



City of Portland
Historic Landmarks Commission

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February 12, 2021

Robert Olguin
Oregon State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301

Re: South Park Blocks National Register District Nomination

Dear Robert,

The Portland Historic Landmarks Commission (PHLC) considered the nomination of the South Park Blocks National Register District at our regularly scheduled meeting on Monday February 8, 2021. The PHLC considered expert testimony from a variety of interests, including from persons with lived experiences, professional expertise, and intergenerational associations absent from the proposed iteration of the South Park Blocks National Register District nomination. The PHLC finds that the proposed nomination provides a wealth of historical information regarding the South Park Blocks, but that substantive revisions are necessary to ensure the nomination is accurate, complete, and inclusive. A letter detailing the recommended revisions will be provided under separate cover.

At this time, the PHLC recommends against nominating the South Park Blocks to the National Register and requests the State Historic Preservation Officer take no further action on this nomination. The members of the Portland City Council concur with the PHLC's recommendation.

The PHLC looks forward to considering a substantively revised nomination for the South Park Blocks in the future.

Sincerely,

Handwritten signature of Kristen Minor in black ink.

Kristen Minor, PHLC Chair

Handwritten signature of Maya Foty in black ink.

Maya Foty, PHLC Vice Chair

Handwritten signature of Matthew Roman in black ink.

Matthew Roman, PHLC

Handwritten signature of Ernestina Fuenmayor in black ink.

Ernestina Fuenmayor, PHLC

Handwritten signature of Andrew Smith in blue ink.

Andrew Smith, PHLC

Handwritten signature of Commissioner Rubio in black ink.

Commissioner Rubio

Handwritten signature of Mayor Wheeler in black ink.

Mayor Wheeler

Handwritten signature of Commissioner Hardesty in black ink.

Commissioner Hardesty

Handwritten signature of Commissioner Ryan in black ink.

Commissioner Ryan

Handwritten signature of Commissioner Mapps in black ink.

Commissioner Mapps

CC: Chrissy Curran, Oregon State Historic Preservation Office



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February 17, 2021

Robert Olguin
Oregon State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301

Re: South Park Blocks National Register District Nomination

Dear Robert,

This letter supplements the letter submitted on February 12, 2021. As you know, in our advisory capacity the Portland Historic Landmarks Commission (PHLC) considered the nomination of the South Park Blocks National Register District at our regularly scheduled meeting on Monday February 8, 2021. The PHLC commends Story Swett, Brooke Best, Roberta Cation, Leslie Hutchison, and Fred Leeson for their volunteer efforts in preparing the nomination that was presented to the PHLC. Similarly, the PHLC deeply appreciates the testimony provided in writing and verbally at the meeting by individuals, communities, and organizations who have deep connections to the South Park Blocks and the land on which they are located. Such a public place deserves serious consideration of issues raised from all sides. Most (though not all) of the testimony supported the ultimate listing of the South Park Blocks on the National Register of Historic Places (NRHP). The PHLC concurs with this majority opinion and hopes that substantive revisions to the nomination will ultimately result in National Park Service designation.

The issues raised are timely, resonant, and important. With every understanding of what a nomination document is (and what it is not) we currently recommend against nominating the South Park Blocks to the National Register until such time that substantive revisions to the nomination can be made and subsequently reconsidered by the PHLC. We acknowledge the unusual nature of this request. Much excellent scholarship, writing, and work has been already done by the team of volunteers and the vast majority of this work can and should be included in a revised document. The City of Portland, especially the Bureau of Parks and Recreation, has an opportunity—and the PHLC believes an obligation—to step in and help with the burden of supplementing the draft nomination as simply adding a few paragraphs regarding the history of this place prior to 1852 will not be sufficient. With thanks to the preparers and testifiers for raising numerous issues, the PHLC offers the following detailed advice.

Historic Context and Inclusive Language

- Unfortunately, there is a sense of one-sidedness in the overall draft narrative. While the narrative is common in Oregon histories and related to the dominant white “pioneer” culture, it does not sufficiently reflect the complicated, sad, and authentic history of events about who was here prior to white settlers and what happened once the settlers began to claim and use land that had already been lived on, managed, and cared for by Native Americans for thousands of years. The decisions of how to treat the land by early (and later) Portlanders and who “owned” it must be told in a more complete way, not only in the pre-1850s time period but as part of Lownsdale’s acquisition of it and

continuing into the period of significance. Some considerations of who used the park over time (and who did not) and whose contributions to its current features, form, and operations were considered important and valued (and whose were not) might be helpful.

