NE 24th Avenue. The firehouse was subsequently designed to look like a Bungalow.

If anything, the Garfield building provides yet another example of how Irvington residents played an active role in ensuring that the residential character of their neighborhood would not be harmed by intrusive commercial or industrial uses even after the sunset of the restrictive covenants. By exerting significant political pressure upon city officials and private businesses, Irvington residents were exceptionally successful in maintaining the architectural character of the neighborhood throughout the period of significance, even within the boundary decrease area. The original restrictive covenants, therefore, provided the initial desire and impetus to maintain the Irvington neighborhood's character that lasted throughout the period of significance.

The Curious Case of the Alameda Pharmacy and Grocery Store

Built in 1923, the Alameda Pharmacy and Grocery Store was erected to provide neighborhood residents with a convenient place to shop for groceries and medicines. In association with this building, the proponents note that:



Similar concerns were voiced about the commercial building built in 1923 at NE 24th Ave and NE Fremont St., but the city did not act to restrict the existing building codes and land use ordinances for its construction, so the store was built with a typical grocery store exterior as shown in Figure 24.13 The building originally contained the Alameda Pharmacy, Alameda Grocery, John Rumpakis's Alameda Shoe Repair, and a dentist's office upstairs above the pharmacy, and was the largest store in the Alameda Neighborhood at the time. The lack of restrictive covenants and city's inaction in regards to concerns about the exterior appearance of the building indicate an inconsistent application of building code restrictions in the Boundary Decrease Area.

After reviewing the sources cited for this passage, the "similar concerns" noted in the passage occurred in the late 1930s and 1940s and were focused on potential store expansions at the intersection of NE 24th and Fremont. Similarly, there is no mention of the city's lack of interest in encouraging a more sensitive design. On top of that, an advertisement in the *Oregonian* for the swanky Johnson's Wax Electric floor Polisher notes that Portland residents could find this essential domestic tool at neighborhood stores. Participating stores in the Alameda district included the Alameda Painting and Decorating Company at 1030 E. 32nd. The Irvington district had six locations where you could rent this wonderful example of suburban excess – one of the locations was the Alameda Grocery Store (*Oregonian*, November 9, 1926; 7). But again, maybe the advertisers didn't know where the store actually was and who their customers were.

This historic revisionism totally undermines the credibility of the Boundary Decrease nomination. Additional examples of inaccuracies and oversights are examined by other commenters on the Boundary Decrease Nomination.

Technical Requirements

There are several components of the nomination that fail to meet the fundamental technical requirements for NRHP nominations as they are discussed in 36 CFR 60. The following discussion reviews various components of the Boundary Decrease nomination that fall short of these requirements as they are discussed in 36 CFR 60.

- 1) First, the nomination fails to include an adequate description of the properties that are to be removed from the NRHP. A map showing where the revised boundaries of the historic district extend to, an appendix with all of the resources to remain in the historic district, and eleven photographs taken in the decrease area does not appear to meet this standard. There is very little information in the boundary decrease nomination about the resources to be removed except for a statistical analysis of the properties to be removed against those that would remain in an attached "Memorandum". The individual properties to be removed are not individually listed or disclosed.
- 2) As noted in 36 CFR 60.7(a)(2), "no diminution of a boundary should be recommended unless the properties being removed do not meet the National Register criteria for evaluation." The proponents' nomination plainly fails to meet this requirement. While arguing that the area to be excluded from the Irvington Historic District is more historically aligned with Alameda, the proponents fail to apply the NRHP Criteria of Evaluation to these properties. Even if the applicants were to somehow prevail in demonstrating that this area is not a part of the Irvington Historic



District, they would have to demonstrate that these 437 resources are individually and/or collectively not eligible for the NRHP. From the content of the boundary decrease nomination, it appears that the proponents are asserting that Alameda could be historically significant for similar reasons as to why Irvington is historically significant. In the very first paragraph of the memorandum, the preparers note that "The majority of resources within the Boundary Decrease Area are within the period of significance for the district and exhibit some of the physical characteristics noted in the Nomination, and share a common general historic context under Criteria A and C." This sentence simultaneously undercuts the proponent's argument that these resources should no longer be listed in the NRHP. Given the Boundary Decrease's own narrative, the decrease area could not be removed from the NRHP.

