SPANISH STEPS

HISTORIC STRUCTURES REPORT

DECEMBER 2004

PREPARED FOR:

CITY OF TACOMA

PREPARED BY:

ARTIFACTS CONSULTING, INC.

AND

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CONTRIBUTORS

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ADMINISTRATIVE DATA

Historic Name: Spanish Stairs and Spanish Steps

Current Name: Spanish Steps

Address: East/west connection between Broadway and Commerce Street as a continuation of South Seventh Street. No applicable physical address. Tacoma WA, 98402

Proposed Treatment: Rehabilitation

Owner: City of Tacoma
Metropolitan Parks District
4702 South 19th Street
Tacoma, WA 98405

Zoning District: Downtown Commercial Core: Overlay 1: HIST-Historical

Legal Description:

The property is located in the Section of 32, Township 21, Range 03, Quarter 44 , NEW TACOMA between Blocks 505 (north) and 705 (south) in Tacoma, Washington.

Landmark Status:

Contributing element within the Old City Hall Historic District listed on the Tacoma and National Registers of Historic Places and the Washington Heritage Register in 1977.

Contemporary Related Studies:

Old City Hall Historic District National Register Nomination (1977).

Cultural Resource Data:

Date of Construction:	1916
Period of Significance:	1916-1965
Major Renovations:	1930s, 1975
Architect:	Édouard Frère Champney

Historic Structures Report Commissioned By:

The City of Tacoma

TABLE OF CONTENTS

EXECUTIVE SUMMARY

1.1 INTRODUCTION

The Spanish Steps:

- Are physically and structurally well suited for continued use and potential rehabilitation projects;
- Are well located to contribute to the continued use and development of the surrounding neighborhood;
- Would be subject to environmental protections as a historic structure if planned for demolition;
- Would benefit from building code interpretations in the *International Existing Building Code* (2003) related to historic structures;
- Are subject to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as a contributing component of a National Register listed Historic District;

The Spanish Steps' landmark status and defining visual and functional public presence should be a factor in property management and public policy decisions. The Spanish Steps accompany the 1916 Elks Building in function and composition. Designed by Édouard Frère Champney as part of the Elks Building competition, they were started in 1915 and completed in 1916 and based on the influence of the Spanish Steps in Rome. They are the primary landscape element in the ensemble of Classical buildings surrounding Old City Hall at the head of Pacific Avenue. As a contributing primary resource in the Old City Hall Historic District, the Spanish Steps embellish and expand the Beaux Arts design of the Elks Building and provide graceful pedestrian access between the former center of municipal government and the principal streetcar corridor that once ran along Broadway. In a city built on a hill, the Spanish Steps comprise the only formalized, landscaped hill-climb in the downtown and the most formal public exterior stairway in Tacoma. Their future use and rehabilitation are inextricably intertwined structurally, aesthetically and historically with the Elks Building.

1.2 WHAT IS A HISTORIC STRUCTURES REPORT?

A Historic Structures Report (HSR) is a written and illustrated reference document that provides a thorough historic and architectural evaluation of a building, site or structure. It identifies significant original and subsequently added features and spaces, existing appearance and condition, and historic events associated with the structure. The purpose of this evaluation is to provide a basis to make decisions relating to maintenance, restoration or rehabilitation of the building or structure.

A HSR is usually prepared for buildings, objects or sites that are on or eligible for listing on the National Register of Historic Places prior to planning any alterations, additions, rehabilitation, or restoration of a historic structure. The report is used to guide contemporary modifications, reuse or restoration of the property. The National Park Service, under the guidance of the United States Department of the Interior, establishes specific guidelines and contents for the creation of Historic Structures Reports, and provides advice on when they should be done. These reports are required when performing work on federally owned historic buildings or structures and recommended for other buildings and structures that have considerable historic significance and community value.

1.3 PURPOSE OF THIS REPORT

This Historic Structures Report is primarily intended to provide basic information to guide stabilization, repairs and continued use, rehabilitation and restoration of the Steps in concert with establishing their role and importance as a cultural heritage artifact within the city of Tacoma. The document also serves as an extensive repository of information concerning the local, state and regional historic and architectural significance of the Spanish Steps.

This Historic Structures Report presents in narrative form the history and significance underpinning the treatment levels ascribed to the Steps' spaces, materials, structural system, and view corridors. Identification of these architecturally and historically significant spaces and features facilitates their incorporation into the planning and development of a future comprehensive approach to the treatment of the Spanish Steps.

This report is anchored on a detailed survey and inventory of the Steps' architecturally significant features and spaces. The survey was performed to investigate the historic character of the Steps and identify original, intact significant elements of the 1916 architecture and historically significant changes. This will allow for the protection and preservation of the historic fabric of the Steps and provide standards for new construction as part of repairs, stabilization, rehabilitation and restoration. The survey was performed during the fall and winter of 2004. At that time, the Spanish Steps were open to the public. Each feature and space and the site were examined, photographed, and noted as to current use, defining physical characteristics and condition. Then each feature and space was categorized by architectural significance (these categories are described in section 4.2 Analysis of Significance). Investigation was limited to above-grade elements. No destructive investigation measures were employed.

As this document is employed in future planning and research related to the Spanish Steps, its content will guide decisions about maintenance, modification and conservation on a detailed level. The information incorporates an understanding of historic preservation design guidelines (*Secretary of the Interior's Standards for the Treatment of Historic Properties*) and accepted practices in regard to architectural conservation methods. The content

organization is designed to facilitate the use of this report as a development and conservation planning tool through the understanding of the Spanish Steps as a historic structure.

1.4 SUMMARY OF REPORT CONTENTS

History of the Spanish Steps: A thorough background statement on the Steps includes historical narratives, photographic and graphic illustrations and primary source materials. This body of information is prepared to address the criteria for designation of historic sites and landmarks as applied by the National Park Service and the National Register of Historic Places. The historic narratives and background materials explore key events and associations and assumed community roles related to the original planning, construction and use of the Steps. This subject matter is the central criteria in evaluating the significance of the Steps and site.

Catalogue of Elements: The report includes a detailed record of features and spaces, which identifies which are original or historic changes that embody the associations and meanings important to the Steps' cultural and architectural significance and those that are non-compatible contemporary additions. The catalogue consists of a schedule of character-defining elements. Each record consists of a systematic discussion of the level of significance, previous alterations, existing state and assessment of condition. The purpose of this section is to identify which parts of the Steps are important to retain, particularly during the stabilization, repairs and restoration of the Steps. Identifying character-defining elements facilitates the protection of the remaining original materials and spaces for their collective interpretive and cultural value and continued community use and appreciation. Structural observations and findings follow this catalogue, identifying critical structural issues affecting the Steps.

Findings: With the original design elements of the Spanish Steps and their roles within the city of Tacoma clearly delineated, and modern additions and subtractions distinguished, it is possible to develop a means of protecting those remaining historic aspects of the Steps so that they will remain for future generations to enjoy. To this end, this section provides the tools for guiding stabilization, repairs and

further changes to the Spanish Steps in a compatible fashion that respects and balances the historical significance of the Steps' design, features and spaces with the need to maintain functionality, address ADA accessibility, and provide for life safety needs. These tools consist of an Introduction, Section 4.1; an Analysis of Significance, Section 4.2; a Decision-Making Matrix, Section 4.3; Structural Recommendations, Section 4.4; and Prioritized Recommendations, Section 4.5. Maps and coded drawings are included in the report in Section 4.2, indicating the relative architectural significance and historic importance of features and spaces.

Supplemental Material: This section contains historical documentation gathered from local repositories including the Tacoma Public Library Northwest Room. No original drawings were located for the Steps. The compact disk (CD) mounted to the back cover contains digital versions, historic photographs gathered and contemporary photographs taken during field surveys, as well as PDF versions of the report for reproduction. The Condition Photographs in Section 5.2 supplement the condition descriptions and assessments in the Character-Defining Elements portion of the report. The Bibliography provides a detailed list of sources consulted.

1.5 SUMMARY OF FINDINGS

The general conclusions that arise out of this report are organized under the captions below and may be individually studied in more detail within the appropriate sections of the main report. The conclusions address the specific historic preservation findings, conditions and issues that exist currently and that should shape plans and policies for stewardship and maintenance of the Steps. They should also be integrated into planning for the stabilization and rehabilitation of the Spanish Steps, for the purpose of retaining important public features and spaces.

Landmark Status: The Spanish Steps are a contributing element within the National Register listed Old City Hall Historic District (listed December 23, 1977). The District nomination identifies the Spanish Steps, in association with the adjacent Elks Building, as one of the four pivotal structures defining the boundaries of the Historic District.

Historic Significance: The Spanish Steps comprise a primary contributing resource in the Old City Hall Historic District (National Register of Historic Places and Tacoma Register of Historic Places) and physically express the ensemble character of the Classical buildings that are clustered at the north end of Pacific Avenue. The Steps create an open space amenity for the surrounds of the former Tacoma City Hall, tying the fraternal lodge into the historic civic center area in both a functional and design sense. The Steps also reflect social patterns in Tacoma before the automobile replaced streetcars and pedestrian pathways in the downtown area.

Degree of Extant Significant Fabric: The Spanish Steps retain a significant amount of original fabric, conveying their original form and function, design intent, materials, and high level of craftsmanship. Original elements include a single cast iron urn, the exterior cast iron lamps, concrete stairs, concrete stringers, cast stone balusters, cast stone railings, and cast stone newels. Repairs in the late 1930s to mid 1940s and during the 1970s introduced both compatible and non-compatible contemporary elements, including cast cpmcrete balusters, railings, urns, and the concrete flooring on the landings.

Condition Assessment: The Spanish Steps remain in fair condition following 88 years of continued public use in an outdoor setting. Priority items needing immediate attention consist of the south slope stabilization and stopping further settlement, and the exclusion of vagrants from the areaway. Extended condition issues consist primarily of problems arising from non-compatible previous repairs, wear due to normal public use and damage from vandalism, compounded by deferred maintenance and increasing depths of water penetration through cracks and breaks in the materials. The repair of deterioration of the braces at the north side of the steps between the Elks Building and the Steps is complicated by their interconnection with the Elks Building.

Design Authenticity/Future Modifications: The Spanish Steps retain their original design authenticity borne through intact original materials, spaces, and their sequencing. The Steps' intact form conveys the original functional intent of the designing architect, Édouard Frère Champney, and strong functional and physical interconnection with the adjacent Elks Building. Ultimately, the Steps are a product of the Elks Building's design, yet they stand totally independent unto themselves as a cohesive design entity. This sequencing of the Steps' spaces and defining components accumulated important intangible associations through 88 years of continuous public use, associations drawn from social events, public assemblies, and as a favored group photograph backdrop.

Landscaping & Plantings Significance: Landscaping and plantings comprise an important element in the interpretation of historic structures, particularly those open to the outdoors and having integral planting spaces. Historically, each of the Steps' planting areas featured lawn (short grass). A Monkey Puzzle tree was also planted in the upper, northwest planting area early in the structure's history. The urns originally featured small evergreen plantings. The appropriate period for restorative plantings and landscaping should be 1916, the date of construction.

Accessibility: Accessibility pertains to use of the Spanish Steps to traverse between Broadway and Commerce Street and from either street to the south, second-floor, side entrance of the Elks Building. The goal of providing and improving existing barrier-free accessibility according to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) is to "provide the highest level of access with the lowest level of impact" to the character-defining elements identified in this Historic Structures Report. The three federal laws directing accessibility

standards are the *Architectural Barriers Act* of 1968, Section 504 of the *Rehabilitation Act* of 1973, and the *Americans with Disabilities Act* (ADA) of 1990.

Significant Spatial Areas & Sequences: The significance of exterior spatial areas and the sequencing and relationship between these areas stems from their interpretive importance and roles in conveying the defining monumental public character of the Spanish Steps. These outdoor areas, though lacking a physical ceiling, do exhibit defining perimeter elements and both distinct functional roles and defined connections to other areas. Their interpretive importance addresses both space specific histories and embedded associations, such as the repeated use of the main landing and the lower stairs as the setting for group photographs by tourists and local citizens celebrating school graduations and weddings. Sequencing and the interrelation between spaces draws visitors and frequent users alike into the Steps and imparts a clear sense of the important civic nature of their function within the city.

Three defining spatial areas are the landings, stairways, and planting areas. The principal sequence is the landings/stairways sequence between the two flanking streets. The secondary sequence involves the Elks Building – the sequence of exiting from the building onto the main landing.

Significant View Corridors: View corridor significance stems from the pronounced influence of vistas on perceived spatial quality, transfer of historical associations, and contextual inspiration for habitual stair users and visitors. The Spanish Steps are oriented lengthwise along a section of South Seventh Street on a steep slope. The Steps provide exceptional views of Commencement Bay and the industrial tide flats, and dominate the views east along South Seventh Street as well as the views from Broadway and Commerce streets looking north on the approach to the Steps.

Managing Change: Managing change implies stewarding repairs and new work to preserve, to the greatest extent possible, the extant spaces and intact original fabric that define the character of the Steps, and to integrate repairs and new work in a manner that reinforces this character without diminishing or obfuscating original elements. Successfully managing change on the Spanish Steps depends upon the following five key priorities:

1) High value must be placed on the retention of existing original stair fabric and spaces during repairs and stabilization, restoration, and rehabilitation, as well as during new construction of adjoining buildings and work on the adjacent streets and sidewalks;
2) A long-term perspective must be employed towards implementing changes in a reversible manner and assessing the long-term value and relevancy of immediate alterations;
3) A sound salvage and reuse policy must be implemented for safe handling and storage of any original elements removed from the Steps during work in a manner allowing their inventory, tracking, and reuse;
4) New finishes must be harmonized with the original to reduce sharp contrasts in styles from the character of the original design intent.
5) Provide for reversibility of treatments and repairs without adverse impact or accelerated deterioration of original fabric.

HISTORY

2.1 SIGNIFICANCE STATEMENT

The Spanish Steps are a key part of an ensemble of architectural elements that mark Tacoma's Old City Hall Historic District at the northern edge of downtown Tacoma. They are a graceful composition of concrete steps and landings designed in 1914 by Édouard Frère Champney. The Steps, with the attached Elks Building and Old City Hall and Northern Pacific Railroad buildings, function like an ornate capital atop the column of Pacific Avenue. With the Steps' completion in 1916 alongside the companion Beaux Arts Elks Building, Tacoma's most formal pocket of Classical architecture was in place and its early ambitions were expressed in physical terms. The Steps' origins and subsequent changes are inextricably interwoven with the design of, additions to, and ultimate fate of the Elks Building.

ca 1916 photograph of the Spanish Steps. Source: Photograph cited from Private Collection. Ochsner, Jeffrey Karl, Ed. (1998). Shaping Seattle Architecture: A Historical Guide to the Architects. Seattle: University of Washington Press, p. 137.

ca 1912 photograph of Champney. Source: Photograph cited from Pacific Builder and Engineer, June 15, 1912, University of Washington Libraries, Special Collections Division; UW14719. Ochsner, Jeffrey Karl, Ed. (1998). Shaping Seattle Architecture: A Historical Guide to the Architects. Seattle: University of Washington Press, p. 132.

ca 1885 view looking north along Pacific Avenue from the Northern Pacific Building.

