SOUTH CORRIDOR

Portland-Milwaukie Light Rail Project

Section 106/Historic and Archaeological Resources Results Report

October 2010

METRO

TRI-MET

U.S. Department of Transportation
Federal Transit Administration
Historic, Archaeological, and Cultural Resources Results Report

This Report has been Prepared in Support of the Portland-Milwaukie Light Rail Project
Final Environmental Impact Statement

October 2010

Metro

Prepared by:  Parametrix
Archaeological Resources Northwest, Inc. (AINW)
Metro

The preparation of this report was financed in part by the U.S. Department of Transportation, Federal Transit Administration. The opinions, findings and conclusions expressed in this report are not necessarily those of the U.S. Department of Transportation, Federal Transit Administration.

Printed on 30% recycled post-consumer paper.
Table of Contents

1. INTRODUCTION ............................................................................................................................1
  1.1 Background ................................................................................................................................. 1
    1.1.1 Portland-Milwaukie Corridor ............................................................................................... 2
  1.2 Purpose and Need ......................................................................................................................... 4
  1.3 Project Considered ....................................................................................................................... 4
    1.3.1 Locally Preferred Alternative (LPA) to Park Avenue ........................................................ 4
    1.3.2 Minimum Operating Segment (MOS) to Lake Road ......................................................... 10
    1.3.3 Related Facilities ................................................................................................................. 10
    1.3.4 Stations and Park-and-Rides .............................................................................................. 10
    1.3.5 Willamette River Bridge .................................................................................................... 13
    1.3.6 Light Rail Operations and Maintenance Facilities ............................................................. 13

2. AFFECTED ENVIRONMENT ....................................................................................................15
  2.1 Introduction ................................................................................................................................... 15
  2.2 Laws and Regulations ................................................................................................................... 15
    2.2.1 Related Federal, State, and Local Regulations .................................................................. 15
    2.2.2 Contacts and Coordination ................................................................................................. 16
  2.3 Summary of Methodologies .......................................................................................................... 16
  2.4 Inventory of the Affected Environment for Historic Resources ................................................... 16
    2.4.1 National Register Eligible Resources ................................................................................ 17
    2.4.2 Mitigation Measures .......................................................................................................... 18
    2.4.3 Section 4(f) Evaluation(s) .................................................................................................. 18
    2.4.4 Documentation ................................................................................................................... 18
    2.4.5 References .......................................................................................................................... 18
  2.5 Historic Properties ........................................................................................................................ 19
    2.5.1 2003 Locally Preferred Alternative ................................................................................... 19
    2.5.2 Operations and Maintenance Facilities .............................................................................. 29
  2.6 Archaeological Resources ............................................................................................................. 29
    2.6.1 Tribal and Agency Consultation and Coordination ........................................................... 32

3. ENVIRONMENTAL CONSEQUENCES ...................................................................................33
  3.1 Introduction ................................................................................................................................... 33
  3.2 Long-Term Impacts ....................................................................................................................... 33
    3.2.1 Short-Term Impacts (Construction) ................................................................................... 45
    3.2.2 Indirect and Cumulative Impacts ....................................................................................... 46
4. MITIGATION MEASURES..................................................................................................................................47

APPENDIX A - REFERENCES.................................................................................................................................. A-1

APPENDIX B – METHODS..................................................................................................................................B-1

APPENDIX C – SHPO DATABASE FORMS............................................................................................................... C-1

APPENDIX D – MEMORANDUM OF AGREEMENT............................................................................................. D-1

APPENDIX E – APE MAPS..................................................................................................................................E-1

List of Tables

Table 1.3-1 Summary of Transit and Roadway Improvements/Modifications .............................................. 12
Table 2.1-1 Historic-Period Resources Located within the Project APE .......................................................... 21
Table 3.2-1 Summary of Adverse Effects.............................................................................................................. 34
Table 3.2-2 Historic Resources and Effects......................................................................................................... 37

List of Figures

Figure 1.1-1 Project Study Corridor by District .................................................................................................. 3
Figure 1.3-1 Locally Preferred Alternative and Minimum Operable Segment .................................................. 5
Figure 1.3-2 Willamette River Bridge Area and Related Transportation Facilities ........................................... 6
Figure 2.1-1 Identified Historic Resources.......................................................................................................... 20
1. INTRODUCTION

This Results Report addresses potentially significant historic built environment and archaeological and cultural resources in the Portland-Milwaukie Light Rail Project’s Area of Potential Effect (APE) and provides an evaluation of impacts of the project and its associated options. Section 106 of the National Historic Preservation Act of 1966 requires that federally assisted projects take into consideration project effects on historic districts, sites, buildings, structures or objects, and archaeological sites or districts listed in or eligible for inclusion in the National Register of Historic Places (National Register). Federal agencies must coordinate with the State Historic Preservation Office (SHPO) before undertaking projects that affect significant resources. The procedures for meeting the Section 106 requirements are defined in 36 CFR 800. The Advisory Council for Historic Preservation (ACHP) has also established procedures for the protection of historic and cultural properties that are on, or determined to be eligible for inclusion in, the National Register (36 CFR 800) and has been invited to comment. In addition, there are Oregon statutes that protect archaeological sites on both private and public lands. A Section 106 review also considers the City of Portland Historic Landmarks Commission requirements and the City of Milwaukie historic resource inventory and preservation ordinances. Review requirements for the properties that are included in the respective cities’ historic resource inventories but are not considered eligible for listing in the National Register will be specifically addressed during the preparation of the FEIS.

The analysis, documentation and coordination being conducted to satisfy Section 106 requirements for the Portland-Milwaukie Light Rail Project continue efforts that were conducted for the Portland – Milwaukie Light Rail Project SDEIS, South-North Corridor Project DEIS, and the South Corridor Project SDEIS, each of which also produced an accompanying results report for historic, archaeological and cultural resources.

1.1 Background

This Results Report has been prepared in support of the Portland-Milwaukie Light Rail Project Final Environmental Impact Statement (FEIS), which examines a proposal to develop light rail transit between downtown Portland, Oregon, the City of Milwaukie and north Clackamas County. This is the southern portion of the South/North Corridor that extends from Clackamas County to downtown Portland and north to the Columbia River and Vancouver, Washington. In 1998, the Federal Transit Administration (FTA), Metro, and TriMet released the South/North Corridor Draft Environmental Impact Statement (DEIS). The Portland-Milwaukie Light Rail Project SDEIS augmented the South/North DEIS by updating information on the purpose and need, alternatives considered, affected environment, and anticipated environmental impacts for the Portland-Milwaukie Corridor to reflect the changed conditions since the South/North DEIS was published. It also incorporates findings developed through the South Corridor Supplemental Draft Environmental Impact Statement (SDEIS), issued in December 2002.

The Portland-Milwaukie Project Final Environmental Impact Statement (FEIS) is being prepared under the National Environmental Policy Act (NEPA), which requires disclosing the environmental impacts and proposed mitigation for projects with federal funding or that involve other federal actions or approvals. The Federal Transit Administration (FTA), Metro, and the Tri-County Metropolitan Transportation District of Oregon (TriMet) are considering a 7.3-mile extension of light rail for the South Corridor between downtown Portland and north Clackamas County that
would include federal as well as local funds. FTA is the federal lead agency under NEPA. FTA invited the Advisory Council on Historic Preservation to participate in consultations seeking ways to avoid, minimize, or mitigate adverse effects to historic properties, and the ACHP declined in writing; documentation of this correspondence and comments is provided in Appendix A of the Final EIS.

This FEIS considers a proposed light rail project that would connect from downtown Portland to the City of Milwaukie and north Clackamas County, and compares the light rail project to a No-Build Alternative. In addition to a Locally Preferred Alternative (LPA), this FEIS includes a Minimum Operable Segment (MOS). When the LPA was adopted, it included a recommendation for a MOS as an alternative if funding could not be secured to construct the full LPA alignment. In addition, streetcar-related facilities that are associated with project, although not funded by the project, are included in this FEIS. These related projects are not necessary for the Portland-Milwaukie Light Rail Project.

1.1.1 Portland-Milwaukie Corridor

The Portland-Milwaukie Corridor is part of the larger South/North Corridor that serves the Portland metropolitan area, comprising the urban portion of Multnomah, Clackamas, and Washington counties in Oregon and the urban portion of Clark County, Washington. Portland is the largest city in the region and is located at its geographic center. The Portland-Milwaukie Corridor is generally defined as the “travelshed” between the urbanized portion of south Clackamas County, Oregon City, Milwaukie, and the Portland Central City.

As shown in Figure 1.1-1, the corridor includes the city of Milwaukie; a significant portion of southeast Portland and Portland Central City, including the Portland Central Business District and the South Waterfront District; and the Central Eastside Industrial District (CEID). These areas have some of the region’s highest concentrations of population and employment, and they include many of the region’s major educational, health services, government/civic, and entertainment facilities.
Travel within the corridor uses a variety of local, regional, state, and interstate facilities. TriMet is the provider of public transportation, operating fixed-route transit buses, on-demand van and small bus service for the elderly and disabled, and light rail lines throughout the region.

1.2 Purpose and Need

The purpose and need for this project was originally defined by the South/North Corridor Project DEIS in 1998. The purpose and need was updated with the South Corridor SDEIS in December 2002 and the subsequent South Corridor LPA decision in 2003. The purpose is:

To implement a major transit improvement in the South Corridor that maintains livability in the metropolitan region, supports land use goals, optimizes the transportation system, is environmentally sensitive, reflects community values, and is fiscally responsive.

This project focuses on the remaining need to develop light rail within the Portland-Milwaukie Corridor as Phase II of the South Corridor.

The need for a major transit investment in the Portland-Milwaukie Corridor is identified as:

- Historic and projected rapid population and employment growth in the corridor, which creates an unmet demand for increased travel choices and transit capacity
- High levels of existing traffic congestion and travel delay in the corridor and deteriorating travel conditions in the future
- The need for high-quality transit service in the corridor to achieve regional and local land use objectives

1.3 Project Considered

This report examines a No-Build Alternative and a Locally Preferred Alternative and related options and facilities for the Portland-Milwaukie Corridor. The No-Build Alternative is required under NEPA and represents future conditions without the Portland-Milwaukie Light Rail Project. The No-Build analysis assumes the same levels of growth in population and employment through the year 2030 as the Portland-Milwaukie Light Rail Project, but depicts the region’s future transportation system without the light rail project. This report examines the selected LPA, the LPA Phasing Option, and the Minimum Operable Segment, compared to the No-Build Alternative.

See Figures 1.3-1 and 1.3-2 for project alignments and facilities.

1.3.1 Locally Preferred Alternative (LPA) to Park Avenue

The LPA to Park Avenue includes approximately 7.3 miles of light rail, ten stations (plus one deferred from the Portland Mall Transit Project at SW Jackson Street and one planned for the future at SE Harold Street), five shelters deferred from the Portland Mall Transit Project, two park-and-rides, and a new bridge across the Willamette River. The route would begin near PSU, at the southern end of downtown Portland, connecting with the Downtown Portland Transit Mall.
Willamette River bridge will include light rail, bus, and streetcar.

**Figure 1.3.1**

- Light Rail
- Shared Transitway
- Station
- Future Station
- Park-and-Ride
- MOS Park-and-Ride
- Existing Light Rail
- Existing Streetcar
- Under Construction, Streetcar
- Portland Aerial Tram
- Railroad
- County Line

Note: For details on Park-and-Ride capacity please see Table 2.1-1

**TRIMET Metro**
Portland - Milwaukie Light Rail Project
Willamette River Bridge Area and Related Transportation Facilities

Figure 1.3-2

1. Streetcar connections to bridge
2. Relocated SE Water Avenue
3. Oregon Rail Heritage Foundation
4. OPR Switching Yard

- Shared Transitway
- Street Improvements/Relocation
- Proposed Streetcar
- Existing/Under Construction Streetcar

- Realign streetcar station and tracks to connect to the bridge. Close existing SE Water Avenue to through traffic and realign to the east.
- Light rail crossing requires relocating Oregon Pacific Railroad to the north.
- Eastern Bus Portal: buses enter and exit shared transitway.
- Western Bus Portal: buses enter and exit shared transitway.
- Another project would rebuild SW Moody Ave streetcar track to connect to the bridge.

South Waterfront
Western Bus Portal:
LRT, Bus, Bike, Pedestrians, Streetcar

December 2009

0 500 1,000 Feet

TRIMET Metro
light rail that opened in 2009 at SW 5th and 6th avenues. The LPA to Park Avenue would end in unincorporated Clackamas County at SE Park Avenue. In addition, the LPA Phasing Option describes how some elements of the LPA to Park Avenue could be deferred or modified in the project’s initial construction and operation.

**Downtown Portland to SE Tacoma Street**

Starting at the Downtown Portland Transit Mall near PSU, the LPA to Park Avenue alignment would turn east and cross SW 5th Avenue, the I-405 on-ramp, SW Grant Street, and SW 4th Avenue at grade, and continue east on SW Lincoln Street. The alignment would follow SW Lincoln Street in a center median, with an extension of SW Lincoln Street to a new intersection at SW Naito Parkway. This one-block extension would be exclusively for use by light rail trains, buses, pedestrians, and bicycles.

The shared transitway would cross on structures over the SW Harrison Street connector and SW Harbor Drive, turn southward, and remain on structures to travel under the I-405 ramp and over SW Sheridan Street. It would continue south along the west side of SW Moody Avenue into the South Waterfront District on retained fill. At the intersection of SW Moody Avenue and SW Porter Street, the alignment would turn toward the river, return to grade, and cross the Portland Streetcar tracks and SW Moody Avenue at grade.

A South Waterfront transit station would be located between SW Moody Avenue and the planned location of SW Bond Street. The station would be configured to accommodate light rail and buses, and adjacent streetcar platforms would be located on SW Moody Avenue.

Leaving the station, the alignment would begin to climb as it approaches the new bridge crossing the Willamette River. The alignment would cross the planned SW Bond Street on retained fill, and then be elevated on structure to cross over the proposed future Willamette River Greenway Trail.

The Willamette River bridge would be a cable-stayed structure that would accommodate light rail trains, streetcars, buses, pedestrians, bicycles, and emergency vehicles. Buses, light rail trains, and streetcars would share a set of paved tracks in the center of the bridge. Two 14-foot multi-use paths would be on the sides of the bridge, separated from the transit vehicles and tracks by barriers.

The bridge would touch down south of the existing Oregon Museum of Science and Industry (OMSI) building. A station would be located east of OMSI and would have separate platforms for buses and light rail vehicles. Streetcars would leave the alignment prior to the station by turning north. Buses would depart the shared transitway at SE 7th Avenue.

Several related street improvements as well as facilities for connecting the streetcar to the Willamette River bridge are also planned. These improvements include:

- Completion of streetcar facilities connecting to the Portland Streetcar Loop Project on the east side at OMSI and the Portland Streetcar in the South Waterfront at SW Moody Avenue, allowing streetcars to operate across the new Willamette River bridge
- The relocation of SW Water Avenue to a new alignment approximately one block east
• The reconstruction of SW Moody Avenue and the Portland Streetcar tracks between SW River Parkway and SW Gibbs Street

The light rail alignment then would continue east, crossing the Oregon Pacific Railroad (OPR) at grade and then continuing underneath the SE Martin Luther King Jr. Boulevard viaduct before turning southeast and running along the south and west side of Union Pacific Railroad (UPRR) right-of-way. From near SE 7th Avenue and SE Powell Boulevard, the LPA to Park Avenue would continue south and west of the UPRR tracks. An existing railroad spur, the Darigold Spur, would be closed. The OPR switching yard, which the light rail tracks would otherwise cross, would be relocated to the north of its existing location. Three at-grade street crossings of the UPRR tracks would be consolidated into one crossing of the UPRR and light rail tracks. The consolidated crossing would occur at a realigned SE 8th Avenue. SE Division Place and SE 9th Avenue would also be realigned to provide access to the consolidated crossing. The reconfigured intersections would have sidewalks and a combination of medians and crossing gates.

A station would be located on SE Gideon Street southwest of the SE 12th Avenue and SE Clinton Street intersection. To improve station access and traffic operations, several modifications to the surrounding street network would occur in the station area, including signalization, rerouting of traffic, and replacement of an existing pedestrian overpass, as described in Chapter 2.

