



South Park Blocks Master Plan

Upcoming Recommended Draft and National Register of Historic Places Nomination

Frequently Asked Questions - January 2021

1. Where is the South Park Blocks Master Plan?

Community and technical feedback on the Draft Preferred Design for the South Park Blocks has been used to guide revisions and produce a Recommended Draft of a Master Plan for the park. The project team would like to release the Recommended Draft to the public in the spring of 2021 before taking it to City Council for their review and acceptance by Council Resolution.

Park master plans are high-level, conceptual documents to guide more detailed design and construction processes that happen in the future when funding is available and system-wide priorities support moving forward with park improvements. Additional engagement with the community, stakeholders, and decision-makers will be part of these more detailed processes.

2. How will the park master plan and future implementation respect the historic character of the park?

Portland Parks & Recreation recognizes and respects the historic importance of the South Park Blocks. The consultant team for this project has expertise in historic cultural landscapes and performed initial research and documentation of significant historic features was done through an [Existing Conditions, Issues, and Opportunities Report](#). Following European settlement, the South Park Blocks were conceived, designed, and developed over many decades. They have been shaped and changed over time, so a rehabilitation approach is most appropriate. Significant historic features include the park's spatial organization of linked gathering areas with focal points, the linear arrangement of trees, the linear, promenade-style pathways, and the use of planting beds and turf areas to reinforce this linear movement.

In accordance with the Secretary of the Interior's Rehabilitation Guidelines, the South Park Blocks Master Plan proposals aim to highlight these resources and guide new park develop-



ment to be compatible, yet distinct from what is historic. The approaches included in the master plan would retain recognizable characteristics of the original and existing design as the future park improvements are designed and implemented. The master plan also highlights the significant history and continued contributions to the land Indigenous groups have made since time immemorial.

3. What does Rehabilitation mean?

Rehabilitation is one of four federally recognized treatment approaches (preservation, rehabilitation, restoration, reconstruction) for cultural landscapes and is the approach selected by the master plan for the South Park Blocks. Rehabilitation treatment for a landscape recommends some change to accommodate contemporary uses and needs. A rehabilitation approach for properties listed in the National Register of Historic Places (NRHP) is defined as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.”¹

4. What is a cultural landscape and what makes preserving them different than buildings?

Cultural landscapes are historically significant places that show evidence of human interaction with the physical environment. Their authenticity is measured by historical integrity, or the presence and condition of physical characteristics that remain from the historic period.² The South Park Blocks are considered a cultural landscape. Landscapes are living and changing; therefore, protection and management of ecological, historic, and cultural resources must be considered together.

For example, trees in the South Park Blocks are important historic, cultural and ecological resources. Preserving the continuous tree canopy as a significant historic feature requires new approaches that respond to changing growing conditions and promote tree health into the future. The South Park Blocks Master Plan balances these historic, cultural and ecological considerations.

Additionally, cultural landscapes have a history made up of many different perspectives and experiences and are not defined by a single period of significance. Publicly owned landscapes present a shared responsibility to acknowledge and reconcile these realities.

¹ A Guide to Cultural Landscape Reports: Contents, Process and Techniques, National Park Service, U.S. Department of the Interior, Washington, DC, 1998.

² <https://www.nps.gov/articles/cultural-landscapes-101.htm>



5. How is Portland Parks & Recreation coordinating with historic preservation agencies during the planning and future implementation process?

Project staff met with a Review and Compliance Specialist and the National Register Coordinator for the Oregon State Historic Preservation Office (SHPO) in the fall of 2019 and again in the spring of 2020. The SHPO representatives remain supportive of the South Park Blocks Master Plan approach and have shared information about the [ORS 358.653 compliance process](#). Oregon SHPO has asked that this compliance process be engaged when specific tangible implementation work is funded and goes through more detailed design and construction. This process facilitates compliance of projects for historic resources that are either eligible for listing or already listed in the National Register. The South Park Blocks were previously determined to be eligible. During the compliance process, SHPO will review and consider options to minimize adverse effects to the park. Oregon SHPO, the City's Historic Program Manager, and the expert consultant team agree that the master plan can coexist with the 358.653 compliance process and a future listing of the South Park Blocks on the National Register.

6. What Is the National Register of Historic Places and how does it relate to the South Park Blocks?

The South Park Blocks are considered eligible for the National Register of Historic Places. The National Register of Historic Places is the official list of historic places considered worthy of preservation in the country. Cities in Oregon are required to protect National Register Resources by review of demolition or relocation proposals that includes, at minimum, a public hearing process. At the time of such a hearing, the Portland City Council and/or the Portland Historic Landmarks Commission would hear public testimony and consider the following factors: condition, historic integrity, age, historic significance, value to the community, economic consequences, design or construction rarity, and consistency with and consideration of other policy objectives in the comprehensive plan.