- 3) The Boundary Decrease nomination is misleading in its use of the existing NRHP nomination (36 CFR 60.11). The Boundary Decrease nomination uses a single page addendum to outline the changes to the original nomination. However, no other example of a boundary decrease nomination in the National Register online database re-uses the original NRHP nomination, modifies very minor details, adds additional author's names, and then attaches a clarifying memorandum that does not follow any acceptable National Register format. The use of a memorandum appears to be contrary to National Register Bulletin 16b and to 36 CFR 60.14. As noted in 36 CFR 60.14(a)(1), "a boundary alteration shall be considered as a new property nomination. All forms, criteria and procedures used in nominating a property to the National Register must be used." The use of a "Memorandum" does not appear to constitute a new nomination, and the use of such a document for a boundary decrease is not discussed in National Register Bulletin 16b or in 36 CFR 60. The "new" nomination form proffered by the proponents is not in fact "new", but is just the old Irvington Historic District nomination. The use of the "new" old nomination is deceptive as it fails to provide any justification for the boundary decrease, fails to describe the properties that would be removed from the NRHP, fails to individually list the properties to be removed from the NRHP, and fails to apply the NRHP Criteria for Evaluation for the properties to be removed either individually or collectively.
- 4) The information in the Memorandum does not conform to any of the NRHP's requirements. It is unclear how the proponent's explanation of location, design, setting, materials, workmanship, feeling, and association; as well as the statistical analysis of house and lot size; and its confusing application of the "Historic Residential Suburbs" MPD Registration Requirements assist in assessing how and why the boundary decrease is warranted. If this information were to be added to the National Register nomination form, where would it go?

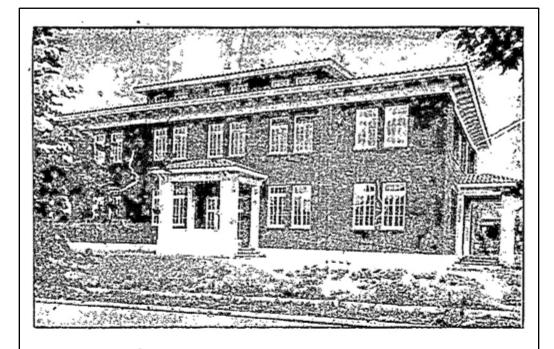
Recommendations

After considering the public comments, both for and against the Irvington Historic District Boundary Decrease NRHP nomination, it is recommended that the PHLC send a strong message to the Oregon SHPO and the SACHP, that these *ex post facto* attempts to undo NRHP Historic Districts should not be entertained unless the nomination meets the plain evidentiary requirements of the NRHP. It is well apparent that the applicants have mistaken modern 1970s notions of neighborhood identity and the boundaries of the current neighborhood associations as after-the-fact evidence of a historical neighborhood. The truth of the matter is that historically, neighborhood identity has been fluid within the City of



Portland – particularly in the early twentieth century, but the Irvington neighborhood stood out as a cohesive community that developed during several different building phases in its period of significance.

The Irvington Community Association (ICA) encourages the PHLC to look past the smokescreen of information provided in the Boundary Decrease nomination. The ICA also recommends that the PHLC provide comments to the SACHP to encourage the commission to unequivocally deny this nomination and to request that the Oregon SHPO send the nomination directly to the Keeper of the National Register of Historic Places for final disposition. It is important to everyone involved that there is finality to this effort.



Telephone Service in 1922

Above we present a view of the new Garfield office of the Pacific Telephone and Telegraph Company, located at 24th and Stanton Streets. In this building is being installed modern automatic central office appartus to serve the large Irvington section. This office will be placed in service the latter part of the year 1922. This building and the equipment for the Garfield office represent an investment of \$1,000,000.00.

This is but one of the many projects planned by The Pacific Telephone and Telegraph Company for Portland's telephone service in 1922. In every office in the city new equipment is being placed or extensions of present equipment are planned. Altogether the Telephone Company will expend for additional plant in Portland in 1922 and 1923 upwards of \$2,000,000.00.

New improvements in telephone equipment will make it possible to handle more quickly interchange calls between manual and automatic telephones and without the necessity of referring such calls to an interchange operator as at present.