The crossing of SE Powell Boulevard at SE 17th Avenue would be on a replacement structure adjacent to the existing UPRR bridge. South of SE Powell Boulevard, the light rail alignment would then transition to the center of SE 17th Avenue and continue to run in the center of SE 17th Avenue to south of SE Schiller Street to just north of SE McLoughlin Boulevard (OR 99E). To accommodate light rail, SE 17th Avenue would be realigned to the west, and widened to provide sidewalk, landscaping, stormwater swales, and other improvements. A center platform station would be located north of the SE 17th Avenue and SE Rhine Street intersection. The existing pedestrian overpass of the UPRR tracks at SE Lafayette Street would be replaced with a reconfigured overcrossing to better facilitate connections between the neighborhoods and the station at SE Rhine Street. Under the LPA Phasing Option, the construction of this overpass may be initially deferred. An island station would be located in a median of SE 17th Avenue, just north of SE Holgate Boulevard.

South of SE Schiller Street, immediately north of SE McLoughlin Boulevard, the alignment leaves SE 17th Avenue and transitions to a structure that allows an elevated overcrossing of SE Harold Street, and the future Harold Station would be located to the south. The construction of the station is accommodated in the design, but is not planned as part of the initial development of the LPA to Park Avenue. In addition, the LPA Phasing Option defers construction of some of the future station’s structural facilities. After descending from the elevated structure at SE Harold Street, the light rail alignment to SE Tacoma Street is located between SE McLoughlin Boulevard and the UPRR tracks.

Along this section within the UPRR right-of-way, a bridge would be constructed for the light rail tracks to cross over Crystal Springs Creek, which is currently in a culvert that continues under the UPRR tracks. Constructing the bridge over the culvert would allow the culvert to be removed in the future. Wetlands would be filled in this area, which would require mitigation. Wetlands mitigation requirements are anticipated to be met through partial funding of the City of Portland’s Westmoreland Park Restoration Project.
As the light rail line proceeds south, the tracks would rise on fill and be on structure over the northbound SE McLoughlin Boulevard ramp and then would cross under SE Tacoma Street before crossing Johnson Creek on a new structure. A station and park-and-ride would be located south of Johnson Creek. As the alignment approaches the Tacoma Station, it would turn toward the southeast.

**SE Tacoma Street to SE Lake Road**

The Tacoma Station would be located south of SE Tacoma Street and Johnson Creek, between SE McLoughlin Boulevard and the UPRR main line tracks. The station platform would be toward the north side of the station site. The station would include a 800-space parking garage. The LPA Phasing Option would defer construction of the parking garage and would provide initially for 320 surface park-and-ride spaces. A new pathway would be constructed that would connect to the Springwater Corridor trail to the south of the site.

South of the station, the light rail line would cross under the existing Springwater Corridor trail bridge, which spans over the UPRR tracks. The light rail line would then rise on retained fill and cross over the Tillamook Branch line railroad tracks on an elevated structure. The Tillamook Branch line and the Anderson spur would be realigned to accommodate the required 25-foot track offset from freight sidings and the Tillamook main line. The light rail tracks would then cross under Highway 224.

The alignment remains along the east side of the Tillamook Branch line, separated by a 25-foot offset, through Milwaukie. A station in downtown Milwaukie would be located at SE Lake Road and SE 21st Avenue. The City of Milwaukie is planning transit-oriented development adjacent to the station at SE Lake Road.

**SE Lake Road to SE Park Avenue**

The tracks would cross over SE Lake Road and Kellogg Lake on a new bridge along the east side of the existing freight rail trestle within the railroad right-of-way. The alignment would cross over SE McLoughlin Boulevard to run along the west side of the roadway, and would continue on an elevated structure to cross over SE 22nd Street, SE Bluebird Street, and SE River Road. Along the west side of SE McLoughlin Boulevard in this area, the light rail project would use a portion of an old streetcar right-of-way that was purchased by Metro and the North Clackamas Parks and Recreation for the development of the Trolley Trail, a six-mile regional multi-use path that is to extend from downtown Milwaukie to Gladstone. A section of trail between SE River Road and SE Park Avenue would be constructed along with the light rail project. Light rail would operate between the trail and SE McLoughlin Boulevard. As the light rail project and the trail approach SE Park Avenue and a new station, light rail leaves the Trolley Tail alignment to stay along SE McLoughlin Boulevard, while the trail continues to follow the old streetcar right-of-way to the west and continues south to Gladstone. The tracks would terminate at a station on the north side of SE Park Avenue, and a 600-space park-and-ride structure would be located south of SE Park Avenue. The LPA Phasing Option would provide for development of a 355-space structure.
The LPA Phasing Option differs from the LPA by eliminating or deferring the elements of the LPA noted above in order to reduce the project cost. TriMet is seeking additional funding for the project to proceed with the LPA, but may need to implement some of the cost-reduction elements identified in the LPA Phasing Option. In this Final EIS, TriMet, Metro and FTA fully evaluate the environmental and community impacts of all of these elements as part of the LPA, and also consider the impacts of their deletion from the project as part of the LPA Phasing Option.

1.3.2 Minimum Operating Segment (MOS) to Lake Road

The MOS to Lake Road would be the same as the LPA to Park Avenue except that it would have an initial southern terminus at SE Lake Road. The MOS to Lake Road would allow the project to be developed in phases if there is not sufficient funding to fully extend the project to SE Park Avenue. The MOS would still be designed to accommodate a future extension to the south. A downtown Milwaukie station would be located at SE Lake Road, similar to the LPA to Park Avenue, but there would be a third track at the terminus and a park-and-ride with 275 parking spaces located north of Kellogg Lake between SE Washington Street and SE McLoughlin Boulevard. In addition, the capacity of the Tacoma Park-and-Ride would increase to accommodate up to 1,000 spaces.

1.3.3 Related Facilities

Ruby Junction

The Portland-Milwaukie Light Rail Project would also require expanding the existing Ruby Junction Operations and Maintenance Facility in Gresham to store and service the additional light rail vehicles and supporting maintenance activities associated with the project.

Related Bridge Area Transportation Facilities

This FEIS also evaluates streetcar facility improvements designed to connect with the shared transitway over the Willamette River bridge, as well as related street modifications. On the west side, this would involve raising and reconstructing a portion of SW Moody Avenue to include double tracks in the median for the existing Portland Streetcar line serving the South Waterfront. On the east side, the improvements would complete the streetcar connection between the shared transitway and the Portland Streetcar Loop Project streetcar line (now under construction) at OMSI, which would also involve realigning a portion of SE Water Avenue.

1.3.4 Stations and Park-and-Rides

The FEIS examines station and park-and-ride options for the project. The LPA to Park Avenue would have ten stations, with a future station at SE Harold Street to be developed when land uses and ridership support its development, and the Jackson Station, deferred from a previous light rail project. The MOS would have one fewer station, with its terminus at SE Lake Road. Major elements that would be incorporated on the platform include shelters, ticket machines, lighting, furniture, and
fencing and railings. All stations would include Americans With Disabilities Act (ADA)-accessible connections to the local street network and sidewalks.

From PSU and heading south, the stations include:

- Jackson (deferred from Portland Mall Transit Project)
- Lincoln
- South Waterfront (designed to accommodate bus and streetcar)
- OMSI (with adjacent OMSI streetcar station)
- Clinton
- Rhine
- Holgate
- Harold (future)
- Bybee
- Tacoma
- Lake Road
- Park Avenue (LPA to Park Avenue only)

There are options for park-and-rides at the following stations (although the LPA Phasing Option identifies smaller initial capacities):

- Tacoma Station (800 spaces with LPA to Park Avenue, 320 spaces with the LPA Phasing Option, and 1,000 with MOS to Lake Road)
- Lake Road Station (park-and-ride developed only with MOS to Lake Road, 275 spaces)
- Park Avenue Station (600 spaces with the LPA to Park Avenue, 355 spaces with the LPA Phasing Option, and no park-and-ride with MOS to Lake Road)

The key characteristics of the light rail project and the No-Build Alternative are summarized in Table 1.3-1 below.
<table>
<thead>
<tr>
<th>Alternative</th>
<th>Transit</th>
<th>Roadway</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>No-Build</strong></td>
<td>Existing transit services and facilities, plus:</td>
<td>Road improvements included in the Regional Transportation Plan (RTP) year 2025 financially constrained highway network. See Appendix B of the Detailed Definition of Alternatives Report (Metro 2010) for a detailed listing of the planned roadway projects within the Portland-Milwaukie project area.</td>
</tr>
<tr>
<td></td>
<td>- Some increases in route frequency and/or run times to avoid peak overloads and/or to maintain schedule reliability.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Incremental increases in service hours and vehicle procurement, consistent with available revenue sources and consistent with the RTP's year 2025 financially constrained transit network.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- A new #30 Johnson Creek bus route on SE Johnson Creek Boulevard that would connect the Clackamas Transit Center and downtown Milwaukie.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- The South Corridor Project on the Downtown Portland Transit Mall and I-205.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- A 100-space shared park-and-ride at Clackamas Community College.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Minor changes in transit operations and routing in the South Corridor.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Expansion of TriMet's Powell Garage facility to accommodate at least 50 additional buses.</td>
<td></td>
</tr>
<tr>
<td><strong>LPA to Park Ave.</strong></td>
<td>All transit improvements included within the No-Build Alternative, plus:</td>
<td>The following road improvements and modifications in addition to those in the 2004 Regional Transportation Plan (RTP) financially constrained highway network:</td>
</tr>
<tr>
<td></td>
<td>- A double-tracked light rail between downtown Portland and Milwaukie, terminating at SE Park Avenue, generally parallel to and east of SE McLoughlin Boulevard, with 10 light rail stations, (plus a previously deferred SW Jackson station and a future SE Harold station) and 20 additional light rail vehicles (17 to 20 vehicles with the phasing option).</td>
<td>- Modifications to segments of roadways along SW Lincoln Street; SW Harbor Drive; SW Moody Avenue between SW River Parkway and SW Gibbs Street and SE Water Avenue from the north side of the OMSI parking lot to SE Caruthers; and SE 8th, SE 9th, and SE 17th avenues in Portland.</td>
</tr>
<tr>
<td></td>
<td>- Adjustments to the bus routing to eliminate or modify bus routes that would duplicate light rail service and adjustment of routes to connect to light rail stations or transit centers.</td>
<td>- Reconfiguration of access to SE McLoughlin Boulevard at the Tacoma Station.</td>
</tr>
<tr>
<td></td>
<td>- An 800-space park-and-ride structure at SE Tacoma Street (with as few as 320 spaces on a surface lot with the phasing option).</td>
<td>- Reconfigurations that would close SE Adams Street and SE Sparrow Street to through traffic.</td>
</tr>
<tr>
<td></td>
<td>- A 600-space park-and-ride structure at SE Park Avenue (or a structure with as few as 355 spaces with the phasing option).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Elevated structures and track over SW Harbor Dr., the Willamette River, SE Powell Blvd., SE Harold St., Crystal Springs Creek, SE Tacoma St. ramps, Johnson Creek, the Tillamook Branch line, SE Lake Road, Kellogg Lake, and SE McLoughlin Blvd.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- A new Willamette River bridge that will accommodate light rail, buses, bicycles, pedestrians, and a future streetcar.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Access to the new Willamette River bridge and transitway for bus lines 9, 17, and 19, allowing rerouting of buses from congested streets.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Expansion of the Ruby Junction Maintenance Facility to accommodate 17 to 20 additional light rail vehicles (a smaller expansion size if phasing is used).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- New and consolidated control center for light rail transit (LRT) operations located at TriMet’s Center Street facility.</td>
<td></td>
</tr>
</tbody>
</table>
Table 1.3-1
Summary of Transit and Roadway Improvements/Modifications

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Transit</th>
<th>Roadway</th>
</tr>
</thead>
<tbody>
<tr>
<td>MOS to Lake Rd.</td>
<td>All improvements included with the LPA to Park Avenue except:</td>
<td>Improvements and modifications included in the LPA to Park Avenue,</td>
</tr>
<tr>
<td></td>
<td>• Light rail would terminate in Milwaukie at SE Lake Rd., with no</td>
<td>except SE Sparrow Street would not be closed.</td>
</tr>
<tr>
<td></td>
<td>structure from SE Lake Rd. to SE McLoughlin Blvd. and would include</td>
<td></td>
</tr>
<tr>
<td></td>
<td>16 additional light rail vehicles.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• A 1,000-space park-and-ride facility at SE Tacoma St. and a 275-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>space facility at SE Lake Rd. There would be no park-and-ride at</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SE Park Ave.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Expansion of the Ruby Junction Maintenance Facility to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>accommodate 16 additional light rail vehicles.</td>
<td></td>
</tr>
<tr>
<td>Related Bridge</td>
<td>New double track for the Portland Streetcar in South Waterfront,</td>
<td>Reconstruction of SW Moody Ave. between SW River Parkway and</td>
</tr>
<tr>
<td>Area Facilities</td>
<td>realigned to remain within median of SW Moody Ave.</td>
<td>SW Gibbs St. and realignment of SE Water Ave.</td>
</tr>
<tr>
<td></td>
<td>• Realigned streetcar tracks and station at OMSI connecting to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>shared transitway,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1 Includes features that could be modified by the LPA Phasing Option.</td>
<td></td>
</tr>
</tbody>
</table>

1.3.5 Willamette River Bridge

The light rail project includes a new bridge for light rail across the Willamette River. The Willamette River bridge would be a two-tower cable-stayed structure. It would have two towers nearly 180 feet high, anchored in foundations in the river. The bridge would be nearly 1,720 feet long from abutment to abutment. The bridge would have a shared transitway designed to accommodate light rail, streetcars, and buses, and it would provide bicycle and pedestrian paths on each side. The structure would provide 77.52 feet vertical clearance (Columbia River Datum) for approximately 150 feet in the center space of the bridge, and a minimum of 75.41 feet for nearly 300 feet. The bridge design was selected based on the project’s navigational analysis, a river use survey, public outreach, landside land use and transportation needs, and a review of environmental constraints for both the human and natural environment.

1.3.6 Light Rail Operations and Maintenance Facilities

The project would require an additional 20 light rail vehicles (a phased approach for the LPA would require 17 to 20 new vehicles) compared to the No-Build Alternative. In addition, the proposed Columbia River Crossing Project is currently considering a proposal to extend the Yellow Line to Vancouver, Washington, which will also require additional light rail vehicles. Therefore, both projects are preparing FEIS documents that evaluate the expansion of TriMet’s existing Ruby Junction Operations and Maintenance Facility, located in the city of Gresham on NW Eleven Mile Avenue. The expansion could be conducted in phases to enlarge the existing maintenance facility site, including adding new structures and storage tracks to accommodate the maintenance needs. The existing operations control center at Ruby Junction would be relocated to TriMet’s Center Street offices on SE 17th Avenue in Portland. The FEIS evaluates an initial phase that expands the facility to meet the needs of the Portland-Milwaukie Light Rail Project, and then a full expansion that meets the needs of both projects.
2. AFFECTED ENVIRONMENT

2.1 Introduction

Section 106 of the National Historic Preservation Act of 1966 requires that impacts of Federally-assisted projects be examined for impacts to historic districts, sites, buildings, structures or objects and to archaeological sites listed on, or eligible for, inclusion in the National Register of Historic Places (National Register). The main body of this methods report describes supporting documentation and processes for project’s findings and mitigation regarding historic built environment resources. Archaeological resources are summarized in this report consistent with the findings in the FEIS, and further details and documentation are provided in an Appendix that is on file with the State Historic Preservation Office. For the protection of sensitive archaeological resources, this information is not Federal agencies must coordinate with the State Historic Preservation Officer (SHPO) before undertaking projects that affect such properties. The Advisory Council for Historic Preservation (ACHP) has established procedures for the protection of historic and cultural properties that are on, or determined to be eligible for, inclusion in the National Register (36 CFR 800).

