



Oregon  
Kate Brown, Governor

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June 26, 2020

Ms. Laura Farthing  
Eugene Water & Electric Board  
4200 Roosevelt Blvd.  
Eugene, OR 97402

RE: SHPO Case No. 19-1211  
EWEB Project 1801700, College Hill 607 and 603 Reservoirs Replacement  
Demo and replace  
2361-2301 Lawrence Street, Eugene, Lane County

Dear Ms. Farthing:

While we ultimately concur that the project will result in an adverse effect to historic resources, we do not concur with the narrow definition of the historic resource being adversely affected.

Our concern with this evaluation is that the individual elements of the site, rather than taken together as elements that share context (as a historic district would), the pieces are parted out and compared against each other, with little reference to the context that draws them together. In so doing, we feel that the evaluation overanalyzes their narrowly-defined relative qualities and associations, where they actually support each other in relating the more complex fabric of the historic context.

Rather than separate the elements of College Hill water system facility from each other for purposes of evaluation, it would be more appropriate to consider them together, as the location of a significant component in the water system of Eugene, reflecting the expansion and evolution of the infrastructure of the City during the first half of the 20th century. The context against which to judge this facility, therefore, is the overall story of the development and expansion of the water system that allowed the City to grow. Within that story are many significant threads, including the 1927 switch from the Willamette River to the McKenzie River as the source, measures taken by EWEB to deal with contamination (typical of municipal water systems), the role of the federal government (PWA in his case), etc. In a tangible sense, the overall system, from the head diversions to the distribution lines, all are associated with that broad context. Within that system, there are specific locations where key elements of the system are located, sited intentionally in order to provide what is needed to serve the function. In this case, College Hill (and Skinner's Butte, and Hendrick's Park, etc.) was selected as such a centrally important location because it provided the elevation needed to charge the system with pressure. Other elements like proximity and available space likely influenced that decision as well.

This location then, within the context of the system, has a period of significance from the initial development in 1916 to 1940, when the final elements were added to bring the facility to maximum capacity. The facility at College Hill represents the result of the various threads of history identified above, including the change from open-air reservoir to covered, including the role of the federal government in supporting such expansions, the specific role of the federal government in supporting this through the use of Depression-era programs, and even the deployment of varied approaches to providing capacity and charge, from the reservoirs to the tower. Under Criterion A, therefore, it would appear that the facility as a whole has significance within that context.



Of course, significance alone is not enough, a property must also have integrity. In this area, too, we find the analysis to be problematic. Considering the Period of Significance to be 1916 to 1940, integrity must reflect that time period. While it is true that Reservoir 603 no longer retains integrity of design reflecting its 1916 appearance, the change itself was made during the period of significance, and was the direct result of significant changes in the course of the history of the larger water system. The reservoir does appear to retain integrity to 1933, reflecting EWEB's adoption of covering the reservoir as a means of controlling contamination. The last sentence in the final complete paragraph of page 20 seems to acknowledge the significance of that, and the design of the 1940 reservoir 607 (covered) would seem to reinforce this. In this respect, we believe that both the original evaluation and the current evaluation place too much emphasis on PWA involvement, at the expense of the broader context of the development and expansion of the water system in Eugene.

We feel that the analysis of integrity of association is erroneously based on the continued use of the individual elements of the system. That one or another of these is no longer actively in use for holding water is not how NPS guidelines indicate this aspect of integrity is evaluated. Rather, National Register Bulletin 15 (p.45) indicates that integrity of association is retained "if it is the place where the event or activity occurred, and is sufficiently intact to convey that relationship to an observer." To the observer, these facilities would look no different today while empty than they would have during the period of significance, because the presence of water within them is not observable due to their closed nature. There is no mistaking these for what they are. Regarding the intervening development between the reservoirs and the water tank, we do not believe that the presence of a single one-story house sufficiently disconnects the water tank from the reservoirs. Indeed, standing upon Reservoir 607, the water tank is an extremely present feature in the viewshed, as amply demonstrated in Figure 3.4-1 (p.18). Similarly with the pumphouse, which appears to retain physical integrity, while it is true that a house has been constructed immediately above and behind the pumphouse, given its design it is difficult to mistake it as some kind of garage for the house as the report suggests, and while standing in front of the structure, the massive retaining wall announces the presence of the reservoirs immediately uphill less than 75 feet away.

Ultimately, because we concur with the finding of adverse effect for the project, we agree with the recommendation that EWEB begin discussions with our office and other suitable consulting parties, including (but not necessarily limited to) the Eugene Historic Landmarks Commission. However, our office believes that all four resources present are significant and retain integrity, and that any mitigation approach should reflect the historical significance of the entirety of the College Hill site, rather than focusing on Reservoir 607 alone. We look forward to working with the various consulting partners to develop a mitigation approach that suitably resolves this adverse effect.

Sincerely,



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cc: Nathan Endicott, Eugene Water & Electric Board