



Interim City Manager, Elizabeth Pauli
Infrastructure, Planning and Sustainability Committee

April 3, 2017

Dear City Manager Pauli and Chair IPS, Councilman Ryan Mello:

Subject: Opinion regarding Cushman Substation, Condenser room & Tower 1

The North End Neighborhood Council and the Historic Preservation Commission have both supported the nomination of the Cushman Substation to the City's Register of Historic Places including certain interior spaces of the building.

There has been no opposition to the addition of the structure itself to the Register but concerns have been raised with respect to certain features included in the application for listing, specifically the interior space identified as the "condenser room" and the retention and location of a single transmission tower.

TPU, and City staff disagrees that the interior of the Cushman building should be preserved and have argued that the language in the Tacoma Municipal Code (TMC) does not provide for the inclusion of interior spaces unless such spaces are, or have been open to public.

It appears that in their analysis of the TMC they have inappropriately conflated the definition of "property" with that of "significant interior features" while omitting consideration of a requirement for nomination found in 137.07.050 A.2.c. TMC section 13.07.050 Tacoma Register of Historic Places provides that:

1. Any resident of Tacoma or City official, including members of the City Council, City staff, or members of the Planning Commission, may request consideration by the Landmarks Preservation Commission of

any particular property for placement on the Tacoma Register of Historical Places. (emphasis added).

The definition of "Property" means any building, object, site, structure, improvement, public amenity, space, streetscapes and rights-of-way, or area." (TMC 13.07.030)

Additionally, section 13.07.050 (c) states that the nomination for a site include;

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

Inclusion of the term "significant interior spaces," which is not otherwise defined in Chapter 13, clearly indicates the intent that such spaces are to be part of the application and, where present, are an essential part of the historic property. There is no requirement that such a "significant interior space" having been open to the public.

The exclusion of such space from inclusion in the nomination because of the possible effect it might have in the future use of the historic structure is contrary to the letter and intent of the ordinance.

It should also be noted that Chapter 13, Section 13.07.095 Certificates of Approval- Standards of review, provides an avenue for the consideration of any alterations to the structure that might be necessary in the future. Therefore, there is neither a legal, nor policy reason, to exclude the "condenser room" from the Tacoma Register of Historic Places.

2. There has also been concern that the retention of a single transmission tower may interfere with the installation of the new transmission towers on N. 21st Street. The initial nomination of the Cushman Substation included all 16 of the associated transmission towers. At the request of City staff (Reuben McKnight, Historic Preservation) the citizen who prepared the nomination agreed to reduce this to a single transmission tower identified as Tower 1.

Now, the representatives of TPU have indicated that leaving the tower in the original historic location will require the creation of a "jog" in the new lines. There has been no discussion as to whether the alignment of the new towers

could be shifted slightly within the right-of-way or an explanation of the circuitous routing of the power line. Absent such an explanation and a discussion with the community, and as TPU has not completed their engineering, TPU should delay determining a final alignment for the power line and the City Council should not make a final determination as the disposition of Tower 1.

We appreciate your consideration of these findings.

Sincerely,

Joe Tieger

On Behalf of the
North End Neighborhood Council

Cc:
Robert Mack, TPU
Councilman Ryan Mello
Councilman Anders Ibsen
Councilman Robert Thoms
Councilman Coner McCarthy
Councilman Keith Blocker
NENC Board Members



April 10, 2017

Infrastructure, Planning and Sustainability Committee
City of Tacoma

Dear Councilmembers Mello, Ibsen, McCarthy, Thoms & Blocker:

Subject: Cushman Nomination

The North End Neighborhood Council and the author of the nomination, Preservation Architect, Jeffrey Ryan would like for you to view a printed copy of a presentation that was prepared for the Landmarks Commission but never shown.

We hope that you enjoy reviewing the history of this important landmark in Tacoma and recognize the importance that each piece of this nomination means to our community the power system and visitors to Tacoma seeking opportunities to learn about history.