We are interested in the growth and progress of this city and are preparing to furnish adequate telephone service as the city grows.



The Pacific Telephone and Telegraph Company



Figure 1. Oregonian, January 2, 1922. Note that it was built to serve the "large Irvington section."

TELEPHONE EDIFICE CAUSES OPPOSITION

Irvington Residents Object to Proposed Location.

AGREEMENT NOT REACHED

Result of Committee's Action Is to Bring Matter Before City Council for Second Time.

Residents of Irvington, through a special committee headed by Charles Alalarkey have declared that the proposed telephone exchange building at East Twenty-fourth and Stanton streets must not be constructed within the limits of Irvington.

This decision was made Wednesday night and came to officials of the Pacific Telephone & Telegraph company as an "eleventh-hour" blow. Officials of the company contend that the committee representing the property owners after careful investigation had approved of not only the location of the building, but of architectural plans.

tectural plans.

The subject will now come before the city council for the second time. A hearing will be held at 2 o'clock this afternoon when the committee of the property owners and representatives of the telephone company will be heard.

Some weeks ago the council refused to grant the permit after residents of Irvington had protested against it. The engineers of the telephone company contended that unless the building was erected on the proposed site or within 200 feet of such site, adequate service could not be maintained. Following the refusal of the city council, the company's officials conferred with residents of the community and entered into negotiations.

Following the refusal of the city council, the company's officials conferred with residents of the community and entered into negotiations with a special committee. This committee named City Engineer Laurgard to study the situation from an engineering standpoint. He reported that the structure would necessarily have to be at Twenty-fourth and Stanton streets if proper service was to be given by the telephone company.

pany.

Being apparently convinced that it must be located within the boundaries of Irvington, the committee then took up the subject of the style of edifice.

A. E. Doyle was named as architect to represent the property owners. Changes were ordered which were adopted by the telephone company officials, it is claimed, and an agreement was drawn up to finally settle the subject.

On Wednesday night the committee met and after several hours' discusson the telephone company officials were notified that the property owners refused to give consent to the erection of the proposed building.

Figure 2. *Oregonian*, April 2, 1920. Note that Irvington residents are the only ones protesting the new telephone building.

The Easy Electric Way to have Beautiful Floors PORTLAND DEALERS BY DISTRICTS paint, J. L. Schumaker, furniture. ALAMEDA. J. L. Schumoleer, furniture.

Paul's Klectric Store.

E. H. Lampart.

Young's Hardware Store.

Medford Exchange, furniture.

Peoples Excits Co.

Scott Woolf, furniture. eds Painting & Decorat-Co., 1630 E. 35d N. GA ALBERTA. S. Salmonson, hardware, 632 Alberta, GA 5314. S. H. Labbo, hardware, E. 31st and Alberta, GA 4431. NEWBERG, OR. W. Hollingsworth & Son-milli Electric Co. BEAUMONT, Beaumont Hardware Co., 1985 Framont, GA 7023. Franchi. GA 7013.
CENTRAL EAST SIDE.
Chus. Johnson. wallpaper and
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Union. 113 Grand Ave. 15A
Union. 140 Grand Ave. 15A
Union. Ave. N. 717 1815.
Portland Hardwood Floor Co.
455 E. Davis. E.A. 3510
Co. 348 Union Ave. N. EA.
8150. NORTH BUND, OR. J. P. Hackett Co. NORTH POWDER, OR. Hutchinson-Perbatrom Co. NORTH POWDER, OR.
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C. H. Medley.
O.R.
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Polerson Furniture O.
Pounk Book & Born. Continues.
Horistore.
Horistore.
Horistore.
London Dray Co.
Jones Livie Co.
Jones Livie Co.
L. J. McAtos, Wallipser and
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McAtos, Wallipser and
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REEESPORT. OR.
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REEESPORT. OR. THIS ELECTRIC Eisnian Hardwood Ploor Co., \$22 E. Yambill. EA 9165. GENTHAL EAST SIDE AND KITUBER Hardware Co. 601 Hawthorne Avo. EA 548.3. Genther's Crucry' 101 Haw-thorne Avo. EA 548.4. Hast Twenty-Third St. Phar-magy, 755 Hawthorne EA 952. FLOOR POLISHER more Act., 1884. Pharmore, 785 Hawtherine BA
9502. DOWNTOWN
Creek Co. Multiling smeerini, 95 Front St. 287 1015.
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Hader Window Stande Co., 251
Lipman. Wolfe & Co., 257
Lipman. Wolfe & Co., 25 and paint.

