Proposed Exposition-Recreation Center Bond Issue

City Club of Portland (Portland, Or.)
AN ACT to amend the Charter of the City of Portland by adding a new chapter providing for the creation of a department of exposition and recreation, creating an Exposition-Recreation Commission and providing for appointment and setting forth the powers and duties of said commission, providing for construction, erection and operation of an exposition and recreation center to include buildings and structures for a multipurpose coliseum and center for sports events, conventions and shows of various kinds including livestock shows, etc., and other recreation and entertainment events and war memorial, providing for administrative, fiscal and accounting procedures, and authorizing issuance of general obligation bonds primarily chargeable against the net revenues of said exposition and recreation center, payable not less than three nor more than twenty years from date of issuance, in a total sum not exceeding $8,000,000, and providing other matters related to the foregoing powers, duties and bond issue.

SHALL THE CHARTER BE SO AMENDED?

Vote 53 Yes □   No □

TO THE BOARD OF GOVERNORS,
THE CITY CLUB OF PORTLAND:

Your Committee was appointed to report on the proposed amendment to the City Charter, which would create a "Department of Exposition and Recreation," provide for the appointment of a five-member Commission, and the issuance of up to $8,000,000 of bonds that would be general obligations of the City of Portland. The Commission would be appointed by the Mayor, subject to the approval of the City Council, and would have the authority to expend the proceeds of the bond issue for the construction, equipment, maintenance and operation of

"buildings and facilities for a multipurpose coliseum stadium, playfield, exposition and exhibition center and war memorial, for conventions, exhibitions, sports events, concerts, shows of all kinds including livestock shows, automobile shows, housing shows and ice shows, patriotic, educational and fraternal meetings, and church conventions, and any other types of entertainment and recreational events, whether of exhibition or of participation character, that the Commission may find appropriate, including educational exhibits and park and recreational facilities, together with facilities for veterans' organizations as the Commission may find desirable or appropriate."

The Commission would also have the specific authority to purchase or condemn property to provide a site or sites for the facilities; to purchase or condemn, and improve, adjacent property "as the Commission may find necessary or appropriate or convenient for the protection, improvement or access to the site or sites selected"; to lease or sell such excess property; to provide "such additional facilities for sports, recreation and entertainment purposes" as they "may find suitable or necessary"; to generally operate and manage the public facilities provided; and to disburse any net income either for improvements and additions to the facilities or for the payment of interest or principal of the bond issue.

This may be summarized by saying that the Commission would have the authority to expend the proceeds of an $8,000,000 bond issue, and any funds thereafter acquired from any source, in connection with the acquisition and management of any kind of exposition and recreation facilities.

LOCATION OF PROPOSED CENTER IN VANPORT AREA

The ballot measure provides for the proposed Exposition-Recreation facilities to be constructed upon a "site or sites" to be selected by the five-member Commission, and no reference is made therein to a specific location. But since the sponsors of the measure have stated that they favor a Vanport location, and approximately $1,500,000 is speci-
fically related to the acquisition and improvement of the West Vanport area, the majority of your Committee decided that it was necessary to consider the Vanport location as an integral part of the proposal.

Briefly stated, the Vanport area program includes the acquisition by the City of the 640 acres comprising what is known as West Vanport, lying between Highway U. S. 99 West and the S. P. and S. Railway line to the west, at an estimated cost of $500,000. An area of approximately 160 acres along the railway trackage would be filled to plus 20 feet for the purpose of giving additional flood protection to the area, and providing industrial sites in the filled area. The Exposition-Recreation Center itself would be located in the area known as East Vanport, or Delta Park, at the confluence of Highways U. S. 99 West and U. S. 99 East near the approach to the north end of the Interstate Bridge. This property is presently owned by the City of Portland. The estimated cost of the entire program is $8,000,000 made up as follows:

- Main exposition building $4,750,000
- War Memorial Section 250,000
- 10-acre exhibition building 1,000,000
- Acquiring West Vanport property 500,000
- Making fill for industrial sites
- Building access roads
- Paving 50-acre parking area
- Landscaping grounds 1,500,000

TOTAL $8,000,000

PACIFIC INTERNATIONAL LIVESTOCK EXPOSITION

It was also thought necessary by your Committee to assume that at least a part of the facilities to be constructed would be so built and located as to be useable by the Pacific International Livestock Association for its annual exposition. This also is not specifically provided for by the ballot measure, but one of the arguments advanced by the sponsors of the measure is that new housing is needed for the Pacific International if it is to stay in Portland, and that if such housing is provided in the proposed Exposition-Recreation Center the Pacific International officials and stockholders will make a gift of its land and buildings to the City of Portland.