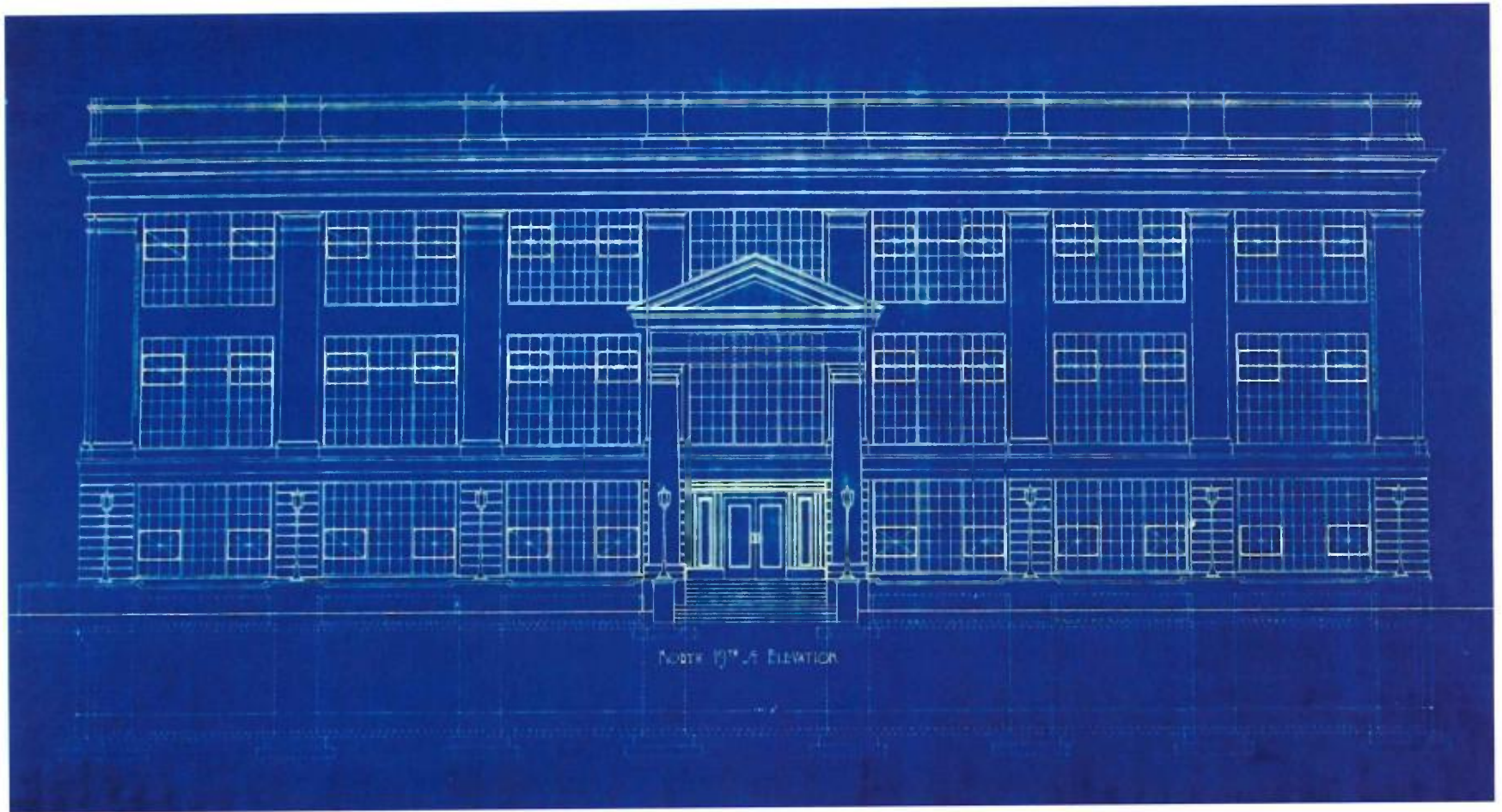
We stand by this nomination along with community members. Several of these community members organized and presented the NENC Board with questions and concerns one year ago. They asked for support and involvement in determining the future use of the buildings and site now that TPU will be transitioning out.

