

BEND LANDMARKS COMMISSION
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Phone: (541) 617-4524 **hkennedy@ci.bend.or.us**

Ian Johnson
Historian
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97301

Re: Pilot Butte Canal Historic District Nomination:

Dear Mr. Johnson,

The Bend Landmarks Commission has reviewed the nomination information for the proposed Pilot Butte Canal Historic District and heard public testimony over the last two, regularly scheduled Bend Landmarks Commission meetings from both people in support of the Pilot Butte Canal Historic District nomination and from representatives of the Central Oregon Irrigation District (COID). At the February 17, 2015 Bend Landmarks Commission identified the following comments and concerns.

Integrity: Concerns

The setting, feeling and association of the portion of the canal that lies within the Canal View subdivision lacks historical integrity. This area of the canal is located in a suburban area of Bend and would not qualify as a "rural setting". Portions of the canal that have been nominated run through the Canal View Subdivision which was constructed between 1996 -2002. These parcels consist of 36 homes constructed on 1/4-to 1/3-acre lots. Non-historic homes, outbuildings and landscaping are readily visible from this portion of the canal. The nomination defines the district boundaries as from the center of the canal +50ft in both directions but it doesn't document if any non-historic, non-contributing elements are located within the 50ft district boundary. How many outbuildings, non-historic/non-contributing elements (if any) are located along this stretch of the Canal? Are there any sheds, decks, non-historic landscape elements located within the district boundaries? If so, will this area be restored to its historic setting and all non-contributing elements restored or removed? The Canal View subdivision development is not consistent with the historical setting of the canal. The setting, feeling and association if the portion of the canal that runs through the Canal View subdivision has been significantly altered.

Description: Concerns

The Pilot Butte Canal was nominated using Criterion A. Only a small 7,435' segment of the canal was nominated. To use Criterion A (settlement and exploration), the entire COID canal system should be taken into consideration, not just consider a small portion of the canal, to qualify as eligible under this

criterion.

Significance and Context: Concerns

Has the appropriate criterion been used? Based on the current feeling and setting of the canal (suburban setting), this section of the Pilot Butte Canal may be best served to be nominated under Criterion C (embodiment of distinctive characteristics/ methods of construction). If the canal is to be nominated to the National Register as related to the broad patterns of our history (Bend/Redmond settlement), the entire canal system should be nominated or reviewed in context of the settlement patterns of Central Oregon not just a small portion of the canal system

Other concerns:

There is no clear designation of who actually owns the rights to use this portion of the canal. The residents along the canal state they have all legal rights to the canal property however, COID owns the ROW and has historically used and maintained the Pilot Butte Canal prior to the development of the Canal View subdivision in the late 1990s.

COID already has a MOA in place with the SHPO office. COID is in the process of an intensive survey and documentation project to identify historically significant elements located along the canal system as a whole (not just a portion). The COID survey and documentation process should take precedent over the Pilot Butte Canal nomination.

As a result of the evaluation, The National Registration Nomination Evaluation Sheet only allows the Commission to determine if the proposed Canal is eligible or not eligible for the National Register. COID has already acknowledged that portions of COID properties are eligible for the National Register and is in process of surveying and documenting these properties.

Only a portion of the Pilot Butte Canal is considered in this nomination. Only a portion of the canal is considered independently and outside of the context of the entire canal system. This portion of the canal doesn't operate independent of the rest of the COID canal/irrigation system. This single 7,435' canal segment does not meet National Register nomination criteria under Criterion A because it lacks integrity (setting, feeling and association) and doesn't document or consider the effects of the entire canal system and irrigation on the general settlement patterns of Central Oregon.

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Significance and Context: Concerns

Has the appropriate criterion been used? Based on the current feeling and setting of the canal (suburban setting), this section of the Pilot Butte Canal may be best served to be nominated under Criterion C (embodiment of distinctive characteristics/ methods of construction). If the canal is to be nominated to the National Register as related to the broad patterns of our history (Bend/Redmond settlement), the entire canal system should be nominated or reviewed in context of the settlement patterns of Central Oregon not just a small portion of the canal system

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Finally, the Bend Landmarks Commission encourages all parties involved in this nomination to work together and review the canal in its entirety and not just a portion of the canal. Please include these comments into the record for the February 19, 2015 State Advisory Committee on Historic Preservation (SACHP) public hearing. Also included with this letter are copies of all the written testimony received by the Bend Landmarks Commission.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Olsen', written over the word 'Sincerely,'.

Bill Olsen,
Bend Landmarks Commission Vice-Chair