2.2 DEVELOPMENT CHRONOLOGY

The hillside location of the Spanish Steps overlooked Tacoma's Chinatown during the early railroad era between 1873 and 1885. Long before the stairway transition was built, wood shanties and a set of wood steps climbed the steep bank between Seventh and Ninth streets on the west side of Commerce Street (called Railroad Street in the 1880s). It was right below the site where the rain-drenched vigilante mob climbed down the hillside from Broadway and confronted the merchants and residents of Chinatown on November 3, 1885. Many of the most violent incidents of that day occurred within sight of the eventual location of the Spanish Steps and Elks Building.

In the years following the completion of the City Hall Building at the corner of Seventh Street and Pacific in 1893, several three-story, wood-frame commercial buildings filled the site that would become the Spanish Steps. At that time, Commerce Street (Railroad Street) went no further north than City Hall, where it ended overlooking the bank below Broadway and its row of mansions.

The Spanish Steps were designed in concert with the Tacoma Elks Building, a grand Beaux Arts expression of the fraternal organization's prominence and stature. The Elks Lodge No. 174 was formed in 1890, holding their initial meetings in the massive Stanford White designed Tacoma Theatre. They moved for a short time into the Sons of Veterans Hall on Commerce and then to the old courthouse where they rented space from the city of Tacoma. In 1901, the lodge members organized a community-wide, week-long festival intended to raise funds to construct their own building. The event was successful, attracting more than 80,000 people. In 1902, the Elks Lodge acquired the Polo Building on Pacific Avenue for $25,000, expanded it to three floors by 1904, and then began ambitious plans for a new building on property adjacent to City Hall and the imposing headquarters building of the Northern Pacific Railroad. The site was previously occupied by the St. Charles Hotel, two smaller wood frame commercial buildings and the set of wood frame steps that connected Broadway and Commerce Streets along the South Seventh Street right of way.

In the era before workman's compensation, fraternal organizations provided both a social and economic value for members. Dues paying members enjoyed the socializing, eating and drinking accommodations of the lodge as well as the privileges of a private club that provided financial support for the family in the event of death or an accident on the job. This contributed to high enrollment and a broad labor pool to fund and aid in construction of a new building. By 1909, the lodge owned the site of the new building and steps and began planning for a ten-story building.

That year, the Northern Pacific Railroad unveiled their long-awaited design for a passenger depot in Tacoma. Designed by the firm Reed & Stem of New York, the domed building was a catalog of Beaux Arts design elements and it had a profound influence on Tacoma buildings of the period. The Federal Building [listed on the National Register of Historic Places (NR)], completed in 1911, also reflected Beaux Arts sensibilities, although its academic style is more properly identified as Second Renaissance Revival. Beaux Arts detailing also appeared on the Tacoma Building, built in 1910 (NR) and Perkins Building, built in two stages in 1907 and 1910 (NR), two of the most important commercial buildings of the time.

On April 4, 1914, the Tacoma Elks began the formal building process by passing the following resolution:

> *"A motion was duly presented by Brother H.Y. Walker which was seconded and carried that the Exalted Ruler appoint a committee consisting of the Exalted Ruler, the Trustees and three members of the Lodge, for the purpose of financing and carrying to completion the building of a new home for the Elks Lodge."*

In compliance with this motion, the committee was appointed consisting of Exalted Ruler, James N. Neil, Chairman, the Trustees (including specifically D.J. Williams, Secretary, and D.K. Derrickson, Treasurer) and Brother Charles O. Bates, Brother D.J Williams and Brother Peter Daly.

The Building Committee spent considerable time deliberating on a method for selecting and architect for the project. The Elks finally chose to hold a design competition to select the architect for their building, as had been done recently for the Washington State Capitol (1911) and the Tacoma Building (1910) which housed both the Tacoma Commercial Club and the Weyerhaeuser Company. The building committee then employed Charles H. Bebb as an advisory architect to assist with conducting the competition. The first call for entries asked for the design of an $85,000 building of

ca 1885 photograph of Tacoma's north end prior to construction of old City Hall, the Elks Building, and the Northern Pacific Building.

ca 1895 photograph of Pacific Avenue looking south. Source: Washington State Historical Society.

ca 1895 photograph looking south along Pacific (left) and Commerce (right) before construction of the Elks Building and Spanish Steps.

"slow burning construction." The rather fatalistic directive implied brick and heavy timber as the construction materials but when the fourteen entries were judged, the unanimous choice was a design by Édouard Frère Champney to be constructed of concrete. His design also involved an elaborate stairway on the south side of the building.

The composition exhibited Champney's affection for building groupings as displayed in his work on expositions and world's fairs. The design visually connected the proposed lodge building with City Hall and the politically important Northern Pacific Railroad Building in a civic ensemble located symbolically at the head of Pacific Avenue. This clustering of the new lodge among Tacoma's most important buildings appealed to the membership and was key to Champney's selection.

Édouard Frère Champney was a French-born, Ecole des Beaux-Arts trained architect with offices in Seattle where he had previously partnered with Augustus Warren Gould. Champney had developed a prestigious reputation for his involvement in the design of several world's fairs including the Buffalo Pan American Exposition (1900), the Lousiana Purchase Exposition in St. Louis (1904), the Lewis and Clark Exhibition (1903-1904) in Portland where he designed the United States Government Pavillion,

the Alaska Yukon Pacific Exposition (1909) in Seattle and the Pan Pacific International Exposition (1912-1914) in San Francisco. His portfolio also included the Roman Catholic Cathedrals of Minneapolis and St. Paul, the YWCA Building (1912) in Seattle, the Seattle Electric Company Building and the New Richmond Hotel in Seattle.

Champney's competition entry was notable for the imaginative use of "a spectacular public stairway" on the south side of the building as a means of both blending the design into the hillside site and reducing the loss of interior space to connecting stairs inside the building. His world's fair exposition experience in juxtaposing large monumental architectural elements with elaborate footbridges, passages and stairs was evident in the composition of structures around the head of Pacific Avenue. Champney's design concept was well suited to the ornate context of the City Hall Building across the street and the Northern Pacific Railroad headquarters just beyond. The Steps quickly became a pedestrian thoroughfare connecting the north end of Pacific with the major streetcar line that ran north along Broadway. The Spanish Steps also connected the civic group with the theatre district centered around Broadway and South Ninth Street, just two blocks to the south.

The Spanish Steps (Scalinata di Spagna) in Rome, which served as inspiration for the abridged Tacoma steps, ramp a steep slope between the Piazza di Spagna at the base and the church Trinità dei Monti on a small hill above. The monumental stairway of 135 steps was built with French funds in 1721-25, linking the Bourbon Spanish embassy to the Holy See (located in the piazza at the base of the steps) with the Bourbon French church (at the top). They were designed by Alessandro Specchi after generations of heated discussion over how the steep slope to the church on a shoulder of the Pincio should be scaled. The solution was a blending of some conventions of terraced garden stairs with the natural sculpture of the hillside. The French design sense apparent in the original Spanish Steps became central to the Beaux Arts style in the late nineteenth century. This Beaux Arts Classicism dominated the appearance of major public buildings in the United States and was the stylistic mainstay of world fairs like the Columbia Exposition in Chicago, Pan American Exposition in Buffalo and the many others at the turn of the century.

Champney's notion of lacing a grand stairway along the south elevation of the Elks Lodge borrowed heavily from his experience designing the grounds and majors buildings for world's fairs. In conceiving the design for the new Elks Building he was also imagining an extended ensemble of civic buildings

ca 1900 view looking north along Pacific Avenue.

Drawing of the Spanish Steps (Scalinata di Spagna) built in Rome in 1721-1725 and designed by Alessandro Specchi. The construction of the stairs represented a means to urbanize the steep incline between the lower plaza and the church above. Note the difference in form and composition between these stairs and the Spanish Steps adjacent the Elks Building.

ca 1901 view looking north over Half Moon Bay rail yard.

1914 photograph of the wood frame stairs serving the site prior to construction of the Elks Building and the Spanish Steps. Source: Tacoma Daily Ledger. (July 5, 1914).

and connecting grounds. The classical steps, with their monumental balustrades, broad landing and graceful flights of stairs, are written in the language of exposition grounds and are Tacoma's best link to the "*City Beautiful*" movement that emanated from that era.

The building committee recommended that the organization elevate their estimated budget to $100,000 in order to "have practically a fireproof building." In late summer 1914, the Elks contracted with C.W. Maxkam to demolish the existing buildings and wood stairs and excavate the site. Building committee minutes indicated that the contractor had a steam shovel on C Street near the site and could undertake the job immediately. On August 5, 1914, a large photograph of the steam shovel on the site of the Spanish Steps appeared in the Tacoma Ledger under the headline "Big Steam Shovel Eating Up Rubbish, Trees and Earth on Site of Elks New Building." In October, Maxkam was issued checks for $2547.36 for the excavation and $50.00 for the demolitions.

Once accepted, Champney's design was directly translated into construction drawings while the lodge negotiated a construction contract with Cornell Brothers Construction for $100,000. E.C. Cornell and his brother D.I. Cornell were members of the Elks and operated one of the region's largest construction companies. They were simultaneously working on the massive construction of Camp (Fort) Lewis where their workforce neared 10,000 employees. In these years before the United States' entry into World War One, it was no surprise that the theme of the February 1915, cornerstone-laying ceremony was American patriotism. Keynote speaker Superior Court Judge W.E. Chapman commented on the Elks' purpose of "Americanism" and the end to hyphenated national heritage labels such as German-American or Irish-American among lodge members.

The minutes of the Building Committee described the cost-cutting measures that were undertaken to reduce the cost of the new lodge. When Champney issued the general specifications for the project, there was a glaring omission. The Spanish Steps were not part of the Elks' financed building project. Rather; the city of Tacoma appears to have funded the construction of the grand staircase on public right of way. In the years to come, the Spanish Steps would be a delicate subject since they clearly benefited the fraternal organization by providing a gracious amenity to their building and a code required fire escape. The Elks later claimed to have paid property tax on the Steps for decades.

In February 1916, the Benevolent and Protective Order of Elks Tacoma Lodge No. 174 was opened to members and the public. The concrete structure cost $160,000 to complete and was furnished with $200,000 in athletic equipment, kitchen appliances, fixtures and furnishings. As completed, the building's elaborate south elevation overlooked a classical stairway that was termed by Champney as the Spanish Steps in deference to the iconic Spanish Steps in Rome. The designer incorporated the same balustrades into the railings of the stairs and the balconies of the building, calling for both to be of cast concrete with a bright white "cement overcoating".

Drawings for the Elks Building indicated a system of poured-in-place concrete using metal pans under the floor plates with steel beams and mesh for reinforcement of the building. Champney likely employed this same system in construction of the Steps, although to date (2004), no original drawings have been located or excavation conducted to verify this. Similarly, the design of the Elks Building called for white cement that was finished on the exterior with white marble dust to give the appearance of cut stone masonry. To blend with the exterior finishes of the Elks Building while providing a durable finish for public use, Champney retained F. J. Hahn of the Seattle office of the Chicago-based Architectural Decorating Company to fabricate cast stone pieces for the Steps. These many cast stone elements such as balusters, railings, posts, newels, and decorative urns were assembled on site and connected by iron pins.

The Spanish Steps were lightly affected by several rounds of alterations and additions made to the Elks Building beginning in 1920. That year, the Elks Building converted over to Consumer Central Heating and 300 feet of steam piping was laid to connect the lodge to the downtown steam system. The Commerce Street level of the Steps was fitted with a new sidewalk which covered the steam lines.

Remodeling that altered the second level of the lodge building was done in 1923 and 1937, with the latter date corresponding to a brief tussle between the lodge members and the city of Tacoma regarding ownership and responsibility for the Spanish Steps. During the summer of 1937, the Elks Building received a new addition on the north side and underwent significant upgrading of the interior spaces, heating and ventilation systems. The project architects, Mock & Morrison, oversaw the erection of the new addition and the exterior rehabilitation. As the project neared completion, the worn condition of the Spanish Steps contrasted with the freshly painted Elks Building and pressure was applied to City Hall for some improvements. After the City dismissed the request for repairs,

ca 1900s photograph taken prior to construction of the Elks Building and Spanish Steps looking north along Pacific Avenue. Old City Hall stands at left in the foreground. Source: Stoddard, John L. (1900s). Scenic America: The Beauties of the Western Hemisphere. Chicago: Werner Company.

1916 photograph of the Spanish Steps. "In the foreground is seen the Portland Elks' band, with the others of the Oregon delegation on the steps at the left. The top steps are occupied by the Seattle herd and the Tacomans are assembled beside their new building, which shows its stately splendor." Source: Tacoma Daily Ledger. (February 23, 1916: A1).

1927 photograph of the Spanish Steps. Note the absence of plantings in the lower planting area. Source: Tacoma Daily Ledger. (April 12, 1927).

Ca 1927 photograph of the Spanish Steps looking northeast. Source: Bonney, W. P. (1927). History of Pierce County Washington, vol. II. Chicago: Pioneer Historical Publishing Company, p. 1101.

the Elks proposed to do it themselves and prosecuted their ownership claims to the Steps. They were planning a grand opening of the new building addition for December of 1937

On November 5, 1937, the Elks erected a barricade at the Steps to block public use, citing the poor condition of the steps and the risk to the public. E.O. Johnson, secretary of the lodge, stated to the newspaper,

> *"The Elks lodge owns that piece of property and pays taxes on it. The trustees were informed that they had lost their right to it (the Stairs) because it had become a common right of way for t*raffic and the barricade is an attempt to set up our legal rights to the property."

Tacoma Public Works Commissioner and Elks member A. R. Bergersen expressed a different opinion when he talked to the reporter, stating:

> *"The Lodge does not own the property where the stairway is. The piece of ground that was deeded to the lodge is 15 feet wide on Commerce Street and tapers to a point on Broadway, a*nd was given to straighten the street at the turn in Broadway."

His comments seem to have settled the issue and from then on the Spanish Steps were maintained as public property. The first round of reconstruction was conducted in the late 1930's using Works Progress Administration (WPA) employees to resurface the concrete work and rework the surrounding landscaping.

By the mid 1950s, the Elks organization was growing fast in the post war years and a suburban site was better suited to auto driving members who lived in the outlying new neighborhoods. Planning and fundraising began for a new building on Union Street near the western edge of Tacoma where the Narrows Bridge and west side housing development connected the organization with its members. In 1965, the Elks vacated the Lodge at 565 Broadway and the Spanish Steps began to slip into a deteriorated condition. The City Hall building was vacated by municipal government in favor of the new County City Building on Tacoma Avenue, and the once glorious Northern Pacific Headquarters Building was partially demolished after being used as the jail. Elsewhere in the downtown Urban Renewal efforts were resulting in a furious effort to recover from the building of Interstate 5 in 1954 and the Tacoma Mall in 1963. Most of the large retail activity had moved out of the downtown area and other generators of pedestrian traffic like movie theaters and restaurants were failing. The Spanish Steps were a barometer of the times. An editorial sketch of the Spanish Steps in August 1974 showed the balustrade and heavy handrail toppled over in sections and newspaper stories echoed

public concern about vandalism in the old city hall area. The Elks Building had been purchased in 1968 by George Russell, Sr. and by the 1970's, it was no longer in active use.

