1 Appendix C FOE Forms



| <b>Agency/Project:</b> Federal Highway Administration and Oregon Department of Transportation<br>I-5 Rose Quarter Improvement Project<br>FHWA FedAid No. S001 (483), ODOT Key No. 19071 |                  |  |                |  |
|---|------------------|--|----------------|--|
| Property Name: Historic Railroad Corridor: Oregon and California Railroad and Oregon Railway and Navigation Company   |                  |  |                |  |
| Street Address: Linear Resource   |                  | City, County: Portland, Multnomah                |                |  |
| Preliminary Finding of Effect   | st:              |  |                |  |
| □No Effect  | ⊠No Adverse E    | ffect  | Adverse Effect |  |
| State Historic Preservation   | Office Comments: |  |                |  |
| Concur  | Do Not Concur:   | ☐No Effect<br>☐No Adverse Eff<br>☐Adverse Effect | ect            |  |
| Signed  |                  |  | Date           |  |
| Comments:   |                  |  |                |  |

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. Include maps, drawings, and photographs as necessary to effectively describe and discuss the project. Use continuation sheets as needed.

#### Introduction

This statement of finding discusses the effect of the proposed I-5 Rose Quarter Improvement Project (Project) on the Historic Railroad Corridor: Oregon and California Railroad (O&C) and Oregon Railway & Navigation Company (OR&N) segments located in Portland, Oregon.

The Federal Highway Administration (FHWA) and Oregon Department of Transportation (ODOT) have determined the Historic Railroad Corridor was eligible for the National Register of Historic Places (NRHP). This determination has been submitted to the Oregon State Historic Preservation Officer (SHPO) for review and concurrence.

It is the finding of FHWA, in concurrence with ODOT, that the Project will result in no adverse effects to the characteristics that make the Historic Railroad Corridor eligible for the NRHP, and therefore a finding of <u>No Adverse Effect</u> pursuant to 36 Code of Federal Regulations (CFR) 800.5(d)(1) is appropriate.

This statement of finding is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR Part 800), Executive Order 11593, and the National Environmental Policy Act.

#### **Project Description**

The Interstate 5 (I-5) Rose Quarter Improvement Project (Project) is located in Portland, Oregon along the segment of I-5 between I-405 to the north and I-84 to the south. The Project also includes the interchange of I-5 and N. Broadway and NE Weidler Street and the surrounding transportation network from approximately N/NE Hancock Street to the north, N. Benton Avenue to the west, N/NE Multnomah Street to the south, and NE 2nd Avenue to the east. The purpose of the Project is to improve the safety and operations on I-5 between I-405 and I-84, and of the Broadway/Weidler interchange, and on adjacent surface streets in the vicinity of the Broadway/Weidler interchange, and to enhance multimodal facilities in the Project Area.

Continuation Sheet

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

Street Address: Linear Resource

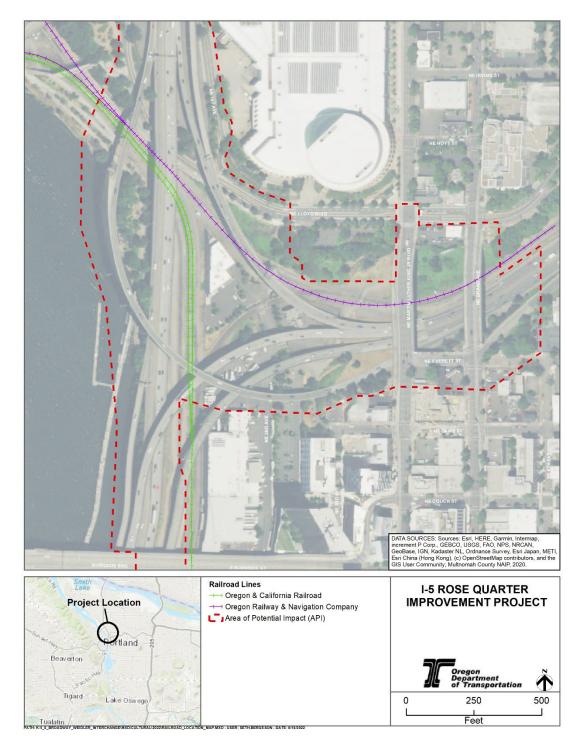


Figure 1. Historic property location with the Area of Potential Impact

Continuation Sheet

| Agency/Project: Federal Highway Administration and Oregon Department of Transportation<br>I-5 Rose Quarter Improvement Project |  |
|--|--|
| FHWA FedAid No. 19071, ODOT Key No. S001 (483)   |  |
| Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments       |  |
| Street Address: Linear Resource  | City, County: Portland, Multnomah County, OR |

