



**CITY OF MCMINNVILLE  
PLANNING DEPARTMENT**  
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**DECISION, FINDINGS OF FACT AND CONCLUSIONARY FINDINGS OF THE MCMINNVILLE HISTORIC LANDMARKS COMMITTEE FOR THE APPROVAL OF ALTERATIONS TO A HISTORIC LANDMARK LOCATED AT 225 NW ADAMS STREET**

- DOCKET:** HL 5-20 (Certificate of Approval for Alteration)
- REQUEST:** Approval of alterations to an existing historic landmark and building that is listed on the McMinnville Historic Resources Inventory as a “Distinctive” historic resource (resource number A400). The proposed alteration includes the addition of handrails to the exterior staircase leading to the entrance door on the north side of the building, which faces the fountain and plaza between the library and the aquatic center.
- LOCATION:** 225 NW Adams Street. The property identified as Tax Lot 9800, Section 20AD, T. 4 S., R. 4 W., W.M.
- ZONING:** R-2 (Single Family Residential)
- APPLICANT:** Jenny Berg, Library Director, on behalf of the City of McMinnville
- STAFF:** Chuck Darnell, Senior Planner
- DATE DEEMED COMPLETE:** December 1, 2020
- HEARINGS BODY & ACTION:** McMinnville Historic Landmarks Committee
- HEARING DATE & LOCATION:** January 5, 2021, Zoom Online Meeting
- PROCEDURE:** An application for a Certificate of Approval for Alteration is processed in accordance with the procedures in Section 17.65.060 of the McMinnville Municipal Code.
- CRITERIA:** The applicable criteria for a Certificate of Approval for Alteration are specified in Section 17.65.060(B) of the McMinnville Municipal Code. In addition, the goals, policies, and proposals in Volume II of the Comprehensive Plan are to be applied to all land use decisions as criteria for approval, denial, or modification of the proposed request. Goals and policies are mandated; all land use decisions must conform to the applicable goals and policies of Volume II. “Proposals” specified in Volume II are not mandated, but are to be undertaken in relation to all applicable land use requests.
- APPEAL:** As specified in Section 17.65.080 of the McMinnville Municipal Code, the Historic Landmarks Committee’s decision may be appealed to the Planning Commission within fifteen (15) days of the date written notice of decision is mailed. The City’s

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Attachments:

Attachment 1 – Application and Attachments



**I. APPLICATION SUMMARY:**

The applicant has provided information in their application narrative and findings (attached as Attachment 1) regarding the history of the subject site and the request under consideration. Staff has found the information provided to accurately reflect the current land use request and the relevant background, and excerpted portions are provided below to give context to the request, in addition to staff’s comments.

***Subject Property & Request***

The subject property is located at 225 NW Adams Street. The property identified as Tax Lot 9800, Section 20AD, T. 4 S., R. 4 W., W.M. **See Vicinity Map (Figure 1) below.**

**Figure 1. Vicinity Map (Approximate Building Footprint Identified)**



The existing building on the subject property is listed on the Historic Resources Inventory as a Distinctive resource (resource number A400).