During the mid 1970s Allied Arts and local activists like architect Alan Liddle led a revival effort in the Old City Hall District. Riding the national interest in historic preservation that surround the Bicentennial in 1976, they successfully placed the Old City Hall Historic District on the National Register of Historic Places in 1977, and then pushed for a local preservation program that enrolled the area as the first historic district on the Tacoma Register of Historic Places in 1978.

Finally, in the summer of 1980, the City of Tacoma employed $95,000 in community development funding to rehabilitate the Spanish Steps. It was a substantial project, replacing twenty-five of the cast stone balustrades along with one of the heavy handrail runs on the main landing. The original large flat urns on the vaults were replicated in cast stone by I-Deal Lawn Pottery of Spanaway from the last remaining example and replaced on the Steps. The general contractor, Pioneer Restoration, replaced the landing floor and drainage system, selectively repaired the concrete treads and risers, and oversaw the re-landscaping of the entire site. The work was completed in June 1980, and was the last significant repair work done on the Spanish Steps.

In the last quarter of a century the Spanish Steps and surrounding landscape have been watched over by the City of Tacoma street maintenance division. A reasonable level of stewardship has been maintained but general wear and some vandalism have worn the concrete steps down both physically and visually. Once again sections of balustrades are missing and the neglected Elks Building has attracted hard use and deterioration. For well over a decade, the attached Elks Building has been unsecured against intruders and vandals and its erosion has begun to transfer onto the Spanish Steps. The Spanish Steps can carry the weight of their own age and wear. They are structurally well built and visually authentic even in a deteriorated condition. They are at a point in time however, where repairs are needed. They continue to be an essential pathway in Tacoma's downtown and are used daily by hundreds of people. As a public right of way as well as amenity, they deserve a basic level of upkeep and maintenance if they are to continue in use. Tacoma's Spanish Steps are one of the timeless, fluid gestures of the city and like an old dancer they have never lost their graceful sense of movement.

CHARACTER-DEFINING ELEMENTS

3.1 BRIEF PHYSICAL DESCRIPTION

The Spanish Steps provide pedestrian connection over the steep incline between Broadway (upper) and Commerce (lower) streets. Foundations and retaining walls for the stairs are set on grade with reinforced concrete braces spanning the Steps' north side and the adjacent Elks Building. A steep slope defines the south side of the Steps. A single, broad direct flight of moderately inclined concrete stairs, interrupted midway by a small, poured concrete intermediate landing, descends from Broadway to the main landing.

The main, poured concrete landing is set midway between Broadway and Commerce providing a viewing area and connection to the Elks Building's second floor. Two moderately inclined, direct flights of concrete stairs descend from either end of the main landing to Commerce Street. All stairs and landings are bounded by cast stone balustrades (and cast concrete additions). These balustrades also extend along Broadway at the top of the stairs.

Massive cast stone newels carrying cast iron lamps and cast stone urns anchor the ends and transitions of the balustrades. Two narrow, rectangular planting areas integrated into the composition flank the upper flight of stairs. The lower two flights of stairs bound a third, larger planting area.

3.2 CATALOGUE OF ELEMENTS

This section identifies by form, detailing and materials those architectural features, exterior spaces and mechanical systems that comprise and define the Spanish Steps' physical and visual character and that embody important historical associations and interconnection with the Elks Building. The site, form, structural assembly, materials, finishes, lighting fixtures, mechanical systems, original functional role, and circulation patterns and spatial relationships comprise vital elements of architectural and historical significance of the Spanish Steps.

Each character-defining element is accompanied by a physical description, identification of major alterations, assessment of condition and level of significance. The level of significance identifies gradations within the features, spaces and systems as to their contributions towards defining the architectural and historic character of the building. Refer to Section 4.2, Analysis of Significance, for a detailed discussion of levels of significance.

All photographs within the following catalogue of character-defining elements are digital images taken in November of 2004 by the staff of Artifacts Consulting, Inc.

References used in text:
CP: refers to Condition Photos, Section 5.2
SE: refers to Structural Evaluations, Section 3.3

DESCRIPTION	CONDITION	SIGNIFICANCE	IMAGE
3.2.1 BALUSTRADES			
3.2.1.1. BALUSTERS Cast stone balusters, each an individual unit, support a railing set on approximate 12-1/2" to 13" centers with 2" to 3-1/2" clear space between each base. Baluster dimensions average 9-1/2" square 1" to 5-1/2" tall base; 8-1/2" square 5" to 1-1/2" cap; 30" total height. Metal dowels anchor balusters to string and railing. Baluster base edges set back 1-1/4" from outer string edge. Bases and caps level at landings; inclined along stairs. (211 total originally, 18 missing)	Fair to poor condition. Some balusters are missing. Cementitious parging, paint, and hard, Portland cement containing patches have been added to the balusters. Rebar jacking due to moisture is evident in some. Through cracks exist primarily at bases and tops of balusters. There are missing units along the south side of the upper stairs. See CP: 5.2.1-5.2.5, 5.2.8; SE: 3.3.1	*PRIMARY*	 
3.2.1.2 POSTS Cast stone posts, each an individual unit, are set at railing joints and provide the majority of lateral rigidity and support to the railing. Their placement visually groups the balusters. Post dimensions average 14-1/2" x 8-3/4" x 30". Baluster connection to railing suggests similar metal dowels at stringer and railing joints. Top and bottom are level at landings; inclined along stairs. (15 total)	Fair condition. Some delamination of previous parging applications has occurred primarily at corners. Previous paint applications are noted. Some horizontal cracking is evident at bases. See SE: 3.3.1	*PRIMARY*	 
3.2.1.3 ENGAGED POSTS Cast stone engaged posts, each an individual unit, are set at railing/newel junctions and provide the base for railing connection at newel. Engaged post dimensions range from one-half to one-quarter the width of the posts with the same 30" height and 8-3/4" depth. Baluster connection to railing suggests similar metal dowels at stringer and railing joints. Top and bottom are level at landings; inclined along stairs. (28 total, 4 missing)	Fair to poor condition. Separation from newels is evident in some. Previous paint and parging applications are noted. A vertical crack is present on a post along the south side of the upper stairs between the main and upper landings. The crack corresponds to cracks in the railing and stringer. See SE: 3.3.1	*PRIMARY*	 
3.2.1.4 RAILING Cast stone railing, comprised of multiple straight (upper landing), arced (main landing), and straight inclined (along stairs) units. Railing section dimensions are 9-1/4" base and 12" cap widths with approximate overall height of 6". The peaked cap features a wash with an approximate slope of 1/2" drop over 6". Approximate unit lengths by area: A (115" upper, 108" lower); B (33-1/2"); C (139" upper, 130" lower); D (two 85" sections at north end, two 170-1/2" sections at south end); E & F (124" upper, 122" lower). Inter-railing unit joint widths measure approximately 1/8". A butt joint exists at railing/newel connection.	Fair to poor condition. Parging has been added with sand pressed into the surface. There is separation of railing units at joints and at newels. Synthetic caulking has been added at some joints. Some spalling and loss of parging layers is concentrated primarily at the joints. A split exists in the railings on the south side of the upper stairs and main landing. Missing sections at new newel/newel connection along Broaway. See CP: 5.2.6-5.2.7; SE: 3.3.1	*PRIMARY*	 

DESCRIPTION	CONDITION	SIGNIFICANCE	IMAGE
3.2.1 BALUSTRADES (CONT.)			
3.2.1.5 NEWELS Cast stone newels with hollow interiors provide stability for the railing, visual definition at transitions within the stairway, and bases for lamps and urns. Approximate newel dimensions by element: base (32-1/2" to 31-1/2" x 28" x 14-1/2" tall); dado (29" to 29-1/2" square x 42" tall, stepped back 1-1/2" from base edge); cap (25-1/4" square x 3-3/4" tall, stepped back 1-3/4" from dado edge). Transitions between base/dado and dado/cap feature 1/2" wash. Beveled corners on dado. (20 total; 10 with urns, 10 with lamps)	Fair to good condition. Spalling and substrate delamination are concentrated primarily at corners, exposed edges and at transition between base/dado. Parging and paint have been added. Settlement cracking is evident in bases, particularly along the south side of the stairs and landings. See CP: 5.2.9-5.2.12, 5.2.14; SE: 3.3.1, 3.3.2	*PRIMARY*	 
3.2.2 STAIRWAYS			
3.2.2.1 STAIRS Poured in-place concrete stairs have a 6" rise and 13-3/4" run with a total approximate width of 16' for the flights above the main landing and width of 10' for the lower flights. All four flights are straight and are connected by upper and main landings and flanked by cast stone balustrades.	Fair condition. Extensive cracking and delamination of surface parging and upper 1" on treads are noted. Previous cementitious repairs have been made to treads and risers. Moderate soiling exists, as well as some opening of joints between the stairs and stringers. An east/west crack is observed along the south portion of the upper stairs in the flight between the main and upper landings. See CP: 5.2.13, 5.2.16; SE: 3.3.3	*PRIMARY*	 
3.2.2.2 CARRIAGE Concrete carriage is not visible for inspection. No access points are available or indication if area beneath the stair is vaulted or in-filled with carriage cast on grade.	No inspection is made of below-grade carriage. No obvious signs of extensive or irregular settlement or failure are noted. See SE: 3.3.3	*SECONDARY*	
3.2.2.3 STRINGERS Concrete stringers run continuously beneath each balustrade run, and are inclined along the stairs and level at the landings. String is 12" in depth with 10-1/2"sloping to 4-1/2" above the stairs and to approximately 6-1/2" above the landings. No determination is made of the total string depth.	Fair to poor condition. Previous cementitious parging and paint have been added. Some settlement cracks are evident, primarily at the north and south ends of the arced balustrade and along the south side of the upper stairs. Spalling and cracking of surface material is concentrated primarily at joints with newels. See CP: 5.2.1, 5.2.3-5.2.4; SE: 3.3.3	*PRIMARY*	

DESCRIPTION	CONDITION	SIGNIFICANCE	IMAGE
3.2.3 LANDINGS			
3.2.3.1 UPPER LANDING The upper landing, rectangular in form, provides transition between two straight flights connecting Broadway with the main landing. The landing is set within the lineal path of two stair flights. The concrete slab floor measures approximately 14'-6" x 6'-6" (94 square foot area).	Fair condition. Moderate soiling is noted. An east/west crack runs along the south portion of the slab.	*PRIMARY*	
3.2.3.2 MAIN LANDING The main landing, rectangular in form with an arced front portion, provides formal public space for view observation over the waterfront, backdrop for social, civic and private group and individual photographs, and formerly for congregation following social events in the adjacent Elks Building. The upper stairs, leading to Broadway and South Seventh Street, connect from the west at the landing's north/south midpoint. The lower stairs, leading to Commerce Street, descend from the east side at the landing's north and south ends with an arced landing projecting between them. The concrete slab floor footprint measures approximately 75'-6" x 13'-6" with the 46' long arced front having a 5' maximum width.	Fair condition. The concrete slab has been replaced with margin-troweled edges. Diagonal cracking is evident at the south end. See SE: 3.3.4	*PRIMARY*	
3.2.3.3 BRIDGE LANDING The bridge landing, rectangular in form, connects the main landing with the adjacent Elks Building. The reinforced concrete slab measures approximately 14' x 6'-6".	Fair condition. It has been painted. See SE: 3.3.7	*PRIMARY*	
3.2.4 FIXTURES			
3.2.4.1 URNS Cast stone urns stand on square pedestals mounted on top of the newels. The urn diameter measures 2' with a total height of 20". The urns are utilized as planters. (10 total originally; 1 missing; only 1 original rest replicas)	Fair condition. Cementitious parging and paint has been added. There is no indication if drainage exists for the urns. Soil is filled to within 1" of the top with plantings in some urns. See CP: 5.2.15	*PRIMARY*	 

DESCRIPTION	CONDITION	SIGNIFICANCE	IMAGE
3.2.4 FIXTURES (CONT.)			
3.2.4.2 EXTERIOR LAMPS Painted, cast iron exterior lamps are mounted on top of the newels. Each unit features a mounting plate (12" x 12" x 1" cast iron), base (8" diameter, 3-3/4" tall cast iron), and fluted, 68" tall, tapered cast iron column, each with a single lighting fixture and globe. The fluting features squared backs. The column tapers from a 6" base diameter to a 3" diameter at the top. Four bolts with cap nuts (hexagonal base with domed top) secure the mounting base to the newel. Each globe is translucent white. (10 total)	Good condition. Chalking of previous paint application and slight surface metal oxidation are observed. Several cap nuts have been replaced. Slight soiling of globes is noted. See CP: 5.2.17	*PRIMARY*	 
3.2.5 WALLS			
3.2.5.1 NEWEL/NEWEL PARAPET WALLS Upper, cast-in-place, painted, concrete parapet walls are located between the newels along Broadway replace the original balustrades along these sections. Walls measure 91" in length with 28-1/2" above grade on the north wall and 33" above grade on the south wall on the west side. Each features a concrete cap 3-3/4" tall at the edges with a peaked middle and 2" overhang on both sides of the wall.	Fair condition. They have been painted. Each of these sections originally featured five balusters.	*NONE*	 
3.2.5.2 NEWEL/ELKS BUILDING PARAPET WALLS Painted, cast-in-place, concrete parapet walls with metal railings between newels along the north side of the stairs and the Elks Building provide a low barrier protecting pedestrians from the open areaway volume between the steps and the building. These walls are utilized along Broadway and at the bridge connecting the stairs to the Elks Building at the main landing. Walls measure 21-1/2" x 59" and both are approximately 20" tall. The upper wall originally featured two painted, 3/4" diameter, metal pipes anchored to the railing (lower pipe missing). The lower two walls feature painted, metal mesh, 59" x 32" panels bolted to the newels and building.	Fair condition. A rail is missing on the upper wall. Some paint is flaking from the remaining pipe rail. The masonry wall portion has been painted. Pipe railing as an original element is secondary, metal screen as a contemporary element is none.	*SECONDARY/ NONE*	 