The Portland-Milwaukie Project Final Environmental Impact Statement (FEIS) is continuing the National Environmental Policy Act (NEPA) and Section 106 compliance processes initiated in 1993 for the South/North Transit Corridor project, which examined light rail improvements in a longer corridor that included a connection between downtown Portland and Milwaukie. The South Corridor SDEIS in 2002 examined alternatives and updated environmental information along the Portland-Milwaukie corridor and the South Corridor SDEIS Examined alternatives and updated environmental information in 2008.

2.2 Laws and Regulations

Pursuant to Section 106 of the National Historic Preservation Act of 1966, the Federal agency (or agencies) responsible for the undertaking must consult with the SHPO, appropriate Indian Tribes and others concerned with cultural resources regarding the identification and evaluation of resources in the project area.

2.2.1 Related Federal, State, and Local Regulations

The following regulations will be considered in the historic and cultural analysis:

- National Environmental Policy Act (NEPA) of 1969
- National Register Standards for eligibility regulation (36 CFR 60.4)
- Protection and Enhancement of the Cultural Environment of 1971 (Executive Order 11593)
- Oregon SHPO regulations
  - ORS 358.475 (Special Assessment of Historic Property)
  - ORS 358.622 (State Advisory Committee on Historic Preservation)
  - ORS 358.612 (Authorities of State Historic Preservation Officer)
  - ORS 358.635 (Preservation of state-owned historic property)
  - ORS 358.680 (Oregon Property Management Program)
  - ORS 358.905 (General Archaeology)
  - ORS 390.235 (Issuance of Archeological Permits)
  - ORS 97.740 (Protection of Indian Graves)
- Historic preservation elements of Portland, Milwaukie and Clackamas County comprehensive plans and associated ordinances and standards

### 2.2.2 Contacts and Coordination

During the course of the project, the Federal Transit Administration (FTA), with Metro and TriMet, has contacted and coordinated with federal, state and local agencies to identify resources and evaluate effects. Agencies involved include the Oregon Department of Transportation (ODOT), SHPO, Clackamas County and the cities of Portland and Milwaukie. FTA, acting on behalf of the U.S. government, has led the contacts with Native American Tribes in the area, inviting them to participate and/or consult on historic and cultural issues. Documentation of this correspondence and process are provided in Appendix A of the Final EIS.

### 2.3 Summary of Methodologies

The detailed methods used to conduct the historic, archaeological and cultural resource investigations are provided in Appendix B, but are summarized below.

### 2.4 Inventory of the Affected Environment for Historic Resources

The area of effect is defined as one-half block, within the Portland and Milwaukie downtown areas or areas with a similarly defined grid street pattern. In areas outside a defined grid street pattern, a distance of 150 feet in each direction from the Portland-Milwaukie project and associated options was considered within the area of effect.
An inventory of potentially affected resources was conducted and is included in the description of the affected environment. The methods employed for inventorying and describing the affected environment included the following:

- Incorporated and updated the Portland-Milwaukie Light Rail SDEIS 2008 Results Report on the Historic, Archaeological, and Cultural Resources. Conducted systematic field studies to identify historic built environment resources inside the revised Portland-Milwaukie project APE in October 2009 for resources built between 1880 and 1966 that were not surveyed earlier because they were not in the project area. Following the selection of the light rail project LPA, the APE was revised to incorporate additional design information produced through preliminary engineering, including additional areas that would involve construction, including improved intersections, mitigation sites, property acquisitions, utilities, and other project features.

- Incorporated and updated the South Corridor SDEIS results report on the historic built environment, as well as relevant portions of the South/North Transit Corridor DEIS results report and other documents and materials prepared for prior studies.

- Researched records at the Oregon SHPO, Oregon Historical Society and other institutions to update the information previously gathered for the project corridor. Local jurisdictions were consulted to identify any known and previously inventoried resources in the project area. Federal, state and local jurisdictions, such as the SHPO, and county and city planning departments were contacted for the most current inventories of historic built environment resources within the corridor. The existing historic inventories within the study area include the following:
  - City of Portland Historic Built Environment Resource Inventory (1984)
  - City of Milwaukie Historic and Cultural Resource Inventory (1988)
  - Clackamas County Cultural Resource Survey (1983-84)

- Conducted systematic field studies to identify historic built environment resources inside the Portland-Milwaukie project area, resources built between 1957 and 1966 (to include resources that may turn 50 years old within the project time frame), as well as revisiting resources identified in the previous study that are in the present study area. These efforts, taken with previously conducted corridor research for the South Corridor SDEIS and the South/North DEIS, were used to assemble an updated inventory for the corridor.

2.4.1 National Register Eligible Resources

- **Previous historic built environment resource identification.** Potential resources were evaluated according to the National Register Criteria (36 CFR 60.4), in a working group format. Participants in the working group included Metro staff, TriMet staff, SHPO staff, local jurisdiction staff and consultant staff. The list was developed in coordination with Metro staff, TriMet staff, SHPO staff, local jurisdiction staff and consultant staff.

- **Fieldwork and Research.** Each property identified through research and/or field studies as potentially significant was documented based on the Oregon SHPO database format and with SHPO Clearance Forms when requested by SHPO. Each property identified as potentially significant was submitted to FTA with a recommended determination of eligibility or
ineligibility. FTA considered the recommendations and made its own findings, which it communicated to the SHPO with a request for SHPO concurrence.

- **Application of Criteria of Effect and Adverse Effect.** A tour of the project area with FTA, SHPO and the project team was conducted during the development of the draft Section 106 finding of effect (FOE) evaluations for properties affected by the project that have been determined to be NRHP-eligible. The FOE evaluations were prepared for FTA consideration based on the Criteria of Effect and Adverse Effect established in 36 CFR 800.

- **SHPO Concurrence on Level of Effect on the 53 National Register eligible properties listed in the Historic, Archaeological and Cultural Resources Results Report prepared for the FEIS in letter to Metro via Ms. Bridget Wieghart from Stephen P. Poyser, PhD, January 2010 and February 2010.

### 2.4.2 Mitigation Measures

- **Memorandum of Agreement (MOA).** To mitigate for adverse effects to NRHP-listed or eligible resources, an MOA has been prepared in consultation with the Oregon SHPO, FTA, Metro, TriMet, the Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of the Siletz Indians, Confederated Tribes of the Warm Springs Reservation of Oregon, the Cowlitz Indian Tribe, and a non-federally recognized tribe, the Chinook Indian Tribe. The MOA for this project was signed in June 2010, and is provided in Appendix D.

### 2.4.3 Section 4(f) Evaluation(s)

- The project team has prepared Section 4(f) evaluations for historic properties whose NRHP qualifying characteristics, or other locally-determined criteria for locally-significant historic built environment resources, may be “used” by the proposed project. A separate Section 4(f) Evaluation has been prepared to submitted to FTA. All historic properties that involved acquisitions were reviewed in the Section 4(f) evaluation, and where a “not adverse” effect was proposed, the documentation and correspondence to SHPO included a notice that the determination would be used to support a Section 4(f) *de minimis* determination.

### 2.4.4 Documentation

- **Results/Technical/Discipline Report.** This Results Report documents the methods used for the project, the cultural resources encountered, the beneficial and adverse effects (or impacts) of the final alternatives on cultural resources, and mitigation commitments for unavoidable adverse effects. This report identifies the documentation, correspondence and consultations between Metro, TriMet, FTA and in support of the determinations of effects listed in the FEIS. Correspondence documenting determinations of eligibility or effect and correspondence indicating SHPO’s concurrence is appended to this report.

### 2.4.5 References

All primary and secondary sources are listed as references in bibliographical format in Appendix A, with additional archaeological resource references provided in reports on file with FTA and SHPO.
2.5 Historic Properties

2.5.1 2003 Locally Preferred Alternative

There are 53 historic properties within the APE that meet the NRHP criteria of eligibility, based on a review of more than 80 potential historic resources that were identified in the SDEIS, and an additional 65 properties that were subsequently identified in the project’s revised APE in 2009. The NRHP criteria include:

- Criterion A. The property is associated with events that have made a significant contribution to the broad patterns of our history.
- Criterion B. The property is associated with the lives of persons significant in our past.
- Criterion C. The property embodies distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
- Criterion D. The property has yielded, or may be likely to yield, information important in prehistory or history. This criterion is generally associated with archaeological resources.

To be eligible, properties that qualify under one or more of the criteria must retain integrity of design, materials, feeling or setting.

Determinations of Eligibility (DOE’s) for eight of the properties (Hawthorne Bridge, Ross Island Bridge, Iron Fireman Building, Eastmoreland Golf Course, Brooklyn Yard, State Highway Division Offices, Milwaukie Middle School and the R. Derwey House) were prepared in 2002 for the South Corridor Project Study. A number of other identified historic resources from the 2002 SDEIS are outside the current APE, which is based on 150 feet on either side of the Portland-Milwaukie project area, including its facilities such as park and rides. Properties outside of the project APE are therefore not included in Table 2.1-1. (Note: The Bybee Bridge has been replaced and the Oregon Worsted Company building has been demolished.) DOE’s for two additional properties (Birkemeier-Sweetland House and Kellogg Lake Outlet Structure) were identified in November 2005 to meet the Section 106 requirements for a project along OR 99E between Kellogg Lake and mile point 9.19.

The updated analysis for the Portland-Milwaukie Light Rail in the SDEIS included systematic field studies to document resources built between 1957 and 1966 that were likely to be affected by the Portland-Milwaukie project. This analysis revealed four additional resources (Portland State School, Royal Foods Warehouse/Office, and a Spanish Revival residence are considered potentially eligible for listing in the National Register based on their architectural significance. The updated analysis for the Portland-Milwaukie Light Rail Project conducted in October 2009 revealed an additional 37 locations of the resources in this segment are shown in Figure 2.1-1 and are described below.
<table>
<thead>
<tr>
<th>Map ID #</th>
<th>Address</th>
<th>Name/Type</th>
<th>Built Date</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>*1</td>
<td>2000 SW 5th Ave</td>
<td>Portland State/School</td>
<td>1965</td>
<td>DOE</td>
</tr>
<tr>
<td>2</td>
<td>2000 1st Ave SW</td>
<td>Portland State Building</td>
<td>1965</td>
<td>DOE</td>
</tr>
<tr>
<td>3</td>
<td>3121 SW Moody</td>
<td>Zidell, industrial site</td>
<td>1916</td>
<td>DOE</td>
</tr>
<tr>
<td>4</td>
<td>3325 Moody Ave SW</td>
<td>Industrial</td>
<td>1951</td>
<td>DOE</td>
</tr>
<tr>
<td>5</td>
<td>2001-2011 6th Ave SW</td>
<td>apartment</td>
<td>1902</td>
<td>DOE</td>
</tr>
<tr>
<td>6</td>
<td>2021-2027 6th Ave SW</td>
<td>apartment</td>
<td>1880</td>
<td>DOE</td>
</tr>
<tr>
<td>7</td>
<td>525 Jackson St. SW</td>
<td>Residence</td>
<td>1894</td>
<td>DOE</td>
</tr>
<tr>
<td>8</td>
<td>614 Jackson St SW</td>
<td>apartment</td>
<td>1928</td>
<td>DOE</td>
</tr>
<tr>
<td>9</td>
<td>1200 SW Naito Parkway</td>
<td>Hawthorne Bridge</td>
<td>1910</td>
<td>DOE</td>
</tr>
<tr>
<td>10</td>
<td>600 SE Powell Blvd</td>
<td>Ross Island Bridge</td>
<td>1926</td>
<td>DOE</td>
</tr>
<tr>
<td>11</td>
<td>2425-2445 SE 8th Ave</td>
<td>Royal Foods/ Warehouse/Office</td>
<td>1957</td>
<td>DOE</td>
</tr>
<tr>
<td>12</td>
<td>4784 SE 17th Ave</td>
<td>Iron Fireman Building (PECO)/Warehouse</td>
<td>1927-28</td>
<td>DOE</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>2505 SE 11th Ave</td>
<td>Ford Motor Assembly Plant</td>
<td>1914</td>
<td>DOE</td>
</tr>
<tr>
<td>14</td>
<td>619-627 SE Division</td>
<td>Industrial</td>
<td>1959</td>
<td>DOE</td>
</tr>
<tr>
<td>15</td>
<td>300 SE Caruthers</td>
<td>OPR Switching Yard</td>
<td>1891</td>
<td>DOE</td>
</tr>
<tr>
<td>16</td>
<td>1735 Franklin SE</td>
<td>Residence</td>
<td>1900</td>
<td>DOE</td>
</tr>
<tr>
<td>17</td>
<td>1528 Holgate Blvd SE</td>
<td>Residence</td>
<td>1928</td>
<td>DOE</td>
</tr>
<tr>
<td>18</td>
<td>1534 Holgate Blvd. SE</td>
<td>Residence</td>
<td>1915</td>
<td>DOE</td>
</tr>
<tr>
<td>19</td>
<td>3330 16th Ave SE</td>
<td>Residence</td>
<td>1910</td>
<td>DOE</td>
</tr>
<tr>
<td>20</td>
<td>3338 16th Ave SE</td>
<td>Residence</td>
<td>1910</td>
<td>DOE</td>
</tr>
<tr>
<td>21</td>
<td>4038 16th Ave. SE</td>
<td>Residence</td>
<td>1925</td>
<td>DOE</td>
</tr>
<tr>
<td>22</td>
<td>4244 16th Ave SE</td>
<td>Residence</td>
<td>1925</td>
<td>DOE</td>
</tr>
<tr>
<td>23</td>
<td>4326 16th Ave SE</td>
<td>Residence</td>
<td>1924</td>
<td>DOE</td>
</tr>
<tr>
<td>24</td>
<td>4414 16th Ave SE</td>
<td>Residence</td>
<td>1925</td>
<td>DOE</td>
</tr>
<tr>
<td>25</td>
<td>4806 16th Ave SE</td>
<td>Residence</td>
<td>1913</td>
<td>DOE</td>
</tr>
<tr>
<td>26</td>
<td>4816 16th Ave SE</td>
<td>Residence</td>
<td>1913</td>
<td>DOE</td>
</tr>
<tr>
<td>27</td>
<td>4904 16th Ave SE</td>
<td>Residence</td>
<td>1913</td>
<td>DOE</td>
</tr>
<tr>
<td>28</td>
<td>4914 16th Ave. SE</td>
<td>residence</td>
<td>1913</td>
<td>DOE</td>
</tr>
<tr>
<td>29</td>
<td>1635 SE Rhone</td>
<td>residence</td>
<td>1926</td>
<td>DOE</td>
</tr>
<tr>
<td>30</td>
<td>1625 Rhone SE</td>
<td>residence</td>
<td>1926</td>
<td>DOE</td>
</tr>
<tr>
<td>31</td>
<td>7605 SE McLoughlin Blvd</td>
<td>Westmoreland Park</td>
<td>1937-39</td>
<td>DOE</td>
</tr>
<tr>
<td>32</td>
<td>2425 SE Bybee Blvd</td>
<td>Eastmoreland Golf Course</td>
<td>1916</td>
<td>DOE</td>
</tr>
<tr>
<td>33</td>
<td>3236 SE Johnson Cr. Blvd</td>
<td>residence</td>
<td>1936</td>
<td>DOE</td>
</tr>
<tr>
<td>34</td>
<td>2001 SE Holgate</td>
<td>Brooklyn Yard/Railroad</td>
<td>1912-1946</td>
<td>DOE</td>
</tr>
<tr>
<td>35</td>
<td>2535 SE Monroe</td>
<td>residence</td>
<td>1905</td>
<td>DOE</td>
</tr>
<tr>
<td>36</td>
<td>2606 SE Monroe</td>
<td>residence</td>
<td>1925</td>
<td>DOE</td>
</tr>
<tr>
<td>37</td>
<td>2607 SE Monroe</td>
<td>residence</td>
<td>1915</td>
<td>DOE</td>
</tr>
<tr>
<td>38</td>
<td>2206 SE Washington</td>
<td>R. Derwey House</td>
<td>1925</td>
<td>DOE</td>
</tr>
<tr>
<td>39</td>
<td>2300 SE Harrison</td>
<td>Milwaukie Middle School</td>
<td>c.1937</td>
<td>DOE</td>
</tr>
<tr>
<td>40</td>
<td>2405 SE Harrison</td>
<td>Residence*</td>
<td>1916</td>
<td>DOE</td>
</tr>
</tbody>
</table>
Table 2.1-1