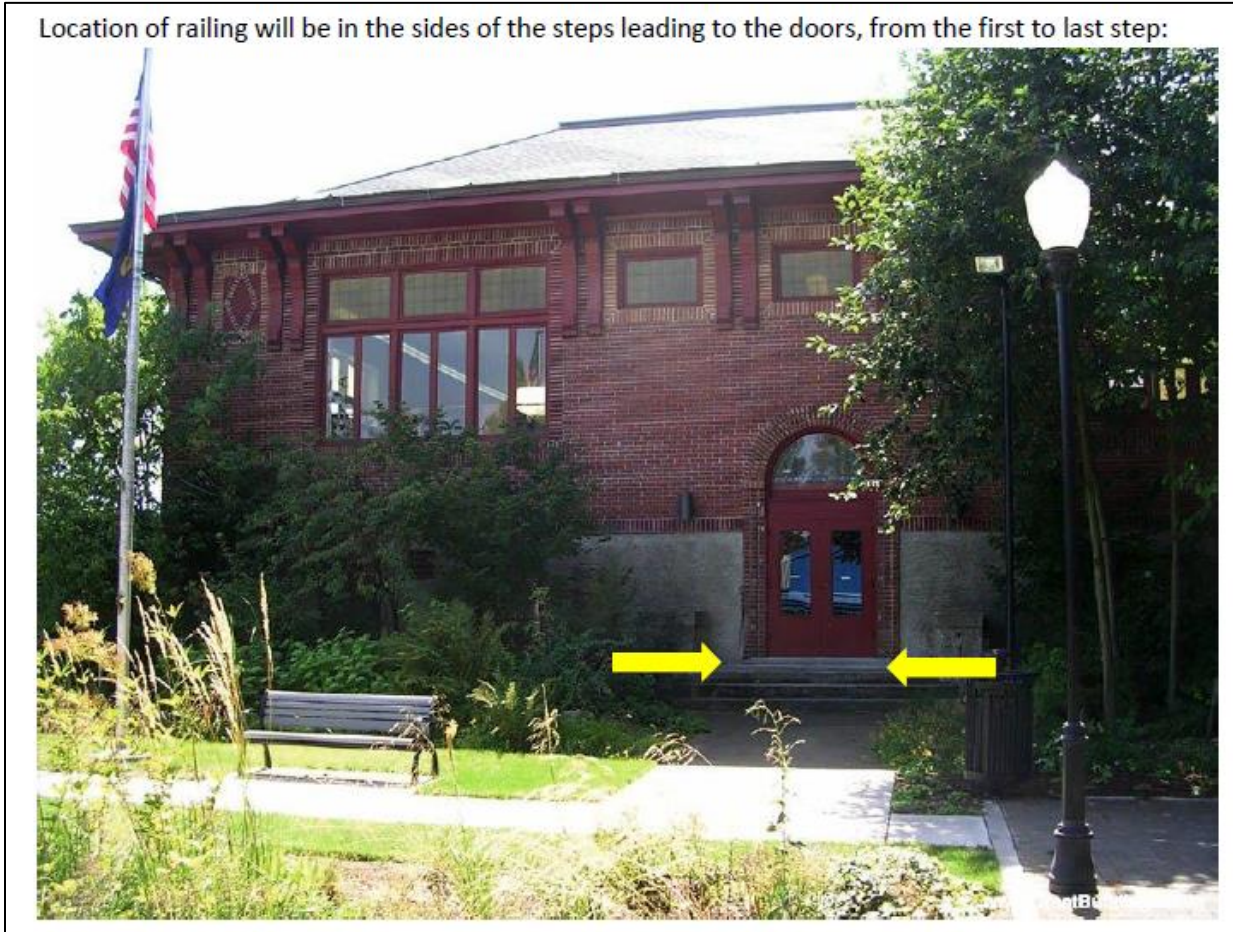
The applicant provided an overview of their proposal and project in the application narrative, which is as follows:

“The intent of the project is to add handrails on the outside steps leading to the entrance of the McMinnville Public Library Carnegie Library. This entrance was used as the primary entrance to the Library from the completion and opening of the Library in 1913 until the completion of the Library addition in 1983.



Due to COVID-19 the Library is using this Carnegie Library entrance as the current entrance to the building, so as to allow for physical distancing and maintain separate ingress and egress to the Library. The three steps leading up to the Carnegie Library entrance do not currently have a handrail. The intent is to install simple, sturdy handrails for safety and support for visitors entering the Library. The current Library exit is what was once both the entrance and exit prior to COVID-19.”

The location of the proposed railing installation is identified below:

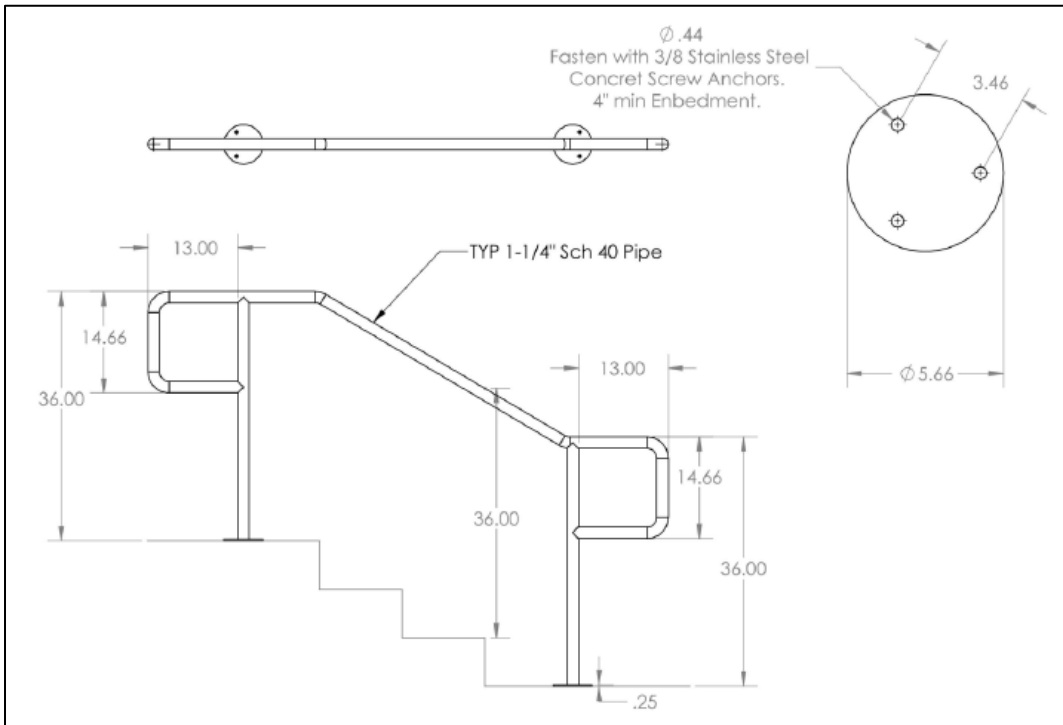
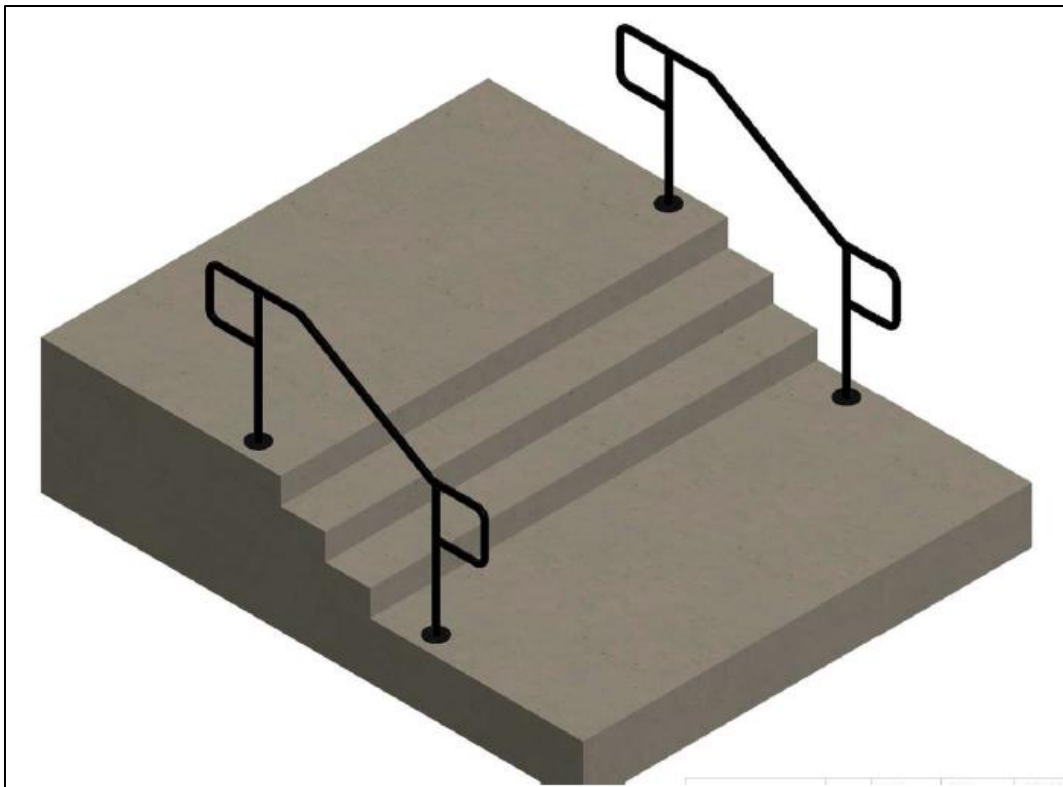


A rendering and specifications of the proposed railings was also provided by the applicant and are identified below:

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### Background

The property was originally surveyed in 1980, which is the date that the "Statement of Historical Significance and Property Description" were drafted and included on the Historic Resources Inventory sheet (resource number A400) for the subject property. The survey photo of the building is dated as