DESCRIPTION	CONDITION	SIGNIFICANCE	IMAGE
3.2.5 WALLS (CONT.)			
3.2.5.3 FOUNDATION WALLS Painted concrete foundation walls bound the outer edges of the steps. The foundation walls extend to grade on the north side. Soil obscures the walls on the south side. No testing is conducted to verify rebar placement. The scale of the stairs and the designing architect's use of rebar in the braces between the stairs and the Elks Building suggests rebar use within the walls.	Fair condition. No inspection of the south below-grade portions is possible. Overall there are no overt signs (cracking of structure above grade) of failure or irregular settlement. Exposed portions along the areaway have been painted. See CP: 5.2.18; SE: 3.3.6, 3.3.8	*SECONDARY*	 
3.2.5.4 RETAINING WALLS Concrete retaining walls bound the outer sides of the upper two planting areas. The south retaining wall is cast-in-place on grade. No testing is conducted to verify rebar placement. The scale of the stairs and the designing architect's use of rebar in the braces between the stairs and the Elks Building suggests rebar use within the walls. The walls project slightly above grade.	Fair condition. Cementitious parging has been added along the upper west end of the south wall. Soil loss from the adjacent south wall has exposed un-parged retaining wall. The north retaining wall exposed along the areaway has been painted. Trees growing along the south wall present a potential destabilizing impact on the slope. See CP: 5.2.19-5.2.22; SE: 3.3.6, 3.3.8	*SECONDARY*	 
3.2.5.5 AREAWAY An open areaway, 5' in width, is set between the Spanish Steps and the adjacent Elks Building immediately north of the steps. A connection between the Elks Building south entrance and the steps spans this volume. Painted, reinforced, 12" x 12", concrete braces provide additional bridging between the building and the retaining and perimeter walls of the steps. Braces are located in the west end and are staged in two tiers, five in the lower and two in the upper. Access to the areaway is from the east side off Commerce Street. Windows and a doorway from the adjacent Elks Building open onto this space.	Fair condition. Extensive corrosion and jacking of the rebar on the cross braces between the foundation walls and the Elks Building is noted. Debris has accumulated within the areaway, which is used by vagrants as temporary shelter. See CP: 5.2.18; SE: 3.3.6	*SECONDARY*	 
3.2.6 PLANTING AREAS			
3.2.6.1 UPPER PLANTING AREAS Upper north and south planting areas (2) flank the upper stairs. Each measures approximately 40' in length with 14' east width and 9' west width. Contours correspond to the stair slope and level upper landing. Both contain rhododendrons (two each) at the landing level with low, decoratively pruned evergreen box wood shrubs arranged in four leaves radiating from a center on the lower slope. The north area contains an approximately 80-year-old Monkey Tail/Puzzle Tree (Araucaria araucana*, Chilean Pine) with a 23" trunk diameter.*	Fair condition. Plantings are set back from masonry. The Araucaria araucana tree is centrally placed within the north area. Evaluation of root bulb growth and pressure impacts on the foundation and retaining walls would require an arborist evaluation. The soil rises to the top of the retaining walls. See SE: 3.3.5	*SECONDARY*	 

DESCRIPTION	CONDITION	SIGNIFICANCE	IMAGE
3.2.6 PLANTING AREAS (CONT.)			
3.2.6.2 LOWER PLANTING AREA The lower planting area is located between the lower two stairways. Measuring approximately 46' x 42' with a soil depth in excess of 2', this area contains a small ornamental deciduous tree having a 5-3/4" trunk diameter. Low evergreen boxwoods bound all four sides.	Fair condition. Plantings are set back from the masonry with the exception of the box wood along the upper edge. See SE: 3.3.5	*SECONDARY*	 
3.2.7 SYSTEMS			
3.2.7.1 ELECTRICAL The electrical system provides power for the exterior lamps. A multi-wire, below-grade, street light circuit connects at the stair's southeast corner. This conduit runs along the south side of the stairs to the west edge of the main landing, branching from this point to the upper and lower lamps. Rigid external metal conduit feeds to the lamps through the hollow newels. (City of Tacoma ID No. 418)	No evaluation of the electrical system is made.	*NONE*	 
3.2.7.2 STORM A main 15" diameter storm line, installed in 1940, runs east/west beneath the stair's north portion (approximately at the middle of the north lower stair). The storm water drainage lines from the two floor drains in the main landing connect to this main line. A short branch from the south drain connects beneath Commerce Street. (City of Tacoma SAP ID 6263296, OLD ID 20260)	No evaluation of the storm system is made.	*NONE*	
3.2.7.3 IRRIGATION Irrigation lines connect to the city water main at the upper west end of the stairs. These below-grade lines provide water to the planting areas.	No evaluation of the irrigation system is made.	*NONE*	

3.3 STRUCTURAL EVALUATION

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3.3.1 Balustrades – These are stairway and plaza guardrail elements made of concrete. The railing balusters and top rail are pre-cast concrete. The balustrades are segmental mortared masonry construction, with presumed steel dowels at the segment joints. The balusters and top railing segments are presumed to be un-reinforced. Some are located on the edge of side grade changes more than 2'-6" and others are on the edge of slight changes in side grade.

3.3.1.1 The balustrades bear on a continuous concrete foundation wall. Most of the foundation walls are buried, but some could be observed to be about 4 feet in height and bear on the sub-grade soils. However, the balustrades bear on a concrete retaining wall at the lower north area near the building.

3.3.1.2 Near the Broadway Street top of the Steps, on the south railing, several balusters are missing. In this area the guardrail safety aspect is not an issue, due to the adjacent planter area that is a similar grade elevations. However, the current opening could allow young persons to access the adjacent planter area and therefore reach the south edge of the planter, which has a grade step more than 2'-6".

3.3.1.3 The top railing is segmented pre-cast concrete between the concrete piers. There are intermittent cracks through the railing. We assume that the cracks are a result of long term settlement and creep movement with the soils, seasonal thermal movements, and earthquakes. In general, these cracks do not present a structural safety issue, however, the segmental masonry continuity and local stability has been compromised.

Photo No. 1: Detail of arced railing and newel joint. Note crack at connection. Source: PCSA Structural Solutions.

3.3.1.4 The foundation wall is continuous between the concrete piers. There are several cracks though the foundation. We assume that the cracks are a result of long term settlement, creep movement, and earthquakes.

3.3.1.5 The balustrade that is curved along the east side of the Mid Level Plaza has moved eastward. We assume that it has settled as a result of creep movement of the soils in the adjacent down slope planter. There are wide cracks in the top rail and foundation at both ends, at the concrete pier. Refer to photo 1.

3.3.2 Piers with Urn or Lamp Standards – These elements are made of concrete with formed internal cavity. They are capped with pre-cast concrete elements. The piers bearing on the sub-grade soils.

3.3.3 Steps – The steps are made of concrete and bear over the sub-grade soils. The steps are basically slab elements.

3.3.3.1 The steps are on-grade concrete elements.

3.3.3.2 Some of the tread faces and nosings have delaminated or spalled concrete. Older mortar patching restorations are in various states of integrity.

3.3.3.3 There are various cracks in the slab

3.3.4 Mid Level Plaza – The plaza has a concrete slab bearing over sub-grade soils.

3.3.4.1 The slab is not a structural concrete element.

3.3.4.2 There are various cracks in the slab.

3.3.5 Planter Areas – These areas are bounded by stairway, plaza balustrades, building retaining wall, or by sidewalks. However, the upper planter at the southwest area has a south boundary made of a concrete foundation wall similar to the balustrades.

3.3.5.1 The upper planter grade at the northwest area appears to have settled as noticed at the base of the Broadway Street wall. It appears that the foundation base for the wall is being exposed.

3.3.6 North Retaining Walls – These are concrete wall elements are 6 feet from the Elks Building and are integrated with the building structure.

3.3.6.1 The walls are partially braced by several horizontal concrete beams to the building. These brace beams are significantly deteriorated with spalled concrete faces and exposed and corroded reinforcing steel. Due to the deterioration of the brace beams, the stability of the retaining wall should be considered unreliable.

3.3.7 Bridge at the Elks Building at the Mid Level Plaza – This bridge is a concrete slab element that structurally spans from the retaining wall to the building. This element is integrated with the building structure.

3.3.8 The South earth slope – This earth slope forms the change in grade from the Steps to the parking lot to the South that is a Commerce Street Level.

3.3.8.1 The western portion is relatively steep. It appears that the soils have had long term down slope creep in this area. This is evident by an apparent drop in grade elevation of about 3 feet, which is basically most of the height of the exposed foundation wall of the planter and the top pier. Refer to photo 2.

Photo No. 2: Detail of grade settlement at south slope (southwest corner). Source: PCSA Structural Solutions.


3.3.8.1
4.3.7
3.3.1.2
4.3.1
3.3.5.1
4.3.5
3.3.6
3.3.6.1
4.3.6
3.3.7
3.3.5
4.3.5
3.3.4
3.3.1.5
4.3.2
3.3.6
TYP 3.3.1, 4.3.4
3.3.8
TYP 3.3.1.1, 3.3.1.4
TYP 3.3.2
TYP 3.2.3
4.3.3
STRUCTURAL ANNOTATIONS

FINDINGS

4.1 INTRODUCTION

The general conclusions that arise out of this report are organized under captions below. These conclusions address the specific historic preservation findings, conditions and issues that exist currently and that should shape plans and policies for stewardship and maintenance of the structure. They should also be integrated into planning for the continued use of and guide the rehabilitation and restoration of the Spanish Steps.

The overall recommended treatment for the Spanish Steps is rehabilitation. The 1916 date of construction constitutes the primary period of significance for maintenance and repair work, and the target period for restoration or replacement of missing or extensively damaged elements.

Landmark Status: The Spanish Steps are a contributing element within the National Register listed Old City Hall Historic District (listed December 23, 1977). The District nomination identifies the Spanish Steps, in association with the adjacent Elks Building, as one of the four pivotal structures defining the boundaries of the Historic District. These pivotal structures frame the buildings within the district as well as dominate the district's skyline and view corridors. The district's two other north end pivotal structures are the Northern Pacific Headquarters Building (1886-1888) and the Old City Hall Building (1893). The Old City Hall Historic District is also listed on the Tacoma Register of Historic Places and the Washington Heritage Register.

Historic Significance: The Spanish Steps comprise a primary contributing resource in the Old City Hall Historic District (National Register of Historic Places and Tacoma Register of Historic Places) and physically express the ensemble character of the Classical buildings that are clustered at the north end of Pacific Avenue. The Steps create an open space amenity for the surrounds of the former Tacoma City Hall, tying the fraternal lodge into the historic civic center area in both a functional and design sense. Tacoma's Spanish Steps borrow from the French-designed counterparts in Rome, Scalinata di Spagna, and, like the Renaissance Revival City Hall Building nearby, evoke European and Italian references to Classical

grandeur and scale for the city. They date from a particularly prosperous time in the city's history and reflect the vitality and formalism of a leading community organization in the years just before the First World War. The Steps also reflect social patterns in Tacoma before the automobile replaced streetcars and pedestrian pathways in the downtown area.

Degree of Extant Significant Fabric: The Spanish Steps retain a significant amount of original fabric, conveying their original form and function, design intent, materials, and high level of craftsmanship. Original elements include a single cast iron urn, the exterior cast iron lamps, concrete stairs, concrete stringers, cast stone balusters, cast stone railings, and cast stone newels. Repairs in the late 1930s to mid 1940s and during the 1970s introduced both compatible and non-compatible contemporary elements, including cast cpmcrete balusters, railings, urns, and the concrete flooring on the landings.

Condition Assessment: The Spanish Steps remain in fair condition following 88 years of continued public use in an outdoor setting. Priority items needing immediate attention consist of the south slope stabilization and stopping further settlement, and the exclusion of vagrants from the areaway. Please refer to the structural evaluation Section 3.3.

Extended condition issues consist primarily of problems arising from non-compatible previous repairs, wear due to normal public use and damage from vandalism, compounded by deferred maintenance and increasing depths of water penetration through cracks and breaks in the materials. The repair of deterioration of the braces at the north side of the steps between the Elks Building and the Steps is complicated by their interconnection with the Elks Building. Corrosion of the metal rebar in these braces is contributing to spalling of the concrete, exposing the rebar to additional water contact. Unchecked deterioration could compromise the structural capacity of these braces and necessitate a more complex repair.

Numerous previous repairs are not compatible with the original materials and are failing and accelerating deterioration of existing original fabric. These previous repairs consist predominantly of stucco patches of hard, mainly Portland cement and paint. The hard, dense cement patches trap moisture against the original material, accelerating water related deterioration. Stucco coverings are cracked, allowing water penetration, as well as separation from the original materials they cover. These repairs also conflict visually with the color, texture, hardness, and performance of the original cast stone.

Deterioration of chips and spalls in outer cast stone joints and molding corners, primarily on the newels, is allowing water penetration deeper into the cast stone and between the cast stone and the substrate framing material of the newels. Tree height and root bulb growth of the Monkey Puzzle tree present potential adverse impacts on the foundation and retaining walls of the northwest upper planting area. Analysis of these conditions necessitates the expertise of a botanist. Missing elements present both aesthetic and condition concerns. Neglected conditions, such as missing and broken elements, foster a continuation of vandalism through a perceived concurrence through non-corrective action. A sense of diminished responsibility and ownership is engendered on behalf of the public.

Design Authenticity/Future Modifications: The Spanish Steps retain their original design authenticity borne through intact original materials, spaces, and their sequencing. The Steps' intact form conveys the original functional intent of the designing architect, Édouard Frère Champney, and strong functional and physical interconnection with the adjacent Elks Building. Champney provided for access to the steps from the Elks Building both for egress purposes and to externalize functional elements of the building to maximize hall space, without intruding upon the overall composition or individual defining spaces (i.e. main landing) of the Steps. Ultimately, the Steps are a product of the Elks Building's design, yet they stand totally independent unto themselves as a cohesive design entity. This sequencing of the Steps' spaces and defining components accumulated important intangible associations through 88 years of continuous public use, associations drawn from social events, public assemblies, and as a favored group photograph backdrop.

Landscaping & Plantings Significance: Landscaping and plantings comprise an important element in the interpretation of historic structures, particularly those open to the outdoors and having integral planting spaces. Landscaping frames views, softens edges, and provides distinctive visual setting contributing to a user's experience of the structure. Plantings change with seasons and as they age they present ongoing variations. Historically, each of the Steps' planting areas featured lawn (short grass). A Monkey Puzzle tree was also planted in the upper, northwest planting area early in the structure's history. The urns originally featured small evergreen plantings. This composition remained through the 1970s until the current boxwood elements and rhododendrons were added ca. 1980s to 1990s. The appropriate period for restorative plantings and landscaping should be 1916, the date of construction.

Accessibility: Accessibility pertains to use of the Spanish Steps to traverse between Broadway and Commerce Street and from either street to the south, second-floor, side entrance of the Elks Building. The goal of providing and improving existing barrier-free accessibility according to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) is to "provide the highest level of access with the lowest level of impact" to the character-defining elements identified in this Historic Structures Report. The three federal laws directing accessibility standards are the *Architectural Barriers Act* of 1968, Section 504 of the *Rehabilitation Act* of 1973, and the *Americans with Disabilities Act* (ADA) of 1990.

The unified composition, steep incline, and material construction of the Spanish Steps do not lend themselves readily to ADA conversion without substantially impacting the overall form and materials. As an exterior element, the stairs, for interpretive purposes, are fully visible from both Commerce and Broadway streets. Potential access through the Elks Building could provide access onto the main landing.

Significant Spatial Areas & Sequences: The significance of exterior spatial areas and the sequencing and relationship between these areas stems from their interpretive importance and roles in conveying the defining monumental public character of the Spanish Steps. These outdoor areas, though lacking a physical ceiling, do exhibit defining perimeter elements and both distinct functional roles and defined connections to other areas. Their interpretive importance addresses both space specific histories and embedded associations, such as the repeated use of the main landing and the lower stairs as the setting for group photographs by tourists and local citizens celebrating school graduations and weddings. Sequencing and the interrelation between spaces draws visitors and frequent users alike into the Steps and imparts a clear sense of the important civic nature of their function within the city.

Three defining spatial areas are the landings, stairways, and planting areas. The principal sequence is the landings/stairways sequence between the two flanking streets. The secondary sequence involves the Elks Building – the sequence of exiting from the building onto the main landing.

Landings as spatial areas serve as solitary, often restive, stationary points amidst the continuous flow ascending and descending the Steps. The landings, particularly the main landing, provide areas of pooling for the flow of traffic as well as viewpoints. They afford important transition points between upper and lower stairways.