SCOPE OF COMMITTEE'S WORK

Your Committee interviewed Mr. Ormond R. Bean, Commissioner of Finance for the City of Portland, Mr. R. L. Clark, President of the Chamber of Commerce and Mr. Carvel Linden, past-President of the Chamber of Commerce, (these three appearing on behalf of the Mayor's Advisory Committee which sponsored the measure); representatives of the City Planning Commission; Mr. Walter Holt, General Manager of the Pacific International Livestock Exposition; Mr. Robert Webb, Oregonian Sports Writer; Mr. M. James Gleason, Multnomah County Commissioner; Mr. Duane Hennessy, Manager of the Multnomah County Fair; and Mr. George M. Baldwin, Executive Secretary of the Tax Supervising and Conservation Commission. In addition, a number of sports and exhibition promoters, real estate brokers and other parties were interviewed by individual members of your Committee; brochures, financial statements or other pertinent data on recreation and exhibition centers in other cities, such as: Spokane, Kansas City, Milwaukee, Houston, Buffalo and Vancouver, B. C., were reviewed; and a careful study was made of the City Planning Commission's preliminary report of February 1954 relative to the proposed Center.

These interviews and studies developed the following arguments for and against the proposal:

ARGUMENTS FOR

1. There is a real and urgent need in Portland for an Exposition-Recreation Center that will seat up to 15,000 people, and make it possible to conduct exhibitions and athletic events, and house large conventions, so that our City will be able to compete successfully with other cities which already have acquired similar facilities, and with “the gatherings that would be attracted to Portland... bring many millions of outside dollars into the City's trade channels.”

2. The Ice Coliseum is considered unsafe by the Portland Fire Department and cannot be used for public gatherings unless certain safety requirements are met, and such action is not contemplated at this time.

3. The Pacific International Livestock Exposition's building is regarded as unsuit-
able for the gathering of large crowds, because of fire hazards, and unless other quarters are provided the annual Exposition may be moved to some other city in the Pacific Northwest.

4. If the proposed Exposition-Recreation Center is constructed, and the Pacific International Livestock Association is given the right to use it for its annual Exposition, it will make a gift to the City of Portland of its buildings and approximately 42 acres of land. The proponents of the Center have estimated the value of this property to be approximately $2,000,000 using a value of $5,000 per acre for the land and an estimated replacement value for the buildings of $1,800,000. They point to the lease of the buildings for U. S. Air Force storage at an annual rent of $144,000 and although this lease is to be terminated as of June 30, 1954, they state that a "reasonable minimum rental" for the building would be $105,600 gross per annum, and $65,000 net after operating and maintenance costs.

5. The acquisition of the West Vanport area, and the completion of the proposed fill of approximately 160 acres, (at an estimated cost of $750,000) would not only provide Portland with additional industrial sites but would "seal off for all time the danger of a repeat flood" in that area.

6. The acquisition of this area by the City of Portland is desirable in order to prevent its scheduled use as an ammunition dump by the U. S. Air Force.

7. The combining of the West Vanport and East Vanport properties would provide ample area not only for the necessary buildings and parking space, but all space requiring activities such as horticultural gardens and exhibits, auto racing, archery and a football stadium if and when the present downtown facilities are discontinued. It also would be suitable for use as a Multnomah County fairgrounds, and could be operated with arrangements with Portland Meadows for the race track and the Exposition-Recreation Center for stock showing and arena use.

8. The Vanport property is centrally situated between the large population area of Southern Washington and the Portland metropolitan area, and will be conveniently located to draw from both areas.

9. If the Vanport area program is adopted, the Mayor's Advisory Committee "can see a direct return in 10 years of at least half the sum requested." Another statement is that an annual net income of approximately $250,000 should be produced by the Exposition-Recreation Center.