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1983. This survey work led to the inclusion of the property on the Historic Resources Inventory, and the Historic Resources Inventory was adopted by the McMinnville City Council on April 14, 1987 by Ordinance 4401. The “Statement of Historical Significance and Property Description” state the following:

“Plans on file at the Oregon Historic Society indicate that Ernst Kroner submitted several larger, more elaborate designs before the executed plans were adopted. The building as finally built, is a regular rectangular block with a low-pitched hipped roof. It sits on the edge of the City Park. Above the first floor, it is brick, below, rough concrete. Wide eaves are supported by paired brackets. Fenestration is somewhat irregular; strips of narrow paired casement windows superimposed by transoms of small translucent lights which are continuous with the frieze. The daylight basement has eight over eight double-hung sash windows. The frieze is partially decorated with contrasting brickwork in diamond patterns. The entrance (on the north façade) is an arched double door (aluminum now) surrounded by concentric arches of headers. A stained glass lunette above the doors displays a design of fir trees, a lamp and the words, “Carnegie Library 1912”.

Tax funding and a library board were created by ordinance in 1911. The first board, appointed by the mayor, included: Mrs. D.C. Apperson, Mr. Macy, Lulu Roger, O.O. Hodson, and Ella Hendrick. Until that time, the library had been in the hands of a private organization, the Civic Improvement Club, it was quartered in Eliza Wright’s building for rent of \$12.00 a month.

In 1911 discussion of a Carnegie Library was begun. Ernst Kroner, Worchester Building, Portland was chosen architect and plans were submitted and reworked throughout most of 1912. Several plan were discussed. Local contractors’ bids were too high and a Portland firm, Wineland & Co. were chosen as builders with a bid of \$8,880. The new building was insured by Oregon Fire Relief Association for \$4000. It was completed in March 1913. The building sits on the edge of the City Park facing north and surrounded by several large trees, most notable a Monkey Puzzle tree.”

### **Summary of Criteria & Issues**

The application (HL 5-20) is subject to Certificate of Approval for Alteration review criteria in Section 17.65.060(B) of the McMinnville Municipal Code (MMC). The goals and policies in Volume II of the Comprehensive Plan are also independent approval criteria for all land use decisions.

The specific review criteria for Certificate of Approval for Alteration requests, in Section 17.65.060(B) of the MMC, require the Historic Landmarks Committee to base each decision on the following criteria:

1. The City’s historic policies set forth in the comprehensive plan and the purpose of this ordinance;
2. The following standards and guidelines:
  - a. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
  - b. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
  - c. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
  - d. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
  - e. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

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- f. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.
  - g. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
  - h. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
  - i. The Guidelines for Historic Preservation as published by the United States Secretary of the Interior.
3. The economic use of the historic resource and the reasonableness of the proposed alteration and their relationship to the public interest in the historic resource's preservation or renovation;
  4. The value and significance of the historic resource; and
  5. The physical condition of the historical resource.

The applicant has provided findings to support the request for a Certificate of Approval for Alteration. These will be discussed in detail in Section VII (Conclusionary Findings) below.

## **II. CONDITIONS:**

None.

## **III. ATTACHMENTS:**

1. HL 5-20 Application and Attachments (on file with the Planning Department)

## **IV. COMMENTS:**

### **Agency Comments**

This matter was referred to the following public agencies for comment: McMinnville Fire Department, Police Department, Parks and Recreation Department, Engineering and Building Departments, City Manager, and City Attorney, McMinnville School District No. 40, McMinnville Water and Light, Yamhill County Public Works, Yamhill County Planning Department, Recology Western Oregon, Frontier Communications, Comcast, Northwest Natural Gas. The following comments were received:

- McMinnville Engineering Department

No concerns.

- McMinnville Building Department

A building permit will be necessary for the new handrails when it comes time for installation.

- McMinnville Water and Light

McMinnville Water & Light has no comment on this historic landmark submittal.

### **Public Comments**

Notice of this request was mailed to property owners located within 300 feet of the subject site. As of the date of the Historic Landmarks Committee public meeting on January 5, 2021, no public testimony had been received by the Planning Department.