Stairways by function are fluid, transitory spaces. They define the primary functional role of the structure. Their incline, riser height, tread depth, balustrade, newels, and lighting form an integral part of the overall experience for stair users during each ascent and descent. Their placement and form as direct flights orient users to the important view corridors. The breadth and monumental scale of the Steps attest to their prominent public role anticipated by Champney.

Planting area placement situates these spaces at the front of the lower stairway ascents and at the front of the upper stairway descent, directly in view of stair users. The upper and lower planting areas serve distinct roles within the overall composition, roles closely linked to the use of the adjacent Elks Building by the Elks for formal social events. Though the Elks Building's two main facades fronted Broadway and Commerce with access into the first and third floors, the south facade overlooking the Spanish Steps provided an important exterior social venue through balconies and the connecting second floor doorway at the Steps' main landing. The two smaller planting areas flanking the upper stairway showcase the descent along this stairway. The lower planting area serves as the setting for the views both upward from the lower stairways ascending towards this main landing and the side entrance of the Elks Building, as well as outward from the promontory of the main landing's arced balustrade.

The *landings/stairways sequence* serves the basic defining function of the Steps, providing important public, pedestrian access between Broadway and Commerce streets. In addition, the sequence serves several, subtle supportive functions that have endeared the Steps to generations of users. Their direct flights align users to the view corridor looking out from the city over Commencement Bay and the industrial area along the tide flats. The single upper stairway leading to the main landing and the lower stairways branching out from the main landing establish the main landing as the central viewpoint within the composition.

The *second floor Elks Building exit/main landing sequence* provides egress from the building. The sequence also affords access to an exterior social gathering area on the main landing of the Steps during social events in the Elks Building, allowing the landing to serve as an externalized space of the Elks Building.

Significant View Corridors: View corridor significance stems from the pronounced influence of vistas on perceived spatial quality, transfer of historical associations, and contextual inspiration for habitual stair users and visitors. The Spanish Steps are oriented lengthwise along a section of South Seventh Street on a steep slope. The Steps provide exceptional views of Commencement Bay and the industrial tide flats, and dominate the views east along South Seventh Street as well as the views from Broadway and Commerce streets looking north on the approach to the Steps.

Managing Change: Managing change implies stewarding repairs and new work to preserve, to the greatest extent possible, the extant spaces and intact original fabric that define the character of the Steps, and to integrate repairs and new work in a manner that reinforces this character without diminishing or obfuscating original elements. Successfully managing change on the Spanish Steps depends upon the following five key priorities:

1) High value must be placed on the retention of existing original stair fabric and spaces during repairs and stabilization, restoration, and rehabilitation, as well as during new construction of adjoining buildings and work on the adjacent streets and sidewalks;
2) A long-term perspective must be employed towards implementing changes in a reversible manner and assessing the long-term value and relevancy of immediate alterations, particularly with new construction in the adjacent south lot (currently surface parking);
3) A sound salvage and reuse policy must be implemented for safe handling and storage of any original elements removed from the Steps during work in a manner allowing their inventory, tracking, and reuse;
4) New finishes must be harmonized with the original to reduce sharp contrasts in styles from the character of the original design intent.
5) Provide for reversibility of treatments and repairs without adverse impact or accelerated deterioration of original fabric.

4.2 ANALYSIS OF SIGNIFICANCE

Understanding the historical significance of the Spanish Steps as a complete entity, and then identifying character-defining elements, makes possible an overall future rehabilitation approach to the Steps that is sensitive to historically important features and exterior spaces such as the landings. The degree to which the historical and architectural significance is ingrained in and conveyed through each feature and space enables these individual elements to be treated differently. Thus, by establishing the level of historical and architectural significance, and the existing condition of the element, a specific approach to its treatment can be developed. This section prioritizes significant spaces and features by architectural and historical significance. The information is presented in this section as Maps of Architectural Significance and in Section 3.0 in the form of a catalogue of Character-Defining Elements with individual levels of significance identified. The following considerations should underlie the formulation of maintenance practices, steer a comprehensive restoration program, and help to manage and guide changes to the Steps by distinguishing between the more significant categories of Primary and Secondary features and spaces, and the amendable Minimal and None elements.

As the Steps continue their original use, as well as assume additional functions in response to changes with the adjacent Elks Building or new construction in the vacant south lot, it is both possible and optimal to retain the key defining elements and original components of the Spanish Steps' important historical character. These elements provide valued tangible links to past construction methods and design sensibilities. They embody associations with important community and social events held on the Steps. Their existence affirms the important functional interconnection between the Spanish Steps and the Elks Building. They offer a foundation of physical heritage and a sense of place for community activities upon which to build for future generations.

The Analysis of Significance designates features and spaces as Primary, Secondary, Minimal and None according to the level of contribution each makes in defining the Stair's architectural character and historical significance. The basis for these four categories stems from: 1) the interpretive value of the feature or space for adjacent building users, Tacoma residents, and visiting tourists (ranked by estimated frequency of use); 2) whether the feature or space

is original, historically significant, or a contemporary change; 3) the extent of non-historic modifications and additions to the feature or space; and 4) the compatibility of finishes and building materials employed in historical and contemporary changes with the original materials and the architect's design intent.

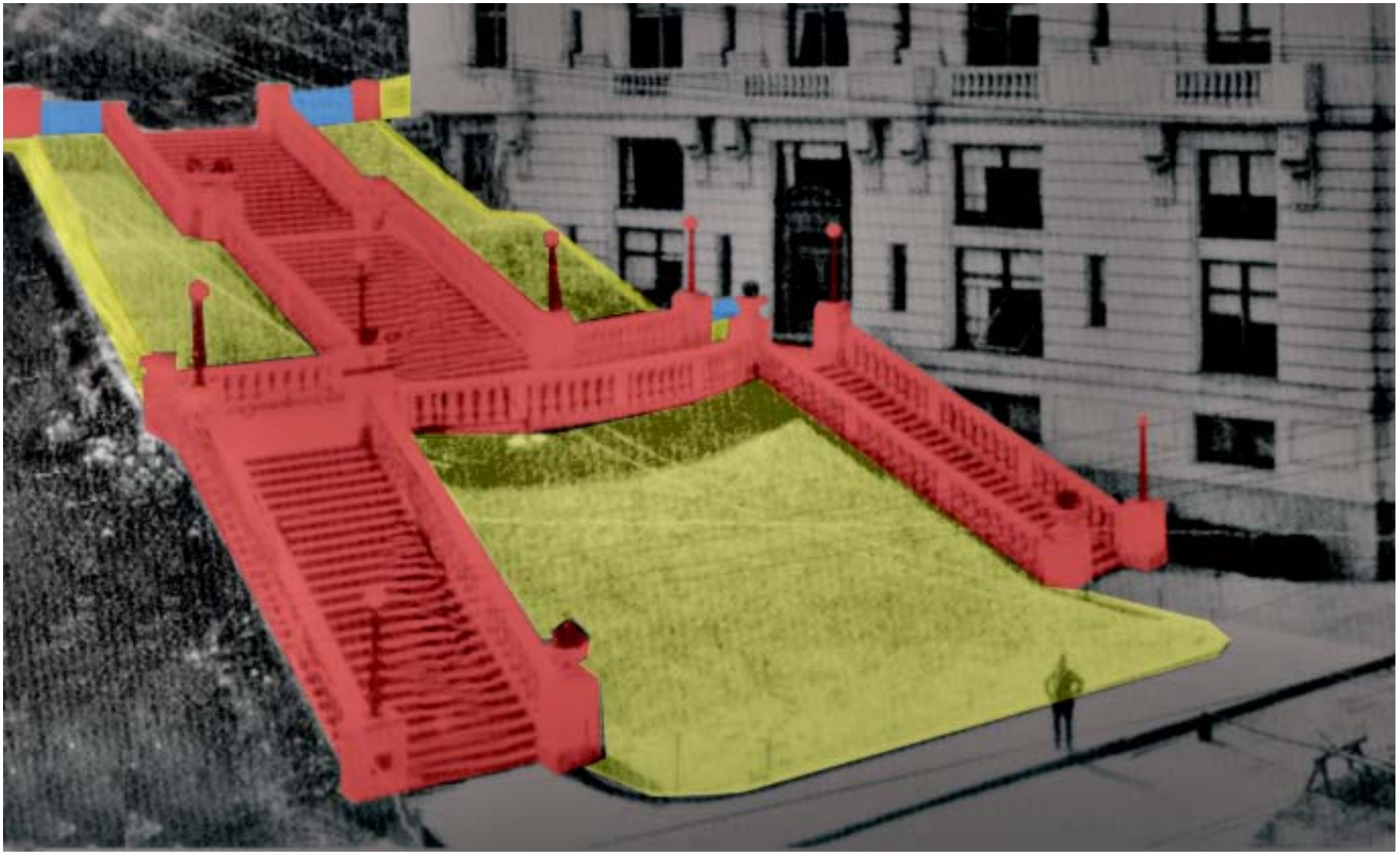
Although the Spanish Steps have a well-defined structural composition and cohesive Classical form, they can be divided into areas of relative character-defining importance. The categorical significance of these areas ranges from "Primary" being the most significant to "None" being the least. There is no intent to fragment the structure into divisible parts that can individually be preserved, modified or discarded in future planning. Rather, the intent is to provide some direction to steer necessary treatments or alterations toward solutions that will permit continued improvements to the Steps' operation without eroding or obscuring its architectural authenticity or character. All aspects of the Steps' above-grade assembly and landscaping are within the public domain and view shed. As such, their treatment merits close attention to detail with a perspective towards the long-term preservation of the Steps' material and design authenticity and functional role as a community asset.

Primary features and spaces are those original to the Steps, although possibly with minor changes or historically significant alterations designed to fit into the character of the original feature or space. They convey the application of notable architectural design and fabrication methods, consist of exceptional materials, and contribute directly to the original role of the structure as a functional exterior public stairway. Their removal or extensive alteration would diminish the historic character of the structure. They may also be noted for associated historic events.

Secondary features and spaces are those original to the Steps, although likely to have undergone major changes and/or historically significant additions. They retain some historic character and significant elements. They exhibit utilitarian, well-crafted but not exceptional materials or architectural features. They provide important comparative context and setting for interpretation of the role of the primary elements and the design hierarchy of the overall composition.

Minimal features and spaces have few distinguishing characteristics. Alternatively, an extensive, non-compatible contemporary remodel might obliterate nearly all historically significant architectural features and spatial configurations through introduced contemporary features and spaces.

None features and spaces have no remaining architectural features or spatial configurations dating to either original construction or significant historical modifications, or are contemporary features and spaces that are not compatible with the original design.



4.2.1 SIGNIFICANCE ANALYSIS MAP

4.3 DECISION MAKING-MATRIX

The following decision-making matrix merges the elements of architectural and historical significance and current condition within the over-arching treatment recommendation of rehabilitation along a pathway that results in a recommended approach to the future treatment of individual features, spaces and the overall appearance of the Spanish Steps. In addition, the matrix can guide the organization of a future restoration program. The more important, significant and intact the space or feature, the more careful attention should be paid to its preservation and enhancement. Conversely, the more a space or feature has been previously altered in a non-compatible manner removing historic fabric, the more amenable this feature or space is to compatible new work. Thus, further changes should be consolidated to elements already altered, thereby reducing the need for and extent of modifications to intact, historically and architecturally significant elements.

Primary character-defining elements and spaces should be preserved in their existing conditions or restored to their original appearances at a specific pre-determined period in time in order to retain their values. Secondary character-defining elements and spaces should be preserved in their existing states or rehabilitated to retain the original hierarchy of design elements within the composition and the supportive contextual setting for primary elements and spaces. Minimal and none exterior spaces and features with less important architectural elements that are not character-defining may be eligible for rehabilitation in which modifications to the features and spaces or new additions to them will have less impact on the historic significance and authenticity of the Steps. Existing significant Primary and, to the greatest extent possible, secondary and minimal elements can be retained and reused while making the Steps more functional for the public.

The final element in the decision-making matrix is the treatment approach. As a general guide to the approaches and levels of treatment recommended, this Historic Structures Report utilizes the tools and terminology developed by the federal departments engaged in historic preservation policy and implementation. The historic preservation community in the United States broadly follows guidelines established by the Secretary of the Interior of the National Park Service for treating historic properties.

These guidelines delineate four different approaches that are generally accepted as standards for treating architectural spaces and elements. They are: Preservation, Rehabilitation, Restoration, and Reconstruction or Replication. These four standards can be applied to the development of programs for the Spanish Steps and can guide responsible stewardship of the Steps, continuing their important community role.

Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization are consolidated under this treatment). Preservation is defined in the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of a 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.

Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods. Restoration is defined by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a Restoration project.

Rehabilitation (recommended approach) acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character. Rehabilitation is defined by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

Reconstruction or **Replication** re-creates vanished or non-surviving portions of a property for interpretive purposes. Reconstruction is defined by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

4.3.1 MATRIX

This matrix was developed in order to determine the appropriate approach to the character-defining elements and individual exterior areas of the Spanish Steps and help retain the structure as a functional pedestrian transportation corridor. Using the architectural and historic significance, and current condition, this matrix shows which approaches are most likely to retain the history and usefulness of the Steps.

The various components and spaces of the Steps have different levels of architectural design and details. These may be the result of the form and use of the area, the type of building materials, and/or the complexity or simplicity of the design. Primary areas and character-defining features should be protected from damage or removal in future work. Existing significant elements in Secondary and Minimal spaces should be reused during modifications to these areas. None or intrusive elements should be removed or the originals restored to facilitate interpretation of the original design intent of areas and features.

Current condition is determined by the amount of original material left in the feature or area and the care that has been taken to maintain it. Missing materials may need replacement. Damaged materials may require stabilization and repair. Intact details should be retained.

Taking these criteria into consideration leads to suggested appropriate future treatments, which in turn will aid in guiding the formulation of restoration and maintenance plans, and future modifications.