#### Identification and Description of the Historic Resource

The Historic Railroad Corridor: this contains segments of the Oregon & California Railroad (O&C) and Oregon Railway & Navigation Company (OR&N) in Portland, Multnomah County, Oregon. The segments pass beneath Exit 31 on I-5 South, and the I-5 North offramp from I-84. Both historic segments are now owned and operated by Union Pacific Railroad (UPRR), which manages a large North American freight railroad network. The urban streetscape includes industrial warehouse buildings to the east, and the Eastbank Esplanade and Willamette River to the west. The active historic railroad corridor includes a 2,434-foot segment of the historic O&C, a 1,956-foot segment of the historic OR&N, and a circa-2015 spur that connects the two segments through Sullivan's Gulch. The historic railroad lines have modern steel rails that are standard gauge replacements, approximately 4 feet, 8½ inches wide. The rails on the historic lines and spur have a standard profile, which resembles a steel I-beam. The railroad ties on the historic O&C and OR&N segments have been replaced with modern, pressure-treated wood ties. They consist of hard wood with standard dimensions, measuring approximately 8 feet 6 inches long, 9 inches wide, and 7 inches thick. The railroad infrastructure includes gravel track ballast covering the mostly flat graded rail corridor.

The historic railroad corridor is recommended as eligible under NRHP Criterion A in the areas of Transportation and Commerce at the regional and state level as part of the larger O&C and OR&N railroads. The period of significance is 1868 to circa 1910, reflecting the initial construction and completion of the railroads and continuing to circa 1910, when both the O&C and OR&N railroads were absorbed by other companies (Southern Pacific and UPRR, respectively). The O&C and OR&N are significantly associated with the development of transportation routes in Oregon and were influential in the development of Oregon cities and in the transportation of commercial goods. The OR&N linked with the Northern Pacific Railway (NPR) at Wallula, Washington, bringing the nation's first transcontinental railroad to the Pacific Northwest, and helping Portland become a major trading center. During the late-nineteenth and early-twentieth centuries, the OR&N also promoted the region's industrial and commercial growth, especially in communities along the Willamette Valley and Columbia River Gorge. The O&C line provided the first railroad link between Portland, California, and the greater Pacific Northwest. The O&C line created mass-scale transportation for both commerce and people on the West Coast of the United States.

The historic railroad corridor retains integrity of location, setting, feeling, and association due to its retention of original location and overall feeling of a late-nineteenth century railway. However, due to maintenance needs of the active railroad, original historic materials like rails, ties, and fasteners have been replaced over time with modern materials. Alterations to the design of the historic railroad corridor include the removal of sidings and switches and the addition of a 2015 railroad spur that provided a more direct connection between the O&C and OR&N railroad lines, changing the use pattern of the railroad corridor.

**Continuation Sheet** 

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

Street Address: Linear Resource

City, County: Portland, Multnomah County, OR



Figure 2. O&C and OR&N segments, along the Eastbank Esplanade and Willamette River; view southeast (AECOM 2022).

**Continuation Sheet** 

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

Street Address: Linear Resource



Figure 3. O&C segment, along I-5; view south from Burnside Bridge (AECOM 2022).



Figure 4. Detail view of historic O&C segment, view from above (AECOM 2022).

Continuation Sheet

| Agency/Project: Federal Highway Administration and Oregon Department of Transportation                                   |  |  |
|--|--|--|
| I-5 Rose Quarter Improvement Project   |  |  |
| FHWA FedAid No. 19071, ODOT Key No. S001 (483)   |  |  |
| Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments |  |  |
| Street Address: Linear Resource City, County: Portland, Multnomah County, OR   |  |  |

#### **Avoidance Alternatives Considered**

#### No-Build Alternative

Under the No-Build Alternative, the proposed I-5 mainline and Broadway/Weidler interchange area improvements would not be constructed, and the current road system would remain in place. Therefore, the No-Build Alternative would not affect any undeveloped ground or encroach on the locations of known historic resources. Due to the preliminary nature of projects that may occur within the API, impacts to historic properties are not known at this time. If federal funds were used for these projects, then the applicable agency would need to comply with Section 106 of the National Historic Preservation Act (NHPA).

