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July 3, 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,

I am writing on behalf of Docomomo US to share our interest in and concern for the planned renovation of the Portland Public Service Building (Portland Building) designed by Michael Graves in 1982 and placed on the National Register of Historic Places in 2011. The Portland Building with its expressive applied ornamentation, colors and tile work is one of the most iconic and historically significant example of Post-Modernism in the United States. While our chapter Docomomo US/Oregon has been speaking out on behalf of this project and proposed changes, as a national organization we wanted to add our voice and emphasize the national and global significance of this building and express that opinion on behalf of all our worldwide Docomomo International members and affiliates.

Docomomo US is concerned with the plans that intends – deliberately – to cover the original materials and in turn replicate, more or less, the original design of the Portland Building. The proposal erroneously states that these interventions are an appropriate ‘reconstruction’ treatment that meet the Secretary of the Interior Standards for Historic Properties. To the contrary, the proposed over-cladding stands in direct contrast to the Standards, specifically Standard Four, which states:

Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.

The current proposal does not replicate an appearance that is non-surviving (it still exists) nor does it accurately duplicate the features and elements of the historic building. Instead it changes every aspect of the original building: its profile, pattern, and material. As noted in the proposal, small changes to the original design are proposed and considered minimal impact to the integrity of the building. But when considering the totality of the changes, these small changes create significant impacts on the holistic integrity. In essence, this is a new façade for the building

and it does not replicate, but instead reinterprets the historic. While this is being touted by some as “new preservation”, the proposed methodology is creating a significant precedent that will suggest to others inaccurately how future projects could approach the Standards, eroding the importance of historic materials when considering historic integrity. This is extremely concerning and should give the Portland Historic Landmarks Commission great pause before moving forward with this proposal.

The proposed “reconstruction” of the Portland Building will have far-reaching implications for other buildings within the coming decades. Docomomo US believes a better solution can be found to retain the character defining features while addressing the maintenance, water-infiltration and quality of life issues that currently exist at the Portland Building.

Docomomo US is the United States chapter of Docomomo International, a non-profit organization dedicated to the documentation and conservation of buildings, sites and neighborhoods of the modern movement for nearly 25 years. Docomomo International, founded in 1988 in The Netherlands, now has national chapters in 69 countries and a membership of thousands of individuals. It is an important presence in conservation and in architectural culture, worldwide, working in partnership with other international organizations, national governments, and regional and national associations. Committed to the principle that modern design merits the attention and preservation received by earlier periods, we maintain a continuous and constructive dialogue with national, state, and local preservation authorities and organizations as well as with building owners, developers, and designers in many disciplines. Our discussions with designing architects are based on the conviction that creative design and preservation go hand in hand.

We hope our voice and the voice of other concerned stakeholders provides you with enough information to take a second look at the renovation plans and determine a better solution can be found so that the Portland Building can be viewed as it was intended but also enjoyed by its occupants and our collective community.

We appreciate your time and consideration of our comments and please let us know if we can be of any assistance.

Sincerely,



Theodore H. M. Prudon FAIA FAPT  
President, Docomomo US  
Member, Advisory Board, Docomomo International, Lisbon