At this same time Mr. Ryan initiated the nomination process. He presented to the NENC asking for a letter of support, which was granted. The NENC has a history of supporting historic properties and districts and find they bring value to our city.

We are pleased to be having this nomination come before the full council in the very near future

Thank you for your time.

North End Neighborhood Council



CUSHMAN SUBSTATION

RYAN ARCHITECTURE

CUSHMAN SUBSTATION

Tacoma Register of Historic Places

- Cushman Substation (NR 2014)
- 21st St. Transmission Towers (NR 2014)
- Cushman Site (NR 2014, partial site)
- Adams Street Substation
- Adams Street Site
- Condenser Room

Goal:

Support and approval

Cushman Substation Buildings, Towers & Sites, A Contextual Group of Historic Structures



March 2, 1963

The Complex as a Whole is greater than
the Sum of its Parts



April 13, 1937

RYAN ARCHITECTURE

Cushman Substation Buildings, Towers & Sites, A Contextual Group of Historic Structures



February 12, 2017



RYAN ARCHITECTURE

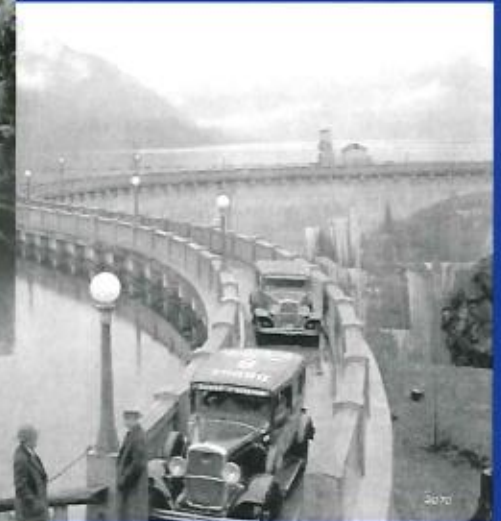
Cushman Power System – Context of the Potlatch Line