#### Revised Build Alternative

The I-5 Rose Quarter Improvement Project (Project) Environmental Assessment (EA) was released in February 2019. The Federal Highway Administration (FHWA) published a Finding of No Significant Impact (FONSI) and Revised EA (REA) for the Build Alternative on November 6, 2020. Since the issuance of the FONSI, the Oregon Department of Transportation (ODOT) has made changes to the design of the Build Alternative ("Revised Build Alternative") and re-evaluated the changes in the context of the FONSI/REA. At the conclusion of the re-evaluation, FHWA and ODOT agreed that the design changes require additional analyses beyond what was presented in the REA, and FHWA rescinded the FONSI on January 18, 2022.

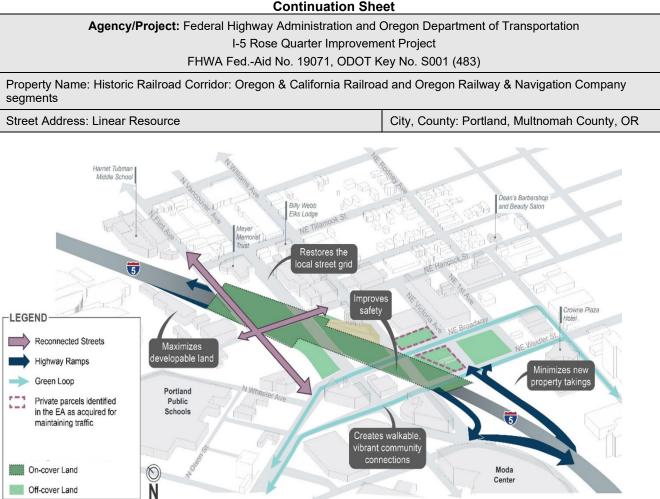
Changes to the Build Alternative include modification to the highway cover design and changes associated with advancements in other elements of the Project design, some of which require expansion of the Project Area. This section describes the highway cover design changes and design changes that resulted from advancements in Project engineering.

Through 2021, ODOT facilitated an Independent Highway Cover Assessment, as directed by the Oregon Transportation Commission, which engaged the Project's advisory committees and community members in a series of collaborative workshops to explore the design opportunities for the highway cover. The purpose of the Independent Highway Cover Assessment was to understand stakeholder goals and objectives within the Project Area; generate potential highway cover scenarios; and assess the impacts and benefits of these scenarios. The independent consultant team worked directly with Black community members from the historic Albina neighborhood to understand how the highway cover design concepts might best serve the historic Albina community. The Project's Historic Albina Advisory Board (HAAB), Executive Steering Committee (ESC), and the Community Oversight Advisory Board (COAC) also provided input as part of the independent highway cover assessment process. These sessions explored potential opportunities for economic development in the Albina community, and the highway cover design concepts.

In July 2021, Oregon Governor Kate Brown also convened a series of meetings with Project stakeholders and community organizations to discuss the independent highway cover design concepts. In August 2021, the HAAB—as supported by the ESC and the COAC, and through the Governor-led process—recommended "Hybrid 3" as the preferred highway cover design concept (Figure 4). The Hybrid 3 highway cover design concept represents a proposed community solution to maximize developable space on the highway cover and create opportunities for the Black community to grow wealth through business ownership and long-term career prospects. Following the community and stakeholder recommendations, in September 2021, the Oregon Transportation Commission directed ODOT to advance further evaluation of the Hybrid 3 highway cover design concept, with conditions related to the Project's funding process and other technical analyses.

This section describes the highway cover design changes and design changes that resulted from advancements in Project engineering, and which are incorporated into the Revised Build Alternative.

**Continuation Sheet** 





#### **Project Area Changes**

As Project design information advanced, some changes required expansion of the Project Area presented in the REA and FONSI (Figure 5). Utility conflicts with mass transit along NE Holladay Boulevard between N. Interstate Avenue and NE Martin Luther King Boulevard require additional overhead utility relocations (label A in Figure 5). An existing parking lot south of N. Interstate Avenue and the Broadway Bridge may be used for contractor staging during construction (label B, Figure 5). The southern end of the Project Area is expanded to include the portion of I-5 south of the Burnside Bridge proposed for a retrofit of the existing bridge rail, restriping the existing freeway, and installation of new guide signs (label C, Figure 5). At the northernmost end of the Project Area, a small area is added along the I-5 shoulders for fiber-optic conduit (label D, Figure 5).

