



June 22, 2021

Council Clerk, City of Portland  
1221 SW 4<sup>th</sup> Avenue, Room 130  
Portland, OR 97204

Sent via email: [cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)

Dear Portland City Council Members,

These comments are in regard to the *South Park Blocks Master Plan*, to be discussed at a Council hearing on July 7, 2021. For the record, I am not contacting you as a representative of, or on behalf of, the University of Oregon, but as a national expert in cultural landscape preservation, planning, and design. I am a Fellow of the American Society of Landscape Architects, authored the very first National Park Service guidelines for documenting and analyzing cultural landscapes, and am a leading author about impacts of climate change on cultural landscapes in the U.S national parks. With grant support from the National Park Service, and others, I continue to work on critical cultural landscape issues throughout this country, as well as in Asia and Europe.

As Professor Emeritus at the University of Oregon I can express my opinions on matters within my expertise, such as the proposed *South Park Blocks Master Plan*. My intent is to clarify aspects of the discussion which may help the Council better understand important underpinnings of the Master Plan and recognize why it is such a valuable contribution to the health and vitality of the South Park Blocks and downtown Portland.

As a recognized international and national expert in this field, I strongly support the draft master plan, its insightful tree succession plan, as well as the Green Loop component of the design, which reflects the adopted Central City 2035 Plan. Together, the plan's component pieces address a range of management opportunities and challenges, as well as contemporary needs of this historic, dynamic cultural landscape in downtown Portland. The Master Plan aligns with rehabilitation standards of the National Park Service for cultural landscapes and recognizes the need for some degree of change to accommodate contemporary use and changing community values, as well as to address a range of park management goals.

The proposed design is the result of collaboration between plan designers and park management staff so that treatment can be implemented and maintained over time. I applaud and support the city's selection of a nationally recognized consulting firm with clear expertise in cultural landscape analysis, planning and design. Cultural landscapes are not like other important historic resources. Unlike buildings, statues and monuments, the dynamic nature of



cultural landscapes is a desired attribute -- and should be managed and protected with that in mind. Cultural landscapes cannot be preserved in the same way that one might preserve a building.

Rehabilitation is the appropriate primary treatment approach for the South Park Blocks considering the extent of physical change this landscape has already undergone, first in 1971-72 in the University District, and then in 1984-1987 in the Cultural District. As is clear in the plan, the intention is to preserve the South Park Blocks' essential qualities, making it a welcoming place for current visitors, while ensuring its healthy and resilient future. This is the essence of rehabilitation.

'Rehabilitation' is the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions, features or characteristics which convey its historical, cultural, or architectural values. In the case of the South Park Blocks, the existing use as a park remains, but park features have flexibility for reasonable change. The central goal is the long-term preservation of the landscape's defining characteristics, but not all historic features will necessarily be preserved as they exist today. There are a range of challenges and issues that the master plan must resolve for this generation and those to come.

Having read some recent comments in social media, it seems that a misunderstanding of 'rehabilitation', and what it means for the South Park Blocks, is the likely point of contention between the plan's proponents and its critics. Some plan critics misinterpret rehabilitation as preservation. Preservation - as defined by national standards - is not an appropriate treatment approach for the South Park Blocks, for reasons discussed above.

Plan critics also misinterpret the successional replanting strategy as a tree removal plan. It is not a tree removal plan. It is a responsible and visionary proposal that understands this cultural landscape, how it has changed over time, and what really characterizes it. This plan is intended to help PP&R responsibly replant elms and other park trees as future needs require, so a mature, continuous cathedral-like canopy survives to welcome future generations of Portlanders.

This is a vision for the South Park Blocks that should be welcomed, not disparaged. It is clear that the historic elm tree spacing on the South Park Blocks would likely never be approved using today's planting standards. Trees were planted too close to each other, contributing to the documented poor condition of younger trees planted in the dense shade of mature neighbors. The South Park Blocks Master Plan has learned from horticultural history and should be applauded for it.



There is more I could share, but these points should be emphasized. Cultural landscapes are not like other historic resources. The *Master Plan* adheres to national rehabilitation standards, including a reasonable amount of change to existing resources. These changes will ensure the long-term stability of the South Park Blocks. It is vitally important to recognize that this plan provides Portland with an avenue to maintain the South Park Blocks for future generations, a commendable civic goal for all parks whether historic or contemporary.

Thank you for the opportunity to share my thoughts on this matter.

Sincerely yours,

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Director, Cultural Landscape Research Group  
Former Dean, School of Architecture and Allied Arts (now College of Design)