10. The facilities and activities of the Pacific National Exhibition in Vancouver, B. C. are used as an illustration of what might be acquired for Portland by the development of the proposed Exposition-Recreation Center. The objectives of the Vancouver association are said to be "almost identical with those of the Pacific International Livestock Exposition in Portland." It is further stated that "very substantial revenues are obtained from the ice arena and from the staging of such athletic events as wrestling, boxing, etc." Excess of Vancouver's revenues over expenditures for the year ending in 1953 were $217,508.

11. The proposed $8,000,000 bond issue can be paid off over a 20-year period by an annual tax levy of 90 cents per $1,000 of assessed value, and with a lower levy if net income is available from the operation of the Exposition-Recreation Center.

ARGUMENTS AGAINST

1. The Vanport location is too far from the center of Portland for the successful staging of conventions, concerts and some types of exhibitions and athletic events.

2. The danger of floods in the Vanport area would not be eliminated by the fill of the 160-acre tract for industrial sites.

3. The fill of the 160-acre area would probably cost close to $1,000,000 (or $6,700 per acre) rather than the $750,000 estimated by the sponsors, and additional money would need to be expended for the installation of street and sewer improvements.

4. If it is considered advisable to acquire the West Vanport property in order to prevent its use as an ammunition dump, or for beautification purposes, the city could do so by the use of funds from the special tax levy for the purpose of acquiring and improving park properties.

5. There is no basis in fact for the claim that the Pacific International property has a value of anywhere near $2,000,000 and there is considerable doubt that it has a dependable net rent potential of $65,000 per annum.

6. The facilities to be provided for the Pacific International Exposition would to some extent be a duplication, at taxpayer expense, of the contemplated new location for the Multnomah County Fair.

7. There is no sound basis for the statement that the Mayor's Advisory Committee
“can see a direct return in 10 years of at least half the sum requested,” or that the annual net income from the proposed Center would be approximately $250,000.

8. The bond issue of up to $8,000,000 may be considerably at variance with the amount needed for an Exposition-Recreation Center if some site other than Vanport is eventually chosen.

9. There is no provision in the proposed charter amendment which makes it mandatory for the Exposition-Recreation Center Committee to apply any excess funds or net income on the payment of either interest or principal of the $8,000,000 bond issue. Neither is there any provision for such application by the Commission, or by the city officials, of any funds derived from the sale of the P. I. properties and the industrial sites on the filled area.

10. The proposal was developed without consultation with the City Planning Commission or with other governmental planning or programming bodies or with many potential user groups or representatives.

11. The proposed measure would be a “blank check” for $8,000,000 in the hands of a Commission appointed by the Mayor. This Commission would have full authority, limited only by the pressure of public opinion to decide where and how this money and revenue would be spent. Since the measure gives the Commission the authority to acquire sites to provide “additional facilities for sports, recreation and entertainment” the Commission could duplicate the work of the Park Bureau if it so desired.

FACTS AND OPINIONS DEVELOPED BY STUDIES

Your Committee is convinced of Portland’s need for a recreation and exhibition center to replace the outmoded, unsatisfactory and unsafe facilities which have been used in the past and which are inadequate for today’s needs. Thought about in terms of its effect upon the life of the City, such a Center, properly located and well designed architecturally, could be a source of civic pride, a lively facility providing positive recreational, educational and cultural values, and thus an asset to the community even though the operating expenses might exceed the gross income.

But the majority of your Committee is of the opinion that the sponsors, including the Mayor’s Advisory Committee, have been too hasty in their choice of the Vanport area as a site for the proposed Center, and in their estimate of capital requirements based on the improvement of that area. No evidence has been forthcoming from competent authorities that the proposed fill of 160 acres along the west side of West Vanport would completely eliminate the flood danger in this area. The City Planning Commission, in its preliminary report of February 1954 concerning the East Vanport location, stated that “until a much stronger dike system is constructed it would be necessary to prohibit large gatherings of people while the river is in the flood stage.” The dangers of a devastating flood or of recurrent floods cannot be disregarded: for example, the 1948 flood is considered possible of recurrence every twenty years. The danger of a devastating flood refers to all dikes protecting the area, not merely the reinforcements at the so-called S. P. & S. fill. The Portland District of the Corps of Engineers’ recommendation for the very necessary strengthening of the river side levee and cross dikes have not received any Congressional funds and the prospects seem dim for the near future. Thus it would seem to be imprudent to spend a substantial sum of money for buildings in such a location so long as there are other areas available where no such risks would be involved. The same report of the City Planning Commission also pointed out two other unfavorable factors, (1) the possibility of excessive cost of the 160-acre fill, and, (2) the unstable nature of the subsoil which might create building foundation problems. As to the first point the report states:

“There may be a question as to the availability of proper type of fill material since Oregon (Hayden) Slough was dredged out about 1922. Since then it has likely been filled with a lightweight silt, which will not produce a stable fill. If this proves to be the case, pumping costs could be prohibitive because of the distance to material in the main channel of the Columbia River.”