In one location, the Project Area was reduced. A parking lot west of the intersection of NE Clackamas St and NE 2nd Avenue is no longer needed for the Project due to the removal of the Clackamas Bicycle and Pedestrian Crossing (label E, Figure 5). In total, approximately 8.7 acres would be added to the Project Area.

Continuation Sheet

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

Street Address: Linear Resource

City, County: Portland, Multnomah County, OR

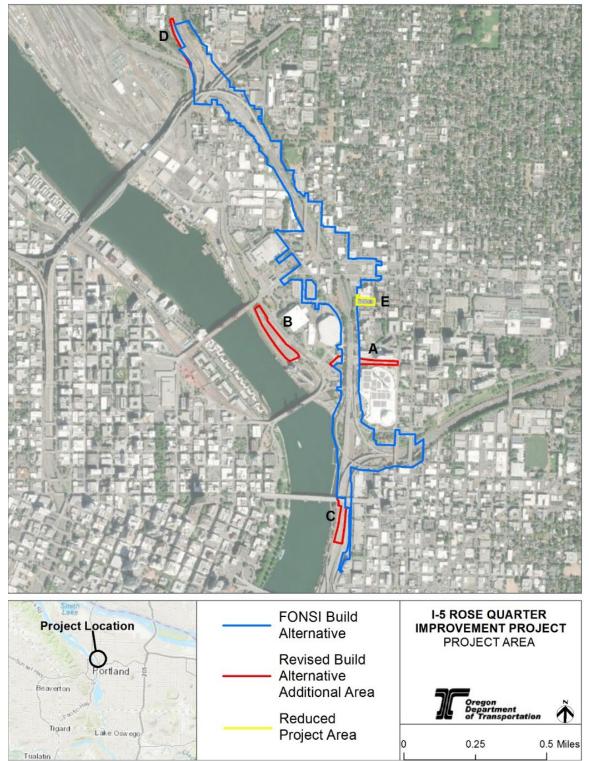


Figure 6. Previous and Current Project Area

Date Recorded: May 2022

Continuation Sheet

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

#### FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

| Street Address: Linear Resource City, County: Portland, Multnomah County, OR |
|--|
|--|

#### I-5 Mainline Improvements Changes

The Build Alternative included relocation of the I-5 southbound on-ramp at N. Wheeler Avenue to N/NE Weidler Street at N. Williams Avenue via the new Weidler/Broadway/Ramsay highway cover; construction of auxiliary lanes and full shoulders (12 feet in width) on I-5 between I-405 and I-84 in both directions; and associated improvements to I-5 through the Project Area. The Revised Build Alternative includes the following changes to those elements of the Build Alternative:

- Move the I-5 southbound exit ramp termini from N. Broadway to south of NE Weidler Street.
- Reduce the freeway median shoulder through the entire Project Area, from 12 feet to 8 feet (4 to 5 feet within highway cover). The outside shoulder width of 12 feet remains unchanged.
- Relocate Noise Wall 24 from N. Commercial Avenue near Harriet Tubman Middle School to attach to Walls 1 and 2 along the eastern edge of I-5.
- Keep the I-5 southbound entrance ramp from NE Wheeler Avenue/N. Williams Avenue/N. Ramsay Way on the existing alignment rather than relocating it to parallel N. Williams Avenue.
- On I-5 south of the Burnside Bridge: retrofit existing bridge rail, restripe freeway, and install new guide signs.

#### Highway Cover Changes

The Build Alternative included the construction of two highway cover structures over I-5 for roadway crossings and other purposes. The Revised Build Alternative includes the following changes to the highway covers:

- Provide one continuous highway cover over I-5 rather than separate covers at the existing N. Flint Avenue, NE Weidler Street, NE Broadway, N. Williams Avenue, and the N. Vancouver Avenue overcrossings.
- Expand the limits of the highway cover by approximately 35 feet to the west, and approximately 400 feet to the north.
- Design and construct the highway cover to accommodate multi-story buildings. Due to span length and site constraints, design would constrain building size, location, type, and use on portions of the cover (Figure 3). Generally, buildings up to three stories can be accommodated throughout the highway cover. Buildings of up to six stories can be accommodated where span lengths are shorter than 80 feet, with strict design constraints.

