

contained therein) would ensure substantial adverse effects to newly discovered archaeological resources would be avoided.

3.5 Historic Resources

3.5.1 Existing Conditions

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve. If a federal project has the potential to affect historic properties, a Section 106 review will take place.

The API (also known as the Area of Potential Effects) for historic resources extends beyond the Project Area to include approximately 39 additional acres of residential and commercial land in the historic neighborhood of Albina that may be subject to Project impacts such as noise and vibration. The Project team conducted a records search in the Oregon Historic Sites Database and identified 54 previously recorded historic resources within the API. This includes two resources that are now listed in the NRHP: Mt. Olivet Baptist Church and the Billy Webb Elks Club/Lodge.

During a subsequent field survey, the Project team identified in the API 115 individual resources that would be at least 50 years old at the time construction on the Revised Build Alternative would be finished (estimated 2034). Of these, the Project team identified 21 resources as potentially meeting the NRHP Criteria for Evaluation¹⁰ and requisite levels of historic integrity. Based on further evaluation, the Project team recommended 15 of the 21 resources as individually eligible for the NRHP and one potential historic district (the Eliot Historic District) as likely eligible for the NRHP (with eight of its contributing resources located within the API). On January 23, 2019, ODOT received concurrence from the Oregon SHPO on the recommended NRHP eligibility for 14 of the individual properties and the Eliot Historic District.

In 2022, as part of the supplemental baseline architectural survey, the Project team identified and photographed eight individual resources built prior to 1984 and not

Eliot Historic District and 15 individual properties in the Project vicinity are eligible for the National Register of Historic Places (NRHP). No short- or long-term impacts would adversely affect the characteristics that makes these historic properties eligible for listing in the NRHP.

¹⁰ If a site meets the NRHP criteria and retains its historical integrity (a historic property), then the federal agency is required to avoid, minimize, or resolve adverse effects to the property under the NHPA. Historic properties are those properties that are included in, or eligible for inclusion in, the NRHP. Federal transportation agencies (i.e., FHWA, Federal Transit Administration, and Federal Aviation Administration) are also required to pursue all reasonable and prudent alternatives if a transportation project adversely affects a historic property under Section 4(f) of the National Transportation Act.

documented in the previous survey. The Project team recommended that seven of the eight resources were not eligible for the NRHP due to diminished integrity or because they were examples of common building types. However, the Project team identified and determined that one additional resource, a historic railroad corridor, was eligible for the NRHP. On September 1, 2022, ODOT received concurrence from the Oregon SHPO on the recommended eligibility of the historic railroad corridor (Jalving 2022). Table 3-5 lists the 16 historic properties within the API considered eligible for the NRHP. Additional details on historic properties within the API are described in the *Historic Resources Supplemental Technical Report* (Appendix A).

Table 3-5. Historic Properties Eligible for the NRHP

Property Name	Property Address	NRHP Eligibility
Urban League of Portland	10 N Russell Street	Eligible (Criterion A)
Serene Court Apartments	1130 NE 1st Avenue	Eligible (Criteria A and C)
W.E. Field Tile Co. Building	122-140 NE Broadway	Eligible (Criteria A and C)
Calaroga Terrace	1400 NE 2nd Avenue	Eligible (Criterion A)
Travelodge at the Coliseum	1441 NE 2nd Avenue	Eligible (Criteria A and C)
Mt. Olivet Baptist Church	1734 NE 1st Avenue	NRHP Listed (Criteria A)
Eliot Historic District (eight contributing properties in the API)	2008 N Williams Avenue 16 NE Tillamook Street (NC) 20 NE Thompson Street 20 NE Tillamook Street (NC) 2156 N Williams Avenue (NC) 23 NE San Rafael Street 66 NE San Rafael Street 69 NE Hancock Street (NC) 72 NE San Rafael Street 73 NE Hancock Street 76 NE San Rafael Street 77 NE Hancock Street	Eligible (four non-contributing resources and 8 contributing resources) (Criteria A, B, and C)
Charles E. and Emma E. Holzer House	2027 N Williams Avenue	Eligible (Criterion C)
Beatrice Mott Reed House	2107 N Vancouver Avenue	Eligible (Criterion A)
Sullivan Pumping Station	211 NE Everett Avenue	Eligible (Criterion A)
Malcolm X Dental Clinic	214 N Russell Street	Eligible (Criteria A and B)
The Hazelwood/The Dude Ranch	222-240 N Broadway	Eligible (Criteria A and C)
Paramount Apartment House	253 N Broadway	Eligible (Criteria A and C)
Fremont Bridge	Crossing Willamette River	Eligible (Criteria A and C)
Billy Webb Elks Club/Lodge	6 N Tillamook Street	NRHP Listed
Historic Railroad Corridor	Linear Resource	Eligible (Criterion A)

