



August 3, 2016

Design Commission  
City of Portland  
1900 SW. Fourth Avenue, Ste. 5000  
Portland, OR 97201

**RE: 915 SW 2<sup>nd</sup> Ave., 902-912 SW 3<sup>rd</sup> Ave.  
LU 16-163126 DZM AD  
PC # 15-221480**

Dear Commissioners,

Restore Oregon is a statewide historic preservation non-profit representing thousands of local supporters working to protect and restore the historic places that make our city like no place else. Restore Oregon urges you to deny the applicant's request for design approval of the above-referenced project which will result in the demolition of the Ancient Order of United Workmen Temple and cause significant negative impacts to the adjacent Auditorium Building.

As stated in Section 33.825.010 of the city code, the City of Portland and its Design Commission should act to "ensure the conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values" of the city. Furthermore, it's goal is to guarantee "that certain types of infill development will be compatible with the neighborhood and enhance the area." As proposed, this project will neither ensure the conservation, enhancement, and vitality of the city's identified architectural values, nor will it enhance the area. We take the word "enhance" to imply an improvement upon that which was there before. **In no way is the design proposed an improvement over a restored Workmen Temple Building.**

Equally important to this review should be the application's adherence to the Central City Plan Design Goals. The second of these goals requires projects to "integrate urban design and preservation of our heritage into the development process." No attempt by the applicant has been made to preserve the heritage of Portland, but the demolition will instead significantly degrade it.

The United Workmen Temple is a significant landmark in Portland's downtown core. It is eligible for listing in the National Register of Historic Places and tells an important story of those who *literally* built this city. Restore Oregon strongly opposes its demolition, which will have the dubious distinction of being **the most significant loss to Portland's historic architectural fabric in over a decade** – one that absolutely could have been averted had the development team truly wanted to do so.

Having exhausted any means by which to stop this, we aver that the structure which replaces it should be significantly better than what was lost. If you are demolishing a landmark, what replaces it should be of extraordinary architectural caliber and advance the city's goals of increased density, affordability, and sustainability. This proposed project will accomplish none of these goals in any meaningful way. To lose such a significant asset which stands at 6-stories, and replace it with an utterly unremarkable design that stands at 10 stories, is an unacceptable trade-off.

Furthermore, this application does nothing to address the need for affordable housing in a city plagued with a demonstrable shortage. **It should be noted for the record that the development firm of IHI believes a rehab of the Workmen Temple as affordable housing, using typical subsidy sources, is an economically viable option.**

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Finally, the proposed demolition is grossly wasteful and will unnecessarily add to the landfill of a city which prides itself on sustainability. The embodied energy in the Workmen Temple will take decades to recoup.

The Design Commission must also take into consideration **the negative impact of this project on the historic Auditorium Building** which sits adjacent to the proposed construction. Built in 1894 this brick and terra cotta Richardsonian Romanesque structure is listed in the National Register. Every attempt should be made to retain, protect, and preserve the qualities which make the Auditorium Building significant. As proposed, **the applicant's project will disrespect this historic structure and locate a loading dock and mechanical systems immediately adjacent.**

In addition to the overarching lack of compliance with the stated purpose of design review and the Central City Plan Design Goals as noted above, Restore Oregon would like to draw the commission's attention to the application's following discrepancies with the city's Design Review ordinance guidelines:

**Guideline A6. Reuse/Rehabilitate/Restore Buildings.** Where practical, reuse, rehabilitate, and restore buildings and/or building elements.

The applicant makes no effort to reuse, rehabilitate, or restore the Workmen Temple. Creative, practical funding opportunities exist to incentivize the reuse of National Register-eligible properties. Historic Preservation and other tax Incentives, the Special Assessment program, and a façade easement donation could all be leveraged to fund rehabilitation. At the least, of course, a thorough plan for deconstruction and salvage of the structure must be implemented. *The applicant has not met Guideline A6.*

**Guideline A8. Contribute to a Vibrant Streetscape.** Integrate building setbacks with adjacent sidewalks to increase the space for potential public use. Develop visual and physical connections into buildings' active interior spaces from adjacent sidewalks. Use architectural elements such as atriums, grand entries and large ground-level windows to reveal important interior spaces and activities.

**Guideline B2. Protect the Pedestrian.** Protect the pedestrian environment from vehicular movement. Develop integrated identification, sign, and sidewalk-oriented night-lighting systems that offer safety, interest, and diversity to the pedestrian. Incorporate building equipment, mechanical exhaust routing systems, and/or service areas in a manner that does not detract from the pedestrian environment.

**In the siting of its loading space and the large louver above that loading bay, the project directly violates the vibrant streetscape and detracts from the pedestrian environment provided by the historic Auditorium Building immediately adjacent.** As proposed, the dimensions of this unattractive utilitarian feature are comparable in size to approximately a quarter of the street-facing façade of the Auditorium Building. Furthermore, this large loading bay and mechanical system will immediately abut the main entrance of the historic landmark. These uninviting features should be located far from the Auditorium Building and its entrance. **This application architecturally abuses what will be the only historically significant building remaining on the block, and the pedestrians and members of the public which appreciate it.** *The applicant has not met Guidelines A8 or B2.*

The application before the commission fails to achieve the justifiably high standards of the City of Portland and its Design Commission. It neither meets the central tenants which underpin design review in Portland nor does it attain compliance with specific Design Review ordinance guidelines. Restore Oregon, on behalf of its thousands of supporters around the state urge you to deny the applicant's request for design approval. The Workmen Temple, Auditorium Building, and the City of Portland deserve better.

Sincerely,



Peggy Moretti  
Executive Director