Power House No. 1



Power House No. 1



Cushman Dam No. 1



Power House No. 2



RYAN ARCHITECTURE

Condenser Room



August 2011, National Register Nomination

RYAN ARCHITECTURE

Condenser Room



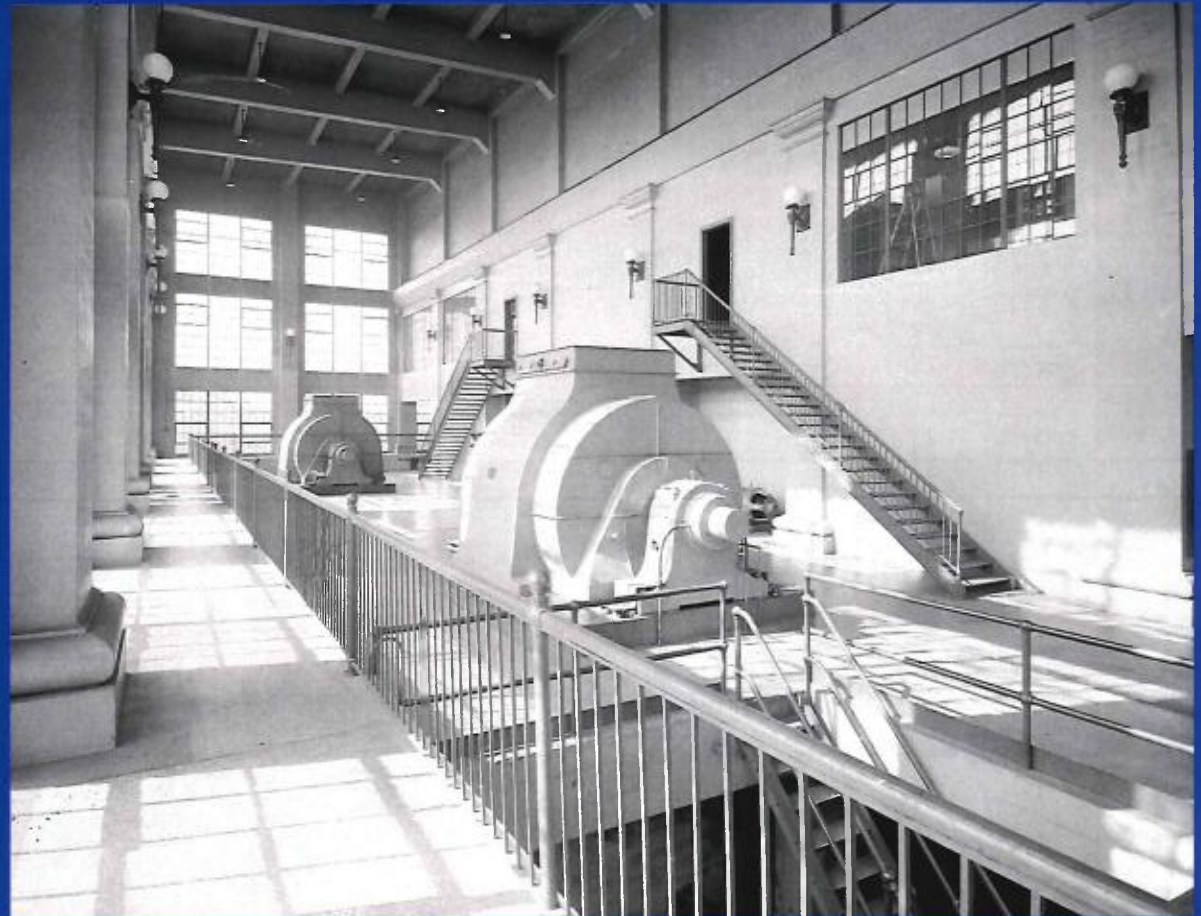
April 1, 2017

RYAN ARCHITECTURE

Condenser Room



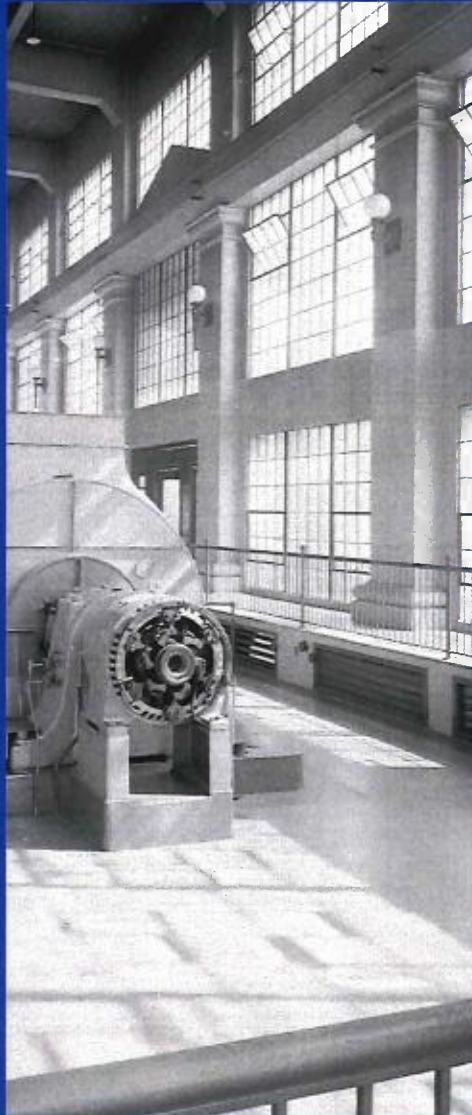
1926 ca.



Public observation gallery

RYAN ARCHITECTURE

Condenser Room, aka Lobby



The words or phrase “Public Space”, “Public Area” or “Assembly Space” are not found in section 13.07.050 of the TMC, governing the nomination and approval of a historic building to the Tacoma Register of Historic Places.

