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MEMORANDUM

April 9, 2015

To: Mayor Hales
Commissioner Fish
Commissioner Fritz
Commissioner Novick
Commissioner Saltzman

From: Teresa Elliott, PE 
Principal Engineer

Subject: LU 14-249689 Council Hearing 4/23/15
Washington Park Reservoir Improvements Project

On March 30, 2015 the Historic Landmarks Commission considered public testimony prior to making its recommendation to support PWB's demolition request (LU 14-249689). This request is based on implementation of the Design Concept (the proposed historic preservation and redevelopment plan) as explained in the application. We would like to clarify the Portland Water Bureau's (PWB) position on a few of the issues raised at the hearing.

First, a new below-ground reservoir is needed to replace Reservoirs 3 and 4. This reservoir will continue to meet the needs of our west side customers for the foreseeable future. Both reservoirs will be taken out of service for the new construction; the reservoirs are currently empty because we are determining how the water system will respond when the reservoirs are taken off-line for construction. The new below-ground reservoir is essential to ensure that our users have reliable water supply during periods of high demand, such as hot weather, for emergency fire suppression purposes, or in emergency situations when other reservoirs may not be fully operational (e.g.,

landslides, wildfires or earthquakes). During normal operations we think we can supply our customer needs through the pipelines. However, we don't know when an emergency will occur so west side storage is essential for the City's livability.

Second, we are committed to carrying out landslide mitigation measures that will substantially reduce the risks to the water system, historic resources, and recreational amenities in the Washington Park Reservoirs Historic District. As documented extensively in our written application, the reservoirs have been subjected to ongoing damage from landslide activity since they were constructed in 1894. Although PWB has taken steps to reduce the pace of earth movement, water system infrastructure will continue to be damaged as the slide continues to move downhill. As explained in Section 1-3 of the application, this project includes extensive geotechnical engineering to substantially reduce the risks to critical water infrastructure and to the new reflecting pools that will replace the historic open water function of the demolished reservoirs.

Of equal importance, these measures will substantially reduce risks from a major earthquake. Although the 1894 reservoir design was highly advanced for its period, the reservoirs were not designed to withstand a major earthquake and certainly do not meet today's seismic codes. The reservoirs are likely to experience severe damage during a large seismic event and are not expected to be available for the City's recovery. If the reservoirs were to remain open and filled with water, an earthquake could trigger a major slide that would cause severe damage to the reservoirs and potentially to downstream homes and businesses.

Third, as documented in Section 1-4 of the application, we have supported an extensive public involvement process since the project began in 2013. We have held three public open houses, convened and met with the Community Sounding Board nine times, met with the American Institute of Architects (AIA) Portland Historic Resources Committee four times, held public meetings before the Historic Landmarks Commission five times, and met with nearby neighborhood associations on multiple occasions. We have also made extensive use of social media. The attached communications report provides additional documentation of PWB's public involvement and outreach efforts.

Fourth, we are committed to maintaining the new water infrastructure, historic structures and new surface water features within the Historic District. The new infrastructure will be less expensive to maintain, because it will be less susceptible to earthquake and landslide damage, and it will be newer. However, as with any public entity, we cannot

guarantee that future City Councils will fully fund maintenance activities in the face of other budgetary demands.

Fifth, we are committed to minimizing construction impacts to our neighbors. We have been and will continue to work with the contractor, design team, Portland Parks and Recreation, Washington Park Transportation Management Association, Community Sounding Board and Neighborhood Associations to minimize the effects of construction on the public during construction. There will be no permanent traffic impacts on the neighbors. The Type 3 Land Use addresses construction management practices, traffic control, etc. However, construction impacts are not part of the Type 4 demolition review.

Sixth, opponents to the proposed demolition cited two comprehensive plan goals that they felt were not met and which were not specifically addressed in the application because we had determined they were not directly applicable – Goal 1 Metropolitan Coordination and Goal 2 Urban Development. To the extent that these goals and related policies may be applicable, we offer the following findings:

- **Goal 1 Metropolitan Coordination** requires that the Comprehensive Plan be coordinated with federal and state law and support regional goals, objectives and plans adopted by Metro. Goal 1 is not intended to provide policy direction when making quasi-judicial land use decisions. In any case, PWB has coordinated extensively with the Oregon Health Authority and the U.S. Environmental Protection Agency in making the decision to cover open reservoirs to address state and federal regulatory requirements. PWB has also coordinated with the State Historic Preservation Office in developing a “memorandum of agreement” to implement additional mitigation measures to restore the historic character of the Washington Park Reservoirs Historic District. To the extent that Goal 1 is applicable, demolition of the reservoir basins and replacement with a new, below-ground reservoir and surface water features has been coordinated with relevant state and federal agencies and supports the goal of intergovernmental coordination.
- **Goal 2 Urban Development** is to “Maintain Portland’s role as a major regional employment, population and cultural center through public policies that encourage expanded opportunity for housing and jobs, while retaining the character of established residential neighborhoods and business centers.” To the extent that Goal 2 is applicable, the new below-ground reservoir will support planned employment and population growth by providing critical infrastructure. **Goal 2, Policy 2.6 Open Space** directs the city to provide opportunities for

recreation and visual relief by preserving Portland's parks and trails; by establishing a loop trail that encircles the city; and by promoting recreational use of the city's lakes. Policy 2.6 overlaps with other comprehensive plan goals and policies that are addressed in Section 2-3 of the application (e.g., Goal 11 Parks and Recreation, Policy 11.39 Maintenance, Goal 12 Urban Design, and Policies 12.1 Portland's Character, 12.5 Pathways and 12.4 Provide for Pedestrians). The Design Proposal supports Policy 2.6 by (1) replacing the existing reservoirs with new reflecting pools and rehabilitating historic structures that offer visual relief from nearby developed areas; and (2) restoring pathways that provide access to the entire Historic District during regular park hours and connect with the Washington Park trails and the 40-Mile Loop Trail.

Finally, PWB has made substantial investments in the Washington Park reservoir system since construction in 1894. As noted in Appendix C, PWB has repaired and modified the reservoirs a number of times responding to landslide movement and aging infrastructure. More recently, in 2008-2010, PWB addressed a number of deferred maintenance activities above and beyond our annual reservoir maintenance program.

As documented in Section 1-4.5 and 2-3.3 (which address to historic preservation and redevelopment plan), we are committed to restoring the eight remaining contributing historic resources in the Historic District, constructing new surface water features, and opening up the entire District to the public upon completion of the project. The Design Proposal resulted from an extensive public outreach program and the design advice provided by the Historic Landmarks Commission, the State Historic Preservation Office, the AIA Portland Historic Resources Committee, and Portland Parks and Recreation.

We appreciate the opportunity to present our views and look forward to responding to any further questions you may have at your April 23, 2015 public hearing.

Attachments: Communications Report
Hearing Packet