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DoCoMoMo U.S./Oregon Chapter Portland, OR www.docomomo-oregon.org

June 15, 2017

Hillary Adam Bureau of Development Services 1900 SW 4th Ave, Suite 5000 Portland, OR 97201

Comments on Portland Building - LU 17-153413 HRM AD

Dear Ms. Adam and members of the Portland Historic Landmarks Commission,

The Portland Public Service Building (Portland Building) is one of the most iconic and historically significant cultural resources in the City of Portland. Internationally recognized for its architectural design, the building was listed in the National Register of Historic Places in 2011. "The Portland Building," states the National Register nomination form, "is notable as the first major Post-Modern work to be completed, instantly making it an icon of a movement." While the building is controversial even to this day, "whether or not one judges the building to be beautiful or even to have fulfilled Graves's ideas about being humanist in nature, it is undeniably important in the history of American architecture" (National Register nomination form 2011).

Given the building's historic significance, it is critical that the renovation be conducted with the highest standard of care. Docomomo Oregon fully supports the City Council's decision to complete a full renovation rather than a demolition. We have concerns, however, about certain aspects of the proposed renovation. These issues should be resolved as part of the Historic Resource Review process to enable the building to retain the required level of historic integrity to remain listed on the National Register.

The approval criteria for alterations in Portland Zoning Code, Section 33.846.060.G are consistent with the national best practice for historic building alterations. The following select criteria provide a sound approach to proposed renovations (author's emphasis in **bold**):

2. Record of its time. The historic resource will remain a physical record of its time, place, and use. Changes that **create a false sense of historic development, such as adding conjectural** *features* or architectural elements from other buildings will be avoided;

3. Historic changes. Most properties change over time. Those changes **that have acquired** *historic significance will be preserved*;

4. Historic features. Generally, deteriorated historic features will be repaired rather than replaced. Where the **severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and other visual qualities and, where practical, in materials**. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence;

...

7. Differentiate new from old. New additions, **exterior alterations**, or related new construction **will not destroy historic materials that characterize a property**. New work will be differentiated from the old;

Based on the above approval criteria, Docomomo Oregon has the following concerns:

Rainscreen Cladding. A concrete structural frame as the primary weather barrier presents challenges for tall, multi-story buildings, such as the Portland Building. Nonetheless, we encourage the Commission and the Applicants to develop solutions to these difficulties that permit the Portland Building to maintain its character-defining painted concrete frame. The extra depth required for the proposed rainscreen cladding will sufficiently alter the building's proportions to diminish its integrity of design and materials. The Commission recently approved replacement windows at the Vista St. Clair, a building of a similar height, also with a concrete wall as its exterior skin.

If the Commission ultimately approves the rainscreen cladding, we request reconsideration of the proposed aluminum panels. Converting the exterior skin from concrete to metal will significantly diminish the building's integrity of design, materials and workmanship. The applicant relies on Lever House as precedent for completely replacing a building's exterior cladding. In that project SOM collaborated with the curtain wall fabricator to develop a new profile that closely resembled the original profile (see attached details, which were approved by the New York City Landmarks Preservation Commission). Pursuant to Section 33.846.060.G.4 provisions enumerated above, the Applicant should use the same level of care for the Portland Building. Should the Commission approve a rainscreen, the new rainscreen material should closely resemble painted concrete, the original material. Suitable options include precast concrete, a ventilated stucco system, or a high quality fiber cement panel system.

Furthermore, the depth of the rainscreen should be minimized. The details in the attached package indicate an additional depth of up to 11-1/2" on each face of the building. The thickness appears to act, in part, as insulation. While it is important to enhance a building's energy efficiency, there are alternatives that would better preserve the Portland Building's historic integrity, such as installing insulation on the wall's interior side.

Terracotta Tiles at Base. Doubling the existing tile size in height and width disregards the approval criteria, which require new materials to "match the old in design, color, texture, and other visual qualities". Installing tile that is twice as large as the original tile will substantially diminish the integrity of materials and design. It will also impact the building's appearance at the sidewalk level, where most people experience the building. The use of the larger module tile would also preclude restoring the original orange tiles above the east elevation's first floor windows. While the original architect's office notes that the original tile size was based on budgetary considerations, the original tile is part of the

building's history and remains a character-defining feature. Replacing the original tile with a different module on this basis risks "adding conjectural features", which the code discourages.

Infill at Parking Entry (East Elevation). Infilling the parking entry, as proposed, will create a much more active and engaging face to the building on the park side. However the double height window significantly changes the expression on SW 4th Ave. While this may have precedent in earlier iterations of the building's design, it again imposes another conjectural feature. The best practice would maintain the existing rough opening, and infill it with glass to enable future scholars, community members, and visitors to read the elevation as it was constructed.

Infill at Loggias. The loggias were part of the 1979 competition brief, and represent the era's urban design philosophy. Portland's renowned 1972 Downtown Plan included goals that call for "a system of pedestrian ways which... creates a pleasant shopping environment in the retail core, utilizing widened and covered walkways." The Downtown Plan is widely regarded as the impetus for Portland's urban renaissance, and as such we must preserve its material legacy. Although the loggias were not successfully executed, and the Applicant's proposal to partially enclose them will improve the building's ground level, the renovation should enable viewers to determine where the loggias were originally located. Pursuant to Section 33.846.060.G.7, the infill should be subtly differentiated. In particular, at the north elevation, the teal colored tile should not extend through the opening..

Rootop Mechanical Equipment. The existing penthouse at the roof is part of a carefully considered and highly symmetrical composition. The proposed mechanical equipment will disrupt the composition. While the sightline studies demonstrate that the proposed equipment will not be visible from the streets immediately adjacent to the building, the equipment will still be visible from greater distances, such as viewpoints at the transit mall. Every effort should be taken to minimize the impact of new mechanical equipment, including locating equipment within the building envelope.

Lobbies and interior spaces. While recognizing that the Commission does not have jurisdiction over interior spaces, the applicants should still seek to preserve the ground floor lobby and the second floor public spaces, which were designed by Graves and noted in the National Register nomination. Other portions of the interior, designed by ZGF Architects, may have acquired their own significance. A survey of interior features should be performed to determine which features retain historic significance.

In conclusion, Docomomo Oregon generally supports the Portland Building renovation. With the careful review by the Portland Historic Landmarks Commission, we are confident that the renovation can successfully move forward, and that Portland's most (in)famous building can retain its historic integrity. We look forward to the renovation, so that the Portland Building can be truly loved and hated in equal measure for generations to come.

Signed,

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Iain MacKenzie, AIA DoCoMoMo Oregon Vice President

About DoCoMoMo:

DoCoMoMo stands for the *DO*cumentation and *CO*nservation of buildings, sites and neighborhoods of the *MO*dern *MO*vement. DoCoMoMo U.S./Oregon Chapter is a regional chapter of an international organization called DoCoMoMo International, which promotes the study, interpretation and protection of the architecture, landscape and urban design of the Modern Movement.