As to the second point, it states:

“Development cost may be high for greater flood control, such as filling, and to overcome the building foundation problems. Engineering studies have indicated that rigid structures with large concentrated loads may cause uncontrollable movements in the subsoil leading to uneven settlement or upheaval of the surface.”

There is also reference in the report to the fact that “In 1946 the Port of Portland was considering the purchase of this site for eventual development as industrial property. They retained Dames and Moore, Foundation Engineers, to investigate soil conditions and their effect on structures.” The report by Dames and Moore detailed exceedingly
poor subsoil conditions as well as the relatively long periods of time required for fill settlement and stabilization, and the Port of Portland thereupon expressed no further interest in the site for industrial development.

A further unfavorable factor in the Vanport location is the distance from the center of the City, and the hotel, theater, restaurant and shopping accommodations provided therein. In your Committee's review of data available on exhibition and recreation centers in other cities it was noted that the majority of them referred to the fact that the centers were within easy walking distance of downtown. Such a location would be of prime importance to conventions, concerts and some types of exhibitions, sports events and other public gatherings, and certainly there should be an endeavor to place the center where it would be most conveniently located for all the people in the Portland area. It seems pertinent to note that the so-called "Cow Palace" in San Francisco, which was built for exhibition and recreation purposes, and which is approximately six miles from the center of the City, is reported by a well known entertainment promoter of that City to be "poorly located (too far out) for the average food show, automobile show, industrial show, etc."

Regardless of the merits or demerits of the Vanport area for the proposed improvements the majority of your Committee wishes to go on record as being strongly opposed to civic authorities sponsoring a public improvement of this kind, and particularly of this magnitude, without first giving the City Planning Commission an opportunity to study the proposal and make its recommendations. In this case it was not until November 24, 1953 that the Mayor's Advisory Committee asked the Planning Commission to make an investigation of the nine best sites proposed. A few weeks after this request was made, it was publicly announced that the measure, with its Vanport site implication, would go on the May ballot. In February the Commission came out with a preliminary survey of the Vanport site, raising serious questions about their physical suitability, and suggesting that the measure be postponed until a more thorough study could be given to the site problems. This suggestion to postpone was overruled by the City Council, but the Council directed the Planning Commission to proceed with a detailed study of all sites. As there would have been ample opportunity for the Planning Commission to finish its studies in time to place the measure on the ballot next fall, the majority of your Committee is unable to recognize such a need for haste as to justify the Mayor's Advisory Committee and the City Council proceeding before the completion of the Planning Commission's work.

From the evidence available to your Committee it appears that the proposed project has been conceived by a very limited group of sponsors without obtaining the participation or concurrence of many groups which are expected to use the facilities.

Your Committee has sought evidence with respect to the claims of the sponsors of the measure that the annual net income of the Exposition-Recreation Center should be approximately $250,000, and more expansive claim that they "can see a direct return in ten years of at least half the sum requested." No supporting evidence whatsoever has been found for the latter claim, and your Committee considers it entirely out of keeping with a fair presentation of the facts to the public. The estimate of annual net income is based upon expected receipts from various exhibitions, sports events and other activities, and includes the $65,000 of net rent estimated for the Pacific International Livestock Exposition. Your Committee has interviewed the parties who might be promoting sports events in the proposed Center, and ones who have participated in the past in staging expositions and trade shows. As a result of these investigations your Committee is convinced that the estimated income is much too high.

The sponsors of the measure point to the net revenues being realized by the Pacific National Exhibition in Vancouver, B. C. and infer that the same results would be obtained in Portland. Your Committee examined the recent financial statements issued by the Vancouver association, and were interested to note that although annual net revenues have been realized, and in the year ending in 1953 amounted to $217,508, only a small amount of the net was obtained from the ice arena and the staging of athletic events. It was also noted, in studying results in other cities, that the municipal auditorium in Kansas City, which has an excellent annual record of trade exhibitions, conventions, concerts, sports events and other public gatherings, shows an average net operating loss over the last three years of $125,768 per annum. There is no readily apparent reason why the expectations for Portland should be so similar to the results in Vancouver, B. C. and so different from those in Kansas City.