7. Will a National Register of Historic Places nomination for the South Park Blocks prevent implementation of the South Park Blocks Master Plan?

Regardless of what is included in the National Register nomination itself, South Park Blocks Master Plan proposals follow the Secretary of the Interior's Rehabilitation Guidelines. De-



pending on how the nomination is written, the process and cost of implementation of the master plan may be lengthened or increased due to the application of demolition review. Once a National Register of Historic Places nomination results in listing:

- Loss of identified contributing resources are subject to demolition review through a Type IV review that goes to City Council as a decision maker. Upcoming Historic Resource Zoning Code changes may make the Historic Landmarks Commission the review body with decisions appealable to City Council. The City retains the authority to approve demolition of contributing resources, subject to the demolition review process and criteria.
- Significant changes to identified character-defining features may require mitigation through the [ORS 358.653 compliance process](#). Any required mitigation would be arranged with the Oregon State Historic Preservation Office (SHPO), like the required process even if a nomination was not in place.

8. Does Portland Parks & Recreation support a National Register of Historic Places nomination for the South Park Blocks?

Portland Parks & Recreation supports historic designations of our properties that are consistent with plans for those properties, and that do not unduly prohibit the City from meeting other important parks and recreation goals in the design and renovation of parks. The Central City 2035 Plan (adopted by City Council in 2018) includes an action item to obtain a historic designation for the South Park Blocks by 2023 to be implemented by Portland Parks & Recreation and/or private partners. It is important that related documentation is complete, accurate, and inclusive.

National Register of Historic Places nominations often represent one significant story from history, excluding stories that are not perceived to be aligned with the area, time period, or features of significance described in the nomination. The significant relationships to historically marginalized or underrepresented communities are often overlooked. The narrative of the current nomination should be improved to be more inclusive of Black, Indigenous, and other underrepresented stories connected to the South Park Blocks.

Reviews at the local, state, and national levels allow for comments to be submitted on the merits of the nomination and areas for improvement prior to formal listing. Portland Parks &



Recreation will submit letters to the Historic Landmarks Commission and State Advisory Committee on Historic Preservation outlining opportunities for improvement of the current nomination. These opportunities for improvement include incorporating input from the Indigenous community and other Portlanders who have not yet been engaged in the nomination process.

Through the community engagement process for the South Park Blocks Master Plan, Portland Parks & Recreation has heard from a diversity of park users and Portland community members to better understand their contemporary uses and needs. The park master plan aims to balance these park needs with respecting historic resources and considering ecological needs of natural resources. The South Park Blocks Master Plan provides comprehensive guidance for the park's future and gives Portlanders the opportunity to revisit how public spaces and public art represent our communities and reflect our values.

9. What are next steps?

You can download a copy of the submitted National Register of Historic Places nomination for the South Park Blocks at the Oregon SHPO website: <https://www.oregon.gov/oprd/OH/Pages/Commissions.aspx#SACHP>

The local Portland Historic Landmarks Commission will review and discuss the nomination at their [February 8, 2021 Zoom meeting](#). Written and/or verbal public testimony about the nomination is accepted.

Written testimony can be shared up until the hearing by emailing hillary.adam@portlandoregon.gov. Written testimony can be made by individuals or groups and typically includes an introduction of the individual or group and an overview of reasons for support or non-support.

Verbal testimony can be shared at the meeting but individuals who want to provide verbal testimony for themselves or on behalf of a group must register for the hearing using this [link](#). Each testifier is typically allowed 2-3 minutes depending on the volume of testifiers.

The State Advisory Committee on Historic Preservation will review and discuss the nomination at their [February 19, 2021 Zoom meeting](#). Written and/or verbal public comments about the nomination are accepted.

Written comments may be submitted either electronically to ORSHPO.NationalRegisterProgram@oregon.gov or by mail to Robert Olguin at 725 Summer St. NE, Suite C, Salem, Oregon 97301.



Written comments should be submitted ahead of the February 19 meeting date to be considered by the State Advisory Committee, but written testimony can be shared up until the National Park Service makes a final decision. Written testimony can be made by individuals or groups and typically includes an introduction of the individual or group and an overview of reasons for support or non-support.

Verbal testimony by an individual or group can be shared at the virtual [meeting](#). The chair will call for public comment on each nomination ahead of their discussion. If you want to provide verbal testimony, please share your intention via email to ORSHPO.NationalRegisterProgram@oregon.gov

If you decide to speak up on the day of the meeting, please log into the meeting using the links above and indicate in the chat box that you would like to speak when the chair opens the floor to the public for comments.