

Historic Preservation Requirements for Repairs and Alterations on the University of Oregon Campus

Campus Planning, Design and Construction
June 2021

Summary of Regulations Governing Historic Properties

University of Oregon:

The university's *Campus Plan* states that all development projects must meet applicable principles and patterns including:

***Campus Plan* Principle 7: Architectural Style and Historic Preservation**

The continuity and quality of the university's campus environment are materially affected by the character and architectural style of the buildings. Furthermore, the university's historic buildings and landscapes, which are important defining features of the campus, are artifacts of the cultural heritage of the community, the state, and the nation.

To preserve the overall visual continuity and quality of the campus and as a commitment to the preservation and rehabilitation of identified historic resources, all construction projects shall follow the policy refinements below.

Principle Refinements:

Historic Preservation

- (a) When altering buildings and landscapes listed on the National Register of Historic Places or as a City Landmark, projects must follow the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (available at <https://www.nps.gov/tps/standards/rehabilitation.htm>).
- (b) When altering interior or exterior resources that are listed or eligible to be listed in the National Register of Historic Places, the university, through Campus Planning, Design and Construction, will consult with the State Historic Preservation Office as appropriate.
- (c) When federal funds are used, projects must comply with the federal historic review process (Code of Federal Regulations, Section 106).

Historic Landscapes

- (a) These policy refinements address processes for identifying and documenting historic landscapes and provide a framework for making decisions about preferred preservation actions and future development. Refer to the Campus Heritage Landscape Plan, section "1.0 Landscape Preservation Guidelines and Description of Historic Resources" for further definition and a description of treatment approaches.
 1. Protect and steward the campus's historic landscapes in the context of an evolving university.

2. Identify, evaluate, and consider preservation treatment for all potential historic landscapes—designated open spaces and others.
3. Develop preservation treatment plans for open spaces determined to be historic.
4. Select treatment approaches based upon significance, integrity, and contemporary goals for the space.
5. Manage and maintain historic landscapes.
6. Balance preservation and other contemporary needs of the university and region.
7. Integrate historic landscape characteristics into new elements and areas.
8. Document cultural landscape design interventions to leave a clear record of preservation and new design actions that will assist future preservation planning.
9. Communicate and educate about the historic qualities of the campus landscape so they become part of the values, culture and intellectual resource of the university.
10. Integrate historic preservation goals into other related *Campus Plan* policies and subject-specific campus planning and maintenance documents.

Campus Plan Patterns (refer to the *Campus Plan* for pattern text)

The *Campus Plan* contains a number of patterns related to historic preservation including:

Architectural Style
Building Character and Campus Context
Campus Quad and Historic Core
Historic Landscapes

Also, the *Campus Plan* states that the Campus Planning Committee shall review projects that “. . . involve new construction or modifications of outdoor spaces, or interior spaces with significant public exposure.” Typically, the Design Review Subcommittee of the Campus Planning Committee reviews small alterations.

The *Campus Plan* is available on line at: <https://cpfm.uoregon.edu/campus-plan>.

City of Eugene:

The City of Eugene has the strongest historic preservation regulations, but they apply to a limited selection of resources.

The city reviews proposed exterior alterations (as well as moving and demolition) to "Historic Properties." Historic properties are defined as resources listed in the National Register of Historic Places or designated by the city as a City Historic Landmark. The city's Historic Alteration application process must be completed prior to issuance of a building permit. The city's Historic Moving and Demolition applications define criteria that must be met, and require a series of comprehensive mitigation steps.

Other city land-use applications required as part of a project (e.g., Conditional Use and Site Review) also may address preservation of historic properties. Although the city's conditional-use and site-review criteria do not specify the need to preserve historic properties, the city may choose to address it in the criteria that requires compatibility of the proposed development's location, size, and design with surrounding properties.

State:

All state entities, including the UO, have an established responsibility to partake in historic preservation implementation measures. ORS 358.653 states:

Any state agency or political subdivision responsible for real property of historic significanceⁱ in consultation with the State Historic Preservation Officer (SHPO) shall institute a program to conserve the property and assure that such property shall not be inadvertently transferred, sold, demolished, substantially altered or allowed to deteriorate.

This state regulation requires all state entities to consult with the SHPO if proposed work might impact resources that are listed or eligible to be listed in the National Register of Historic Places.

"Consultation" is not clearly defined, but it usually includes SHPO review of the proposed development and recommendations to mitigate negative impacts on historic resources.ⁱⁱ The UO must consider SHPO's recommendations but is not required to follow all of them. The process is designed to assist the UO in meeting its historic preservation responsibilities as a state agency.

SHPO typically includes primary- and secondary-ranked resources in the consultation requirements because they are usually considered eligible to be listed on the National Register of Historic Places. In 1974 the Oregon State Board of Higher Education approved the Report of the Ad Hoc Committee on Properties of Historical and/or Architectural Value. The report identifies and ranks historic resources on each campus and specifies their preservation. Subsequent cultural resource surveys (2006 UO Cultural Resource Survey, the Ellis Lawrence Inventory, and the South University/Fairmount Neighborhood Cultural Resources Inventory) identify additional properties as having primary or secondary significance. Typically, the surveys are acknowledged by SHPO as part of the statewide inventoryⁱⁱⁱ.

Federal:

Federal regulations generally defer to state and local governments for implementation of historic preservation measures. The National Register of Historic Places determines a resource's significance but does not provide protection unless federal funds are being used. If a project uses any federal funds, a comprehensive review and mitigation process (Section 106) is required.

ⁱ A "real property of historic significance" includes but is not limited to "buildings listed or eligible to be listed on the National Register of Historic Places under section 101 of the National Historic Preservation Act of October 15, 1966 (16 U.S.C. 470a)." (ORS 276.093 (5)).

ⁱⁱ The SHPO uses the *Secretary of the Interior's Standards for the Treatment of Historic Properties* to determine if proposed alterations are appropriate. Usually, the standards addressing rehabilitation are the most relevant for UO projects.

ⁱⁱⁱ The State Historic Preservation Officer (SHPO) "acknowledges" cultural resource surveys as part of the statewide inventory if they meet the SHPO's specified survey standards. Note: The 2006 UO Cultural Resource Survey was acknowledged by the City of Eugene but it has not been reviewed by SHPO.