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## **V. FINDINGS OF FACT - PROCEDURAL FINDINGS**

1. The applicant, Jenny Berg, Library Director, on behalf of the City of McMinnville, submitted the Certificate of Approval application (HL 4-20) on September 15, 2020.
2. The application was deemed incomplete on September 16, 2020. A revised application submittal, including the items that were requested by the Planning Department to deem the application complete, was provided on November 18, 2020.
3. The application was deemed complete on December 1, 2020. Based on that date, the 120 day land use decision time limit expires on March 31, 2021.
4. Notice of the application was referred to the following public agencies for comment in accordance with Section 17.72.120 of the Zoning Ordinance: McMinnville Fire Department, Police Department, Parks and Recreation Department, Engineering and Building Departments, City Manager, and City Attorney, McMinnville School District No. 40, McMinnville Water and Light, Yamhill County Public Works, Yamhill County Planning Department, Recology Western Oregon, Frontier Communications, Comcast, Northwest Natural Gas.

Comments received from agencies are addressed in the Decision Document.

5. Notice of the application and the January 5, 2021 Historic Landmarks Committee public meeting was mailed to property owners within 300 feet of the subject property in accordance with Section 17.65.070(C) of the Zoning Ordinance on December 18, 2020.
6. No public testimony was submitted to the Planning Department prior to the Historic Landmarks Committee public meeting.
7. On January 5, 2021, the Historic Landmarks Committee held a duly noticed public hearing to consider the request.

## **VI. FINDINGS OF FACT – GENERAL FINDINGS**

1. **Location:** 225 NW Adams Street. The property identified as Tax Lot 9800, Section 20AD, T. 4 S., R. 4 W., W.M.
2. **Size:** The size of the parcel on which the building is located is undetermined, but is much larger than the library building itself and includes the adjacent aquatic center building and adjacent City Park.
3. **Comprehensive Plan Map Designation:** Residential
4. **Zoning:** R-2 (Single Family Residential)
5. **Overlay Zones/Special Districts:** Downtown Design Standards Area.
6. **Current Use:** Library
7. **Inventoried Significant Resources:**
  - a. **Historic Resources:** Historic Resources Inventory – Resource Number A400.
  - b. **Other:** None

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8. **Other Features:** The site on which the library is located is large and contains other buildings and facilities, including the City’s aquatic center, City Park, and other facilities and features associated with those uses.
9. **Utilities:**
- a. **Water:** Water service is available to the subject site.
  - b. **Electric:** Power service is available to the subject site.
  - c. **Sewer:** Sanitary sewer service is available to the subject site.
  - d. **Stormwater:** Storm sewer service is available to the subject site.
  - e. **Other Services:** Other utility services are available to the subject site. Northwest Natural Gas and Comcast is available to serve the site.
10. **Transportation:** The site is adjacent to NW Adams Street, which is identified as a Major Arterial street in the McMinnville Transportation System Plan (TSP). Section 17.53.101 of the McMinnville Municipal Code identifies the right-of-way width for major arterial streets as 104 feet. The existing right-of-way width adjacent to the property is not 104 feet, but is located within the downtown area where existing development is generally constructed up to or within close proximity to existing property lines. Therefore, no right-of-way dedication is required for the proposed development.

## **VII. CONCLUSIONARY FINDINGS:**

The Conclusionary Findings are the findings regarding consistency with the applicable criteria for the application. The applicable criteria for a Certificate of Approval for Alteration are specified in Section 17.65.060(B) of the Zoning Ordinance.

In addition, the goals, policies, and proposals in Volume II of the Comprehensive Plan are to be applied to all land use decisions as criteria for approval, denial, or modification of the proposed request. Goals and policies are mandated; all land use decisions must conform to the applicable goals and policies of Volume II. “Proposals” specified in Volume II are not mandated, but are to be undertaken in relation to all applicable land use requests.

### **Comprehensive Plan Volume II:**

The following Goals, Policies, and Proposals from Volume II of the Comprehensive Plan provide criteria applicable to this request:

The implementation of most goals, policies, and proposals as they apply to this application are accomplished through the provisions, procedures, and standards in the city codes and master plans, which are sufficient to adequately address applicable goals, policies, and proposals as they apply to this application.

The following additional findings are made relating to specific Goals and Policies:

**GOAL III 2: TO PRESERVE AND PROTECT SITES, STRUCTURES, AREAS, AND OBJECTS OF HISTORICAL, CULTURAL, ARCHITECTURAL, OR ARCHAEOLOGICAL SIGNIFICANCE TO THE CITY OF McMINNVILLE.**

**GOAL III 4: ENCOURAGE THE PRESERVATION AND REHABILITATION OF HISTORIC RESOURCES**

**GOAL III 6: INCREASE HERITAGE TOURISM**

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**APPLICANT’S RESPONSE:** The proposed project will meet the policies of the Comprehensive Plan by increasing public awareness of McMinnville’s history by safely inviting people to use the original entrance to the Library, which offers a beautiful view of the original Carnegie architecture. The project protects the historic resource of the Library as the railing can be removed when it is no longer needed, leaving the façade intact. The project will keep heritage tourists safe as they enter the Library entrance during COVID-19, allowing them to use the handrails to enter the old Carnegie Library entrance.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings.