<table>
<thead>
<tr>
<th>Map ID #</th>
<th>Address</th>
<th>Name/Type</th>
<th>Built Date</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>41</td>
<td>2326 SE Monroe</td>
<td>Spanish Revival Residence</td>
<td>1928</td>
<td>DOE</td>
</tr>
<tr>
<td>42</td>
<td>Kellogg Lake Park</td>
<td>Oregon Pacific &amp; Union Pacific Railroads &amp; Trestle</td>
<td>c.1900</td>
<td>DOE</td>
</tr>
<tr>
<td>43</td>
<td>Approx. 11205 SE McLoughlin Blvd.</td>
<td>Kellogg Lake Outlet</td>
<td>1934-1950s</td>
<td>DOE</td>
</tr>
<tr>
<td>44</td>
<td>12006 SE McLoughlin Blvd.</td>
<td>Birkemeier-Sweetland Home</td>
<td>1878-1960</td>
<td>DOE</td>
</tr>
<tr>
<td>45</td>
<td>12320 SE 25th Ave</td>
<td>residence</td>
<td>1900</td>
<td>DOE</td>
</tr>
<tr>
<td>46</td>
<td>13003 SE Oatfield Rd</td>
<td>residence</td>
<td>1927</td>
<td>DOE</td>
</tr>
<tr>
<td>47</td>
<td>2616 SE Park Ave</td>
<td>residence</td>
<td>1930</td>
<td>DOE</td>
</tr>
<tr>
<td>48</td>
<td>3020 SE Park</td>
<td>residence</td>
<td>1935</td>
<td>DOE</td>
</tr>
<tr>
<td>49</td>
<td>12025 SE River Road</td>
<td>residence</td>
<td>1925</td>
<td>DOE</td>
</tr>
<tr>
<td>50</td>
<td>12108 SE River Road</td>
<td>residence</td>
<td>1930</td>
<td>DOE</td>
</tr>
<tr>
<td>51</td>
<td>2311 SE Wren</td>
<td>residence</td>
<td>1938</td>
<td>DOE</td>
</tr>
<tr>
<td>52</td>
<td>2313 SE Wren</td>
<td>residence</td>
<td>1953</td>
<td>DOE</td>
</tr>
<tr>
<td>53</td>
<td>2316 SE Wren</td>
<td>residence</td>
<td>1922</td>
<td>DOE</td>
</tr>
</tbody>
</table>

One building previously discussed in the 2008 SDEIS for the project, the State Highway Division Office and Garages at 9002 SE McLoughlin Boulevard, Milwaukie, is no longer in the APE of the current project. The NRHP-eligible resources, based on the revised APE and the previously determined NRHP-eligible resources from the SDEIS, are listed below. Sixteen of the properties were previously studied in the SDEIS, and SHPO concurred on the eligibility and findings. The remaining properties were identified after project refinements extended the APE, and FTA submitted additional information to the SHPO in database format to reach concurrence on the determinations of eligibility and findings of effect. (Please refer to Appendix C for copies of the database forms submitted for SHPO’s review, containing the DOEs, and which also include Findings of Effect (FOEs) and the signed concurrence of SHPO.)

The following is a summary of the characteristics of the properties identified as eligible or in the National Register:

- **1. 2000 SW 5th Avenue, Portland State/School Building.** Built in 1965, this building is considered potentially eligible for its architectural merit. The distinctive qualities of the architecture include the central block with vertical steel columns and painted steel plates. The projecting wings on either side of the building include decorative brickwork. This building blends horizontal and vertical features into a distinctive mid-century modern form.

- **2. 2000 1st Ave SW Portland.** One of the newer Portland State Buildings, this 1965 educational building is architecturally significant as a good example of a Neo Expressionist Mid Century Modern building featuring decorative concrete with curving walls and windows that look out of the arched openings.
3. **3121 SW Moody, Portland.** The Zidell industrial site dates back to 1916 when the company sold second-hand machinery and is significant as a site that contributed to the development of Portland’s industrial areas. Following World War II, Zidell became the second largest ship dismantler in the nation. The major focus for the company from nearly 50 years was the industrial valve business, in the 1960s the company recovered steel from ships being dismantled to create barges.

4. **3325 Moody Ave SW, Portland.** This 1951 concrete industrial building is an architecturally significant example of post WW II, industrial building featuring multi-pained steel frame windows and barrel roof. Industrial architecture includes factories, warehouses and typically they are unadorned and employ standardized, mass-produced components, commonly associated with engineering.

5. **2001-2011 6th Ave SW, Portland.** This 1902 two story wood frame apartment house is architecturally significant as a good example of a Colonial Revival apartment from the turn of the century. The Palladian windows on the first floor, the slanted bay windows on the second floor, Doric front porch columns and hipped roof make it a good example of the style.

6. **2021-2027 6th Ave SW, Portland.** This is the oldest building in the APE and is architecturally significant as a good example of a 1880s Italianate style. It has been converted to an apartment house but otherwise has integrity of style with its overhanging boxed eaves and small porch with pedimented gable roof.

7. **525 Jackson St. SW, Portland.** This two story Queen Anne style residence was constructed in 1894. It is architecturally significant as a good example of the Queen Anne style of architecture featuring shingles, horizontal siding and stick work, bay windows and a cross gable roof.

8. **614 Jackson St SW, Portland.** This circa 1928, three story brick and concert apartment buildings features round arch windows and door openings and a hipped roof in a Twentieth Century Period Revival style with Mediterranean elements. It is architecturally significant as a good example of this style of apartment building in Portland.

9. **1200 SW Naito Parkway, Hawthorne Bridge.** This bridge was constructed in 1910. It was formally determined eligible in 1985 as part of ODOT’s Historic Highway Bridges of Oregon thematic group nomination. It is the oldest operating vertical-lift bridge in the U.S. and the oldest remaining highway structure across the Willamette River. The bridge was recently fully rehabilitated.

10. **600 SE Powell Boulevard, Ross Island Bridge.** This bridge was constructed in 1926. It was formally determined eligible in 1985 as part of ODOT’s Historic Highway Bridges of Oregon thematic group nomination. It is the only cantilever deck truss bridge in Oregon.

11. **2425-2445 SE 8th Avenue, Royal Foods Warehouse/Office.** Built in 1957, this building is considered potentially eligible for its architectural merit. The distinctive qualities of the architecture include the fenestration patterns consisting of vertical windows arranged in a horizontal pattern, the use of glass block interwoven with brick surfaces, and the cantilevered overhang on the second level of the front façade. This building illustrates the blending of traditional features, such as materials, with the mid-century modern streamlined forms.
12. 4784 SE 17th Avenue, Iron Fireman Building. This building is a large one- and two-story manufacturing facility that was built in 1928. It is eligible for its association with Thomas H. Banfield (1885-1950), a locally-educated native of Portland. He and C.J. Parker developed an automatic coal-stoker machine and organized the Iron Fireman Company in 1926 to manufacture the device, becoming the largest manufacturer in the U.S. of this and similar products.

13. 2505 SE 11th Avenue, Ford Motor Assembly Plant. Constructed in 1914 for the Ford Motor Company, this building was designed by a prominent Portland architect, A.E. Doyle. Built one year after Ford’s Seattle plant, these buildings were part of Ford’s national program of decentralized assembly. It is architecturally significant as a good example of an early twentieth century industrial building designed by a well-known architect.

14. 619-627 SE Division. Portland, This 1959 concrete industrial building, features horizontal steel frame windows and several service bays and is architecturally significant as an intact example of this utilitarian type of building.

15 and 42. Oregon Pacific Railroad, Union Pacific Railroad. The railroad system is significant for its association with early interstate and transcontinental rail transportation in Oregon. It includes the property at 300 Caruthers and Water Ave. Portland, the OPR Switching Yard. The railroad switching yard is significant for its contribution to the development of transportation and economic development of Portland. The current Oregon Pacific Railroad East Portland Branch is essentially the last 5 miles of what was once a vast network of electric railroads that extended all over Portland and into Oregon City, Gladstone, Boring and as far as Estacada that started in the 1890s. During the 1920s and 1930s, the interurban line, which includes the current line from East Portland to Milwaukie, served local industry and switched many companies within East Portland, interchanging with the Southern Pacific. By the late 1950s, the era of electric engines, overhead power lines and trolleys had come to an end the operation used exclusively diesels. In approximately 1962, the Union Pacific and Southern Pacific jointly acquired the Portland Traction Company. Over the decades, between the 1930s and 1980s, the line was cut back, piece by piece. By the 1980s, the last remaining trackage was the line between the East Portland Yard, interconnecting with the Southern Pacific to north that extended south to Milwaukie and then east to Boring. By the late 1980s, the remaining line was purchased by Richard Samuels, who owned a steel company in Milwaukie. With the UP and SP wanting to abandoned or sell the line, Mr. Samuels formed the East Portland Traction Company, to distinguish himself from the Portland Traction Company which is now called the Oregon Pacific Railway.

16. 1735 Franklin SE, Portland. This circa 1900 residence is architecturally significant as a modest vernacular building with some Classic elements such as the front facing gable with eave returns, and pedimented gable roof porch.

17. 1528 Holgate Blvd SE, Portland. Constructed in circa 1928, this residence is architecturally significant as a good example of a one and one half story wood frame side facing gable roof Bungalow with gable dormer and gable porch. It features the Bungalow style’s low horizontal look with the wide covered front porch and stylized tapered porch support columns.

18. 1534 Holgate Blvd. SE, Portland. This one story circa 1915 front facing Bungalow style residence features wide wood shingles and brick porch supports. It is architecturally significant as a good example of a modest working man’s residence with integrity of design, materials and
setting. The Bungalow style has its origins in the British Arts and Crafts movement which dates back to the 1860s. The style was a reaction to the degradation of the dignity of human labor resulting from the Industrial Revolution and a reaction against the over-decorated aesthetic and disregard for the worker of the Victorian era. Common features usually including: low-pitch roof lines on a gabled or hipped roof; deeply overhanging eaves; exposed rafters or decorative brackets under the eaves; and a front porch beneath an extension of the main roof.

- **19. 3330 16th Ave SE, Portland.** This circa 1910 Craftsman Bungalow style residence is architecturally significant as a good example of a modest working man’s residence located near the industrial section of SE Portland in the Brooklyn Neighborhood. Stylistic elements include Doric column porch supports, the hipped roof dormer window and the slightly sweeping overhanging hipped roof.

- **20. 3338 16th Ave SE, Portland.** This circa 1910 Craftsman Bungalow style residence is architecturally significant as a good example of a modest working man’s residence located next to the industrial section of SE Portland in the Brooklyn Neighborhood. Stylistic elements include decorative rafters under the roof and dormer eaves.

- **21. 4038 16th Ave SE, Portland.** Located in the Brooklyn Neighborhood this modest one story Bungalow style residence was constructed in circa 1925 and features a side facing gable roof with a small front facing gable porch with overhanging eaves and exposed rafters and brick porch supports. It has some window alterations but generally has integrity of design and meets the basic NRHP eligibility for a contributing historic resource.

- **22. 4244 16th Ave SE, Portland.** This one story wood frame circa 1925 Bungalow style residence features the hallmark Bungalow style over hanging eaves and exposed rafters. Located in the Brooklyn Neighborhood it is architecturally significant as a good example of a small working man’s cottage.

- **23. 4326 16th Ave SE, Portland.** Built in circa 1924 this one story side facing gable residence is architecturally significant as a good example of a small Bungalow. It features wide overhanging eaves, exposed rafters and knee braces decorative elements.

- **24. 4414 16th Ave SE, Portland.** Located in the Brooklyn Neighborhood this modest one story Bungalow style residence constructed in circa 1925 features a side facing gable roof that covers a recessed front porch supported by tapered columns. A small shed roof dormer faces the front of the building. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship of a small Bungalow.

- **25. 4806 16th Ave SE, Portland.** This circa 1913 Bungalow style residence features a side facing gable roof with centered shed dormer windows and a recessed porch supported by tapered columns resting on concrete posts. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship of a small Bungalow.

- **26. 4816 16th Ave SE, Portland.** Constructed in circa 1913 this Bungalow style residence features a side facing gable roof with a front facing gable roof porch supported by tapered columns resting on concrete posts. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship of a small Bungalow.
27. **4904 16th Ave SE, Portland.** This circa 1913 Bungalow style residence features a side facing gable roof with centered shed dormer windows and a recessed porch supported by tapered columns resting on concrete posts. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship of a small Bungalow.

28. **4914 16th Ave. SE, Portland.** Built in circa 1920 this one story front facing gable residence is a good example of a small Bungalow. It features wide overhanging eaves, exposed rafters and knee braces, and tapered porch columns decorative elements. It has some replacement windows but retains the primary character defining elements of a Bungalow.

29. **1635 SE Rhone, Portland.** This shingled circa 1926 residence is Bungalow style residence features a side facing gable with small centered gable roof porch. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship of a small Bungalow.

30. **1625 Rhone SE, Portland.** Constructed in circa 1913, this wood frame residence is architecturally significant as a good example of a front facing gable roof with recessed porch on one side. It sports typical Bungalow elements of overhanging roof, exposed rafters, knee braces and tapered column.

31. **7605 SE McLoughlin Boulevard, Westmoreland Park.** This 47-acre park was constructed in 1937-39 as a City of Portland park. It is eligible for its contribution as a major recreational facility in Portland and as a designed landscape. The park was built in conjunction with the completion of SE McLoughlin Boulevard as an attractive recreational facility and gateway into the city.

32. **2425 SE Bybee Boulevard, Eastmoreland Golf Course.** Developed in 1916, it is reportedly the second oldest golf course in Oregon. It was designed by Chandler Egan and is eligible under the theme of landscape architecture as one of Portland’s earliest designed golf courses.

33. **3236 SE Johnson Cr. Blvd, Portland.** This circa 1936 wood frame one story residence is a good example of a Twentieth Century Period Revival Norman Farmhouse. It features a cross gable roof with small gable roof brick-faced entry with a round arched door. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

34. **2001 SE Holgate, Boulevard Brooklyn Yard.** Brooklyn Yard consists of a complex of buildings and structures dating from 1912 to 1946. This district is historically significant for its association with early interstate and transcontinental steam-powered rail transportation in Oregon.

35. **2535 SE Monroe, Milwaukie.** Built in circa 1905, this two story front facing gable roof residence features Queen Anne and some Bungalow style elements. Queen Anne elements include use of both shingles and horizontal siding, a steep pitched gable roof, and the pent roof over the 3 part front window. Bungalow elements include the overhanging eaves and decorative knee brackets. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

36. **2606 SE Monroe, Milwaukie.** A circa 1925 one story stucco Bungalow style residence featuring Jerkin Head roof and a centrally placed pedimented gable rood porch supported by
square columns. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

- **37. 2607 SE Monroe, Milwaukie.** This 1915 two story wood frame Bungalow style residence has an unusually low sloping front facing gable roof located on only one side. Decorative modillions are located under the overhanging eaves. A wide hipped roof porch extends along the entries front façade of the building supported by tapered columns supported by shingled passed columns. A gable dormer is located on the side of the house. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

- **38. 2206 SE Washington Street R. Derwey House.** This two-and-one-half story Dutch Colonial style house was built in 1925 for a well-known Milwaukie jeweler and watchmaker named R. Derwey. It is architectural significant as the best known example of a Dutch Colonial house in Milwaukie.

- **39. 2300 SE Harrison Street Milwaukie Middle School (now known as the Portland Waldorf School).** The Georgian Revival-style Milwaukie Junior High (Middle) School building, built as a high school c.1937, was determined eligible in 1998. The architect-designed (L.L. Dougan) building was constructed using Public Works Administration (PWA) funds. It is architecturally significant as a good example of the Georgian Revival style and its association with PWA.

- **40. 2405 SE Harrison Street Residence.** This circa 1916 one-story Craftsman Bungalow is one of the best examples of its kind in the older Milwaukie area. Architecturally significant, its character-defining features include bracketed eaves, original multi-light double-hung wood windows, wood shingle siding, and two-part glazed and paneled garage doors.