ARCHITECTURAL AND HISTORICAL SIGNIFICANCE	CONDITION OF SPACE/FEATURE	RECOMMENDED APPROACH
PRIMARY	MISSING	RECONSTRUCT
	DAMAGED	RESTORE
	INTACT	RESTORE/PRESERVE
	NO WORK	PRESERVE
SECONDARY	MISSING	RESTORE/REHABILITATE
	DAMAGED	RESTORE/REHABILITATE
	INTACT	RESTORE/PRESERVE
	NO WORK	PRESERVE
MINIMAL	MISSING	REHABILITATE
	DAMAGED	REHABILITATE
	INTACT	PRESERVE/REHABILITATE
	NO WORK	PRESERVE/REHABILITATE

ARCHITECTURAL AND HISTORICAL SIGNIFICANCE

PRIMARY
- Original to structure or site, though possibly with minor changes or historically significant additions designed to fit in to the design or character of the area or setting
- Finishes and materials of a high quality and well crafted
- Convey consciousness of setting and preferences during period of construction
- Removal or extensive alteration would debase architectural and historical significance of structure and detract from overall visual and physical unity of site
- May be noted for historic events or users

SECONDARY
- Original to building or site, though likely to have undergone major changes and/or historically significant additions
- Retain some historic character and significant elements
- Exhibit utilitarian, well-crafted but not lavish building materials or architectural features
- No important history may have been made in the areas

MINIMAL
- Originally unused or constructed as service areas rooms with few distinguishing characteristics, or
- An extensive, non-compatible contemporary remodel obliterating original spatial configurations and nearly all significant architectural features through introduced contemporary areas and elements

NONE
- Features and areas have no remaining configurations dating to either original construction or significant historical modifications
- Contemporary features and areas that are not compatible with the original design

CONDITION OF SPACE/FEATURE

NO WORK
- Material is intact and requires no work

INTACT
- Material still exists, but may require cleaning/ resurfacing

DAMAGED
- Material is damaged, deteriorated, altered/ modified

MISSING
- Original features/areas were removed or otherwise no longer exist

RECOMMENDED APPROACH

NO WORK
- No work is required. Repair or modify to meet user needs and maintain functions

NEW
- Add new material as needed to accomplish task

RECONSTRUCT
- Replicate the original form, features and details of missing areas, features and materials with new materials and/or new construction

RESTORE
- Return the features and spaces to original condition at a particular period of time

REHABILITATE
- Repair, alter and add materials, features and areas to make the item useful, while retaining its historic character

PRESERVE
- Apply measures necessary to sustain existing form, authenticity and extant materials to protect and stabilize the features and areas

4.3 STRUCTURAL RECOMMENDATIONS

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4.3.1 Replacing Balustrade Balusters – Replacing missing balusters should incorporate doweling at the foundation wall and top railing. In order to accomplish this effectively, we anticipate that the top rail will need to be removed and reset. By disturbing the railing, therefore the segments should be doweled together and at the piers.

4.3.2 East Curved Balustrade at the Mid Plaza – The foundation wall should be under pinned in order to reduce settlement, and thus to prolong its lifespan. This could be done with hand dug intermittent concrete footing piers or steel pipe piles.

4.3.3 Patching Steps – Cement mortar patching techniques would be appropriate.

4.3.4 Various Cracks in the Balustrade Top Rails and Foundation – Filling the cracks with cement mortar or pressure injected epoxy would be appropriate. Such repairs will restore some bond and keying of the elements. There should be a future expectation that the crack filling or the nearby concrete will initiate cracking.

4.3.5 Planter Grades – Where the grade has settled (presumed) adjacent to the concrete foundations, to such a degree to expose the base of the foundations or otherwise cause stability issues, then the grade should be raised with properly keyed earth fills. The grade level should be restored to the original elevation, or the base of all foundations should be buried at least 1 foot.

4.3.6 North Retaining Wall Brace Beams – Defer restorative work with work on the building. However, due to the state of deterioration, the retaining wall could shift, which could affect the Steps. We recommend restorative attention in the near future.

4.3.7 Western Portion of the South Earth Slope – The loss of grade elevation along the western south edge of the planter wall and southwest pier should be corrected by raising the grade elevation with quality earth fills. This would likely create a retaining wall element. In order to determine the engineering feasibility, a geotechnical engineering study would be necessary.

4.4 PRIORITIZED RECOMMENDATIONS

The recommendations in this report cover a wide variety of future work necessary to stabilize, preserve, rehabilitate and restore the Steps, and that range in difficulty and expense. Recommendations are tailored toward the long-term goal of rehabilitating the Steps to facilitate their continued community use. Establishing this organized approach is necessary to facilitate fund-raising and ensure that work proceeds in a logical sequence of mutually supportive tasks rather than compounding future projects through repetition or reversing previous work. Tasks can be undertaken on an individual basis as funding permits or folded into a larger set of projects. It will also be necessary to match specific tasks with the available skills of local volunteers and contractors. All projects let out to bid should include a provision prioritizing contractor selection by skills and previous experience on preservation projects, not exclusively by the lowest bid. Contractors having prior experience with National Park Service certified rehabilitation projects utilizing Federal historic preservation tax credits are familiar with the attention to detail and the review process associated with the application of the *Secretary of the Interior's Standards for the Treatment of Historic Properties.* The importance of skilled crafts persons to the success and timely, within-budget completion of projects involving the often complex and delicate work on historic structures cannot be overstated. Original building fabric is often irreplaceable if lost or damaged.

Organization of the recommendations prioritizes projects on a short-, mid-, and long-term basis according to the immediacy of stabilizing and maintaining the Steps in anticipation of continued use. Short-term projects are those that need to be done immediately within the next one to two years in order to protect the safety and authenticity of the structure. Mid-term projects are those that generally should be done within the next five years to weatherize the Steps and improve overall site conditions, but are not immediately critical to the life safety and function of the Steps or site, and that require planning and

fund-raising to accomplish. Long-term projects are those that should be implemented within the next ten years as substantial capital improvements, as rehabilitation or restoration projects, and may be delayed that long to allow for thorough planning and fundraising. The short, ten year time frame for long-term projects is based on three driving factors:

- urgency of repair work to halt deterioration and stabilize the structure;
- complexity and interconnection of the required repair work and need to establish a standard for several tasks which precludes incremental implementation of many of the repairs, and;
- need to coordinate some important structural repair work with capital improvements to the Elks Building as these structural elements interconnect the Spanish Steps and the Elks Building.

Conceptualization of projects within the short-, mid-, and long-term time frames organizes the tasks under the categories of Planning, Minor and Major projects. These groupings are based on the skill types and resources necessary to implement the tasks. The first category in the process of working with the Steps is Planning. This involves identifying available local resources, developing schedules, cultivating funding, assigning tasks, and implementing necessary studies. To facilitate this process, projects that could be undertaken by skilled local volunteers, city staff or maintenance persons and that require minimal resources and funding are in the category of Minor projects. Those projects requiring specialized services, substantial funding and the intense time and resource commitment of a contractor are in the category of Major projects.

The importance cannot be overstated of the members of the Tacoma Landmarks Preservation Commission, City Council and Historic Preservation Officer taking the necessary time to review the full scope of work involved in the short-, mid-, and long-term recommendations to gain familiarity with the broad patterns of work to be done. This will enable them to develop a long-range plan for the rehabilitation of the Steps, so that immediate needs are resolved in a timely manner and long-term projects are planned, funded, implemented and coordinated with studies and capital improvements on the Elks Building. With Tacoma as a certified local government and the Spanish Steps' standing as a contributing element within a National Register District, a variety of funding resources including state and federal grants could supplement city general fund and budgetary appropriations for many if not most of the Planning, Minor and Major building projects outlined in the following

recommendations. In fact, most funding agencies will require such a preservation plan from their recipients to ensure that priorities are well understood and part of the overall scheme. To this end, this report was written with the concept in mind that certain expensive and complicated items could be put off for several years to allow time to determine the best solution, find funding sources, and hire competent and sensitive craft persons to perform the work. If federal funding is utilized, Section 106 review would apply to the proposed work.

The following planning and project recommendations stem from archival research and site visits conducted in the fall and winter of 2004. No destructive investigation was conducted. No access was available beneath the Steps. No condition analyses were conducted for the electrical, sewer or storm water systems (all contemporary systems).

4.4.1 Short Term

Planning

Fund raising procedures and resource identification will be critical to the successful implementation of plans in the following short-, mid- and long-term sections to assess needs and explore the state and federal funding available to supplement city funds for rehabilitating the Steps. Planning for this task should include consultation among city departments, with non-profit preservation groups such as the National and Washington Trusts for Historic Preservation, and with government agencies such as the Washington State Office of Archaeology and Historic Preservation.

Property boundaries should be verified between the south block (B 705, lot 1) and the Steps. The Tacoma GIS map indicates the north edge of lot 1 block 705 bisects the south slope. Establishing a firm boundary will be important for the geo-technical analysis and the engineering of stabilization measures for the south slope. Coordination with the owner of parcel no. 2007050011 (containing lot 1 of block 705) may be necessary.

Geo-technical analysis should be made of the south slope to assess and inform structural and civil engineering design development of south slope stabilization measures. Addressing the issue of the south slope settlement and stability is critical to the retention of the Steps. Means and methods addressing this issue will also have a long-term influence on new construction and development in the adjacent south lot, utilized at the time of this writing (2004) for surface parking. Please refer to Structural Recommendation item no. 4.3.7.

Structural and civil engineering designs should be developed for stabilization measures for the south slope. Please refer to the Structural Evaluation section. The critical element to address during short-term projects is the south slope. Additional settlement issues could be addressed separately as part of mid- and long-term projects.

Public interest and relations work during this period would be invaluable towards achieving two principal goals:

1. serve an educational purpose on the role and function of the Tacoma Landmarks Preservation Commission and the cultural value of the Spanish Steps and the adjacent Elks Building as community assets;
2. generate public support and interest in the work to be undertaken and demonstrate the tangible benefits for the community of projects undertaken with public funds, and possibly spur private and non-profit support and donations of labor, materials or funding.

This could be accomplished through describing the history and importance of the Steps, their relation to the Elks Building, studies undertaken and the progress and proposed timeline of tasks and goals.

Minor Projects

Foundation and Retaining Walls

Braces and walls should be monitored for new cracks along the north side between the Steps and Elks Building. Existing braces exhibit spalling of concrete and corrosion of rebar. Their interconnection with the Elks Building precludes addressing this issue prior to City ownership of and capital improvements to the Elks Building. Should new cracks emerge or existing spalling or small cracks widen, a structural engineer should be consulted to determine if and what temporary shoring measures may be necessary pending a more comprehensive project. Repair of these braces should comprise an important component of an overall rehabilitation of the Steps. Please refer to Structural Recommendation item no. 4.3.6.

Areaway

Debris should be cleaned from the areaway. Improved closure of the areaway should be provided, such as a locking metal mesh or bar gate at the east end of the areaway at grade to prevent vagrant access to the areaway and adjacent vacant Elks Building. The existing plywood projection detaches readily. Visibility through the gate for security related observation of the areaway from grade is recommended.

South Slope

Slope should be stabilized to halt and prevent further settlement and cracking of the Spanish Steps' south portion. Refer to Structural Recommendations, item no. 4.3.7.

4.4.2 Mid Term

Planning

Cast stone composition analysis should commence at this stage to identify the materials of the original cast stone elements (i.e. balusters, newels, stringers, railings and posts). Establishing the material constitution and ratios at the outset will inform architects, engineers and contractors as to the complexity of replicating these elements and what adjustments or allowances may be necessary to meet code requirements. This material composition information will also facilitate in locating a qualified cast stone contractor by showing what materials are needed for replication. Due to the historical significance and public prominence of the Steps, the long-term goal should be a return to a cast stone exterior surface. Inner core materials and structure of these cast stone elements would need to be worked out as part of the design development of a long-term project to incorporate basic factors of seismic performance, building code and structural requirements, and industry fabrication processes. Cast stone and concrete are entities of distinctly different composition, texture, visual appearance, and performance and should not be used interchangeably.

Structural and civil engineering design development of stabilization measures for the arced balustrade on the east side of the main landing is described in item no. 4.3.2 in the Structural Recommendation section. This task is critical to address prior to restoration work on the balustrade.

Public interest and relations work should be continued as described above in Section 4.4.1 Short Term, Planning.

Minor Projects

Stairs

Spalls and cracks should be patched. Vapor permeable patching material containing no latex or acrylic bonding agents should be utilized. Patch material should be compatible with the physical characteristics of the existing concrete. The patch material should be color-matched to the existing concrete. The sides of patch areas should be square cut. Jahn M90 or equivalent concrete patching material is recommended. Please refer to Structural Recommendation item no. 4.3.3.

Landings

Cracks should be mortar filled or grouted. This task could also be undertaken as part of a long-term project. Fill with mortar or grout would constitute a non-structural void filling to prevent water and debris infiltration into the assembly. Mortar or grout are recommended as they are compatible materials with the finish character of cast stone and concrete and as such present less of a visual impact compared with synthetic caulking.

Newel/Elks Building Parapet Walls

Missing pipe rail at upper northwest parapet wall should be restored in-kind.

Major Projects

None

4.4.3 Long Term

Planning

Stair rehabilitation planning should form the core of long-term projects and draw from the findings of short-, mid- and other long-term planning studies. The balusters, railings, stringers, newels, posts, stairs, landscaping, exterior lighting, and urns present an important unified character that defines the Steps and visually connects them to the adjacent Elks Building. These elements merit a restoration treatment approach. The retaining walls, foundations, braces, landings, electrical connections and irrigation system support the above elements. The extent of previous modifications and their supportive roles merit a rehabilitation treatment approach. Planning should involve all stakeholders and interested parties and involve identifying and retaining an architect, structural engineer, and a masonry and cast-stone contractor, all experienced in historic building and structure rehabilitation, and developing a scope of work and cost estimate for the project. This information will aid in grant application and fundraising efforts. The decision-making matrix, maps of architectural significance, and levels of significance

identified for individual character-defining elements provide an important pathway for considering the development of a major rehabilitation project and should be consulted at the beginning of any conceptual project scope development. Please refer to Structural Recommendation item no. 4.3.1-4.37.

Arborist evaluation of the Monkey Puzzle tree will determine the extent of root bulb impact and potential growth impact upon the foundation and retaining walls of the Spanish Steps. Critical issues include: is the existing tree mature? If not, what is the extent of potential continued growth? What is the lifespan for this species and when is replacement in-kind needed? Was this species ever appropriate to the location or should a new more compatible type be identified? The tree provides a sustained and historically significant landscape element for the Steps. Arborist findings should be integrated into the landscape plan. Retention should not jeopardize the structural stability of the Steps.

A landscape architect will be needed to develop a landscape plan for the three planting areas and to effectively evaluate the history of the plantings and historically significant patterns and plant types with local climatic conditions. In addition, a landscape architect can develop and identify the overall intended visual character of the site during the seasons. Landscape plan development should be coordinated with the city's system for sustained maintenance of the plants and the type of irrigation necessary. The irrigation system should not adversely impact the concrete and cast stone of the Steps through introduction of excessive water to the site. Re-evaluation of the drainage system may be necessary as part of this planning.

Electrical and plumbing should be evaluated to assess the condition and capacity of the current systems serving the exterior lamps and irrigation system. Findings from this analysis should be coordinated with proposed work on the project to meet projected needs.

Barrier free access planning is an important priority of long-term planning to provide universal community member access to the Steps. Please refer to the Accessibility portion of Section 4.1.

Public interest and relations work should be continued as described above in Section 4.4.1 Short Term, Planning.

Minor Projects

None

Major Projects

Balusters, Posts, Engaged Posts

Balusters, posts, and engaged posts should be restored. Restoration of these elements presents a complex set of issues:

First, existing conditions present original, historically significant repairs, compatible contemporary repairs, and non-compatible contemporary repairs.

Second, there are physical condition issues presented through jacking rebar, settlement cracks, fractures, and spalls in existing materials.

Third, there are contemporary layers of paint and Portland cement based stucco which clad original cast stone elements. These layers obscure existing conditions and original finishes and textures. Delamination of these coatings from the original material suggests water penetration and failure of the mechanical bond between the two layers. Extensive cracking in the outer contemporary layers allows water to penetrate, which is then trapped against the cast stone by the contemporary layers.

Fourth, all repairs need to be coordinated with seismic and building code engineering requirements as well as the capacity of modern materials to replicate missing elements.

