



## City of Portland Historic Landmarks Commission

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October 31, 2018

Multnomah County Board of Commissioners  
501 SE Hawthorne Blvd, Suite 6000  
Portland, OR 97214-3587

Dear Multnomah County Board of Commissioners,

The Burnside Bridge: Earthquake Readiness project previously came before the Portland Historic Landmarks Commission (PHLC) on September 11, 2017, June 25, 2018 and October 08, 2018. At the most recent briefing four bridge options were presented: the "Enhanced Seismic Retrofit", "Replacement: Fixed Bridge", "Replacement: Movable Bridge" and the "Replacement: NE Couch Connection". While the PHLC understands that the final design of the proposed bridge is still years away, we would like to voice strong concern and hesitation for the proposed "Replacement: Fixed Bridge" option and mention a few additional important issues regarding the site and the process:

- Regarding the proposed "Replacement: Fixed Bridge" option:  
Unlike the other proposed options which show a west landing at NW 2<sup>nd</sup> Avenue, the "Replacement: Fixed Bridge" proposes a landing at NW 5<sup>th</sup> Avenue. This would extend the bridge into both the Skidmore/Old Town Historic District and the new Chinatown/Japantown Historic District having significant impact to both historic districts streetscapes and public realms.
- Regarding the Hierarchy of Historic Structures Impacted:  
While the Burnside Bridge is an individually listed landmark on the National Register, the Skidmore/Old Town Historic District is a Nationally Registered Landmark Historic District and so supersedes the Burnside Bridge in protective status. With this, we reiterate our concern for the proposed "Replacement: Fixed Bridge", which would have the greatest negative impact on the historic district.
- Regarding Type IV Demolition Reviews:  
All of the proposed bridge options except the "Enhanced Seismic Retrofit" will require Type IV Demolition Reviews due to their removal of the existing Burnside Bridge, a landmark listed on the National Register. Type IV Demolition reviews will also be required for any "contributing" structures within the historic districts or landmarks needing to be removed as a part of the process. Type IV Demolition Reviews are a component of the City of Portland Title 33 code and are not superseded by NEPA.
- Regarding Mitigation:  
Mitigation for the impacts to the Burnside Bridge and the historic districts should be proportional. PHLC suggests that the mitigation component need not necessarily be tied to saving portions of the bridge, but could potentially be for a historic resources inventory of a neighborhood nearby, etc.

Thank you for your consideration,

Handwritten signature of Kristen Minor in black ink.

Kristen Minor  
Chair, Portland Historic Landmarks Commission

Handwritten signature of Maya Foty in black ink.

Maya Foty  
Vice Chair, Portland Historic Landmarks Commission