Continuation Sheet

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

Street Address: Linear Resource

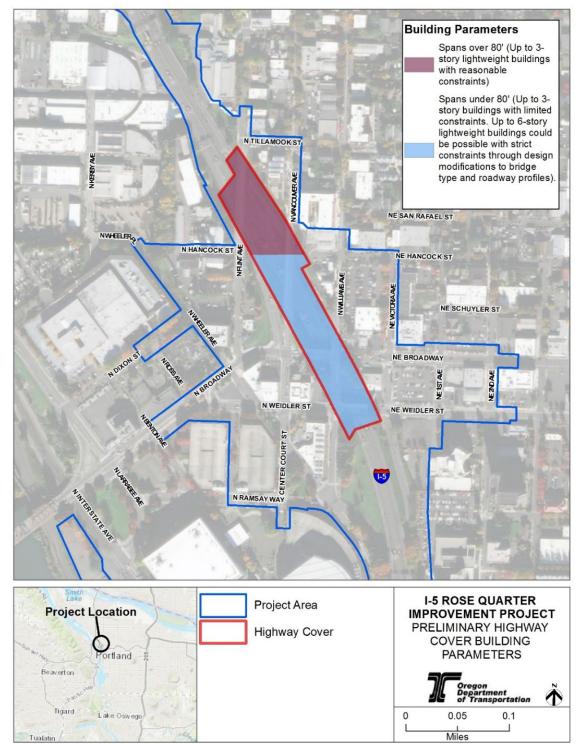


Figure 7. Building Parameters on the Cover

Continuation Sheet

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

Street Address: Linear Resource

City, County: Portland, Multnomah County, OR

Related Local System Multimodal Improvements Changes

The Build Alternative included construction of a new bicycle and pedestrian bridge over I-5 at NE Clackamas Street, and other local street improvements. The Revised Build Alternative includes the following changes to these improvements:

- Remove the Clackamas Bicycle and Pedestrian Crossing from the Build Alternative.
- Enhance pedestrian and bicycle improvements along NE Broadway and NE Weidler Street.
- Connect N. Flint Avenue across I-5 from NE Tillamook Street to N. Hancock Street and terminate it at N. Broadway Street.
- Remove the NE Hancock Street overcrossing of I-5, connecting to N. Dixon Street. NE Hancock Street would cross I-5 and connect to N. Flint Avenue with the expanded highway cover.

Remove the two-way cycle track on N. Williams Avenue between NE Hancock Street and NE Broadway, and a two-way bicycle and pedestrian path between NE Broadway and N. Ramsay Way.

Continuation Sheet

Agency/Project: Federal Highway Administration and Oregon Department of Transportation

I-5 Rose Quarter Improvement Project

FHWA Fed.-Aid No. 19071, ODOT Key No. S001 (483)

Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments

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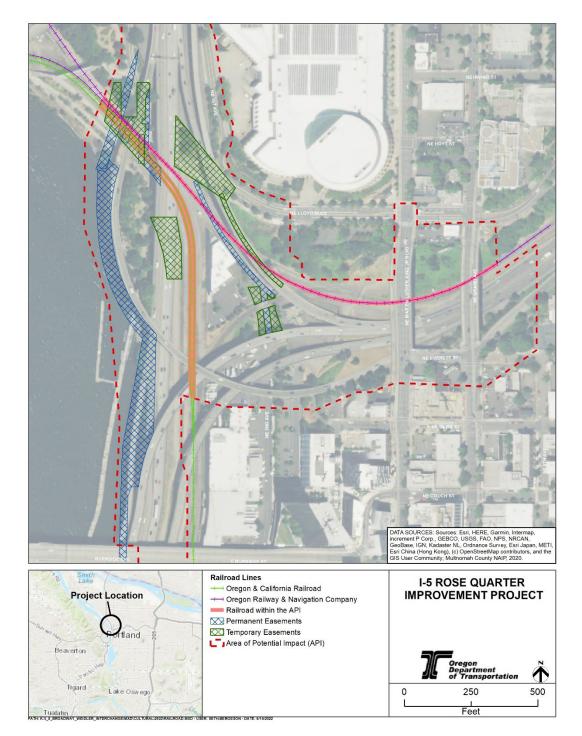