- **41. 2326 SE Monroe Street Spanish Revival Residence.** This house, built in 1928, is architecturally significant. The character-defining features of the house include the stucco finish, tile roof and arched openings. It is one of the best remaining examples of a Spanish Revival style residence in Milwaukie.

- **42. OPR and UPRR:** see 15 above.

- **43. 11205 SE McLoughlin Boulevard, Kellogg Lake Outlet.** The Kellogg Lake Outlet structure consists of several concrete culverts joined in tandem. A portion dates from 1934 and was McCullough’s extension on an existing concrete culvert, which appears to have been extended more than once. A sewer plant bridge was added, with modifications made to its west wing wall. A fish ladder was also added later on, likely in the 1950s. It is significant for its engineering qualities.

- **44. 12006 SE McLoughlin Boulevard Birkemeier-Sweetland Home.** This house, built 1878 on Kellogg Lake, is eligible for listing in the National Register based on its association with the builder, Frederick Birkemeier, and a later owner, Monroe Sweetland. The period of significance is 1878 to 1960. The house was moved when the East Side Railway Company extended their line to Kellogg Lake in 1893. In the 1930s it was moved again with the new alignment of Highway 99. Because it was moved several times, only the house, and not the site, is considered eligible for listing.
• **45. 12320 SE 25th Ave, Milwaukie.** This large two story Shingle style residence was constructed in circa 1900. It features a rambling design reminiscent of the large Single style homes on the east coast. An oriel dormer window with a pyramidal roof and a hipped roof dormer grace the front façade. It is architecturally significant as a NRHP-eligible historic resource with integrity of design, materials and workmanship.

• **46. 13003 SE Oatfield Rd, Milwaukie.** This two-story shingled Twentieth Century Period revival Tudor style residence was constructed in circa 1927. It features a tall, wide steeply pitched front facing gable roof. A side facing gable roof connects to the front porch which is located on the side of the buildings. Two gabled dormers extend the interior space on the other side of the building. It is architecturally significant as a NRHP-eligible historic resource because it has integrity of design, materials and workmanship.

• **47. 2616 SE Park Ave, Milwaukie.** A one story Bungalow style residence constructed in circa 1930. It features a side facing gable roof with centrally placed gable roof entry and hipped roof additions on the side of the building. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

• **48. 3020 SE Park, Milwaukie.** A one and one half story shingled circa 1935 Twentieth Century Period Revival Tudor style residence. It features a cross gable roof system with a centrally placed gable entry with round arch opening. It is architecturally significant as a good example of the Tudor Revival style residence.

• **49. 12025 SE River Road, Milwaukie.** Constructed in circa 1925 with one and one half story wood frame Bungalow style buildings features a side facing gable roof with a shed dormer facing the front building. It features a recessed entry with a pergola hood at the entry area. It is architecturally significant as a good example of the Bungalow style residence.

• **50. 12108 SE River Road, Milwaukie.** This circa 1930 two story brick, stucco and wood residence features strong Tudor stylistic elements including a Tudor arch entry and half timbering stick work in the gable ends. The style elements drawn from domestic architecture of the English Tudor period dating 1485-1547. It's architectural forms and decorative motifs include diapered brickwork, decorative half-timbering, steeply pitched roof, prominent cross gables, tall narrow windows, and massive chimneys. This residence is architecturally significant as a good example of a Tutor Revival building.

• **51. 2311 SE Wren, Milwaukie.** A modest one story circa 1938 minimal traditional Cape Cod style house. It features a side gable roof, horizontal siding and a small gable roof entry. Steep roof with side gables and small roof overhang. The first Cape Cod style homes were built by English colonist in the late 17th century who modeled their homes after small rural houses of England. The style was especially popular during the 1930s. A typical Cape Cod house is one or one and half stories tall, features a steeply pitched side gable roof and has multi-paned windows with shutters. It is architecturally significant as a good example of a Cape Cod Revival style residence.

• **52. 2313 Wren, Milwaukie.** Constructed in circa 1953 this one story wood Ranch style residence features a low hipped roof, horizontal wood windows, brick facing in the entry area and an attached garage. The Ranch style is a uniquely American domestic architectural style. First built in the 1920s, and extremely popular in the United States during the 1940s to 1970s. Ranch style houses typically were one story with a long low roofline with a large overhanging
eaves and a rectangular, L-shaped or U-shaped design. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

- **53. 2316 SE Wren, Milwaukie.** A good example of a Twentieth Century Period Revival two story Tudor style residence. Built in circa 1922 it features brick, stucco and wood with half timbering wood work in the gables.

### 2.5.2 Operations and Maintenance Facilities

No historic built environment resources were identified near the Ruby Junction light rail maintenance facility expansion.

A Section 106 survey of the project area was conducted by a qualified cultural resources specialist consultant in October 2009. None of the buildings in the project area met the criterion for eligible for the National Register of Historic Places because they do not meet the age criteria of 50 years or older or have been altered and have lost their integrity of materials, design or setting.

### 2.6 Archaeological Resources

The affected environment includes the Area of Potential Effects (APE) from the north end of the project at Station 100+00 at the intersection of SW Jackson Street between SW Fifth Avenue and SW Sixth Avenue to the south end of the project at Station 488+53.50 at the Park Avenue Station and Park and Ride. It also includes areas surrounding the Ruby Junction Facility at East Burnside and 197th Avenue in Gresham. The APE was defined as one-half block within Central Business Districts or areas with a defined grid street pattern. In areas outside a defined grid street pattern, an average of 150 feet in each direction from the alignment was defined as the APE. During the FEIS, the APE was further defined to demarcate all areas where project construction was directly anticipated (i.e., the project footprint or area of direct impact). Detailed maps of the APE used for this project are provided in Appendix E and in the *Archaeological Resources Reconnaissance Report*, which is on file with the SHPO and FTA.

While much of the project corridor was previously evaluated for the South Corridor Project Supplemental Draft Environmental Impact Statement (SDEIS) (Metro 2003) and updated for the Portland-Milwaukie Light Rail Project SDEIS (Metro 2008). In the preparation of the FEIS, the project further consulted with SHPO staff on the level of documentation needed to assess the potential for encountering archaeological resources and develop measures to identify, avoid and protect resources that could be encountered. Additional information is provided in the *Archaeological Resources Reconnaissance Report*.

Seven archaeological sites have been recorded within the project APE. Six archaeological resources were previously recorded and one archaeological resource was recorded as part of the current project. Five of these resources either have been previously removed and will not be impacted by the project or have been determined not eligible for inclusion in the NRHP. The sixth resource is located within the project APE in Milwaukie and has not been evaluated for NRHP eligibility; current project designs indicate that the archaeological site may be impacted by construction activities; archaeological monitoring is recommended at that location. The seventh site, recorded as part of the current project, needs additional testing in order to complete a recommendation of its eligibility for
listing in the National Register. Six additional archaeological sites containing historic-period and/or prehistoric materials have been recorded near the project area.

There are also locations along the corridor that have the potential to contain significant archaeological resources. The project inventory identified areas with high probabilities for encountering archaeological resources. The probability reflects available information about other known resources that may be nearby, as well as areas that are typically associated with the presence of Native American and historic-period Euroamerican archaeological sites. The project has conducted additional field surveys and assessments to assist in determining the likelihood that a significant archaeological resource is present in an area that could be disturbed by the project.

An area where there is a reasonable expectation that a significant archaeological site may be present is noted as having a high probability. Thirty-one high probability areas for the presence of Native American and historic-period Euroamerican archaeological sites were identified within the APE. The areas include the following:

- Five high probability areas (HPA-1, HPA-2, HPA-20, HPA-21, HPA-22) are in downtown Portland; one is near a recorded archaeological site that is outside of the project APE, three for historic archaeological resources are located along SW Lincoln Street where the corridor is wider than the historic-period street, and the other high probability area is associated with a work space where a significant archaeological site, now removed, was previously recorded.
- Two additional high probability areas (HPA-9 and HPA-10) are positioned where the alignment transitions between downtown Portland and the South Waterfront area.
- Three high probability areas are located on the east side of the Willamette River near the waterfront. One of these high probability areas (HPA-3) is located near a recorded archaeological site on the east side of the Willamette River. There is an additional high probability area (HPA-11) located between the UPRR and OPR rail facilities. The third high probability area (HPA-23) that is near these locations is found between SE Water Avenue and SE 2nd Avenue.
- Five high probability areas (HPA-24, HPA-25, HPA-26, HPA-27, and HPA-28) are located along the proposed alignment in the outer neighborhoods of Portland and Milwaukie at locations where historic-period residences were formerly located.
- Two high probability areas (HPA-4 and HPA-5) were previously noted as part of the South Corridor Project SDEIS. They are in the vicinity of Crystal Springs Creek and Johnson Creek.
- A high probability area (HPA-8) near SE McLoughlin Boulevard exists where the project will pass through an area recorded as a former historic brick factory.
- An additional high probability area is located within Westmoreland Park (HPA-12) and would be related to a wetland mitigation site for the project.
- One high probability area (HPA-29) is defined in the vicinity of Crystal Lake in the northern portion of the city of Milwaukie.
- Four high probability areas (HPA-6, HPA-7, HPA-16, and HPA-31) are located north and south of Kellogg Lake.
- Three high probability areas (HPA-13, HPA-14, and HPA-15) for historic archaeological resources are within downtown Milwaukie.
- A high probability area (HPA-30) was also identified near the intersection of SE McLoughlin Boulevard and SE Park Avenue in Milwaukie.

- Three high probability areas (HPA-17, HPA-18, and HPA-19) are within the APE of the Ruby Junction Facility. There are two identified sites containing prehistoric and historic-period archaeological resources in the vicinity. Maps indicate that a marsh was once present, and several areas within the expansion area do not appear to have been previously disturbed. A section of a historic railroad alignment is also within the APE. This resource has been determined not eligible for listing in the NRHP.

Full identification and evaluation of archaeological resources within some of the designated high probability areas is practically and logistically restricted due to factors such as property-owner consent or active use of areas, such as buildings, parking lots, or roads. For areas where access is limited by these factors, archaeological assessment will be completed immediately before or during construction at locations where construction activities may impact buried archaeological deposits.

Archaeological pedestrian survey and subsurface testing have been conducted within 6 of the 31 high probability areas identified within the project APE. These six high probability areas (HPA-6, HPA-7, HPA-12, HPA-16, HPA-17, and HPA-18) were not covered in pavement, capped by a building, or prohibited from access by the landowner at the time of the archaeological work. Archaeological fieldwork was conducted within these areas where there was access to the mineral ground surface in order to determine whether archaeological resources were present within the area and whether additional archaeological work such as testing or monitoring should occur. The results of the fieldwork are discussed below, with further detail on file with the SHPO and FTA.

An archaeological pedestrian survey was conducted within HPA-6, HPA-7, HPA-12, HPA-16, HPA-17, and HPA-18. Archaeological shovel testing was also conducted at each of these locations, except for HPA-12, where pedestrian survey indicated that no additional work was needed. No archaeological materials or deposits were encountered in any of the high probability locations except for HPA-6, where a shallow, disturbed archaeological site was found. Because intact archaeological deposits may be found within this site, additional archaeological work is recommended to determine the site’s eligibility for listing in the NRHP. Additional archaeological work is recommended at HPA-7, of the other five high probability areas within which fieldwork was conducted, in the area where deep fill was found capping the location and where the possibility that subsurface archaeological deposits are present at the location was not able to be assessed.

As a result of the archaeological investigations that have been conducted for the project thus far, four high probability areas have been investigated and found not to contain significant archaeological resources. Of the original 31 high probability areas identified, 27 areas are still considered to have a high probability for containing significant archaeological resources. Archaeological investigations at these locations will occur immediately before or during construction activities at the areas. The procedures and protocols the project will use for further investigations are described in detail in the signed MOA for the project.
2.6.1 Tribal and Agency Consultation and Coordination

Consultation and coordination has been undertaken with the Oregon SHPO in defining the study scope and APE, based on earlier consultations conducted for the Portland-Milwaukie Light Rail Project SDEIS, the South Corridor SDEIS and the South/North DEIS.

FTA consulted with tribal nations, including the Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of the Siletz Indians, Confederated Tribes of the Warm Springs Reservation of Oregon, the Cowlitz Indian Tribe, and a non-federally recognized tribe, the Chinook Indian Tribe. Consultations included correspondence and meetings with tribes as the SDEIS began development in August 2007, further invitations to discuss or comment on findings of the SDEIS in May and June 2008, and additional contacts and correspondence in December 2009 and February 2010. These tribes were also invited to participate in the development, review and endorsement of the MOA.
3. ENVIRONMENTAL CONSEQUENCES

Historic Built Environment

3.1 Introduction

This section identifies the potential effects of the Portland-Milwaukie project alternatives on the identified historic built environment resources in the study area. The final analysis of the criteria of effect and adverse effect was completed with FTA in consultation with SHPO in February 2010.

The effects were evaluated to determine if the impacts could be avoided. If the impacts could not be avoided, then the analysis and project documentation focused on mitigation. The final evaluation of effect and commitment to mitigation measures will be completed in coordination with SHPO adverse effects from the project on historic built environment resources that cannot be avoided will be mitigated in a Memorandum of Agreement (MOA) developed through consultation between the agencies, FTA, the SHPO, interested Tribes (if applicable) and other affected parties. The MOA will document the commitments to mitigation. It will be completed prior to publication of the Final Environmental Impact Statement (FEIS) and would be included in the FEIS.

3.2 Long-Term Impacts

This portion of the report contains a description of long-term (year 2030) impacts of the Portland-Milwaukie project alternative and design options on the identified historic built environment resources. A summary of preliminary analysis of effect and adverse effect is presented in Table 3.2-1. Identified cultural resources are referred to by numbers that correspond to the numbers in Table 2.1-1 in Section 2.1 and Figure 2.1-1. The long term impacts to historic resources includes direct effects, such as acquisition and physical change, followed by assessments of secondary effects, such as noise and vibration and traffic.

Of the 53 NRHP-listed or NRHP-eligible historic resources, up to 3 would experience adverse effects because of the light rail project. The NRHP-listed or NRHP-eligible historic resources and the project impacts on those properties are described in Tables 3.5-1 and 3.5-2.

The range of effects for the Portland-Milwaukie Light Rail Project alternatives is provided in Table 3.2-1 and summarized below. Table 3.2-2 identifies the specific resources affected.
**Table 3.2-1**

**Summary of Adverse Effects**

<table>
<thead>
<tr>
<th>Alternatives and Related Facilities</th>
<th>Properties with Identified Historic Resources</th>
<th>Historic Resources with Expected Adverse Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>No-Build</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LPA to Park Ave.¹</td>
<td>53</td>
<td>3</td>
</tr>
<tr>
<td>MOS to Lake Rd.</td>
<td>44</td>
<td>3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Related Facilities</th>
<th>Properties with Identified Historic Resources</th>
<th>Historic Resources with Expected Adverse Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Related Bridge Area Transportation Facilities</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Ruby Junction</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total (range)</strong></td>
<td><strong>46 – 55</strong></td>
<td><strong>3</strong></td>
</tr>
</tbody>
</table>

¹ Including LPA Phasing Option.

**No-Build Alternative**

No adverse effects to historic resources are expected to occur with the No-Build Alternative.

**Locally Preferred Alternative (LPA) to Park Avenue**

Of the 53 NRHP-eligible historic resources identified that are located within the APE of the LPA to Park Avenue (or the LPA Phasing Option), 37 would have no effects, 12 to 13 would have no adverse effects, and 3 would have adverse effects. The three adversely affected resources are:

- Royal Foods Warehouse at SE 8th Avenue in Portland, which was built in 1957 and is considered NRHP-eligible for its architectural merit. The distinctive qualities of the architecture include the fenestration patterns consisting of vertical windows arranged in a horizontal pattern, the use of glass block interwoven with brick surfaces, and the cantilevered overhang on the second level of the front façade. This building illustrates the blending of traditional features, such as materials, with the mid-century modern streamlined forms. The project would require the full acquisition of the property and partial to full demolition of the building.

