



City of Portland
Historic Landmarks Commission

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May 19, 2025

Ann Cudd
President | Portland State University

Jason Franklin
AVP Planning | Construction & Real Estate
Portland State University

Bryan Bruckman
Associate Campus Planner | Planning & Sustainability Office
Portland State University

Dear President Cudd, Mr. Franklin and Mr. Bruckman:

The Portland Historic Landmarks Commission (PHLC) urgently requests your reconsideration regarding Portland State University's recent filing of a 120-day demolition delay permit for the historic Montgomery and Blackstone Halls. As a priority, we urge the University to examine whether demolition - resulting in the loss of 200 housing units and their embodied carbon - truly reflects the mission and values of the University.

We recommend additional analysis including:

- **Alternative Design Considerations:** Conduct a feasibility analysis. There are many examples in Portland of historic buildings being retrofitted and there are numerous talented local architectural firms that could provide unbiased analysis of feasibility. It may be possible to achieve the desired outcomes through renovation rather than reconstruction.
- **Financial Re-Evaluation:** Appraise the cost differential between retrofitting the existing buildings and constructing new buildings, normalized by room count.
- **Alternative Financing Exploration:** Explore the use of alternative financing mechanisms, including but not limited to ground leases that would enable the use of historic tax credits and low-income housing tax credits to offset 20% - 40% of the rehabilitation costs.
- **Environmental Stewardship:** Conduct a whole building life cycle analysis of carbon to ensure that the proposed solutions align with the University's and the City's commitment to a sustainable future. Portland's existing buildings are among its greatest renewable resources. Preserving their structural integrity while thoughtfully renovating their interiors is the most responsible course of action.

Finally, we respectfully request that you consider your responsibilities as the largest property owner in the downtown area and model the preservation of our cultural heritage and sense of place. Montgomery and Blackstone Halls are potentially eligible for listing in the National Register of Historic Places for the following reasons:

- **Historical Significance:** Montgomery Hall, originally built in 1917 as the Martha Washington Hotel for Working Women by the Portland Women's Union and designed by A.E. Doyle, holds social and historical significance as a pioneering residence offering safe, supportive housing and professional development opportunities for single working women at a time when such resources were rare. It became student housing for Portland State University in 1969, continuing its legacy of providing community-oriented support.
- **Design and Materiality:** Montgomery Hall honors historical design traditions such as the Classical Revival style, characterized by its symmetrical façade, brick construction, and classical detailing. Blackstone Hall is notable for its Egyptian Revival architectural style. While Classical Revival architecture continues to be preserved and appreciated in Portland, Egyptian Revival is largely a historical rarity, with few surviving examples and little contemporary application. Regardless, both styles deserve celebration and preservation.
- **Spatial Experience:** Both buildings contribute to the Cultural District's streetscape with their human-scaled massing, detailed historic façades, and strong street frontages that create a sense of continuity, character, and pedestrian intimacy along the Park Blocks. Preserving them maintains the architectural diversity and layered history that define the urban experience of downtown Portland.

We appreciate your consideration of PHLC's position relative to these two important buildings. Our role as historical advocates - whether through physical preservation, valuing placemaking, or our endeavor to uphold the City's commitment to environmental and social responsibility - is one we take very seriously on behalf of our constituents.

Sincerely,

The Portland Historic Landmarks Commission

Cc: Donnie Oliveira, Deputy City Administrator
 David Kuhnhausen, Director of Portland Permitting & Development
 Eric Engstrom, Director of Bureau of Planning & Sustainability
 Olivia Clark, District 4 City Councilor
 Mitch Green, District 4 City Councilor
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 Evyn Mitchell, Office of Government Relations
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