- The term “Significant Interior Space” appears once in section 13.07.050 under paragraph A2c. “Specific language indicating which improvements on the site are included in the nomination including any significant interior spaces within publicly owned buildings; The Space nominated is within a Public Building.
- The public space or assembly requirement was not contained in any staff report until after a presentation by TPU five months after the nomination was submitted, reviewed, edited, approved by staff, and approved as eligible by the TLPC during the first of three public meetings where the nomination was discussed in depth.
- While the Condenser Room is not required by the TMC it is a grand space within a public building, by general definition it is a public space. The space as designed also functioned as a Entrance Lobby and central circulation space for the building. The main public entry door off North 19th Street opens directly into this space and onto a visitors gallery running along the south and west walls of the room, separated from the electrical equipment by a tall decorative railing.
- Legal Definition: A public place is generally an indoor or outdoor area, whether privately or publicly owned, to which the public have access by right or by invitation, expressed or implied, whether by payment of money or not, but not a place when used exclusively by one or more individuals for a private gathering or other personal purpose.
- Tacoma Power has over the years opened the building to the public for special occasion and given tours. Not unlike open houses at other City facilities such as Tacoma Rails yearly open house and not unlike the Power House tours at TPU Dams and Power House advertised by TPU.

Visitors Welcome

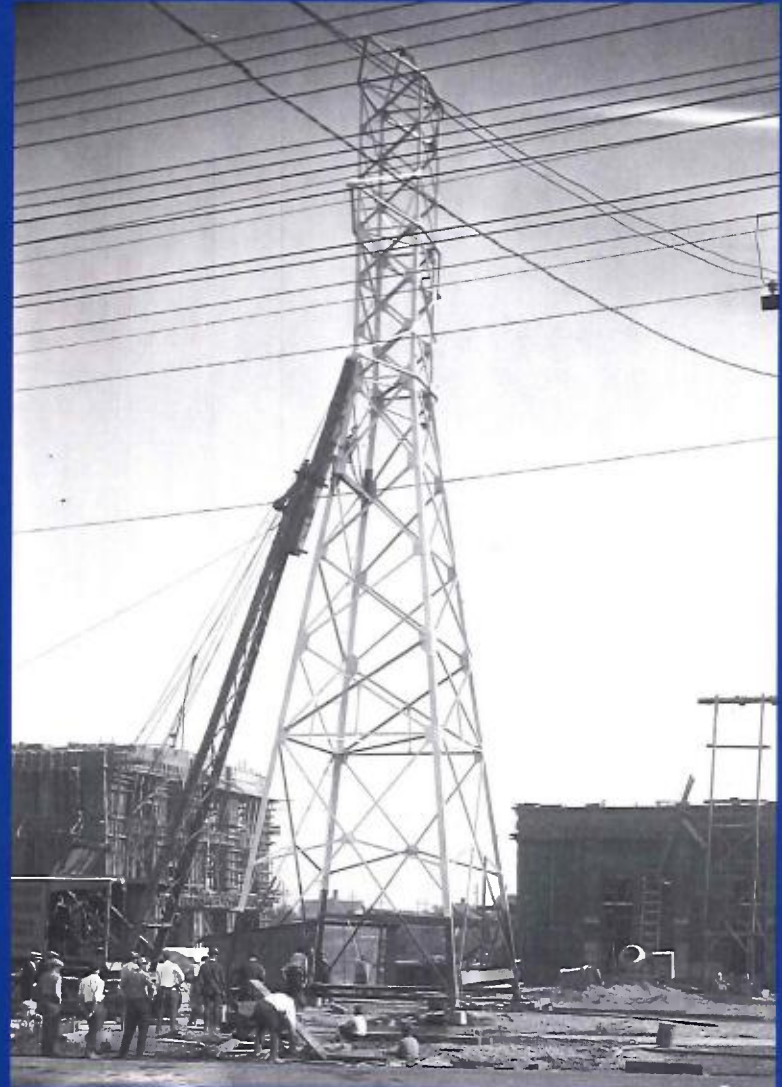


1936 ca. New Neon Sign for Cushman Power House No. 2

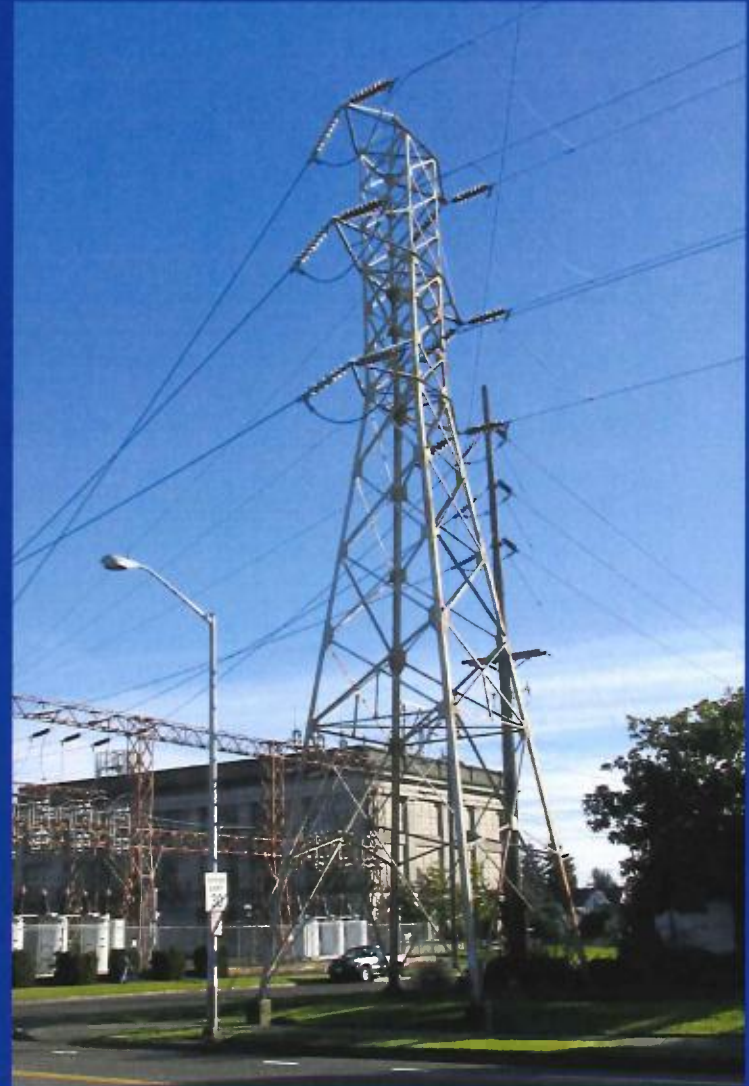
21st Street Towers



The Towers were manufactured in Tacoma by the Star Iron Works and transported to the site. After 91 years of service they have never been repainted, yet are in great condition.



21st Street Towers



Adams Street Substation & Site



2016



1925



1937

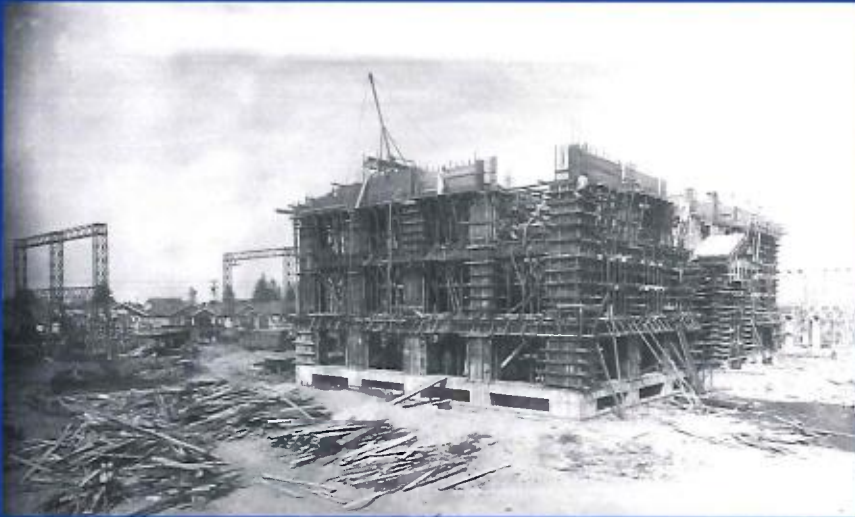
Built in 1925 as part of the original Cushman system and \$4,000,000 public bonds issued for the Cushman Power Project, the Adams Street Substation represents the last of three neighborhood substation built at that time.