Note: N = North; NE = Northeast; NRHP = National Register of Historic Places; NC = non-contributing

3.5.2 Environmental Consequences

The Project team assessed each identified historic property in the API for potential effects using the criteria of adverse effect from 36 CFR Section 800.5. An adverse effect occurs when an activity alters, directly or indirectly, any of the characteristics of

the historic property that qualify the property for inclusion in the NRHP. Examples of adverse effects include the following:

- Physical destruction of or damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR Part 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's important historic features
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious or cultural significance to an Indian tribe or Native Hawaiian organization
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance

3.5.2.1 No-Build Alternative

No direct or indirect impacts to NHPA Section 106 listed or eligible historic properties would occur under the No-Build Alternative.

3.5.2.2 Revised Build Alternative

Table 3-6 identifies 12 eligible historic properties in the API that would be impacted by construction of the Revised Build Alternative. These historic properties could experience short-term impacts such as noise and vibration from nearby construction activities, increased truck traffic, traffic congestion and changes to access, increased dust, and temporary changes to the historic setting due to the presence of construction equipment, staging areas, and materials storage areas.

Two historic properties would be affected by temporary easements or permanent property acquisition—the Travelodge at the Coliseum and a historic railroad corridor near Sullivan's Gulch. The Revised Build Alternative would require from the Travelodge at the Coliseum historic property a 5,763-square-foot permanent fee acquisition and a 7,579-square-foot temporary construction easement to construct a wall, and a 1,726-square-foot permanent fee easement to maintain the wall. On January 21, 2022, the Oregon SHPO agreed with ODOT's finding that these easements and acquisitions would result in "No Adverse Effects" (Raasch 2022). The Revised Build Alternative would also require a 125,125-square-foot permanent fee easement

and an 84,907-square-foot temporary easement from the historic railroad corridor, which encompasses a total of 5,718 linear feet within the API. On September 1, 2022, the Oregon SHPO agreed with ODOT's finding that these easements and acquisitions would result in "No Adverse Effects" to the historic railroad corridor (Jalving 2022).

The Revised Build Alternative also has the potential to impact underground sewer lines in the API, several of which may be eligible for the NRHP. Some of these lines may need to be relocated to avoid conflicts with structural support columns and footings for new elevated structures. Although several of these sewer lines are likely over 50 years old, they are part of a larger sewer system that has seen many updates and upgrades over the past 100 years. These changes may have altered the historic characteristics that would otherwise make the sewers eligible for the NRHP. As design of the Revised Build Alternative progresses, the Project team would look for ways to avoid conflicts with underground sewer lines, particularly those with potential historic significance.

Long-term impacts to historic properties from operation of the Revised Build Alternative could include changes to the settings of historic properties by the introduction of new transportation structures, including the proposed highway cover, lane/shoulders, ramp improvements, and long-term atmospheric or audible impacts. A noise analysis performed by the Project team estimated that the Travelodge at the Coliseum would experience a very small increase in operations-related noise generated by nearby vehicle traffic. None of the potential short- or long-term impacts described above would adversely affect the characteristics that make these historic properties eligible for listing in the NRHP. Indirect impacts to historic resources from the Revised Build Alternative would not result in measurable changes to, and diminished integrity of, archaeological resources.

