



**TO:** Elizabeth Pauli, Interim City Manager  
**FROM:** Peter Huffman, Planning and Development Services Department  
**COPY:** Infrastructure, Planning and Sustainability Committee  
**SUBJECT:** Nomination of the Cushman and Adams Street Substations to the Tacoma Register of Historic Places  
**DATE:** April 17, 2017

**SUMMARY:**

On April 17, 2017, staff will present a recommendation by the Landmarks Preservation Commission to designate the Cushman and Adams Street Substations (3713 N 19<sup>th</sup> and 1920 N Adams Streets) as City Landmarks. The properties are owned and used by Tacoma Public Utilities (TPU).

The Commission recommendation for designation includes the exteriors of both substation buildings, the surrounding sites, a solitary lattice transmission tower on the Adams Substation property, and the interior of the “condenser room” within the Cushman Substation building.

This nomination is being presented to the Infrastructure, Planning and Sustainability Committee because the Landmarks Commission recommendation differs somewhat from the staff recommendation to the Commission, and from the stated position of TPU. Due to this, and because of the high level of public interest in this nomination, a recommendation to the full Council from the Infrastructure, Planning and Sustainability Committee is being sought. Council’s authority over and its process related to these nominations is contained in TMC 13.07.050 D.

**BACKGROUND:**

The Cushman and Adams Street Substations were nominated to the Tacoma Register of Historic Places by a private citizen. As originally submitted, the nomination included the substation buildings, including the interior of the Cushman Substation condenser room, the site surrounding both buildings, and the lattice transmission towers located in the center of North 21<sup>st</sup> Street that run from the substations to North Highland Street (approximately 1.5 miles to the west). The Cushman Substation property and the transmission line were previously added to the National Register of Historic Places in 2016.

The Cushman and Adams Street Substations are of primary historical significance to Tacoma. The complex is significant for its association with the region’s growth as a result of hydroelectric power production and as an excellent example of monumental, neoclassical revival style architecture. The Cushman Substation is a visual statement as to the importance of the city’s municipal hydroelectric system.

The Commission first reviewed the nomination on December 14, 2016, at which time, it voted to exclude the transmission towers within North 21<sup>st</sup> Street from further consideration. The Commission held a public hearing on the nomination of the remaining elements, which included one remaining lattice transmission tower located adjacent to the Adams Street Substation, on February 8, 2017.

**ISSUE:**

While all parties and nearly all public comment generally supports the designation of the properties to the Tacoma Register of Historic Places, there is disagreement regarding which elements of the nomination should be included in the final designation.

The primary issue is whether the interior of the condenser room within the Cushman Substation should be included in the historic designation. Staff recommended against its inclusion, while the Landmarks Preservation Commission recommends that it be included.

The Commission reviewed the testimony and Staff Recommendation on February 22, 2017. Staff recommended designation of the following elements of the properties:

1. The exteriors of both substation buildings
2. The sites surrounding both buildings (not including the non-historic electrical switchyard equipment)
3. The solitary transmission tower adjacent to the Adams Substation (which would serve as an interpretive remnant of the original transmission line, and could be relocated elsewhere on the site if needed)

TPU has indicated that, while generally supportive of the historic designation of the Adams and Cushman Substations, they oppose including the switchyards (primarily the electrical equipment), the interiors of both buildings, and the remaining lattice tower adjacent to the Adams Substation. TPU asserted that the interior space of the Cushman building does not meet the requirements for historic designation based on the Tacoma Municipal Code and should not be considered historically contributing due to alterations. Regarding the tower, TPU indicated that retaining the one lattice tower in its current location would negatively impact the North 21<sup>st</sup> transmission line upgrade project due to clearance requirements. However, if necessary, the lattice tower could be relocated and preserved on the property.

Staff recommended exclusion of the interior of the condenser room, even though it is a historically significant space, for two reasons. The first is that very few interior spaces are regulated by the Landmarks Commission (the exceptions being frequently used and highly accessible public spaces such as the lobbies of the Municipal Building, and the auditorium of the Pantages Theater). The second reason is that staff's interpretation of the code is that the condenser room does not meet the definition of a "significant interior feature." Although the code makes it clear that interior spaces in public buildings can be historically designated, the definitions section limits those spaces to those areas accessible to the public:

**TMC 13.07.030 Definitions**

*"Significant interior features"* means architectural features, spaces, and ornamentations which are specifically identified in the landmark nomination and which are located in public areas of buildings such as lobbies, corridors, or other assembly spaces.

**TMC 13.07.050 Tacoma Register of Historic Places – Nomination and designation process for individual properties [under nomination requirements]**

...

c. Specific language indicating which improvements on the site are included in the nomination, *including any significant interior spaces* within publicly owned buildings...



The author of the nomination stated that the condenser room should be considered a public space, because it had been open to the public in the past for tours, and because there is a viewing platform in the room that clearly suggests that it was designed to be a public space. TPU stated that the space is secure and used for storage, and is not open to the public.

The Commission subsequently voted to include the “condenser room” in their recommendation to City Council, as it is a character-defining space within the building, and that it could be interpreted to be a public space based on past activities such as tours, and it could be made publicly accessible in the future.

Most recently, a review of the above code sections by the City Legal Department concluded that, because the condenser room is not located in the public area of a public building, and was not historically utilized as a space for public gathering or assembly, it is not appropriate for inclusion in the Tacoma Register of Historic Places.

#### **ALTERNATIVES:**

The recommended nominations of the Cushman and Adams Street Substations could be rejected for listing on the Tacoma Register of Historic Places by Council under TMC 13.07.050 D, which would leave these properties unprotected from inappropriate future alterations or even demolition.

The Council could also accept the recommendation to designate but in Council’s designating resolution under TMC 13.07.050 D.2.c remove any individual element from the nomination, including the condenser room, the surrounding site, or the lattice tower. This action would limit the Landmarks Commission’s oversight over the property to only those elements specified in the resolution.

#### **FISCAL IMPACT:**

There is no direct fiscal impact that results from designation to the Tacoma Register of Historic Places. Design review can potentially increase the cost of future alterations. A property’s status as a City Landmark can increase the potential for adaptive reuse due to the special Historic Conditional Use Permit process.

#### **RECOMMENDATION:**

The Landmarks Preservation Commission recommends the designation of the Cushman and Adams Street Substations, including:

1. The exteriors of both substation buildings
2. The interior of the “condenser room” of the Cushman Street Substation
3. The sites surrounding both buildings (not including the non-historic electrical switchyard equipment)
4. The solitary transmission tower adjacent to the Adams Substation (which would serve as a remnant of the original transmission line, and could be relocated to elsewhere on the site if needed)

Staff concurs with the recommendation of the Landmarks Commission, with the exception of the interior condenser room in the Cushman Substation, which is recommended to be removed from the designating resolution.