- Westmoreland Park at 7605 SE McLoughlin Boulevard, which was constructed in 1937–39 as a City of Portland park and was determined to be an NRHP-eligible historic district for its contribution as a major recreational facility in Portland and its relationship to the Depression-era Works Progress Administration (WPA) program. The park was built in conjunction with the completion of SE McLoughlin Boulevard and was one of Portland’s largest WPA projects. As a wetland mitigation site, the project would convert the duck pond into a riparian wetland. The visual change from pond to riparian wetland was determined an adverse effect by the SHPO in a project proposed by the City of Portland in 2003 and again by the SHPO in February 2010. However, SHPO has indicated that the alteration of the duck pond would not disqualify Westmoreland Park from its NRHP-eligibility as an historic district.
- R. Derwey House at 2206 SE Washington Street, which was built in 1925. This Dutch Colonial style house was developed by a well-known Milwaukie jeweler and watchmaker named R. Derwey. It is architecturally significant as the best known example of a Dutch Colonial house in Milwaukie. The project would require the acquisition of land along the west side to within approximately 10 feet of the historic house.

The LPA to Park Avenue also requires the use of sections along the historic UPRR/Tillamook Branch line right-of-way, and would build a structure parallel to the existing tracks, including the Kellogg Lake trestle near downtown Milwaukie. The SDEIS analysis had concluded that the introduction of the new structure beside the trestle would change views of the trestle and would constitute a change in setting of the resource, resulting in a finding of adverse effect. However, as the project continued to be developed, FTA, TriMet, and Metro continued to coordinate with the SHPO to review the previous finding, since the project is avoiding direct alteration of the trail facility. The project provided additional information to the SHPO to support a finding of no adverse effect, because the primary characteristics of setting were being preserved by the project. The SHPO concurred with this finding of in January 2010.

The project features several other railroad crossings and alignment sections involving the use of railroad right-of-way, including along the UPRR, as well as a crossing of a local railroad known as the Oregon Pacific Railroad, or OPR. The project’s actions include changing elements of the railroad properties by relocating some of the tracks and removing a non-historic building in the UPRR Brooklyn Yard, but the project would not affect the characteristics for which the railroads are eligible for listing in the NRHP.

The other NRHP-eligible buildings in the APE not adversely affected could experience some secondary effects to their settings, such as the introduction of visual intrusions or the removal of existing landscape elements. These effects would not be considered substantial and would not render the properties ineligible for listing in the NRHP. Individual forms providing further information for each of these properties, along with SHPO’s signed concurrence, is provided in Appendix C.

**Minimum Operable Segment (MOS) to Lake Road**

The MOS to Lake Road has the same adverse effects to three properties as the LPA to Park Avenue, including the Royal Foods Warehouse, Westmoreland Park, and the R. Derwey House. The MOS to Lake Road avoids visual impacts to the Kellogg Lake trestle, and its APE does not extend south of downtown Milwaukie, where nine additional historic resources are located.

**Related Facilities**

**Related Bridge Area Transportation Facilities**

Two eligible historic resources, including the Ross Island Bridge and a large marine industrial property owned by the Zidell Company, were identified in or near this segment of the project, but the project would have no effect on these resources.
Ruby Junction Maintenance Facility

No historic resources were identified for the Ruby Junction Facility expansion, either for its full buildout or for the reduced footprint of a phased expansion.
<table>
<thead>
<tr>
<th>Map ID #</th>
<th>Address Description</th>
<th>Name/Type</th>
<th>Date Built</th>
<th>Status</th>
<th>No-Build</th>
<th>LPA to Park Ave.</th>
<th>MOS to Lake Rd.</th>
<th>Related Bridge Area Transportation Facilities</th>
<th>Ruby Junction</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2000 SW 5th Ave., Portland</td>
<td>Portland State University School Building</td>
<td>1965</td>
<td>DOE</td>
<td>No effect</td>
<td>ROW acquisition Not Adverse*</td>
<td>ROW acquisition Not Adverse*</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>2</td>
<td>2000 SW 1st Ave., Portland</td>
<td>Portland State University Building</td>
<td>1965</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>3</td>
<td>3121 SW Moody Ave., Portland</td>
<td>Zidell Company industrial complex</td>
<td>Circa 1916</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>4</td>
<td>3325 SW Moody Ave., Portland</td>
<td>industrial building</td>
<td>Circa 1951</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>5</td>
<td>2001 – 2011 SW 6th Ave., Portland</td>
<td>apartment</td>
<td>1902</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>6</td>
<td>2021- 2027 SW 6th Ave., Portland</td>
<td>apartment</td>
<td>Circa 1880</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>7</td>
<td>525 SW Jackson St., Portland</td>
<td>residence</td>
<td>1894</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>8</td>
<td>614 SW Jackson St., Portland</td>
<td>apartment</td>
<td>Circa 1928</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>9</td>
<td>1200 SW Naito Parkway, Portland</td>
<td>Hawthorne Bridge</td>
<td>1910</td>
<td>DOE</td>
<td>No effect</td>
<td>Indirect visual Not Adverse*</td>
<td>Indirect visual Not Adverse*</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>10</td>
<td>600 SE Powell Blvd</td>
<td>Ross Island Bridge</td>
<td>1926</td>
<td>DOE</td>
<td>No effect</td>
<td>Indirect visual Not Adverse*</td>
<td>Indirect visual Not Adverse*</td>
<td>Not Adverse</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>11</td>
<td>2425-2445 SE 8th Ave.</td>
<td>Royal Foods Warehouse &amp; Office</td>
<td>1957</td>
<td>DOE</td>
<td>No effect</td>
<td>Full acquisition ADVERSE</td>
<td>Full acquisition ADVERSE</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Map ID #</td>
<td>Address</td>
<td>Name/Type</td>
<td>Date Built</td>
<td>Status</td>
<td>Alternatives</td>
<td>Related Facilities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>---------</td>
<td>----------</td>
<td>------------</td>
<td>--------</td>
<td>--------------</td>
<td>-------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>4784 SE 17th Ave.</td>
<td>Iron Fireman Building (now PECO Warehouse)</td>
<td>1927-28</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>13</td>
<td>2505 SE 11th Ave.</td>
<td>Ford Motor Assembly Plant</td>
<td>1914</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>14</td>
<td>619-627 SE Division Pl., Portland</td>
<td>industrial building</td>
<td>1959</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>15</td>
<td>OPR between SE 4th Ave., SE Caruthers St., and SE Water Ave., Portland</td>
<td>OPR Switching Yard</td>
<td>Various dates</td>
<td>DOE</td>
<td>No effect</td>
<td>ROW acquisition</td>
<td>Moving some tracks</td>
<td>Not Adverse</td>
<td>ROW acquisition</td>
</tr>
<tr>
<td>16</td>
<td>1735 SE Franklin St., Portland</td>
<td>residence</td>
<td>Circa 1900</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>17</td>
<td>1528 SE Holgate Blvd., Portland</td>
<td>residence</td>
<td>Circa 1928</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>18</td>
<td>1534 SE Holgate Blvd., Portland</td>
<td>residence</td>
<td>Circa 1915</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>19</td>
<td>3330 SE 16th Ave., Portland</td>
<td>residence</td>
<td>Circa 1910</td>
<td>DOE</td>
<td>No effect</td>
<td>Indirect visual</td>
<td>Not Adverse</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>20</td>
<td>3338 SE 16th Ave., Portland</td>
<td>residence</td>
<td>Circa 1910</td>
<td>DOE</td>
<td>No effect</td>
<td>Indirect visual</td>
<td>Not Adverse</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>21</td>
<td>4038 SE 16th Ave., Portland</td>
<td>residence</td>
<td>Circa 1925</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>22</td>
<td>4244 SE 16th Ave., Portland</td>
<td>residence</td>
<td>Circa 1925</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
<td>No effect</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>
Table 3.2-2  
Historic Resources and Effects (continued)

<table>
<thead>
<tr>
<th>Map ID #</th>
<th>Address</th>
<th>Name/Type</th>
<th>Date Built</th>
<th>Status</th>
<th>Alternatives</th>
<th>Related Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>23</td>
<td>4326 SE 16th Ave.,</td>
<td>residence</td>
<td>Circa 1924</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>24</td>
<td>4414 SE 16th Ave.,</td>
<td>residence</td>
<td>Circa 1925</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>25</td>
<td>4806 SE 16th Ave.,</td>
<td>residence</td>
<td>Circa 1913</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>26</td>
<td>4816 SE 16th Ave.,</td>
<td>residence</td>
<td>Circa 1913</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>27</td>
<td>4904 SE 16th Ave.,</td>
<td>residence</td>
<td>Circa 1913</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>28</td>
<td>4914 SE 16th Ave.,</td>
<td>residence</td>
<td>Circa 1913</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>29</td>
<td>1635 SE Rhone St.,</td>
<td>residence</td>
<td>Circa 1926</td>
<td>DOE</td>
<td>No Effect</td>
<td>Partial ROW acquisition and noise impact</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Partial ROW acquisition and noise impact</td>
</tr>
<tr>
<td>30</td>
<td>1625 SE Rhone St.,</td>
<td>residence</td>
<td>Circa 1913</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>31</td>
<td>7605 SE McLoughlin</td>
<td>Westmoreland Park</td>
<td>1937-1939</td>
<td>DOE</td>
<td>No effect</td>
<td>Duck pond for wetland mitigation ADVERSE</td>
</tr>
<tr>
<td></td>
<td>Blvd., Portland</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Duck pond for wetland mitigation ADVERSE</td>
</tr>
<tr>
<td>32</td>
<td>2425 SE Bybee Blvd.,</td>
<td>Eastmoreland Golf Course</td>
<td>1916</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Portland</td>
<td></td>
<td></td>
<td></td>
<td>LPA to Park Ave.</td>
<td>MOS to Lake Rd.</td>
</tr>
<tr>
<td>33</td>
<td>3236 SE Johnson Creek</td>
<td>residence</td>
<td>Circa 1936</td>
<td>DOE</td>
<td>No effect</td>
<td>Intersection improvement</td>
</tr>
<tr>
<td></td>
<td>Blvd., Portland</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No effect</td>
</tr>
<tr>
<td>Map ID #</td>
<td>Address</td>
<td>Name/Type</td>
<td>Date Built</td>
<td>Status</td>
<td>No-Build</td>
<td>LPA to Park Ave.</td>
</tr>
<tr>
<td>---------</td>
<td>----------------------------------------------</td>
<td>----------------------------------</td>
<td>-----------------</td>
<td>---------</td>
<td>---------------</td>
<td>------------------</td>
</tr>
<tr>
<td>34</td>
<td>5424 SE McLoughlin Blvd. between SE Rhone St. and SE Harold St., Portland</td>
<td>UPRR Brooklyn Yard</td>
<td>1912 – 1946</td>
<td>DOE</td>
<td>No effect</td>
<td>ROW acquisition and ca. 1966 freight office to be acquired Not Adverse</td>
</tr>
<tr>
<td>35</td>
<td>2535 SE Monroe St., Milwaukie</td>
<td>residence</td>
<td>Circa 1905</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td>36</td>
<td>2606 SE Monroe St., Milwaukie</td>
<td>residence</td>
<td>Circa 1925</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td>37</td>
<td>2607 SE Monroe St., Milwaukie</td>
<td>residence</td>
<td>Circa 1915</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td>38</td>
<td>2206 SE Washington St., Milwaukie</td>
<td>R. Derwey House</td>
<td>1925</td>
<td>DOE</td>
<td>No effect</td>
<td>ROW acquisition/visual and setting ADVERSE</td>
</tr>
<tr>
<td>39</td>
<td>2300 SE Harrison St., Milwaukie</td>
<td>Milwaukie Middle School (now Portland Waldorf School)</td>
<td>1937</td>
<td>DOE</td>
<td>No effect</td>
<td>Indirect visual Not Adverse</td>
</tr>
<tr>
<td>40</td>
<td>2405 SE Harrison St., Milwaukie</td>
<td>Residence</td>
<td>1916</td>
<td>DOE</td>
<td>No effect</td>
<td>Indirect Visual, noise impact Not Adverse</td>
</tr>
<tr>
<td>41</td>
<td>2326 SE Monroe St., Milwaukie</td>
<td>Spanish Revival Residence</td>
<td>1928</td>
<td>DOE</td>
<td>No effect</td>
<td>ROW acquisition/noise impact Not Adverse</td>
</tr>
<tr>
<td>Map ID #</td>
<td>Address</td>
<td>Name/Type</td>
<td>Date Built</td>
<td>Status</td>
<td>Alternatives</td>
<td>Related Facilities</td>
</tr>
<tr>
<td>---------</td>
<td>------------------------------------------</td>
<td>--------------------------------</td>
<td>------------</td>
<td>----------</td>
<td>---------------------------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>42</td>
<td>UPRR between SE Caruthers St. near OMSI to Milwaukie by Kellogg Lake Park</td>
<td>Tillamook Branch line and UPRR &amp; trestle</td>
<td>1912</td>
<td>DOE</td>
<td>No effect; Partial ROW acquisition on railroad ROW; Indirect visual to trestle; Not Adverse</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>43</td>
<td>Approx. 11205 SE McLoughlin Blvd., Milwaukie</td>
<td>Kellogg Lake outlet</td>
<td>1930</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>44</td>
<td>12006 SE McLoughlin Blvd., Milwaukie</td>
<td>Birkemeier-Sweetland House</td>
<td>1878</td>
<td>DOE</td>
<td>No effect; No effect; Not effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>45</td>
<td>12320 SE 25th Ave., Milwaukie</td>
<td>residence</td>
<td>Circa 1900</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>46</td>
<td>13003 SE Oatfield Rd., Milwaukie</td>
<td>residence</td>
<td>Circa 1927</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>47</td>
<td>2616 SE Park Ave., Milwaukie</td>
<td>residence</td>
<td>Circa 1930</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>48</td>
<td>3020 SE Park Ave., Milwaukie</td>
<td>residence</td>
<td>Circa 1935</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>49</td>
<td>12025 SE River Rd., Milwaukie</td>
<td>residence</td>
<td>Circa 1925</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>50</td>
<td>12108 SE River Rd., Milwaukie</td>
<td>residence</td>
<td>Circa 1930</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>51</td>
<td>2311 SE Wren St., Milwaukie</td>
<td>residence</td>
<td>Circa 1938</td>
<td>DOE</td>
<td>No effect; No effect; No effect</td>
<td>Not Applicable; Not Applicable</td>
</tr>
<tr>
<td>Map ID #</td>
<td>Address</td>
<td>Name/Type</td>
<td>Date Built</td>
<td>Status</td>
<td>No-Build</td>
<td>LPA to Park Ave.</td>
</tr>
<tr>
<td>---------</td>
<td>------------------------</td>
<td>-------------</td>
<td>------------</td>
<td>---------</td>
<td>----------</td>
<td>-----------------</td>
</tr>
<tr>
<td>52</td>
<td>2313 SE Wren St., Milwaukie</td>
<td>residence</td>
<td>Circa 1953</td>
<td>DOE</td>
<td>No effect</td>
<td>Partial acquisition/ noise impact</td>
</tr>
<tr>
<td>53</td>
<td>2316 SE Wren St., Milwaukie</td>
<td>residence</td>
<td>Circa 1922</td>
<td>DOE</td>
<td>No effect</td>
<td>No effect</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>53</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. PE = Potentially eligible; DOE = Determination of Eligibility.
2. Including LPA Phasing Option.
Archaeological

No-Build Alternative

There would be no direct long-term impacts to historic-period or Native American archaeological sites with the No-Build Alternative. There is the potential for indirect effects to unidentified archaeological resources due to development of other transportation projects that would still occur even if the light rail project were not developed. These potential indirect effects cannot be quantified.

Locally Preferred Alternative (LPA) to Park Avenue

The LPA to Park Avenue (including the LPA Phasing Option) will intersect with the locations of five previously recorded archaeological resources, one recently recorded archaeological resource, and 25 high probability areas recommended for additional archaeological work. Four of the previously recorded resources either have been removed and will not be impacted by the project, or the recorded portions of them have been evaluated and determined to be not eligible for inclusion in the NRHP. The fifth recorded archaeological resource has not been evaluated for NRHP eligibility and is located within a portion of the proposed alignment near SE McLoughlin Boulevard in Milwaukie that may be impacted by the project, according to current construction plans. Archaeological monitoring is recommended during construction activities in the vicinity of this site (HPA-8). One recently recorded archaeological site at HPA-6 also may be impacted by the project.