Figure 8. Revised Build Alterative

Continuation Sheet

| Agency/Project: Federal Highway Administration and Oregon Department of Transportation<br>I-5 Rose Quarter Improvement Project |  |  |  |
|--|--|--|--|
| FHWA FedAid No. 19071, ODOT Key No. S001 (483)   |  |  |  |
| Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments       |  |  |  |
| Street Address: Linear Resource City, County: Portland, Multhomah County, OR   |  |  |  |

#### Evaluation of Effects: No Adverse Effect

The FHWA, in conjunction with ODOT, has concurred with the determination that the Historic Railroad Corridor is eligible for the NRHP. Evaluating the Level of Effect for the proposed undertaking on the property requires application of the Criteria of Adverse Effect as set forth in 36 CFR 800.5. Examples of adverse effects enumerated in 36 CFR 800.5(a)(2) that would result from the Project include a (iv) change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; and (v) introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features. The Revised Build Alternative will not involve markedly altering the setting of the Historic Railroad Corridor, nor would it diminish the integrity of the property's significant historic features through the introduction of any visual, atmospheric, or audible elements. These changes would have no adverse effects on the characteristics that make the property eligible for the NRHP. Because no federal funds would be expended under the No Action Alternative, Section 106 of the NHPA would not apply.

As noted above, the proposed Project consists of I-5 Mainline Improvements as well as multimodal improvements to the surface street network in the vicinity of the Broadway/Weidler interchange. Figures 4 through 7 provide an overview of the Project Area and the Revised Build Alternative in the vicinity of the Historic Railroad Corridor, illustrating the historical characteristics of the property and how potential and temporary and permanent impacts to the general setting of the property would occur. Figure 7 provides an overview of potential Project improvements in the vicinity of the Historic Railroad Corridor, including permanent maintenance easements and temporary construction easements. These easements are required by ODOT during construction of the Project, and to perform maintenance for the duration of facility operations. These construction and maintenance activities are to be coordinated with railroad operators, and no adverse effects are anticipated, because the Historic Railroad Corridor will continue to be used for its current function, and no changes to its existing alignment are proposed. Proposed modifications to I-5 would occur to the west, north, and east of the Historic Railroad Corridor. These changes would have a minimal visual impact from the resource. All other improvements conducted farther north and south would be minimally visible, if at all.

Although some of these Project features may temporarily and permanently affect the audible and visual setting of the Historic Railroad Corridor, the existing setting of the property has been altered since its period of significance (1868 to circa 1910) as a result of urban renewal projects (such as construction of the Memorial Coliseum) and the construction of I-5 in the 1960s. Noise levels near the property may increase over the period of construction, but they would remain in the current decibel range, and would not be sufficient to diminish the historical integrity of the property. Although temporary construction vibration may be present during construction, the effects of these vibrations are not expected to exceed levels that could potentially damage the integrity of materials and workmanship related to the Historic Railroad Corridor. The Project features and construction-related activities, therefore, would not substantively affect the characteristics that make the property eligible for the NRHP. The No-Action Alternative would likely result in no effects to the Historic Railroad Corridor, because it would largely maintain the existing visual environment.

#### **Coordination and Public Output**

Coordination with the Oregon SHPO is ongoing. Meetings with the ODOT/SHPO liaisons for built environment and archaeology are ongoing. The liaisons will continue to review and provide input on the project identification efforts and preliminary assessment of potential project effects.

In addition to public meetings, ODOT has notified and sought comments about the revised build alternative from several consulting parties, including the Architectural Heritage Center, the Oregon Black Pioneers, the Community Oversight Committee, the Historic Albina Advisory Board, City of Portland, and others.

#### Conclusion

It is the determination of FHWA, in coordination with ODOT, that the I-5 Rose Quarter Improvement Project will result in no adverse effects to the characteristics that make the Historic Railroad Corridor eligible for the NRHP. A finding of <u>No Adverse</u> <u>Effect</u> pursuant to 36 CFR 800.5(d)(1) is therefore appropriate. Consultation is progressing, and the views of the public are being considered during Project planning.

