



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240



June 3, 2022

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Property: **Anna Mann House, 1021 NE 33rd Avenue, Portland, OR**

Project Number: **43595, Part 2**

Appeal Number: **1653**

Action: **Final Administrative Decision**

Dear [REDACTED]

I have concluded my review of your appeal of the January 10, 2022 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the Part 2 – Description of Rehabilitation application for the property cited above (the Decision). The appeal was initiated and conducted in accordance with Department of the Interior regulations [36 C.F.R. part 67] governing certifications for federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you, [REDACTED] [REDACTED] for meeting with me via videoconference on February 24, 2022, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the materials presented as part of your appeal and subsequently submitted at my request, I have determined that the impact of the proposed rehabilitation of the Anna Mann House is consistent with the historic character of the property and meets the Secretary of the Interior's Standards for Rehabilitation (the Standards). Accordingly, I hereby reverse the denial of certification issued by TPS in the Decision.

The Anna Lewis Mann Old People's Home was individually listed in the National Register of Historic Places in 1992. Located on a hill above Sandy Boulevard at the intersection of NE 33rd Avenue, the site originally included seven acres, extending from Sandy Boulevard south to Oregon Street, of which three acres survive. The original building was designed by the Portland architectural firm Whitehouse & Fouilhoux and completed in 1910 in the Tudor Revival Style. U-shaped in plan, the primary façade faced north toward Sandy Boulevard and the two wings pointed south toward what was originally an orchard, service garden, and greenhouse, where residents grew their own vegetables. The original entrance drive was from the intersection of Sandy and 33rd, crossing diagonally up the hill to a porte cochere and the main entry on the west side of the building. There was a service courtyard between the south wings, with access from a second entrance on 33rd Avenue.

Sometime in the late 1940s, the northeast corner of the property was sold, and a gas station was constructed at the corner of Sandy Boulevard and 33rd Avenue. A single-story infirmary addition was constructed in 1953 on the east side of the original building and extending forward of it toward the gas station. Sometime before 1969, a large section of the south end of the property, the former orchard and gardens, was sold and in 1978 the Presbyterian Church of Laurelhurst was constructed close to the new south property line. In 2007, the remaining stretch of the property along Sandy Boulevard was sold and the original north lawn was regraded to create buildable lots along the boulevard, creating a sharp drop-off along the new north property line. The primary access today is from 33rd Avenue. A second addition was constructed on the northwest corner of the original building in 1993, creating a courtyard on the remaining north lawn between the two additions.

The proposed rehabilitation will convert the property to 129 low- and moderate-income apartments, with 39 units in the Anna Mann House, and will include the construction of two large new buildings on the site, one between the 1953 addition and 33rd Avenue with 50 units, and another with 40 units built on a parking lot along the south property line. In the Decision, TPS stated that, *"While the proposed rehabilitation of the existing historic building itself meets the Standards, it is the effect that the new construction has on the setting and environment of the historic building that is inconsistent with the Standards. Taken together, this new construction significantly alters the historic character of the property."*

The new east building, although close to the original building, will be shielded from it by the non-historic 1953 addition and screened from 33rd Avenue by dense foliage and mature street trees. TPS determined that the proposed east building is not in and of itself a denial issue.

The new south building is similar in scale and massing to the east building and, although smaller in size, it is more prominently visible from the historic building. TPS noted that, *"The south side of the property arguably retains the most historic integrity from the original setting of what was*

a monumental building sited on top of a small hill and surrounded by pastoral grounds.” TPS further noted that, *“This new building will create a hard edge to the open space of terrace and lawn that is a significant feature of the landscape. Instead of the terrace stepping down to the more informal and bucolic lawn area, the lawn and terrace would essentially become a courtyard between two similarly sized and scaled buildings.”* TPS determined that the south building will create a courtyard with the historic building, significantly altering the character-defining landscape features and setting, concluding that, *“Thus, as proposed, the project fails to meet Standard 1, which states that any new use of a historic property should require minimal change to the defining characteristics of the building and its site and environment.”*

At the appeal meeting, Cindy Hamilton presented significantly more historical information about the evolution of the property over time than had been included in the original Part 2 application (summarized above), information that was not available to TPS at the time of its review. Consequently, although the TPS denial decision was reasonable based on the then available information, the new information places the proposed new buildings, particularly the south building, in a different context.

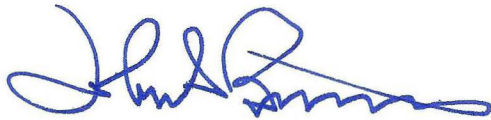
Regarding the site and environment, the appeal presentation revealed that a multi-story building is under construction on the north section of the original property along Sandy Boulevard sold off in 2007, effectively eliminating the remaining historic views to the north. And the church constructed on the south side of the property sold off in the 1960s is planned to be demolished and the site redeveloped into multi-story housing, effectively eliminating historic views to the south. As a result, the property will be bordered on the north and south by urban-scale buildings. I have determined that the new south building seeks to manage the original building’s environment by making the remaining south lawn a sheltered and bucolic space in an increasingly urban setting. I agree that the new south building will block distant views to the south, but probably not much more than the new building planned for the adjacent church property, and it will replace the current near view of the parking lot and roof of the church. I also note that the south building is far enough away from the original building that views to the southeast and southwest over the adjacent single-family homes will remain.

Both new buildings are differentiated from the historic building by having a rectangular mass rather than an irregular mass, and the use of modern materials and simplified architectural details. They are compatible in size and scale, have similar façade and roof configurations and architectural features, and match some of the historic materials. And I further note that the early construction photographs you submitted show that the specimen Tulip Poplar tree on the south lawn is well protected from construction activity, and that the area cleared for the east building leaves intact a substantial amount of the vegetative screening along 33rd Avenue.

Thus, based on the new information presented in the appeal, I disagree with TPS that the proposed rehabilitation contravenes Standards 1, 2, and 9, and have determined that the overall impact of the proposed rehabilitation of the Anna Mann House is consistent with the historic character of the property. Accordingly, I reverse TPS's January 10, 2022 Decision.

As the Department of the Interior regulations state, my decision is the final administrative decision with respect to TPS's January 10, 2022 Decision regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA, FAPT
Chief Appeals Officer
Cultural Resources

cc: OR SHPO
IRS

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