REMEDSPORT, OR.

Residence Decetaling Co.

Residence Decet from your neighborhood store sv. HELENS, OR. J. W. Akin.

SALEM. OR.

Chambers & Chambers, furnichambers & Chambers, furnichambers & Chambers, furniture

S. C. Hamilton, turniture.

M. L. Stiff & Co., furniture.

W. G. Ghibedef, housewars.

Hutcheon Fulet Co., wall paper and paint.

Beappoose Drug Kors.

Scappoose Drug Kors. for $^{\$}2^{\frac{99}{2}}$ a day With it you can easily SEASIDE, OR. beautify ALL your floors SILVERTON, OR.
Ames Hardware Co.
W. L. SHIT Purnbure Co.
SPHINGPIELD, OR.
Vassy Brok. and linoleum in the time it formerly took to do a single room. By this new method all hard work is avoided. You don't need Docharty-Powers Purniture Co. Standisman-Boon, hardware. H. N. Consdall. Dawson Electric Works. to stoop or kneel. It won't soil or roughen your hands. fashioned hand methods.

JOHNSON'S WAX

Slectric floor Polisher

CAMAS, WASH.

CAMAS, WASH. TOLEDO, OR. Burdroff & McKay, hardware. And it is ten times better W. 0175.

HIGHLAND AND ALDERTA.

W. H. Smith, maint and wallpaper, 255 Union Ave. N.

W. 354 St. Freedy, 254

Alameda Greetty, 54th, and
Pressont Sts. GA 1145.

Wancher Bros., grocery, 254

E. Broadeny, BA 057;

E. Broadeny, BA 575. Sanders & Co., 108 E. Broad-way, GA 1137. Hungerford's Grocery, E. 21st K. and Multacomab, GA 1171. J. H. Nicoll, 642 E. Broadway, GA 9718. grocery, B. 1808. and Broadway, GA 1194. and Broadway, GA 1194.

Figure 3. Advertisement for Johnson's Wax Electric floor Polisher. *The Morning Oregonian*, November 9, 1926. Detail views of Alameda and Irvington distributors are provided below.

ALAMEDA.

Alameda Painting & Decorating Co., 1030 E. 32d N. GA 0333.

ALBERTA.

W. Tr 9949.

IRVINGTON.

Alameda Grocery, 24th and Fremont Sts. GA 1165. Wascher Bros., grocery, 594 Written testimony before the Portland Landmarks Commission and the State Advisory Commission on Historic Preservation

From The Irvington Community Association Historic Preservation Committee February 5, 2015



NE 25th Avenue & Stanton Street

The Period of Significance for the Irvington Historic District encompasses over fifty years and the virtually the entire evolution of home building in streetcar suburbs from the late Victorian Queen Anne houses to the modernized English Cottages of the 1940s. Different styles and decades of construction are found throughout the District in varying numbers on each block. This eclectic pattern, very emblematic of streetcar suburb development, makes a Boundary Decrease Area based on artificially drawn lines very difficult to justify.

Visual case studies of the Irvington Historic District (attached in a separate document) will emphasize what one actually sees as you walk the street grid both inside and outside the proposed Boundary Decrease Area. These studies show that the argument that the Boundary Decrease Area "more closely resembles the Alameda Neighborhood than it resembles the Irvington Historic District" is not true. Nor does this claim have bearing on the criteria under which the Irvington Historic District was nominated.



2334 NE 24th Avenue (not in the Boundary Decrease Area)



3234 NE 24th Avenue (in the Boundary Decrease Area)

These visual case studies also address arguments that the Boundary Decrease Area is made up of "smaller lots and homes more characteristic of a typical working-class Portland neighborhood" and that the "number of large lots in the Boundary Decrease Area is much lower than in adjacent areas of the remaining Irvington Historic District." While there are certainly larger multiple tax lot homes in both Irvington and Alameda, the Irvington grid, and the adjoining Edgemont and Gleneyrie plats were designed to facilitate movement in a streetcar neighborhood on foot and by streetcar. The Historic District blocks, both in and out of the Boundary Decrease Area, are largely made up of row upon row of 50' x 100' lots.