- Overall, there is a troubling emphasis on how “sedate” or “quiet” activities are good, have historic integrity, and are valued, while more active uses are not. An example of this is the section discussing why the North Park Blocks are ineligible due to a loss of integrity, mostly due to the playground and basketball courts in that section of the park. Yet those uses were tied to the historic park playground movement (cited in the document as being 1906/1908). It is puzzling why the document includes one end of the park (PSU blocks 1-6) with more varied and active uses such as the Farmer’s Market, gathering spaces, and performance areas; and excludes the North Park Blocks based mostly on its active uses.
- In terms of who used the park historically, again there is some evidence for changes over time. The nomination needs to discuss and expand on this starting with change in single-family homes to a higher density along the park (p.36, WWI & depression era)- why was this happening in terms of a larger US context? Did the park ever change in terms of its public perception as a safe place or a welcoming place for all?

Cultural Landscape Approach

- A Cultural Landscape approach to the nomination would allow for a more flexible and more appropriate understanding of the myriad changes that have occurred within this public space and how the landscape might still change in the future, while retaining its essential qualities. Change over time in a cultural landscape is a feature and a process, as pointed out in the letter received by Robert Melnick, University of Oregon.
- It is important to clarify that changes are an integral part of a cultural landscape process. Since this nomination is written from the architectural point of view and not the cultural landscape point of view, the acceptance of the evolution of the park is missing from the narrative. As written, the narrative diminishes change and does not accurately convey the integrity of the blocks. Note: If the cultural landscape perspective is used, the North Park Blocks would almost certainly qualify as part of the nomination. If they are to be excluded, consider what the rationale is.
- Define the character-defining qualities of the park using a Cultural Landscape lens. For instance, the nomination refers to the linear promenade as being one of the critical attributes of the overall park design, evidenced throughout various iterations. Yet the diagonal layout of the PSU blocks (1-6) seem inconsistent with that description. In addition to circulation (of various types, not limited to pedestrian), defined qualities or attributes might include spatial organization, topography, views, axial and hierarchical relationships, uses, vegetation, and clusters of features. Please refer to National Park Service bulletins and published information about documenting and analyzing cultural landscapes.
- Tree species planted by early white Portlanders were quite often trees that originated in Europe or at least the east coast of the U.S.- is there a source for statement on p.7 that the choice of species represents “Portland’s only park planted primarily with broadleaf deciduous tree species”? Many street trees in Portland’s older neighborhoods are these same east coast-based species.
- Ecology and landscape species choice is an issue that is not raised in the nomination, except to say that the allees of mature, deciduous trees were chosen and planted to provide a “European-inspired” character to the linear park blocks. Elm trees, though, are an introduced species, not native to our ecology in the pacific northwest. As urban forestry improves as a science, we understand more about the reasons to plant a more diverse mix. This is not to say that the PHLC advocates for a significant change in the tree species represented in the park, but it is important to recognize the problem, listen

to experts, and then to define the characteristics that are the most critical to the experience and character in the park. The PHLC suspects that some flexibility would not undermine the historic experience while improving the health of the park overall. Grass under the trees is another species question: on what model is this based on? Plenty of European examples of allees do not have grass. The shade makes grass a difficult choice for maintenance; perhaps a low ground cover would allow for flexibility and better ecology.

Boundary

- As presented by the preparers, it is evident that there is some confusion and intent to clarify the boundaries of the nominated area. The PHLC appreciates Bill Hawkins' testimony regarding the historic size of the Park Blocks and the various iterations of sidewalk, roadway, and curblin over time. The PHLC supports the stated intent to clarify the boundaries. The current roadway widths on both sides of the planted park blocks are not historic, nor are they necessarily important to the character or function of the park. In fact, defining the park too narrowly may have the result of locking in "car only" zones on the outside of the park, rather than considering the park functions as a whole including multi-modal transportation. The idea of a "well-defined boundary" seems less about where roadways are currently and more about the spatial boundaries defined by the architecture on either side of the park.
- Whether or not the boundaries extend to the fronts of buildings on either side, the relationship between these buildings and the park should be better described as place-defining. Many of the buildings themselves are historic and have a relationship to the park. This could be an entire district including the buildings, theoretically.
- Strong re-consideration of the two "ends" of the park and whether they belong in the nominated area is warranted. The current nomination has the PSU blocks included and not the North Park Blocks. This may be supportable, but the current arguments are weak for both decisions.
- Mention of the Arlington Club on p.18 might include a bit more on this building as the 'terminus' of the South Park Blocks and how it came to be constructed at that location.