RYAN ARCHITECTURE

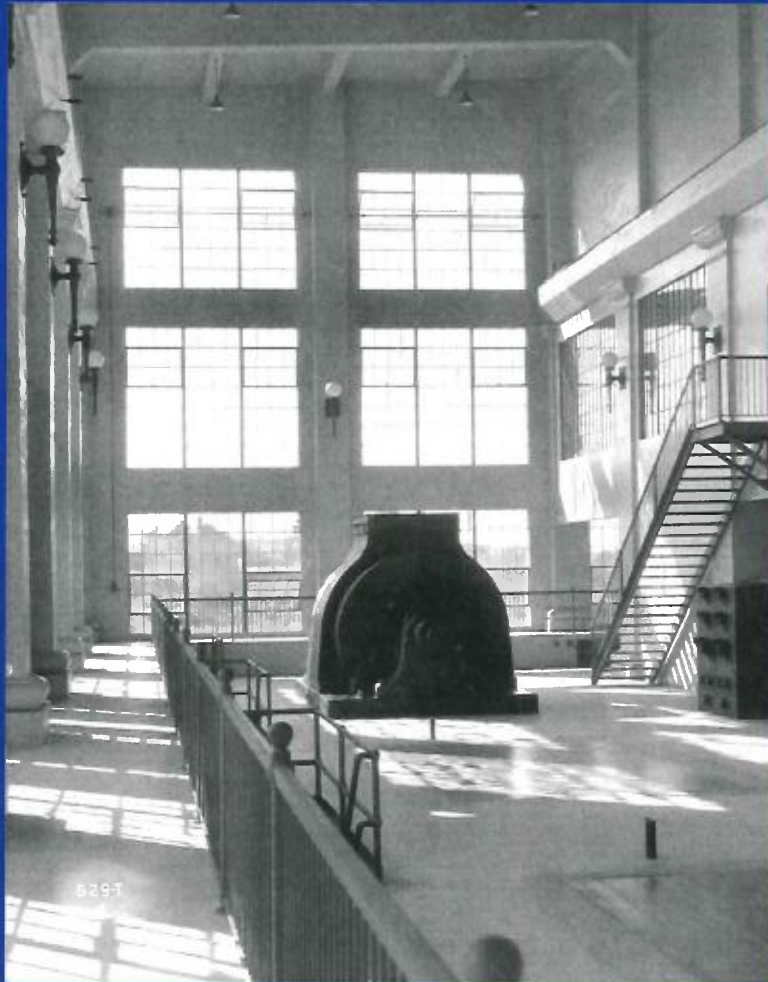
Board-Formed Concrete



Rubbed Concrete Finish



Terrazzo Flooring & Large Steel Windows





August 4, 1925

RYAN ARCHITECTURE

“Policy UF–13.28

Encourage the conversion of electrical substations for recreational purposes if the sites are no longer needed for their intended purpose.”



RYAN ARCHITECTURE

Cushman Substation

- Design & Development: **Goal DD-13**: Protect and preserve Tacoma's historic and cultural character.
 - **Policy DD 7.1**: Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the build environment.
 - **Policy DD-13.1**: Encourage the protection and restoration of high-quality historic buildings and places that contribute to the distinctive character and history of Tacoma's evolving urban environment.
 - **Policy DD-13.5**: Survey and inventory historic resources as part of future sub-area or neighborhood planning projects, with a focus on areas of anticipated growth and change.
 - **Policy P-7.1**: Neighborhood parks should be designed to enhance neighborhood identity, preserve neighborhood open space and improve the quality of life of nearby residents.
 - **Policy P-1.2**: Prioritize investment in acquisition and development of parks and recreation facilities in areas where need is greatest, including:
 - a) Where availability and access to facilities is lowest; and
 - b) Where the greatest population growth is occurring or forecast, such as the mixed use centers.
- Who should NENC committee engage for support to this project in City Planning Department?