NE 18th Avenue between Klickitat & Fremont Streets (not in the Boundary Decrease Area)

The Boundary Decrease Nomination argues that Multnomah County's current day quality of construction ranking system should be applied to show disparity between the Boundary Decrease Area and the remainder of the Historic District. Even if one were to accept the premise that the Multnomah County construction ranking had bearing on the criteria for designation of historic properties, a true disparity between the Boundary Decrease Area and the Irvington Historic District as a whole cannot be proven. These visual case studies will compare the specific photographs chosen by writers of the Boundary Decrease nomination to photos drawn from the original Irvington Historic District nomination reconnaissance survey to illustrate a level of consistency in house styles and types that runs across the artificial boundary suggested by the Boundary Decrease nomination.

Finally, the Boundary Decrease nomination focused on the specific architects found listed in the Irvington Historic District nomination. While almost no historic district nomination lists <u>all</u> the architects and builders that contributed to its building inventory, this is particularly true for a district as large as the Irvington Historic District. With over 2800 properties and more than fifty years of significance, the Irvington nomination highlighted the vast array of architectural styles and a sampling of the master architects. The district meets Criteria C regardless of how many architects or styles are specifically called out in the nomination. Nonetheless, the Irvington Historic Preservation Committee has undertaken a visual case study of the 1930s & 1940s construction in the Irvington Historic District, specifically Kenneth Birkemeier and his contemporaries in order to counter the Boundary Decrease nomination contention that the omission of Mr. Birkemeier from the original Irvington nomination was significant in any way.



2733 NE 16th Avenue (not in the Boundary Decrease Area, attributed to Birkemeier)

The distinct tastes for new houses in Portland in the 1930s and 1940s, in the waning years of the streetcar era, are reflected the styles being built by a number of builders throughout in the Irvington neighborhood including Kenneth Birkemeier. While these early Birkemeier houses were well designed, they were hardly unusual. Essentially, Birkemeier and his contemporaries sought out empty building sites for homes wherever they could. While, as the Boundary Decrease nomination asserts, Birkemeier was adept at building homes on difficult sloping sites as found on the Alameda ridge and Portland Heights, he was also comfortable building on the flatter landscapes of Irvington, Rose City Park and East Moreland.

Recognition of Ken Birkemeier's work was relatively late in coming among Portland's architectural historians. It wasn't until local independent historian Jack Bookwalter began exploring the architects of the Mid-Century Modern era in the late 2000s that Birkemeier's name came up. While individual Birkemeier home owners had noticed something special about their homes, there was nothing written about his work in the standard architectural history literature up until that point. Bookwalter began serious research in 2009, contacting the Birkemeier family members, visiting the houses and compiling lists of properties, based on newspaper searches and on documents supplied by the family.

Subsequently, Bookwalter completed an article for the Northwest Renovation Magazine and in November, 2010, <u>after</u> the Irvington District Nomination had been approved, presented his first lecture on Birkemeier to a sold-out audience at the Architectural Heritage Center. His lecture and subsequent house tours organized through the AHC, brought Birkemeier home owners together and triggered a long overdue re-assessment of Birkemeier's legacy as a

builder/designer. Ironically, for all of his talent as a designer, he never was licensed as an architect, and hired a licensed architect to complete his plans and file for the required permits.

A link to Bookwalter's article for Northwest Renovation Magazine is found here: http://nwrenovation.com/architecture/the-mid-century-modern-homes-of-kenneth-l-web-80%86birkemeier/

Fundamentally, one reason that the Birkemeier homes may be under referenced in the Irvington Historic District nomination is that his work hadn't been fully researched at the time the nomination was being finalized. Like many early twentieth century builder/contractors who were not licensed architects, Birkemeier's work was not on the radar for architectural historians. Many of his projects are still being identified. Birkemeier-built homes that were actually owned by others at the time of their construction can be difficult to document with certainty. Unless, a design attribution was definitive, it was not called out in the Irvington Historic District nomination in 2010.