Table 3-6. Historic Properties Potentially Impacted by the Revised Build Alternative

Property Name	Property Address	Short-Term Impacts	Effect Determination ¹
Serene Court Apartments	1130 NE 1st Avenue	Audible, Visual, Vibration	No Adverse Effect
Calaroga Terrace	1400 NE 2nd Avenue	Audible, Visual, Vibration	No Adverse Effect
Travelodge at the Coliseum	1441 NE 2nd Avenue	Audible, Visual, Vibration	No Adverse Effect
Mt. Olivet Baptist Church	1734 NE 1st Avenue	Audible, Visual, Vibration	No Adverse Effect
Historic Railroad Corridor	Linear Resource	Audible, Visual	No Adverse Effect
Eliot Historic District (two contributing properties affected)	2008 N Williams Avenue 23 NE San Rafael Street	Vibration	No Adverse Effect
Charles E. and Emma E. Holzer House	2027 N Williams Avenue	Vibration	No Adverse Effect
Beatrice Mott Reed House	2107 N Vancouver Avenue	Vibration	No Adverse Effect
Billy Webb Elks Club/Lodge	6 N Tillamook Street	Vibration	No Adverse Effect
Sullivan Pumping Station	211 NE Everett Avenue	Vibration	No Adverse Effect
The Hazelwood/The Dude Ranch	222-240 N Broadway	Vibration, Visual	No Adverse Effect
Paramount Apartment House	253 N Broadway	Audible, Visual, Vibration	No Adverse Effect

Note: N = North; NE = Northeast.

¹ In determining the effects of the undertaking upon historic properties, the agency finding would be "No Historic Properties Affected" [36 CFR 800.4(d)(1)], "No Adverse Effect" [36 CFR 800.5(b)], or "Adverse Effect" [36 CFR 800.5(d)(2)].

3.5.2.3 Avoidance, Minimization, and Mitigation Measures

The implementation of BMPs during construction would reduce the potential for Project-related noise and inadvertent impacts to historic properties.

The Project would follow the ODOT construction specifications and BMPs to minimize high noise levels during construction. Avoidance and minimization measures for potential construction-related vibration would include pre- and post-construction assessments, on-site monitoring during construction, and stop work authorization. If it is likely that the Project would affect historic properties by vibration, ODOT would prepare a treatment plan consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and thus consistent with the requirements of 36 CFR 800.5(b), to make the applicable repairs. If repairs are necessary due to the vibration, alterations to historic resources may require a land use review, such as a Historic Resource Review, from the City of Portland.

ODOT, FHWA, and Oregon SHPO have signed a project-level PA, in consultation with Tribes and other parties, to avoid and/or minimize the potential for Project-related effects to archaeological resources and built historic properties, as the extent of these potential effects would be unknown prior to the implementation of the Revised Build Alternative (Appendix C). With the execution of the PA, and the avoidance and minimization measures contained herein and in the *Historic Resources Technical Report* (ODOT 2019b) and the *Historic Resources Supplemental Technical Report* (Appendix A), the Project would result in no adverse effects to the characteristics that make historic properties within the API eligible for the NRHP. Therefore, a finding of “no historic properties adversely affected” pursuant to 36 CFR 800.5(b) is appropriate. Additional details on the effects assessment for historic properties are included in the *Historic Resources Technical Report* (ODOT 2019b) and *Historic Resources Supplemental Technical Report* (Appendix A).

3.6 Section 4(f)

3.6.1 Existing Conditions

The API for the Section 4(f) analysis is the same as the API for historic resources and extends east beyond the boundary of the Project Area to include the historic neighborhood of Albina. The 15 individual historic sites and the Eliot Historic District described in Section 3.5 are Section 4(f) resources.

Four publicly owned parks in the API also qualify as Section 4(f) resources:

- Vera Katz Eastbank Esplanade
- Willamette River Greenway Trail
- Lillis-Albina Park
- Portland Peace Memorial Park

The Vera Katz Eastbank Esplanade overlaps a segment of the Willamette River Greenway Trail. Both resources are located in the southern portion of the API. The Vera Katz Eastbank Esplanade is a City of Portland park. The Willamette River Greenway Trail is an interconnected network of trails managed and/or owned by a number of entities (including the City of Portland). Lillis-Albina Park is a City of Portland park and is at the northern end of the API, and the Portland Peace Memorial Park is a City of Portland park just east of the Vera Katz Eastbank Esplanade in the southern end of the API. Additional information on these Section 4(f) resources is located in the *Section 4(f) Technical Report* (ODOT 2019b) and the *Historic Resources Supplemental Technical Report* (Appendix A).