**GOAL X 1:** TO PROVIDE OPPORTUNITIES FOR CITIZEN INVOLVEMENT IN THE LAND USE DECISION MAKING PROCESS ESTABLISHED BY THE CITY OF McMINNVILLE.

**GOAL X 2:** TO MAKE EVERY EFFORT TO ENGAGE AND INCLUDE A BROAD CROSS SECTION OF THE COMMUNITY BY MAINTAINING AN ACTIVE AND OPEN CITIZEN INVOLVEMENT PROGRAM THAT IS ACCESSIBLE TO ALL MEMBERS OF THE COMMUNITY AND ENGAGES THE COMMUNITY DURING DEVELOPMENT AND IMPLEMENTATION OF LAND USE POLICIES AND CODES.

*Policy 188.00 The City of McMinnville shall continue to provide opportunities for citizen involvement in all phases of the planning process. The opportunities will allow for review and comment by community residents and will be supplemented by the availability of information on planning requests and the provision of feedback mechanisms to evaluate decisions and keep citizens informed.*

**APPLICANT’S RESPONSE:** None.

**FINDING: SATISFIED.** The process for a Certificate of Approval for Alteration provides an opportunity for citizen involvement throughout the process through the public notice and the public meeting process. Throughout the process, there are opportunities for the public to review and obtain copies of the application materials and the completed staff report prior to the advertised public meeting(s). All members of the public have access to provide testimony and ask questions during the public review and hearing process.

### **McMinnville Zoning Ordinance**

The following Sections of the McMinnville Zoning Ordinance (Ord. No. 3380) provide criteria applicable to the request:

#### **Chapter 17.03. General Provisions**

**17.03.020 Purpose.** The purpose of this ordinance is to encourage appropriate and orderly physical development in the City through standards designed to protect residential, commercial, industrial, and civic areas from the intrusions of incompatible uses; to provide opportunities for establishments to concentrate for efficient operation in mutually beneficial relationship to each other and to shared services; to provide adequate open space, desired levels of population densities, workable relationships between land uses and the transportation system, and adequate community facilities; to provide assurance of opportunities for effective utilization of the land resource; and to promote in other ways public health, safety, convenience, and general welfare.

**APPLICANT’S RESPONSE:** None.

**FINDING: SATISFIED.** The purpose of the Zoning Ordinance is met by the proposal as described in the Conclusionary Findings contained in this Decision Document.

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**17.65.060 Exterior Alteration or Remodeling.** The property owner shall submit an application for a Certificate of Approval for any exterior alteration to a historic landmark, or any resource that is listed on the National Register for Historic Places. Applications shall be submitted to the Planning Department for initial review for completeness as stated in Section 17.72.040 of the McMinnville Zoning Ordinance. The Planning Director shall determine whether the proposed activities constitute an alteration as defined in Section 17.65.020 (A) of this chapter. The Historic Landmarks Committee shall meet within thirty (30) days of the date the application was deemed complete by the Planning Department to review the request. A failure to review within thirty (30) days shall be considered as an approval of the application. Within five (5) working days after a decision has been rendered, the Planning Department shall provide written notice of the decision to all parties who participated.

**APPLICANT’S RESPONSE:** None.

**FINDING: SATISFIED.** The applicant, who is representing the property owner, filed an application and request for approval of proposed alterations to the building that is designated as a Significant resource on the Historic Resources Inventory. The application was reviewed by the Historic Landmarks Committee shortly after 30 days of the application being deemed complete.

**17.65.060 Exterior Alteration or Remodeling.** [...]

B. The Historic Landmarks Committee shall base its decision on the following criteria:

**17.65.060(B)(1).** *The City’s historic policies set forth in the comprehensive plan and the purpose of this ordinance;*

**APPLICANT’S RESPONSE:** None.

**FINDING: SATISFIED.** The findings for the applicable Comprehensive Plan policies are provided above.

**17.65.060(B)(2)(a).** *A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.*

**APPLICANT’S RESPONSE:** The property will continue to be used as it has always been used, as a public library to serve the citizens and visitors of McMinnville.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings, and adds that the proposed method in which the handrails will be installed will not impact any portion of the historic building other than the existing concrete steps near the entrance. Therefore, distinctive materials, features, and spatial relationships of the historic building itself will be retained.