Selection of the LPA to Park Avenue could result in long-term impacts to up to 25 high probability areas that have the potential for Native American and historic-period Euroamerican archaeological resources; 24 of these high probability areas have not been investigated for archaeological resources due to existing buildings or other physical access constraints, and one was partially investigated. The majority of the high probability sites are for historic-period Euroamerican archaeological resources. While these impacts would be due to construction activities, the potential for adverse effects to significant archaeological resources is considered a long-term (permanent) loss of the archaeological deposits. Construction activities could disturb buried archaeological sites and result in the permanent loss of the archaeological deposits due to destruction or removal.

The long-term effects to archaeological resources would result from the development of the light rail project within the high probability areas identified on each side of the Willamette River. Although the project has conducted additional field investigations, including subsurface explorations to help further define the potential presence of resources, resources in the probability areas could remain undetected and may not be avoided prior to construction.

The long-term effects of the LPA to Park Avenue on high probability areas include the new Willamette River bridge and its approaches, which involve structures that would have deep foundations. It also would relocate existing railroad facilities in a larger area north of the light rail alignment, where archaeological resources may be present. Despite many years of disturbance in the South Waterfront District and the Central Eastside Industrial District, archaeological sites have surfaced during recent construction activities. There are also recorded archaeological sites in or near portions of the LPA to Park Avenue APE. Because the waterfront and nearby areas have been subjected to continued ground disruptions during industrial developments and operations from
approximately 1890 to the modern era, it is less likely that intact Native American archaeological resources would be present, and the most likely intact resources would be historic-period Euroamerican archaeological resources. However, SHPO records indicate that Indian camps were in the vicinity of the project on the east and west sides of the river. The lands along the Willamette River have been impacted by activities such as lumber mills, steel mills, electrical power plants, railroads, and other industrial enterprises, which filled many of the areas and conducted industrial operations. Several of these areas were subsequently subjected to further disturbances during the extensive dismantling, removal, and cleanup of industrial properties.

Other high probability areas where prehistoric archaeological resources could be impacted during construction include sites on both sides of the Willamette River, near Johnson Creek, along Crystal Springs Creek (both at a rail crossing as well as along the creek in Westmoreland Park, where the project proposes wetland mitigation), near Crystal Lake in Milwaukie, adjacent to Kellogg Lake, and possibly in the vicinity of the Ruby Junction Facility. Historic archaeological resources could be encountered throughout downtown Portland, on the east side of the Willamette River to where the alignment joins the UPRR, at Johnson Creek, in formerly residential areas in the outer neighborhoods of Portland and Milwaukie, in several areas of downtown Milwaukie, and along the west side of SE McLoughlin Boulevard. Other areas within the proposed project alignment may contain archaeological resources, but the areas have been previously impacted by modern and historical development and the potential for intact deposits to be found in these areas is lower than in the high probability areas.

**Minimum Operable Segment (MOS) to Lake Road**

The MOS to Lake Road has the same effects as the LPA to Park Avenue up to downtown Milwaukie, where it would terminate. It could result in long-term impacts to up to 22 high probability areas that have the potential for Native American and historic-period Euroamerican archaeological resources.

**Related Facilities**

**Related Bridge Area Transportation Facilities**

The development of connecting streetcar facilities and the related modifications to SE Water Avenue and SW Moody Avenue were assessed as part of the light rail project’s review of the APE, and coordinated with the project’s consultations with the SHPO. These facilities are adjacent to two high probability areas that would also be encountered by the LPA to Park Avenue. The development of the streetcar connections and SW Moody Avenue and SW Water Avenue modifications could result in long-term impacts to archaeological resources within these two areas, and the project’s Memorandum of Agreement (MOA) defines the additional investigations, monitoring, and treatment plans to be used.

**Ruby Junction Maintenance Facility**

There is one previously recorded archaeological resource within the Ruby Junction Facility APE. This resource has been determined not eligible for inclusion in the National Register. There is one high probability area within the expanded Ruby Junction Facility footprint even if it were phased.
Two additional high probability areas were identified in the APE but are not within the footprint of the full buildout footprint, while only one would be within the APE of a phased expansion footprint. This area has not been investigated for archaeological resources due to access constraints. The development of the facility could result in long-term impacts to archaeological resources within this area.

3.2.1 Short-Term Impacts (Construction)

3.2.1.1 Historic Resources

**No-Build Alternative**

The No-Build Alternative would not involve construction activities that would affect historic properties.

**Locally Preferred Alternative (LPA) to Park Avenue**

Short-term impacts are those that would result from construction activities, and the duration of the impact is limited to the duration of construction. Where major construction activities are directly on historic properties, they have been considered as part of the long-term impact assessment of effects. Otherwise, the construction impacts to historic properties would be impacts to the vicinity or indirect impacts, and include noise and vibration due to nearby construction activities, increased truck traffic, traffic congestion and changes to access, short-term loss of parking, increased dust, and short-term visual changes due to construction equipment, staging areas, material storage, etc. In addition, the project could acquire temporary construction easements along the property lines of some historic properties directly along the alignment, such as would be needed to construct curbs or sidewalks. Because these impacts are similar to those that would occur for the community at large, the discussion of the indirect effects of construction and their mitigation is discussed in more detail in Chapter 3.3, Community Impacts. None of the short-term direct impacts on historic built environment resources would rise to a level that would alter the characteristics that make them eligible for the NRHP.

**Minimum Operable Segment (MOS) to Lake Road**

The short-term construction impacts for the MOS to Lake Road would be the same as for the LPA to Park Avenue.

**Related Facilities**

**Related Bridge Area Transportation Facilities**

Only two historic properties are within the vicinity of these facilities: the Ross Island Bridge and the Zidell Company property. The historic characteristics of these resources would not be adversely affected by construction.

**Ruby Junction Maintenance Facility**

No historic properties have been identified within the APE of the Ruby Junction Facility.
3.2.1.2 Archaeological Resources

Construction impacts involving the acquisition and demolition of a disturbance of an archaeological site are considered as long-term impacts, and would be as described above for the light rail project alternatives and related facilities.

**No-Build Alternative**

The No-Build Alternative does not involve construction of light rail and would not result in effects to recorded archaeological sites or high and medium probability areas.

3.2.2 Indirect and Cumulative Impacts

The FEIS identifies five indirect effects to NRHP-eligible buildings that would be caused by the proposed project. The following buildings would have noise or vibration impacts requiring noise or vibration residential sound insulation treatments:

- **1635 SE Rhone Street** in Portland, with traffic noise impacts that would require residential sound insulation or window treatments.

- **2405 SE Harrison Street** in Milwaukie would have light rail transit (LRT) noise impacts that would require a noise wall, the location of which is to be determined. The noise wall would need to be approximately 220 feet in length with a height of 6 to 8 feet, depending on the placement relative to the tracks; alternatively, residential sound insulation could be used.

- **2326 SE Monroe Street** in Milwaukie would have light rail noise impacts that would be mitigated by using reduced level bells with shrouds (meeting the FTA moderate impact criteria), and further application of residential sound insulation may be required to eliminate residual noise impacts. Vibration impacts would be mitigated by treatments built into the project.

- **2206 SE Washington Street** in Milwaukie would have vibration impacts that would be mitigated by treatments built into the project.

- **2313 SE Wren Street** in Milwaukie would have light rail noise impacts that would require a noise wall. A noise wall of 6 to 8 feet in height is sufficient to mitigate noise from light rail vehicles, depending on the topographical conditions in the area; the affected home is on a hill overlooking the alignment. A detailed design is to be developed; however, this noise wall could be placed between the track and the trail, substantially below the grade of the house, or it could be built into the retaining walls. This would be similar to fencing and other landscaping/plantings to provide screening to minimize visual impacts and the loss of vegetation in the backyard of the property.

The impacts were reviewed by the Oregon SHPO and determined to be “no adverse effect,” but because mitigation required by FTA noise and vibration standards could cause potential adverse effects to the NRHP-eligible properties if not done appropriately, stipulations to avoid any adverse effect have been included in the MOA between the SHPO and FTA. These stipulations are summarized below under mitigation.
4. MITIGATION MEASURES

4.1.1.1 Historic Resources

Mitigation Commitments

The Portland-Milwaukie Light Rail Project would have three adverse effects to historic resources, with mitigation defined in a signed MOA with the SHPO, FTA, and TriMet and executed for inclusion in the FEIS (see Appendix D of this document and Appendix N of the FEIS). Mitigation measures defined in the MOA include documentation meeting the guidance provided by the Oregon SHPO. The properties with adverse effects requiring mitigation include:

- Royal Foods Warehouse and Office, 2425 SE 8th Avenue, Portland
- Westmoreland Park, 7605 SE McLoughlin Boulevard
- R. Derwey House, 2206 SE Washington Street, Milwaukie

Other Historic Resources

Several properties have been found to have “no adverse effect,” and will be minimally impacted. For those NRHP-eligible resources the following measures are included:

The FEIS has identified secondary impacts to five additional historic built environment resources at 2405 SE Harrison, 2326 SE Monroe, 2313 SE Wren, and 2206 SE Washington streets in Milwaukie and 1635 SE Rhone Street in Portland. These impacts are considered to have “no adverse effect,” and the impacts would not alter the characteristics for which these resources are considered eligible for the NRHP. However, because the impacts require noise and vibration mitigation and that mitigation could have adverse effects to the historic buildings if done inappropriately, the MOA includes a commitment that all noise and vibration impacts meet the Secretary of the Interior Standards for Rehabilitation.

For 2206 SE Washington Street, 2313 SE Wren Street, and 1635 SE Rhone Street, where a small right-of-way acquisition is required, the property owners will be fully compensated in accordance with FTA policy and the Uniform Relocation Assistance and Real Property Acquisition Policies Act. No additional mitigation will be required.

4.1.1.2 Archaeological Resources

Archaeological resources within the high probability areas may be affected by construction of the light rail project. Unlike historic buildings, many of the archaeological resources in the region are concealed beneath sidewalks, buildings, parking lots, and streets. The probability of encountering archaeological resources is based upon presence of preferred landforms or previous discoveries adjacent to or within the project area; however, it is usually not possible to locate archaeological resources before construction, when they are hidden under sidewalks and streets.

To minimize and mitigate the potential adverse effects if archaeological resources are encountered during construction, the MOA for the project defines the procedures and measures the project will
follow as it continues beyond the FEIS and preliminary engineering and into construction. The MOA was developed through consultation among the lead agencies, FTA, SHPO, appropriate Tribes, the ACHP, and other affected parties (see Memorandum of Agreement).

For example, if in preparing for construction or during construction an archaeological site is found, project construction plans will be reviewed in order to determine whether the site can be avoided by the project. If the site cannot be avoided, the site will be evaluated for its potential eligibility for the NRHP.

Archaeological treatment plans will be developed for any sites that are determined significant under National Register criteria and that will be adversely affected by the project. To minimize harm and mitigate effects, the project will consider a variety of measures such as construction modifications, buffering, protective walls or fencing, and construction monitoring. Those sites that cannot be avoided may require a data recovery plan or other alternatives proposed as the mitigation for the adverse effect of the project. The options to be considered will take into account whether the significance of the resource calls for preservation in place, data recovery, documentation through monitoring, further research, or other mechanisms of mitigation.

Among the measures in the MOA are additional subsurface testing, further shovel tests, and other exploratory excavations for buried archaeological sites to be conducted during final design and in early construction for those areas with exposed ground surface where access was not granted by the landowner. These field efforts can reduce potential impacts and minimize delays during general construction. For areas that are unavailable for archaeological field inspection before construction due to the presence of an active transportation corridor, parking lot, or building, an archaeological monitoring plan will be followed, as defined in the MOA. The early archaeological field investigations and archaeological monitoring during project construction activities will be covered by the project’s inadvertent discovery plan, which is also defined in the MOA. The plan provides procedures for notifying SHPO, the Tribes, and other parties with jurisdiction should resources be encountered, along with measures for documentation, resource recovery, and analysis.

The MOA commits the project to follow the guidance of the ACHP covering the recovery of information from archaeological sites (ACHP 1999 and ACHP 2008). The MOA defines the hierarchy for specific mitigation actions, considering the state and the nature of the resources discovered. The mitigation actions can include preservation in place for future study or use, recovery or partial recovery of archaeological data, public interpretive display, or any combination of these and other measures. Data recovery as mitigation for adverse effects will be allowed under specific conditions and will be guided by the project’s data recovery plan.

As defined in the MOA, geotechnical exploration and general construction activities that result in excavating materials within the probability areas shall be monitored by a professional archaeologist and, if requested, monitors from appropriate Tribes will be invited. Construction staff will also be provided training and instruction on the project’s protection plan for archaeological resources. The project will prepare a Monitoring Protocol before construction begins, in consultation with the federal agencies, the SHPO, Metro, TriMet, and appropriate Tribes.
APPENDIX A - REFERENCES

Historic Resources

Clackamas County Assessor’s Office Deed Records

Metro, and Larson Anthropological Archaeological Services


Metro, Archaeological Investigations Northwest, Inc.


Milwaukie Building Permit Records

Portland Maps Online

Portland Building and Plumbing Permit Records

Sanborn Maps, 1924 and 1950

South Corridor Determinations of Eligibility, 2002 and State Historic Preservation Office Concurrence Letter dated August 5, 2002

State Historic Preservation Office Architectural Survey Data for Portland and Milwaukie
APPENDIX B – METHODS

Section 106 of the National Historic Preservation Act of 1966 requires that impacts of Federally-assisted projects be examined for impacts to historic districts, sites, buildings, structures or objects and to archaeological sites listed on, or eligible for inclusion in, the National Register of Historic Places (National Register). Federal agencies must coordinate with the State Historic Preservation Officer (SHPO) before undertaking projects that affect such properties. The Advisory Council for Historic Preservation (ACHP) has established procedures for the protection of historic and cultural properties that are on, or determined to be eligible for inclusion in, the National Register (36 CFR 800). There are also Oregon statutes that protect archaeological sites on both private and public lands. The analysis, documentation and coordination being conducted to satisfy Section 106 requirements for the Portland-Milwaukie Light Rail Project continued efforts that were initiated with the 1998 South-North Transit Corridor Project Draft Environmental Impact Statement (DEIS), the efforts conducted for the 2002 South Corridor Supplemental Draft Environmental Impact Statement (SDEIS), the 2008 Portland – Milwaukie Light Rail SDEIS and additional research conducted in October 2009 based on the revised project APE.

The purpose of the analysis is to assess the impacts of the various Portland-Milwaukie project alternatives on known and potential historic, archaeological and cultural resources.

Related Federal, State, and Local Regulations

The following regulations will be considered in the historic, archaeological and cultural analysis:

- National Environmental Policy Act (NEPA) of 1969
- National Register Standards for Eligibility regulation (36 CFR 60.4)
- Protection and Enhancement of the Cultural Environment of 1971 (Executive Order 11593)
- Oregon SHPO guidelines
  - ORS 358.475 (Special Assessment of Historic Property)
  - ORS 358.622 (State Advisory Committee on Historic Preservation)
  - ORS 358.612 (Authorities of State Historic Preservation Officer)
  - ORS 358.635 (Preservation of state-owned historic property)
  - ORS 358.680 (Oregon Property Management Program)
  - ORS 358.905 (General Archaeology)
• ORS 390.235 (Issuance of Archeological Permits)
• ORS 97.740 (Protection of Indian Graves)
• Oregon statutes that address Indian burials (ORS 97.740) and archaeological sites (ORS 358.905 and 390.235)
• Oregon Statewide Planning Goal 5 (Oregon Administrative Rule [OAR] 660-015-0000)
  Natural Resources, Scenic and Historic Areas, and Open Spaces. Oregon’s Statewide Planning Goals and Guidelines. OAR 660-015-0000. Amendments effective 08/30/96
• Historic preservation elements of Portland, Milwaukie and Clackamas County comprehensive plans and associated ordinances and standards

Contacts and Coordination

Federal, state and local agencies will be contacted and coordinated with during the identification of resources and evaluation of effects. Agencies involved include Metro, TriMet, the Oregon Department of Transportation (ODOT), SHPO, Clackamas County and the cities of Portland and Milwaukie. The Federal Transit Administration (FTA), acting on behalf of the U.S. government, will lead any contacts with Native American tribes in the area to invite them to participate and/or consult on historic, archaeological and cultural issues. Other jurisdictions and agencies may also be consulted on an as-needed basis. Individual property owners of identified resources may also be consulted.