**Continuation Sheet** 

| Agency/Project: Federal Highway Administration and Oregon Department of Transportation<br>I-5 Rose Quarter Improvement Project |  |  |
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| FHWA FedAid No. 19071, ODOT Key No. S001 (483)   |  |  |
| Property Name: Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments       |  |  |
| Street Address: Linear Resource  | City, County: Portland, Multnomah County, OR |  |

#### Sources

AECOM. 2022a. "Historic Resources Supplemental Technical Report – I-5 Rose Quarter Improvement Project." For Oregon Department of Transportation. May 22.

AECOM. 2002b. "Section 106 Documentation Form, Historic Railroad Corridor: Oregon & California Railroad and Oregon Railway & Navigation Company segments." I-5 Rose Quarter Improvement Project.

SHPO Case# 17-1520



Department of Transportation Delivery & Operations Division/ Engineering &Technical Services Environmental & Hydraulic Engineering Section, MS #6 4040 Fairview Industrial Dr SE Salem, OR 97302 Main Line: 503-986-3252

January 11, 2022

Christine Curran, Deputy State Historic Preservation Officer Oregon State Historic Preservation Office 725 Summer Street SE, Suite C Salem, OR 97301

Subject: Section 106 Finding of No Adverse Effect–REVISED TraveLodge at the Coliseum Interstate 5 Rose Quarter Project Portland, Multnomah County, Oregon ODOT Key No. 19071 Federal-Aid No. S001(483)

Dear Ms. Curran:

I am writing you about revisions to the design plans for the Interstate 5 Rose Quarter Project, in particular the reconfiguring of the northbound off-ramp from Interstate 5 as part of the Hybrid 3 design changes to the Build Alternative, known as the Hybrid 3 design, and potential effects to the TraveLodge at the Coliseum, a National Register-eligible historic property. As you may recall, the purpose of the Interstate 5 Rose Quarter Project is to improve the safety and operations on Interstate 5 between Interstate 405 and Interstate 84, the Broadway/Weidler interchange, and adjacent surface streets in the vicinity of the Broadway/Weidler interchange. In January 2019, the Oregon Department of Transportation (ODOT) and the Federal Highway Administration (FHWA) transmitted to your office a Section 106 Level of Effect Form for the TraveLodge at the Coliseum. Tracy Schwartz concurred on its eligibility under National Register Criterion A for associations with Community Development and under Criterion C for its architecture. In addition, the TraveLodge at the Coliseum was less that fifty years old at the time of its evaluation (1971), but met the requirements of Criteria Consideration G for being exceptionally important because of its patented "tri-arc" architectural form and as one of the tallest expressions of that form in the United States when it was constructed.

On January 17, 2019, Tracy Schwartz also concurred on a Finding of No Adverse Effect for the anticipated project impacts to the TraveLodge at the Coliseum. The project would have created moderate changes to the setting and general environment surrounding the historic property and make modifications to Interstate 5 to the west of the hotel. **The Build Alternative would have** 

**required a temporary construction easement of 4009.5 square feet and a permanent fee acquisition of 173.74 square feet of the 109,206.5-square-foot (2.57-acre) TraveLodge parcel.** The acquisitions and easements would have taken place mostly along the western edge of the rear parking area of the TraveLodge at the Coliseum, with a very small square footage on the northern edge of the north parking area along NE Weidler Street. The temporary easement would have consisted of approximately 3.6 percent of the total space of the parcel while the permanent acquisition would have consisted of 0.2 percent of the parcel. The Built Alternative would not have had direct physical impacts to the historic hotel building, nor would it have affected the physical features that contribute to the hotel's historic significance.

The original Build Alternative also included the Clackamas Bicycle & Pedestrian Bridge, which the project would have constructed directly to the south of the TraveLodge at the Coliseum. The construction of the bridge and modifications to Interstate 5 would have required a permanent acquisition of undeveloped land directly to the south of the TraveLodge and from a small parking lot the northeast that is owned by Prosper Portland.