However, this new recognition for Birkemeier built homes is highlighted by the story of 3120 NE 22nd Avenue. In 2013, the property owners next door were considering purchasing and demolishing this 1947 home. While meeting with the Irvington Community Association Land Use Committee, it was discovered that a typo in the nomination had inadvertently listed the home as non-contributing in the Irvington Historic District. The contributing status was corrected. The possible connection to Birkemeier was brought to light. The property owners next door re-evaluated their plans, deciding instead to purchase, renovate and put the property on the market. The Birkemeier attribution was confirmed. In fact, this attribution was utilized to help sell the house for \$790,000 in 2014. According to the MLS listing for the property it is an: "Amazing renovation of a Birkemeier designed/built home in the heart of Irvington."



3120 NE 22nd Avenue (Birkemeier, in the Boundary Decrease Area)

The 1930s, and to a lesser extent the war years of the early 1940s, saw infill development characterized by numerous English Cottage style homes throughout Irvington as scattered empty lots were filled by builders "getting by" during the Depression and World War II. Most of these houses, like the known Birkemeier built homes of that era, used a mix of brick and some type of wood siding (board & batten and/or shingle clapboard) or stucco. Many have at least one of the large, horizontally divided light windows that were becoming popular. The waning importance of the streetcar can be seen in the inclusion of garages under many of these homes. These fully incorporated garage designs make a significant statement regarding the impact of increasing personal automobile ownership in the last decades of significance in a typical streetcar neighborhood in the United States.



2135 NE 22nd Avenue (not in the Boundary Decrease Area)

It is also important to note that Birkemeier's revival style homes, built up through the 1940s are not considered to be his real significant contribution to local architecture. As Jack Bookwalter concluded, "Although credited with building some Colonial, English, and conventional Ranchstyle homes, it is the Birkemeier Modern house that remains his most recognizable house style today. These brick (or partial-brick) houses were artfully designed, often with elements of avantgarde or whimsical detailing." The classic Birkemeier Modern was a post -World War II house. This is another reason why Birkemeier did not necessarily merit mention with the architects and builders called out in the Irvington Historic District nomination.

The Boundary Decrease nomination has spurred the Irvington Historic Preservation Committee to take on additional research into the contributions of 1930s and 1940s builders, Kenneth Birkemeier and his many contemporaries. From the southwest corner of the district to the Edgemont and Gleneyrie plats of the northeast corner there is a remarkable consistency to their contributions. It is also clear that the availability of open lots created pockets of intense

development. The Boundary Decrease nomination points out the cluster of Birkemeier houses around 22^{nd} Avenue and Siskiyou/Stanton Streets. However, it is important to note that there are also similar clusters of 1930s/40s development along Knott Street between 8^{th} and 15^{th} Avenues, and along 20^{th} Avenue north of Knott.



1234 NE Knott Street (not in the Boundary Decrease Area)

The visual case study of 1930s & 1940s houses in the District is provided in a separate document.

Birkemeier Irvington Property Research

Note: on individual homes where owner is noted, the "Owner" name came from the plumbing permit. Items in blue are not in the proposed boundary decrease area.

- 2733 NE 16th built 1947 Attributed to Birkemeier by Jack Bookwalter research, owner Al Lovitt in 1946
- 2348 NE 22nd built 1953 Advertised as a Birkemeier in *The Oregonian*, May/April, 1979, built 1953 for C.W. Border Attributed to Birkemeier by Bookwalter
- 3120 NE 22nd built 1947 Confirmed as a Birkemeier by Plumbing Permit, IHD Contributing status saved home from demolition in 2013
- 2225 Klickitat built 1942 Identified as a Birkemeier in the IHD RLS 2010
- 2235 Klickitat built 1943 Identified as a Birkemeier in the IHD RLS 2010, original owner Mrs. E. H. Birkemeier

- 1504-10 NE Knott built 1957 On project list provided by K. Birkemeier's widow to Jack Bookwalter, Confirmed as Birkemeier by newspaper article and Plumbing Permit
- 2225 NE Siskiyou built 1942 Confirmed as a Birkemeier by Plumbing Permit (and is a near twin to 2225 NE Klickitat)
- 2235 NE Siskiyou built 1942 Confirmed as a Birkemeier by Plumbing Permit
- 2507 NE Stanton built 1940 Confirmed as a Birkemeier by Plumbing Permit
- 2517 NE Stanton built 1941 Confirmed as a Birkemeier by Plumbing Permit