Please refer to Structural Recommendation 4.3.1, 4.3.4.

Casting work should replicate and replace missing or extensively damaged balusters, posts, and engaged posts. All extensively damaged original cast-stone balusters, posts, and engaged posts should be retained in use or salvaged. Any extensively damaged original cast stone balusters, posts, and engaged posts removed from the Steps should be placed into long-term storage to serve as archival records of original materials, dimensions and design to guide future repairs. All future replicated and reconstructed elements should be matched where possible to original elements, not to previous historically significant or compatible contemporary repairs. All existing historically significant and compatible contemporary repairs not adversely impacting the Steps should be retained in use. As these elements deteriorate and fail, they should be replaced with replicas matched to the original elements. Existing non-compatible contemporary repairs should be replaced with replicas matched to the original elements.

Repair work should accomplish consolidation, profile restoration, and void filling for existing original and historic and compatible contemporary elements. All contemporary paint and stucco layers should be removed from original elements. Priority should be given to matching repair material hardness, color, texture, porosity, permeability, and strength with original cast stone elements. Contemporary elements utilized in the Steps exhibit physical qualities differing from the original elements, making repair material matched to this new work incompatible with original elements. Repair work on all settlement cracks should follow stabilization of the south slope and stabilization of the arced balustrade along the east side of the main landing.

Newels

Repair work should accomplish consolidation, profile restoration, and void filling for existing original elements. All contemporary paint and stucco layers should be removed from original elements. Repair material should be matched to the hardness, color, texture, porosity, permeability, and strength of the original cast stone elements.

Stairways

Previous repairs should be inspected to assess performance. Stringers should be repaired in concert with balustrade work, filling voids and restoring profiles as necessary.

Please refer to Structural Recommendation 4.3.3.

Landings

Landings should be repaired as needed. Existing landing concrete is contemporary.

Matching preference should be given to the existing concrete in the stairs.

Urns

A new urn should be replicated to replace the missing urn on the upper southwest corner newel.

Existing compatible contemporary replicas should be retained. As needed, existing should be replaced with replicas matched to the single existing original urn.

Urns should be replanted according to the landscape plan.

Exterior Lamps

Exterior lamps should be removed to disassemble, clean and refinish.

Wiring should be inspected. Upgrades and repairs

should be made as needed.

Exterior lamps should be reinstalled.

Non-compatible contemporary cap nuts should be replaced with cap nuts matched to existing originals.

Walls

Cracks should be repaired as needed.

Walls should be refinished as needed.

Braces between foundation walls and the Elks Building should be repaired in coordination with capital improvements to the Elks Building. Please refer to Structural Recommendations, Item 4.3.6.

Planting Areas

Planting types and schemes should be restored in each of the three planting areas per landscape plan recommendations. A long-term maintenance plan should be developed as part of the landscape plan, identifying costs and tasks.

Electrical System

Electrical wiring for the exterior lamps should be inspected and updated.

Storm System

Storm water management system should be inspected and updated as needed.

Irrigation System

Irrigation system for planting areas should be inspected and updated in coordination with landscaping plan development.

Site

Sidewalks along Broadway and Commerce streets should be repaired following completion of the bulk of the work on the project and finalizing of utilities and storm and irrigation connections. Work should be coordinated with site work on the Elks Building.

SUPPLEMENTAL MATERIAL

5.1 HISTORIC PHOTOGRAPHS

ca 1912 photograph of Champney. Source: Photograph cited from Pacific Builder and Engineer, June 15, 1912, University of Washington Libraries, Special Collections Division; UW14719. Ochsner, Jeffrey Karl, Ed. (1998). Shaping Seattle Architecture: A Historical Guide to the Architects. Seattle: University of Washington Press, p. 132.

ca 1885 view looking north along Pacific Avenue from the Northern Pacific Building.

ca 1885 photograph of Tacoma's north end prior to construction of old City Hall, the Elks Building, and the Northern Pacific Building.

ca 1895 photograph of Pacific Avenue looking south. Source: Washington State Historical Society.

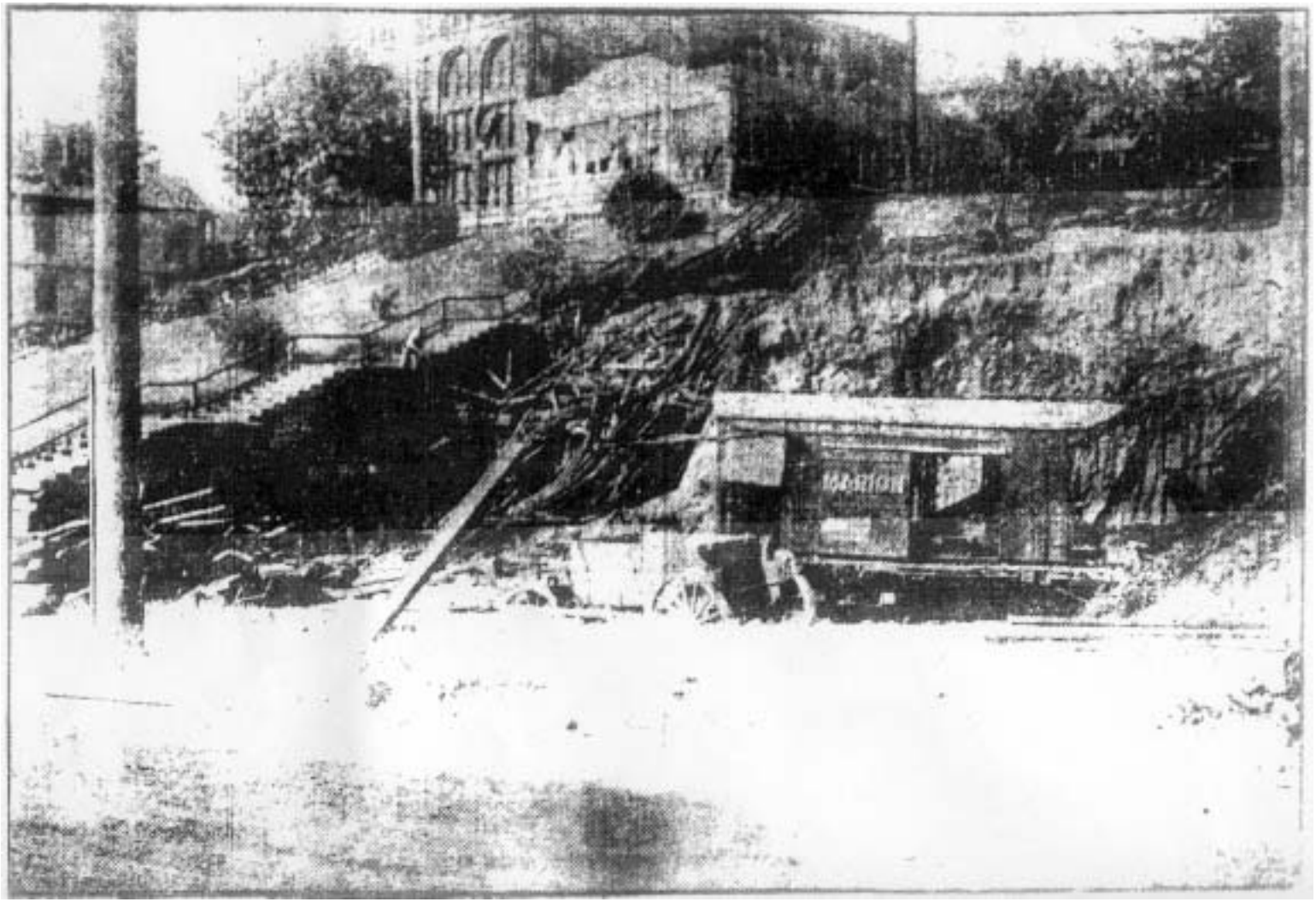
ca 1895 photograph looking south along Pacific (left) and Commerce (right) before construction of the Elks Building and Spanish Steps.

ca 1900 view looking north along Pacific Avenue.

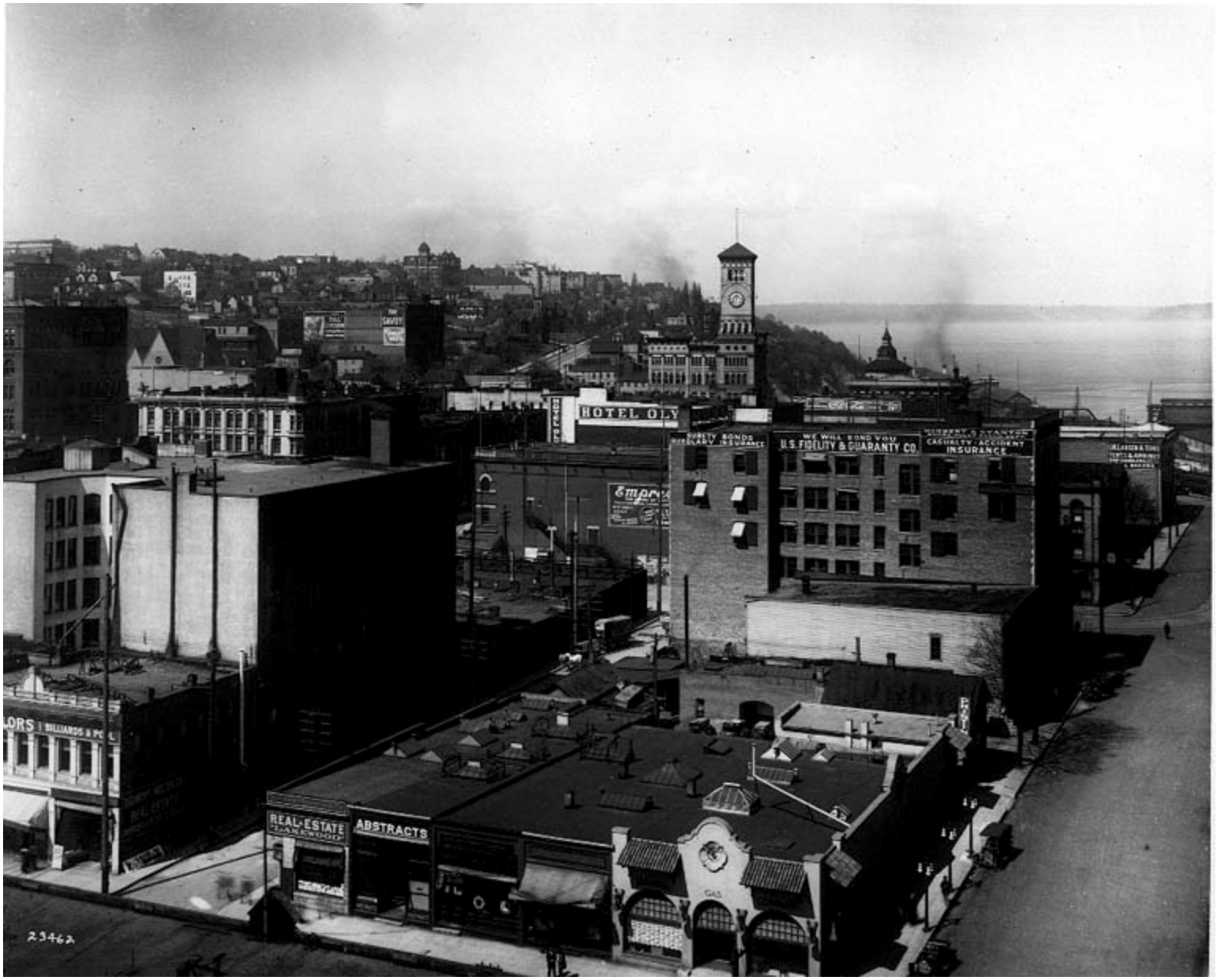
ca 1900s photograph taken prior to construction of the Elks Building and Spanish Steps looking north along Pacific Avenue. Old City Hall stands at left in the foreground. Source: Stoddard, John L. (1900s). Scenic America: The Beauties of the Western Hemisphere. Chicago: Werner Company.

ca 1901 view looking north over Half Moon Bay rail yard.

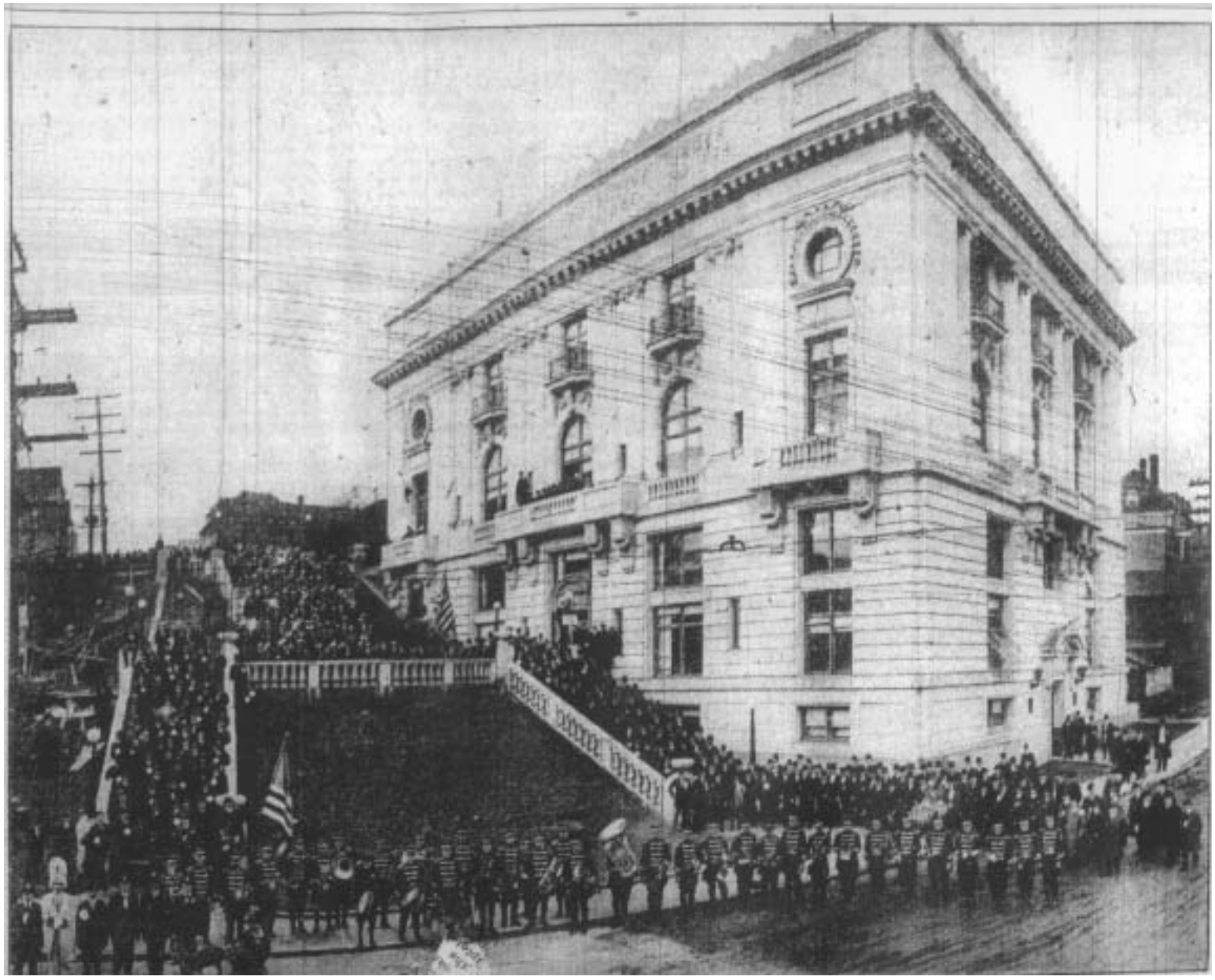
1914 photograph of the wood frame stairs serving the site prior to construction of the Elks Building and the Spanish Steps. Source: Tacoma Daily Ledger. (July 5, 1914).



ca 1915 photograph looking north over Tacoma prior to the construction of the Elks Building and the Spanish Steps.