Period of Significance and Nomination Criteria

- The proposed period of significance is quite long. If it is appropriate to include the more recent decades, more history on events from the 1940s through the 1970s should be added. Several PHLC commissioners were comfortable with the period of significance as proposed, but several others had some concern that such an extensive time period results in an unfocused discussion of the criteria. It is not clear how changes made in the 1970s might be included as "contributing," but changes made in the 1980s would not be (perimeter walkways being the clearest example).
- In terms of the Criteria A arguments for the park falling under the "City Beautiful" movement, it is possible that the Parks MPD could be used as an umbrella for this nomination but that the changes to the park in the later periods would be excluded. However, this approach would also have major challenges to managing the landscape and accounting for changes, and the PHLC instead recommends a Cultural Landscape approach to Criteria A (See "cultural landscape" category of discussion above). As it stands, the arguments for which aspects of the park are "character-defining" and which are not, over time, are not adequately tied back to the criteria & themes discussion overall.

Character-Defining Features and Contributing Resources

- As defined in the nomination, the boundary, period of significance, character-defining features, and contributing resources should reinforce each other and tell a coherent story under the appropriate

themes of the nomination criteria. It is important to take a deeper look at the character-defining features of the park, especially the added 1920s-era Roosevelt and Lincoln statues which have now been removed.

- Are these statues appropriate as character-defining features, especially since they are not in the park, and also given the testimony regarding the intent of the donor of the statues? If so, the document must at least address the fact that the statues are gone (and why they are gone) and discuss why and by whom they were placed. Indeed, testimony received makes it clear that the statues are literally traumatic for some. It may be that there are locations in the park for public sculpture defined, but that the statues themselves do not necessarily have to occupy these places.
- Review the list of character defining features and omit items without more evidence. Make sure major defining features are defined, but perhaps omit the more granular items like material palette lists. Raised planting beds, walkways and their materials, much has changed over time. Perhaps better approached as a cultural landscape that has changed over time, with those essential features defined more broadly. For instance, a break in the ubiquitous 200 x 200 Portland grid is truly a character-defining feature of the park blocks. However, having “well-defined boundaries” seems less clear as (see boundary discussion) these boundaries have indeed changed relative to curblines.
- More rigor in how the character-defining elements are defined relative to the National Register criteria and period of significance is warranted. For instance, in terms of trees, what defines “historic trees”? Are they individually listed on heritage tree list, or in Phyllis Reynolds’ “Trees of Greater Portland”? Are the backless benches described in Block #4 truly character-defining? Some additional evidence could make the case, perhaps, but we recommend a study of seating and how it has changed over time to define what the essential qualities of seating were and are in the park.
- Was there lighting designed and installed in the park that is no longer present? Some description of this, if so, should be included.

Other Technical Details and Edits

- Page 5: Indicate that the park is a linear north-south contiguous open green space.
- Page 6: Under Character-Defining features the first bullet point has “Material Palette;” under this category there is “grass” which is a plant species, not a material. Grass probably does not belong here.
- Page 11- Paragraph 6: Explain ADA.
- Page 12, (top of page): when was the clock installed in the park?
- Page 13 (and other locations), “Victorian style” is not a style but an era.
- Page 18, Shemanski fountain- what is original date?
- Page 19: Alterations. The list of alterations includes in the first paragraph planting beds. Since these are also a character-defining feature, be specific about their location, type, etc.
- Page 20- Park Integrity: Incorporate language regarding cultural landscape here. There needs to be an analysis as explained above that indicates how integrity evolves as is understood in cultural landscapes.
- Page 25, eliminate question marks or rephrase
- Page 27: Footnote 77 and 81 is missing the publication year. Please add this.
- Page 28: After the first paragraph until the end of the page, the storyline is confusing. Please consider revising for clarity.
- Page 30: First line. We suggest indicating which European country Pfunder came from. This is explained later in the narrative, but it should be clear from the first mention.

- Page 31: Clarify why Holladay is the “first property purchased specifically for park purposes by the city government”, the narrative is leading the reader to understand that the park blocks were the first ones, clarify the difference.
- Page 36- third paragraph: the last sentence indicate that the authors assumptions need to be based in something, it is not clear what indicates that the axial and diagonal walkways were from this period. Is this evidence photographic? Please add notation or explanation.
- Page 42 – Fourth paragraph: for consistency refer to Louis Gustav Pfunder as Pfunder since that is how he has been referred to throughout the document. (Should read “Pfunder returned to Germany”).
- Page 49 – fourth paragraph: this information is repeated. No need to repeat citation and references.
- Page 46, elk statue needs to be discussed in terms of current condition/location
- Page 55: indicate that there is a National Register Nomination, since it is referred to in the bibliography.
- The Block by Block Detail figures are great; however, it does not credit the author of the drawings. And the boundary line is not graphically clear, not easy to read. Need to find a better way to represent such boundary.

The PHLC offers our support and help to the ongoing process and looks forward to considering a substantively revised nomination for the South Park Blocks that addresses the issues identified above.

Sincerely,



Kristen Minor, PHLC Chair



Maya Foty, PHLC Vice Chair



Matthew Roman, PHLC



Ernestina Fuenmayor, PHLC



Andrew Smith, PHLC