In its consideration of the proposed Exposition-Recreation Center your Committee has not been unmindful of the value of the Pacific International Livestock Exposition to our community, and the present need of this association for modern exhibition facilities. But in the opinion of the majority of this Committee it would be unwise, and seemingly unnecessary, to jeopardize other civic and business interests by the location of the Exposition-Recreation Center in a fringe area where it would be useable for livestock exhibitions, but quite unsatisfactory for events needing a location near the center of the City. Such a result would seem to be unnecessary because of the coincidence that at this time the Multnomah County Commissioners find it necessary to relocate the county fairgrounds,
and apparently there is no unwillingness on their part to collaborate with the Pacific International on the use of the fairgrounds and buildings. The similarity of activities on the part of a county fair and a livestock exposition would indicate the desirability of combining such facilities, thus avoiding unnecessary duplication of expense to the taxpayers, and providing a downtown location for the other enterprises that would benefit materially from such a location.

Your Committee has concluded, on the basis of expert opinion, that a $2,000,000 value for the Pacific International property is substantially above the present market value, and that any expectation of a reasonably constant $65,000 net annual rental is unduly optimistic. Experienced real estate brokers have stated that in their opinion it would be difficult to secure tenancy for the property that would give any assurance of a satisfactory and dependable income. Here again is a serious discrepancy in the facts and figures submitted to the public by the sponsors of the measure.

Because of the absence of any definite plans or specifications for the buildings to comprise the Exposition-Recreation Center your Committee has made no study of the cost estimate of $5,750,000 for such improvements. But it did note, in its review of similar projects in other cities, that in the early part of this year the city of Spokane completed the construction of a multipurpose auditorium for exhibition and recreation uses, seating 9,000 persons, at a cost of approximately $2,000,000.

As the proponents of the measure have pointed out, the $8,000,000 bond issue can be retired over 20 years, as to both principal and interest, by an additional tax levy of 9/10ths of a mill, or somewhat less if assessed values increase materially. But it is well to bear in mind that on the May ballot there is a five year zoo levy which if approved by the voters will increase property taxes 1.2 mills for those five years, a proposed bond issue for the rehabilitation of our public docks which would add close to 9/10th of a mill, a bridge improvement measure which would add 1.3 mills, and a proposed increase in the school district tax base which would add an average of approximately 3 mills over the next five years, with probably as much or more thereafter. The approval of all these measures will mean a tax increase for at least a five-year period of approximately 7.3 mills, or 13.6% over the 1953-1954 levy. (Data supplied by Tax Supervising and Conservation Commission). In addition to the proposals on May ballot there are many other city and county improvements that will be needed in the foreseeable future. These facts and figures are not presented as an argument against the construction of a soundly conceived Exposition-Recreation Center, but for the purpose of illustrating the many needs facing the city and county, and the obvious desirability of the most careful and sound planning of our civic improvements.

MAJORITY CONCLUSION

Your Committee is unanimously of the opinion that Portland cannot afford to continue without a well located, soundly conceived facility for the housing of exhibitions, sports events, large conventions, concerts, and other public gatherings.

But the majority of your Committee believes, for the reasons set forth in the report, that insufficient consideration has been given to the location of the proposed Exposition-Recreation Center. As the $8,000,000 bond issue the voters are asked to approve is the amount estimated to be necessary to improve the Vanport area and construct the Center therein, and probably would be considerably more or less than necessary if it is located on some other site, we cannot recommend approval of the proposed measure. We suggest that the City Planning Commission continue with its studies until the best site for the greatest number of interests can be selected, after which a more definite proposal can be made to the voters. This recommendation will not satisfy the proponents of the present measure, who would like immediate action as an indication of progress, but it is respectfully suggested that action itself, without careful planning by qualified personnel, may be an indication of backwardness in a City's thinking, rather than progress.
RECOMMENDATION

The majority of your Committee therefore recommends that the City Club go on record as being opposed to the present measure.