**17.65.060(B)(2)(b).** *The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

**APPLICANT’S RESPONSE:** The historic character will be retained and preserved, with no changes made other than the addition of the handrails.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings, and adds that the proposed method in which the handrails will be installed will not impact any portion of the historic

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building other than the existing concrete steps near the entrance. Therefore, distinctive materials, features, and spatial relationships of the historic building itself will be retained.

**17.65.060(B)(2)(c).** *Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.*

**APPLICANT’S RESPONSE:** The stair railing will be visually compatible with the current library, made from simple, bent, metal railing powder coated in black.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings, and adds that the proposal generally protects the character-defining structural components of the historic landmark, in that the major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the arched double door, concentric arches of headers, and stained glass lunette above the doors. Other features of the building, including its exterior façade materials and design finishes, would also be protected as the handrails are not proposed to be installed in a manner that would attach to or impact the building itself. The handrails are proposed to be mounted only to the concrete steps near the entrance of the building. The handrails also avoid any alteration or impact to the taller side walls of the entrance landing, which are original to the building and finished in the same material and texture as the lower portion of the adjacent building façade.

The proposed color and style of handrail is a powder coated metal railing that would be black, which is physically and visually compatible with the building. The railing design that is being proposed meets applicable building code requirements for railings that provide an entrance to publically accessible buildings. The railing is not overly eccentric or a design that attempts to mimic any feature on the building or surrounding site. Historic photo evidence of the building does not provide any clear documentation of a particular form or style of handrail being present at this entrance. It appears that a railing was present on the building, in a longer form that extended along the sidewalk leading up to the entrance steps. However, the proposed railing is again meeting current building code requirements and also is smaller and therefore less visually impactful on the historic entrance to the building. Some historic photos are provided below (exact dates unknown but estimated to be circa 1920s to 1930s):



A railing was also present near this building entrance as late as 1983 in the date of the photo taken and included in the Historic Resources Inventory, which is identified below:





**17.65.060(B)(2)(d).** *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

**APPLICANT’S RESPONSE:** Not applicable.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings, and adds that there is no evidence that changes to the steps around the entrance to the building have acquired historic significance that require retention or preservation. As discussed above, the proposed method in which the handrails will be installed will not impact any portion of the historic building other than the existing concrete steps near the entrance. Therefore, distinctive materials, features, and spatial relationships of the historic building itself will be retained.

**17.65.060(B)(2)(e).** *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

**APPLICANT’S RESPONSE:** Distinctive materials, features, finishes, and construction technique of the Carnegie Library will be preserved.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings, and adds that the proposal generally protects the character-defining structural components of the historic landmark, in that the major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the arched double door, concentric arches of headers, and stained glass lunette above the doors. Other features of the building, including its exterior façade materials and design finishes, would also be protected as the handrails are not proposed to be installed in a manner that would attach to or impact the building itself. The handrails are proposed to be mounted only to the concrete steps near the entrance of the building. The handrails also avoid any alteration or impact to the taller side walls of the entrance landing, which are original to the building and finished in the same material and texture as the lower portion of the adjacent building façade.

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**17.65.060(B)(2)(f).** *The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.*

**APPLICANT’S RESPONSE:** No intervention will be needed to repair deterioration.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings.

**17.65.060(B)(2)(g).** *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

**APPLICANT’S RESPONSE:** No chemical or physical treatments will be used that cause damage to historic materials.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings.

**17.65.060(B)(2)(h).** *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

**APPLICANT’S RESPONSE:** We are not aware of any known archeological resources at the site that will be affected by this project.

**FINDING: SATISFIED.** The City concurs with the applicant’s findings.

**17.65.060(B)(2)(i).** *The Guidelines for Historic Preservation as published by the United States Secretary of the Interior.*

**APPLICANT’S RESPONSE:** The proposed project fits the Secretary of Interior Guidelines for Historic Preservation as Rehabilitation as a Treatment. The Dept. of Interior website states “Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property’s historic character.”

**FINDING: SATISFIED.** After further review, the City finds that the proposed alterations would be more closely considered a “Preservation” of the existing historic resource, which is a type of treatment of historic properties described in the Secretary of the Interior’s Standards for the Treatment of Historic Properties. This document describes the preservation of a historic building as follows:

“Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.”