The Hybrid 3 design eliminates the Clackamas Bicycle & Pedestrian Bridge and creates the need for a wall along the eastern edge of the TraveLodge at the Coliseum historic property, along the northbound off-ramp to Broadway/Weidler. For the wall, the project will need to acquire additional right-of-way in the form of a permanent acquisition, a permanent maintenance easement, and a temporary construction easement from the TraveLodge historic property. During the National Environmental Policy Act (NEPA) phase, the specifics of the right-of-way needs for the Build Alternative evolved as the project design advanced. They included a 3,473-square-foot temporary construction easement from the TraveLodge at the Coliseum (a decrease of 536.5 square feet from what was in the original Finding of Effect) and a 560-square-foot permanent fee acquisition from the TraveLodge at the Coliseum (an increase of 386.26 square feet from what was in the original Finding of Effect).

The Hybrid 3 design will require from the TraveLodge at the Coliseum a 7,579-square-foot temporary construction easement and a 5,763-sqare-foot permanent fee acquisition. It will also require a 1,726-square-foot permanent fee easement to maintain the new wall. The temporary construction easement increases by 4,106 square feet over the area called out during the NEPA phase. The permanent fee acquisition increases by 5,203 square feet over the area called out during the NEPA phase. (There was no permanent maintenance easement included in the Build Alternative that ODOT presented to your office or in the NEPA phase.) However, the total area required by the project, 15,068 square feet permanently and temporarily, is still relatively small when considering that the historic property (the hotel and associated parking areas) is 109,206.5 square feet. Moreover, the additional right-of-way needed for the Hybrid 3 design is at the back of the parcel, in the service area west of the hotel building (not near the primary elevation or the main entrances). This is the location for the majority of the proposed easements and acquisitions from the TraveLodge at the Coliseum for the original Build Alternative.

The temporary construction easements for the original Build Alternative and the Hybrid 3 design, regardless of the differences in size, are temporary in nature and are located away from the front of the historic property. The permanent fee acquisition for the Hybrid 3 design removes the same number of parking spaces at the rear of the historic property that the original Build Alternative permanent fee acquisition and the revised NEPA fee acquisition would have taken away. The permanent easement to maintain a new wall at the rear of the historic property, at the eastern edge, will not preclude the hotel from using that area for parking or for other needs.

ODOT and FHWA believe that an Application of Section 106 Criteria for Identification and Evaluation of Historic Properties (36 CFR 800.4(d)) with the Hybrid 3 design continues to indicate a finding of "No Adverse Effect" for the TraveLodge at the Coliseum for the Interstate 5 Rose Quarter Project. ODOT, acting as an agent for FHWA, requests your concurrence with a REVISED Finding of No Historic Properties Adversely Affected for the TraveLodge at the Coliseum historic property for the Hybrid 3 design for the Interstate 5 Rose Quarter Project. If you have any questions, please contact Robert W. Hadlow, Ph.D., ODOT senior historian, at (503) 731-8239; Carol Snead, ODOT senior environmental project manager, at (503) 731-4804; or Emily Cline, FHWA environmental program manager, at (503) 316-2547. You can reach me at (503) 986-3370.

Sincerely,

G. Roand

John Raasch Statewide Natural and Cultural Resources Manager ODOT Environmental and Hydraulic Engineering Section

*The State Historic Preservation Office concurs that the* Interstate 5 Rose Quarter Project with the Hybrid 3 design *will have No Adverse Effect on the* TraveLodge at the Coliseum *historic property*.

SHPO Official Signature (Built Environment)

1/21/2022

Date

Copies to:

Emily Cline, Environmental Program Manager, FHWA–Oregon Division, Salem Carol Snead, Senior Environmental Project Manager, ODOT Region 1, Portland Mary Young, Environmental Coordinator, ODOT Region 1, Portland Denis Reich, Environmental Manager, ODOT Region 1, Portland ODOT Key No. 19071, File Type E

### Attachment:

Ranzetta, Kirk, Anisa Becker, and Tim Wood. "Section 106 Level of Effect Form, TraveLodge at the Coliseum." Interstate 5 Rose Quarter Project, ODOT Key No. 19071, Federal-Aid No. S001(483). Aecom. May 2018. Concurred by Tracy Schwartz, Oregon State Historic Preservation Office, January 2019.

Section 106 Finding of No Adverse Effect–REVISED TraveLodge at the Coliseum Interstate 5 Rose Quarter Project Portland, Multnomah County, Oregon ODOT Key No. 19071 Federal-Aid No. S001(483) Page 5 of 5



Looking west at the TraveLodge at the Coliseum.



Right-of-Way needs for the Hybrid 3 design from the TraveLodge at the Coliseum historic property.