Respectfully submitted,

IVAN BLOCH
DONALD DRAKE
GEORGE D. DYSART
WALTER GORDON
CARLETON WHITEHEAD
RICHARD A. WELCH, Chairman

MINORITY CONCLUSION

While the committee has made a careful and, for the most part, a well-substantiated factual study of the Exposition-Recreation Center proposal, in my opinion the conclusion of the majority is in error. The reasons for this opinion are:

1. The committee agrees that the development of such facilities proposed are essential to the growth and well being of the City of Portland. (The majority of the committee recommends a "no" vote only on the basis of "imperfect plans" and because of questions concerning the proposed location.) While details may be subject to question, it must be remembered that these details are not an issue. The broad project as submitted to the voters has been publicly discussed and planned for at least 20 years.

2. The question up to the voters is: "Can we safely put the details of location, plan, construction and operation in the hands of a Commission?" In other words we must now make the choice of giving a Commission the right to study, plan and build this needed facility or of waiting until some nebulous time in the uncertain future when another group of citizens might dare to try and present a "perfect" plan. Such a plan voluntarily developed must be complete and without major faults. We must hope that taxes will then be lower so voters will be more generous than today. After another discouragement in the long battle for such a facility, it is doubtful if such a time will ever come.

3. To doubt the advisability of putting details of location and plan into the hands of a Commission which would have time and money to study the problem is to deny the soundness of our very form of government which is largely administered by commissions. We put millions annually in the hands of a city commission, a highway commission, a port commission and give them carte blanche authority to spend our money. There is no other way to come to grips with details. The location of highways, or details of running a city, cannot be decided at an election booth. We must put technical details into the hands of a Commission.

Most of our commissions have been rather good stewards of the money entrusted to them. The Exposition-Recreation Commission to be appointed would have the benefit of our study and criticism, the complete report of the City Planning Commission, the Tax Supervision and Conservation Commission and adequate funds to secure needed technical data on all phases of plan, construction, location and use, which no one will have until the voters approve the general undertaking.

There is nothing in the charter amendment to suggest any specific place or plan. In order to get a vote at all it was necessary for volunteers to envision the general type of facility and how it would answer certain known needs. Membership of the commission would quite likely be entirely distinct from those serving on the voluntary committee. The mayor has assured me that this is indeed the case. It is just as probable that members of our committee would and perhaps should be represented on the commission.

4. Portland is growing so rapidly the chance to acquire "close-in" property may soon be lost forever ... the costs will certainly never be less. It is getting more expensive every day to prepare for the Portland of 10, 25 and 100 years from today. The time to make such plans is now. If we are serious about getting the things we admit we must have ... especially if these details are now more difficult to obtain as the years roll on ... we had better start now. The recreational site we save today is a heritage we pass on to generations to come ... forever!

5. A "yes" vote on this issue will assure Portland of at least one necessary step
toward becoming a great city... a step that many very much smaller cities are taking. It will give Portland what may be the finest facility of its kind on the coast. It seems unthinkable that a city the size of Portland should have lost even the poor facilities it once possessed and then refuse to plan for them now. It is about time we stopped going backward and moved forward. Our pioneer ancestors who crossed the plains to Oregon would probably never have made the gamble if they had appointed a City Club committee to weigh the dangers of the wilderness and the chances for success. Most all far sighted, envisionary plans, whether building a railroad across a nation, establishing a democracy or buying Alaska are made by people willing to take a chance on the future, promoted by dreamers, perhaps, and usually opposed by the men with the slide rules. By the very nature of its work a City Club Committee must look for the faults and errors in any proposal. It is always easy to find them! Possibly we may too often delay needed progress because we find the plan is not yet "perfect."

6. Portland has a pretty sad record of defeating proposals for long range development, such as civic centers, slum clearance, new zoo, throughways, etc. We may well ask how long we are going to turn our backs to progress while one city after another on the coast goes ahead of us, and we slip into relative unimportance and civic degeneration. Already we have ceased to be the 4th city on the coast and soon we may be the 6th. We are already 25 years too late in building facilities for a big city and even now there is little on the planning boards.

In this election the voters of Portland are going to make the decision whether or not this is a city that dares to grow up.

MINORITY RECOMMENDATION

For these good reasons I recommend that the City Club go on record for progress and this measure.

Respectfully submitted,

JAMES A. MOUNT

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