The City finds that the proposal does include a limited upgrade of code-required work, in the addition of hand rails for accessibility to the stairs leading to the now main entrance of the building. This limited upgrade and addition is listed as being allowed within the Preservation treatment when done to make properties functional. The City also finds that the proposal could

be considered a Preservation treatment because the manner in which the railings are proposed to be installed generally protects the character-defining structural components of the historic landmark. The major building forms of the structure that are listed in the Historic Resources Inventory would remain, including the arched double door, concentric arches of headers, and stained glass lunette above the doors. Other features of the building, including its exterior façade materials and design finishes, would also be protected as the handrails are not proposed to be installed in a manner that would attach to or impact the building itself. The handrails are proposed to be mounted only to the concrete steps near the entrance of the building. The handrails also avoid any alteration or impact to the taller side walls of the entrance landing, which are original to the building and finished in the same material and texture as the lower portion of the adjacent building façade. Based on the fact that the proposed alteration does not impact or involve direct alteration to any of these prominent building features, it is determined that the most applicable treatment for this specific work is the Preservation treatment.

The City's findings are supported by some of the applicable Preservation guidelines for code-required accessibility work on historic buildings, which are provided below:

Recommended Guideline: Identifying the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work.

Recommended Guideline: Complying with barrier-free access requirements in such a manner that the historic building's character-defining exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible.

Recommended Guideline: Finding solutions to meet accessibility requirements that minimize the impact of any necessary alteration for accessibility on the historic building, its site, or setting, such as compatible ramps, paths, and lifts.

Not Recommended Guideline: Altering, damaging, or destroying character-defining exterior features, interior spaces, features, and finishes, or features of the site and setting while making modifications to a building, its site, or setting to comply with accessibility requirements.

Not Recommended Guideline: Making modifications for accessibility without considering the impact on the historic building, its site, and setting.

Finding: As discussed above, the proposed method in which the handrails will be installed will not impact any portion of the historic building other than the existing concrete steps near the entrance. Therefore, distinctive and character-defining materials, features, and finishes of the historic building itself will be retained. The installation of the railings by mounting only to the existing concrete steps, and the proposed finish in a simple powder-coated black color, will result in little impact on the features of the building site and its setting.

**17.65.060(B)(3).** *The economic use of the historic resource and the reasonableness of the proposed alteration and their relationship to the public interest in the historic resource's preservation or renovation;*

**APPLICANT'S RESPONSE:** This project is reasonable in that the proposed alteration is in the public interest by creating a safer entrance to the Library while maintaining the historic character of the Carnegie Library.

**FINDING: SATISFIED.** The City concurs with the applicant's findings. The City adds that the proposed alterations are reasonable, based on the overall goal of avoiding alterations or impacts to the more character defining building features. The reasonableness of the proposed action is further supported in the findings for other applicable review criteria, particularly in the findings for the Secretary of the Interior Standards that are further described above.

**17.65.060(B)(4).** *The value and significance of the historic resource; and*

**APPLICANT'S RESPONSE:** The McMinnville Public Library has great value and significance to the community and visitors of McMinnville. Creating a safe and welcoming entrance using the historic entrance of the Carnegie Library adds value by allowing more people to use this entrance.

**FINDING: SATISFIED.** The City concurs with the applicant's findings, and adds that the proposed method in which the handrails will be installed will not impact any portion of the historic building other than the existing concrete steps near the entrance. Therefore, distinctive materials, features, and spatial relationships of the historic building itself will be retained, which will not impact the value and significance of the historic building and resource.

**17.65.060(B)(5).** *The physical condition of the historical resource.*

**APPLICANT'S RESPONSE:** The physical condition of the Library is good. The project will improve the condition by allowing greater safety upon entering the Library.

**FINDING: SATISFIED.** The City partially concurs with the applicant's findings. The City adds that there have been some changes to the north entrance to the building over time, as documented in the changes evident between historic photos, photos from the time of the Historic Resources Inventory in 1983, and more current photos of the building. However, overall building features and designs are still intact. As discussed in more detail above, the current proposed work is minimal and is proposed in a manner that would not impact any portion of the historic building other than the existing concrete steps near the entrance. Therefore, distinctive materials, features, and spatial relationships of the historic building itself will be retained, and the physical condition of the historic building will not be negatively impacted.

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