

## MEMORANDUM

Date: January 27, 2025

To: Chair Andrew Smith, Vice Chair Kimberly Moreland, and Historic Landmarks Commission members

From: Hayli Reff, Cultural Resources Manager, Interstate Bridge Replacement program

Subject: Section 106 Update

CC: Brandon Spencer-Hartle, Senior City Planner, Historic Resources Program

### Background

The City of Portland is one of eight local partner agencies on the Interstate Bridge Replacement (IBR) program, which covers a five-mile corridor along Interstate 5, including the Interstate Bridge and seven interchanges.

The proposed program investments associated with the Modified Locally Preferred Alternative approved in 2022, include a replacement bridge over the Columbia River and the North Portland Harbor, a partial interchange on Hayden Island, a full interchange at Marine Drive, local roadway improvements, extension of light rail service with one station on Hayden Island, enhanced bus services and connections, and new pedestrian/bicycle facilities such as a shared use path over the river.

The IBR program is conducting a robust cultural resources consultation process, as federally mandated under Section 106 of the National Historic Preservation Act (NHPA). This process requires consideration of the effects on historic properties within the Area of Potential Effects (APE) and includes opportunities for public input. The feedback that we gather from this process will help us understand these important places.

Section 106 and NEPA are separate laws that federal agencies must comply with, and both establish a process to evaluate impacts that result from project design and operation, including impacts to cultural resources and the environment. The laws also require that consultation is undertaken with tribes, consulting parties and the general public on potential impacts and mitigation. Federal guidance encourages these reviews to occur simultaneously, such that one review informs the other. The program is coordinating these evaluations and both reviews are being taken into consideration as design progresses.

At this meeting, IBR program staff will provide a Section 106 update, address questions from Commission members and share next steps.

### Timeline

Historic properties within the IBR program's APE were identified through field survey, consultation and background research. These properties were evaluated for their significance and consideration under Section

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106. The evaluation of each property is documented in a Determination of Eligibility (DOE) form. For properties that are subject to Section 106 consideration, a Finding of Effect (FOE) form was prepared to evaluate effects from IBR program investments.

A Section 106 public comment period was held for 30 days beginning Oct. 18 through November 18 to seek public input on the DOE and FOE documents. This duration is typical for Section 106 review periods and the public had the opportunity to provide input on the identification of historic properties and the assessment of effects on those properties. Please note any adverse effects to historic properties or cultural resources within the APE will be avoided or minimized and mitigated where necessary.

Our immediate next steps include:

- Incorporating, where appropriate, public input into the Determination of Eligibility and Finding of Effect documents and re-submitting to Oregon SHPO and Washington DAHP as necessary.
- Considering effects to identified properties, supplemented by consultation, and considering avoidance and minimization opportunities.
- Coordinating on the identification of mitigation concepts to resolve adverse effects.
- Preparing the Programmatic Agreement.

A separate opportunity to provide input on the Programmatic Agreement, including identification of mitigation to resolve adverse effects to historic properties, will be provided to the public during another 30-day review period in early 2025. The Final Programmatic Agreement will be executed prior to the issuance of the Amended Record of Decision (ROD) and will be included as an appendix to the Amended ROD.

To learn more about the Section 106 process and to provide public comment, please visit the IBR Program's [Cultural Resources webpage](#). You are also welcome to submit questions or comments via email at [culturalresources@interstatebridge.org](mailto:culturalresources@interstatebridge.org).

## Action and Next Steps

No action is requested with this presentation. The information presented at this meeting is intended to increase awareness of the IBR program and inform Commission members about ongoing Section 106 work and activities. City staff working on the IBR program will continue to keep the Commission updated. For detailed information, please refer to: <https://www.interstatebridge.org>.

## Staff Contact:

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Attachment(s): None.