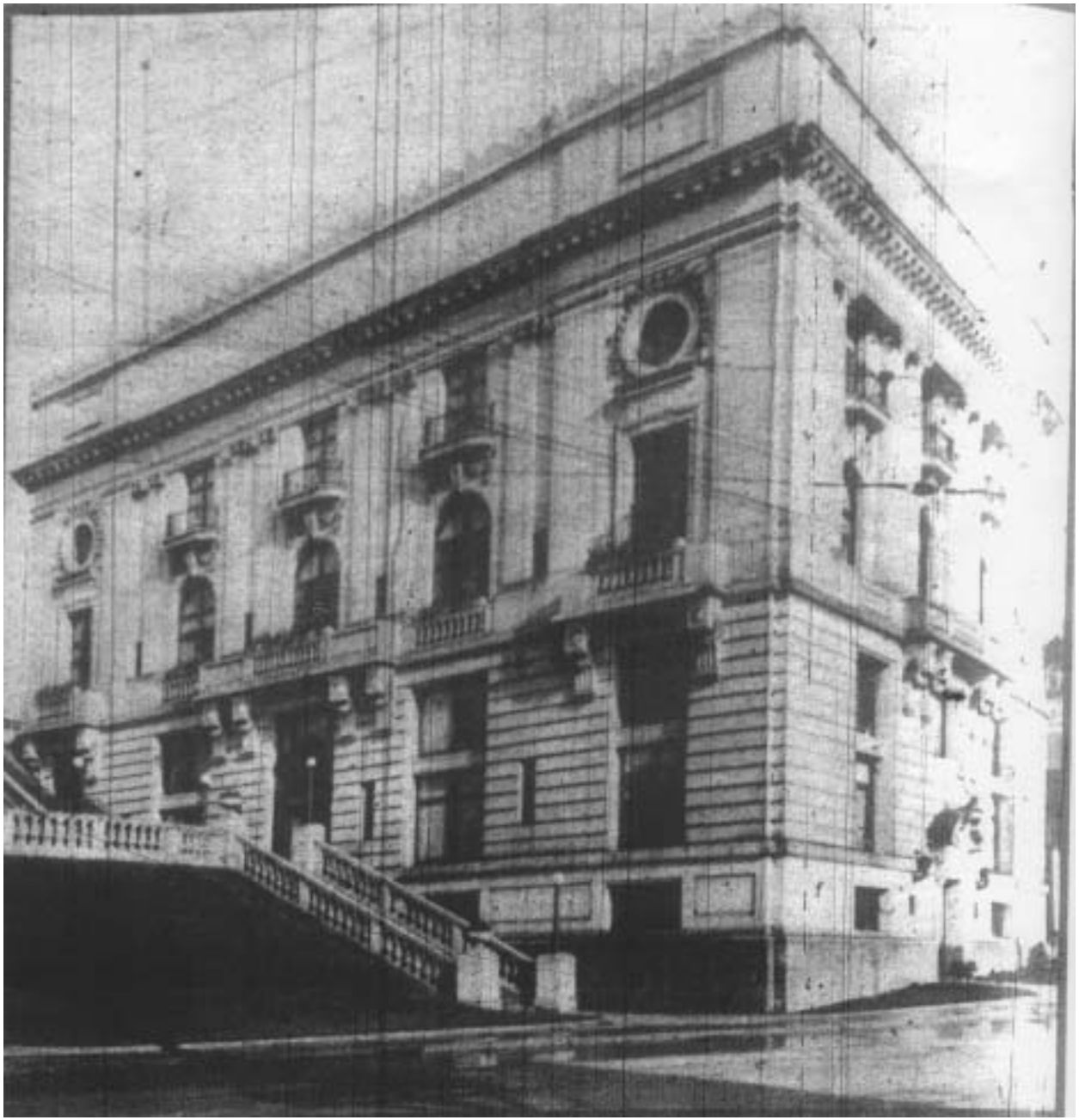
1916 photograph of the Spanish Steps. "In the foreground is seen the Portland Elks' band, with the others of the Oregon delegation on the steps at the left. The top steps are occupied by the Seattle herd and the Tacomans are assembled beside their new building, which shows its stately splendor." Source: Tacoma Daily Ledger. (February 23, 1916: A1).



ca 1916 photograph of the Spanish Steps. Source: Photograph cited from Private Collection. Ochsner, Jeffrey Karl, Ed. (1998). Shaping Seattle Architecture: A Historical Guide to the Architects. Seattle: University of Washington Press, p. 137.

ca 1925 postcard showing the Spanish Steps and Elks Building following construction. Source: Elks Tacoma Lodge No. 174, Artifacts Consulting, Inc.

1927 photograph of the Spanish Steps. Note the absence of plantings in the lower planting area. Source: Tacoma Daily Ledger. (April 12, 1927).



Ca 1927 photograph of the Spanish Steps looking northeast. Source: Bonney, W. P. (1927). History of Pierce County Washington, vol. II. Chicago: Pioneer Historical Publishing Company, p. 1101.

ca 1928 photograph looking out over Tacoma's north end following construction of the Elks Building.

ca 1935 photograph of the Spanish Steps.

ca 1935 photograph of Tacoma police officers posed before the northeast flight of stairs.

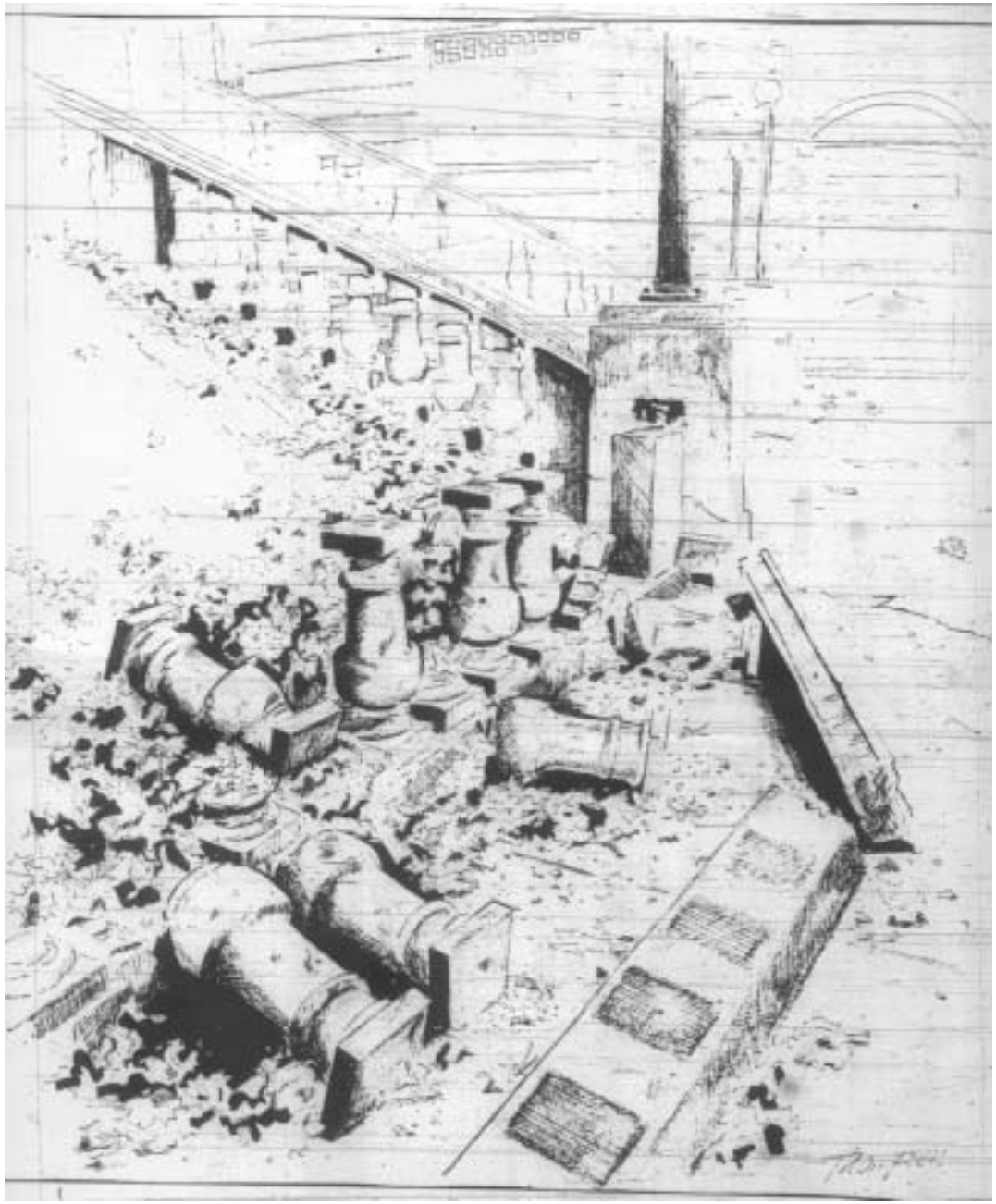
ca 1935 photograph of the Spanish Steps.

ca 1938 photograph of the Spanish Steps.

ca 1950s photograph of the Elks Lodge band posed on the upper steps.

ca 1950s photograph of school kids posed along the upper planting southwest area of the Spanish Steps.

1974 drawing done to represent existing conditions amid the consideration of who owned and would repair them. Source: Tacoma News Tribune. (September 1, 1974).



1977 photograph of the Spanish Steps. Source: Old City Hall National Register Historic District Nomination (1977).

1977 photograph of the Spanish Steps. Source: Old City Hall National Register Historic District Nomination (1977).

1977 photograph of the former building in the adjacent south lot. Source: Old City Hall National Register Historic District Nomination (1977).

1977 photograph of the Spanish Steps from the Broadway level. Source: Old City Hall National Register Historic District Nomination (1977).

5.2 CONDITION PHOTOGRAPHS

The following condition photographs supplement the descriptions and assessments of features and spaces provided in Section 3.2, *Catalogue of Elements*. Photographs are cross-referenced in the description section using each photograph's figure number. Digital photographs for this section were taken by Artifacts Consulting, Inc. staff in the summer of 2004. The following photographs were chosen to provide clarity and examples for some of the more serious condition issues afflicting the building.

CP. 5.2.1 *Missing balusters along the south portion of the upper stairs. Note grade of planting area behind balustrade approximately at stair level.*

CP. 5.2.2 *Previous, non-compatible contemporary patches to the balusters.*

CP. 5.2.3 *Missing baluster along the south portion of the upper stairs. Note grade of planting area behind balustrade approximately at stair level.*

CP. 5.2.4 *Previous, non-compatible cementitious patches to the balusters.*

CP. 5.2.5 *Cracking along the upper portion of a baluster.*

CP. 5.2.6 *Cracking and previous non-compatible caulking employed at joints in railings.*

CP. 5.2.7 *Seperation of previous non-compatible caulking from railing.*

CP. 5.2.8 *Broken cast-stone baluster.*

CP. 5.2.9 *Lateral crack along base of upper northwest newel.*

CP. 5.2.10 *Delamination of previous parging added on the newels. Note weep hole drainage redepositing dissolved cast stone along top of retaining wall.*

CP. 5.2.11 *Deteriorated upper corner on a typical newel.*

CP. 5.2.12 *Weep hole in a typical newel.*

CP. 5.2.13 *Previous cementitious stair repairs.*

CP. 5.2.14 *Cracking along newel base.*

CP. 5.2.15 *Urn detail.*

CP. 5.2.16 *Deteriorated and previously repaired stair nosing.*

CP. 5.2.17 *Contemporary cap nuts on lamp bases.*

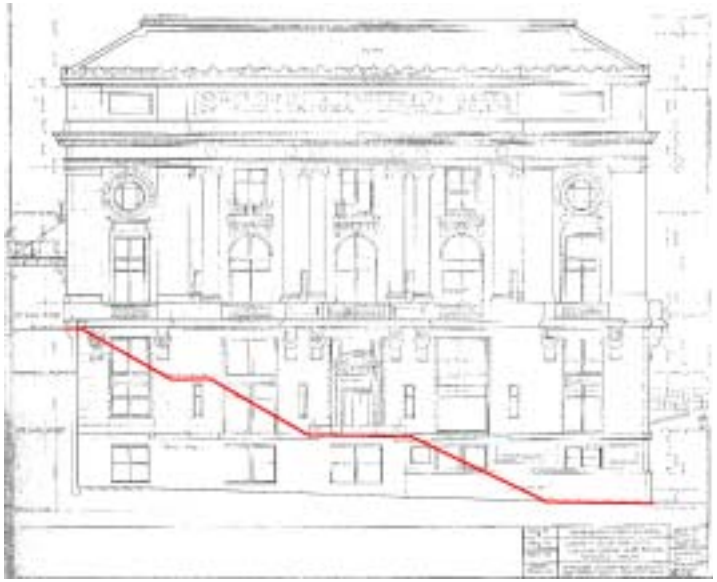
CP. 5.2.18 *Debris filling areaway. Note exposed rebar in braces spanning between Spanish Steps (left) and Elks Building (right).*

CP. 5.2.19 *View looking north at the south slope.*

CP. 5.2.20 *Southwest retaining wall. Exposed aggregate portion was formerly covered by grade. Height of exposure suggests extent of slope settlement.*

CP. 5.2.21 *Detail view of underside of retaining wall.*

CP. 5.2.22 *South slope detail looking down from Broadway.*



DRW. 5.3.1 *Elks Building south elevation. Red line indicates approximate line of Spanish Steps.*

DRW. 5.3.2 *Elks Building section. Red lines indicate approximate interconnection of Spansh Steps foundation walls and the foundation of the Elks Building.*

5.3 THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES (1995)

Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization are consolidated under this treatment.) Preservation is defined in the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of applying measures necessary to sustain the existing form, authenticity, and materials of a 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.

1. 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.
2. 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.
3. 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.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. 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.
7. 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.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken. Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.

Restoration is defined by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

1. A property will be used as it was historically or be given a new use which reflects the property's restoration period.
2. Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period will not be undertaken.
3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
4. Materials, features, spaces, and finishes that characterize other historical periods will be documented prior to their alteration or removal.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.

6. Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials.
7. Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.
8. 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.
9. Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
10. Designs that were never executed historically will not be constructed.

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. Rehabilitation is defined by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather

than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. 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.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Reconstruction re-creates vanished or non-surviving portions of a property for interpretive purposes. Reconstruction is defined by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) as the act or process of depicting, by means of new construction, the form, features, and detailing of a nonsurviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.

3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

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