

Memo



Metro

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Portland, OR 97232-2736

Date: November 9, 2018
To: Kristen Minor, Chair, Portland Historic Landmarks Commission
From: Elizabeth Mros-O'Hara, Division Transit Project NEPA Project Manager, Metro
Subject: Division Transit Project, Section 106 Consultation

Metro and TriMet are pleased to meet with the Portland Historic Landmarks Commission (PHLC) to share information about the Division Transit Project (DTP) as it relates to historic and cultural resources, and assist the Federal Transit Administration (FTA) in its efforts to consult with stakeholders as a part of the compliance process for Section 106 of the National Historic Preservation Act (NHPA). In addition to presenting information, Metro, TriMet, and their cultural resources consultant will be present to address comments and answer questions about the project. Metro has made recommendations to the FTA concerning Determinations of Eligibility for the National Register of Historic Places (NRHP) and Findings of Effect for historic properties impacted by the proposed DTP described below.

To satisfy the FTA's responsibilities under Section 106, the agency initiated consultation with the City of Portland (City) on September 25, 2017 and sent additional correspondence to the City following adjustments to the Area of Potential Effect (APE) on July 17, 2018. On October 25, 2017, the City confirmed that it wanted to participate as a Section 106 consulting party and did not have any comments on the APE at that time. In keeping with the consultation requirements of Section 106, Metro and TriMet are now meeting with the PHLC to provide the Commission with the results of cultural resource investigations that identified properties eligible/listed for the NRHP and the potential for effects to those properties from the DTP.

Architectural Resources

In the Division Transit Project: Section 106 Historic and Archaeological Resources Report, 51 historic properties were identified within the APE. The effects to historic properties were assessed in two tiers. The first tier assessed the potential for project elements to indirectly affect the settings of 41 historic properties. The second tier includes 10 historic properties that were evaluated during the Intensive Level Survey (ILS) and that had the potential to be directly and indirectly affected by the project. These 51 resources are listed in the attached table.

In general, the level of project effects fall into two categories. For historic properties with a "no historic properties affected" finding under 36 CFR 800.4(d), the project was found to have no effect upon them as defined in 36 CFR 800.16(i). For historic properties with a "no adverse effect" finding under 36 CFR 800.5(b), the project's direct and/or indirect effects were found to not diminish the historical integrity of the respective properties' characteristics that make the properties significant.

To avoid and/or minimize the potential for effects to the 10 NRHP eligible or listed properties, effect minimization measures were developed. With the implementation of these measures, the project (as a whole) will result in no adverse effects, pursuant to 36 CFR 800.5(b), for built environment resources.

Archaeological Resources

The DTP's plans have been reviewed for effects on potential archaeological resources in the Archaeological APE. An Archaeological Monitoring Plan (AMP) was developed, and key areas have been identified for construction monitoring. If cultural materials are encountered during construction, an Inadvertent Discovery Plan (IDP) would be implemented consistent with 36 CFR 800.13. The implementation of the AMP and IDP would avoid, minimize, and resolve effects to archaeological resources.

Conclusion

In summary, we would appreciate any comments you may have concerning the project (e.g. the significance of properties within the APE and the potential for project effects). FTA consultation with the Oregon State Historic Preservation Office (SHPO) is ongoing, but the report cited above will likely be submitted by the FTA requesting the SHPO's concurrence which will initiate a 30-day review cycle. If you should have any questions about the project please contact Elizabeth Mros-O'Hara (Metro) at 503-797-1641, or by email at Elizabeth.Mros-OHara@oregonmetro.gov. Metro will share any input provided with the Federal Transit Administration which is the lead federal agency for the DTP. The FTA project leads are Mark Assam at Mark.Assam@dot.gov and Kim Marcotte Kmarcotte@anchorgea.com. A digital copy of the Section 106 report can be provided upon request.

Attachments: Table of Section 106 Findings of Effect for Historic Properties in APE (Portland)
Map of Project Alignment and Station Locations

cc: Mark Assam, FTA
Michael Kiser, TriMet
Hillary Adam, Portland BDS
Teresa Boyle, Portland BPS
Kim Marcotte, Anchor QEA