Inventory of the Affected Environment

The area of potential effect (APE) will be defined as one-half block in each direction from the alignment within the Portland and Milwaukie downtown areas or areas with a similarly defined grid street pattern. In areas outside a defined grid street pattern, approximately one block or 150 feet in each direction from the study alternatives will be considered to be within the area of effect. This remains consistent with the APE defined previously for the South/North DEIS and for the South Corridor SDEIS. A wider area of effect would be used for the proposed new Willamette River crossings because of the potential height and scale of those structures. For new bridges, the APE will be 1,000 feet wide, centered on a midpoint between the two proposed crossings. A detailed mapping of the project corridor and APE will be provided with the completed results report, and project area mapping, including alternatives, is provided in Chapter 1 of the SDEIS Methodology Reports compilation.

For Historic Resources

An inventory of potentially-affected resources will be conducted and included in the description of the affected environment. The methods that will be employed for inventorying and describing the affected environment include the following steps:

• Incorporate and update relevant information from the South/North DEIS, the South Corridor SDEIS results reports, as well as other documents and materials prepared for prior studies.
• Research records of the SHPO, Oregon Historical Society and other institutions to update the information previously gathered for the Portland-Milwaukie project. Local jurisdictions will be consulted to identify any known and previously inventoried resources in the project area.
Federal, state and local jurisdictions, such as the SHPO, Tribal Historic Preservation Offices, and county and city planning departments, will be contacted for the most current inventories of historic resources within the corridor.

- Systematic field studies and archival research will be conducted to identify any other potentially-eligible resources that now fall within the APE of the Portland-Milwaukie light rail alternatives. The updated inventory effort will also revisit resources identified in the South/North and South Corridor results reports. The period of historic significance will be updated to identify historic resources built up to 1966 (to include resources that may turn 50 years old within the project time frame). Field observations and archival research will also be used to identify potential resources not previously included in local inventories and to review locations and conditions of all resources within the APE that are eligible for or are in the National Register.

The existing historic inventories within the study area include the following:

- City of Portland Historic Resource Inventory (1984)
- City of Milwaukie Historic and Cultural Resource Inventory (1988)
- Clackamas County Cultural Resource Survey (1983-84)

For Archaeological Resources and Traditional Cultural Properties

- Conduct a comprehensive records search at SHPO to gather data on any archaeological surveys or related studies conducted along the entire proposed alignment, including all options currently under consideration. This will update data gathered in 2002 for the South Corridor project and address the new project areas listed above.

- Conduct a review of historical cartographic materials, photographs and other documents for new project areas and/or alignments not previously reviewed in detail in the South Corridor SDEIS. This review is to identify locations considered likely to have archaeological resources.

- Revisit the three archaeological high-probability locations identified in the South Corridor SDEIS (crossings of Crystal Springs Creek, Johnson Creek, and Mt. Scott Creek/Kellogg Creek) to assess current field conditions and determine if they remain high-probability locations for archaeological resources.

- Conduct a field reconnaissance of the three new project areas listed above to assess current conditions, supplement the archival research, and determine if any of these areas should be considered high-probability locations for archaeological resources.

- Contact federal, state and local officials, such as the SHPO, Tribal Historic Preservation Officers and county and city planning officials for the most current inventories of cultural resources within the corridor.

- Conduct field studies to identify potential cultural resources not previously included in local inventories and to review locations and condition of resources listed on inventories, eligible for or in the National Register.

- FTA will undertake coordination and consultation with the appropriate Native American Tribes for additional information on traditional cultural properties in the project area.
National Register Eligible Resources

Potentially eligible historic and cultural resources will be evaluated according to the National Register Criteria (36 CFR 60.4). This analysis will be done in a working group format or project tours. Participants will also be invited to review working drafts of technical reports and the SDEIS. In addition to FTA staff, participants in the working group could include Metro staff, TriMet staff, SHPO staff, local jurisdiction staff and consultant staff. Native American Tribes will also be contacted and invited to participate in the evaluations. Tribes to be notified of the project are:

- the Confederated Tribes of the Grand Ronde Community of Oregon
- the Confederated Tribes of the Siletz Indians of Oregon
- the Confederated Tribes of the Warm Springs Reservation of Oregon

Oregon SHPO Database. For each property earlier identified as potentially significant, TriMet will recommend to FTA a determination of eligibility or ineligibility. FTA will consider the recommendations and make its own findings, which it will communicate to the SHPO with a request for SHPO concurrence.

Application of Criteria of Effect and Adverse Effect

Prepare Findings of Effect (FOE). A tour of the project area with FTA, SHPO and the project team will precede completion of draft FOE reports for those properties affected by the project that have been determined to be NRHP-eligible. The FOE reports will be prepared based on the Criteria of Effect and Adverse Effect established in 36 CFR 800. FTA will coordinate with appropriate Native American Tribes to provide input on impacts to known or probable archaeological sites and traditional cultural properties.

SHPO Concurrence on Level of Effect. The FTA (with assistance from the project team) will seek SHPO’s concurrence on the FOEs.

Local Input on Level of Effect. The project team will coordinate with local jurisdictions to solicit their input on whether or not any historic resource found to have local historic significance, but that does not meet NRHP eligibility criteria, would be adversely affected by the project, considering local impact assessment criteria.

Mitigation Measures

Memorandum(s) of Agreement (MOA). If there are any adverse effects to NRHP-listed or eligible resources, an MOA will be prepared.

Section 4(f) Evaluation(s)

The project will prepare Section 4(f) evaluations for properties whose NRHP qualifying characteristics, or other locally-determined criteria for locally-significant resources, may be “used” by the proposed project. The Section 4(f) applicability, requirements and methods are discussed in Section 7 of this report.
Documentation

Results Report. The project consultant team will prepare an Historic, Archaeological and Cultural Resources Technical/Discipline Report that will document the methods used for the project, the resources encountered, the beneficial and adverse effects (or impacts) of alternatives on the resources, and recommended mitigation measures for unavoidable adverse effects. This includes a summary of archaeological and cultural resources, although to protect resources some specifics about locations and resources may be redacted from the technical report and contained in a separate report to be provided to FTA and filed with the SHPO. The Results Report will be reviewed by TriMet, Metro and other parties as appropriate. This report will form the basis of the discussion of historic and cultural resources in the SDEIS.

Appendices. The technical report will provide documentation of the detailed inventories of cultural and historic resources along the corridor. Appendices will also include the Historic Context Statement, documentation of historic and archaeological reconnaissance, comments and coordination documentation, and Determination of National Register Eligibility/Section 106 Documentation forms. The Historic Context Statement from the South/North DEIS, which was also used for the South Corridor SDEIS, continues to be proposed for the Portland-Milwaukie project. The Historic Context Statement should meet the requirements of the SHPO, but will be resubmitted for additional review and comment. This report will attach all correspondence and coordination with other interested parties, including documentation of determinations of eligibility or effect and correspondence indicating SHPO’s concurrence. The appendix will also reference other previous correspondence and coordination conducted for the South/North DEIS and the South Corridor SDEIS, but since not all of that background information applies to the current Portland-Milwaukie corridor, only correspondence relevant to the current corridor’s resources will be included.

References

All primary and secondary sources will be listed as references in bibliographical format in the Appendix to the Results Report. All newspapers, books, interviews, reports, papers, inventories, National Register Nominations and miscellaneous data will be included. As noted above, archaeological data will be summarized and documented in a separate report, but will not available for public review, and instead will be filed with the SHPO.
TO: Christa Gardner Metro

FAX #: 503-797-1930

FROM: Steve Payseur

DATE: 4/25/08

PAGES (INCLUDING COVER PAGE): 3

RE: Thanks for the info

IF YOU HAVE ANY PROBLEMS RECEIVING THIS FAX, PLEASE CALL ASAP
April 25, 2008

Ms. Bridget Wieghart
Portland Metro
600 NE Grand Avenue
Portland, OR 97232-2736

RE: SHPO Concurrence
South Corridor Portland-Milwaukie Light Rail Project
Multiple Sites, Portland/Milwaukie, Multnomah/Clackamas

Dear Ms. Wieghart,

The State Historic Preservation Office (SHPO) has reviewed the materials submitted on the project referenced above. SHPO conditionally approves the survey project contingent upon successful resolution of any adverse effects noted on the 17 National Register eligible properties listed below and on the attached Cover Sheet. Also, we concur with the effect determinations of the following properties, also listed below and on the attached Cover Sheet:

- 2300 SE Harrison, Milwaukie Middle School, No Adverse Effect
- 2405 SE Harrison, Residence, No Adverse Effect
- 2326 SE Monroe St., Spanish Revival Residence, No Adverse Effect
- 2001 SE Holgate, Brooklyn Yard, No Adverse Effect
- 11205 SE McLoughlin Blvd., Kellogg Lake Outlet, No Effect
- 12006 SE McLoughlin Blvd., Birkemeyer-Sweetland Home, No Effect
- 2505 SE 11th Ave., Ford Motor Assembly Plant, No Effect
- 4784 SE 17th Ave., Iron Fireman Building, No Effect
- 2425 SE Bybee Blvd., Eastmoreland Golf Course, No Effect
- 7605 SE McLoughlin Blvd., Westmoreland Park, No Effect
- 1200 Naito Parkway, Hawthorne Bridge, No Effect
- 600 SE Powell Blvd., Ross Island Bridge, No Effect
- 9002 SE McLoughlin Blvd., ODOT Region Office, Adverse Effect with possible design refinements or mitigation options to reduce effect
- 2206 SE Washington, R. Derwey House, Adverse Effect with possible design refinements or mitigation options to reduce effect
- 2425 SE 8th Ave., Royal Foods, Adverse Effect, with possible design refinements or mitigation options to reduce effect
- 11200 SE McLoughlin Blvd., Oregon Pacific & Union Pacific Railroad/Trestle, No Adverse Effect to Railroad track/grade; Adverse Effect to Trestle with possible design refinements or mitigation options to reduce effect
- 2000 SW 5th Ave., Portland State School Building, No Adverse Effect (NP, however, due to acquisition of property, included for review)

Our response here is to assist you with your responsibilities under Section 106 of the National Historic Preservation Act (36 CFR Part 800). Please feel free to contact me if you have questions.

Sincerely,

Stephen P. Poyser, PhD
Sec. 106 Review & Compliance/Preservation Planner
503.986.0666 or stephen.poyser@state.or.us
Oregon Cover Sheet

for

Parks and Recreation Department
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266
(503) 986-0707
(503) 986-0793
www.oregonstate.or.us

Survey Project Name: Portland - Milwaukie LRT
City: Portland
County: Multnomah
Survey Type: Selective Baseline
Survey Sponsor: Parametrix
Surveyor Name: Julie Osborne/Kimberli Fitzgerald

Acreage Surveyed: 110
# Contributing Properties: 17
# Non-contributing Properties: 64

The area surveyed is bounded on the west by SW 8th Ave and spans southeastward to Milwaukie along either side (north/south) of McLoughlin Blvd.

Survey Boundaries

The area surveyed is bounded on the west by SW 8th Ave and spans southeastward to Milwaukie along either side (north/south) of McLoughlin Blvd.

Survey Summary

The selection of inventoried properties within the APE (one-half block within the Portland grid system, and 160 on either side of the alignment outside the grid system) was based on several factors: (1) It was to build on the information prepared for the 2002 SDEIS; (2) it included all properties along the transit line that will be affected to provide context for the resources that are potentially eligible; (3) it included assessing properties built between 1957 and 1967 that may become eligible when they reach the 50-year age criterion.

106 Effect:
The effects to eligible historic resources are included in the database comments. Summarized they are:

- 2300 SE Harrison, Milwaukie Middle School, No Adverse Effect
- 2408 SE Harrison, Residence, No Adverse Effect
- 2326 SE Monroe St., Spanish Revival Residence, No Adverse Effect
- 2001 SE Holgate, Brooklyn Yard, No Adverse Effect
- 71120 SE McLoughlin Blvd., Kellogg Lake Outlet, No Effect
- 1200 SE McLoughlin Blvd., Birkemeier-Sweetland House, No Effect
- 2505 SE 11th Ave., Ford Motor Assembly Plant, No Effect
- 4784 SE 17th Ave., Iron Fireman Building, No Effect
- 2425 SE Bybee Blvd., Eastmoreland Golf Course, No Effect
- 7605 SE McLoughlin Blvd., Westmoreland Park, No Effect
- 1200 Naito Parkway, Hawthorne Bridge, No Effect
- 600 SE Powell Blvd., Ross Island Bridge, No Effect
- 9002 SE McLoughlin Blvd., ODOT Region Office, Adverse Effect with possible design refinements or mitigation options to reduce effect
- 2205 SE Washington, R. Derwey House, Adverse Effect with possible design refinements or mitigation options to reduce effect
- 2426 SE 8th Ave., Royal Foods, Adverse Effect, with possible design refinements or mitigation options to reduce effect
- 711200 SE McLoughlin Blvd., Oregon Pacific & Union Pacific Railroad/Trestle, No Adverse Effect to Railroad track/grade; Adverse Effect to Trestle with possible design refinements or mitigation options to reduce effect
- 2000 SW 8th Ave., Portland State School Building, No Adverse Effect (NP, however, due to acquisition of property, included for review)

To Be Completed by SHPO Staff

SHPO Evaluation of Survey Project

Approved

[ ] Conditionally Approved
[ ] Returned for Corrections

SHPO Comment on Effect Determinations

[ ] Concur
[ ] Do Not Concur
[ ] Return for Additional Data

SHPO Staff Signature

[Signature]

Date: 4/22/08

Checklist of Required Items:

1. [ ] Research Design Completed Prior to Survey
2. [ ] Properly Marked Survey Map
3. [ ] Copy of USGS Map Showing Location of Surveyed Area
4. [ ] Completed Survey Forms (Field Forms)
5. [ ] Survey Data Submitted in Electronic Format
6. [ ] Properly Labeled Photos
7. [ ] Final Report, including outline of historic contexts and recommendations for future action
8. [ ] Completed "Cover Sheet"
9. [ ] Duplicates of everything: one for SHPO and one for the contracting community or agency.
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>12412 SE 27th Ave</td>
<td>NC c.1920</td>
<td>Horizontal Board</td>
<td>Bungalow (Gen.)</td>
<td>Single Dwelling Bungalow</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>lacks integrity</td>
<td></td>
</tr>
<tr>
<td>12418 SE 27th Ave</td>
<td>NC c.1925</td>
<td>Asbestos</td>
<td>Bungalow (Gen.)</td>
<td>Single Dwelling Bungalow</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>lacks integrity</td>
<td></td>
</tr>
<tr>
<td>2103 SE Adams St</td>
<td>NP c.1965</td>
<td>Aluminum Siding</td>
<td>Vernacular</td>
<td>COMMERCIAL: General Other Commercial/Public</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2323 SE Hanna Harvester Dr</td>
<td>NP c.1985 Poured Concrete</td>
<td>Utilitarian</td>
<td>Warehouse</td>
<td>Warehouse</td>
<td>10/22/2007</td>
</tr>
</tbody>
</table>

Evaluation Codes: ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Yr.(s)</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milwaukie Middle School</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2406 SE Harrison St</td>
<td>NP c.1980</td>
<td>Synthetic Wood Products</td>
<td>Vernacular</td>
<td>Multiple Dwelling Other Apt./Hotel Plan</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>State Of Oregon Highway Division Region Office</td>
<td>1.5 Shingle</td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td>6/1/2002</td>
</tr>
</tbody>
</table>

DOE - Determined Eligible; masterID:30671: The proposed Portland-Milwaukie LRT project will not require the acquisition of any property associated with the Milwaukie Middle School. It will be located on the east side of the property parallel to existing railroad tracks. A 1960s building is located between the historic school and the proposed LRT track and will block any visual impacts. Noise and vibration is not expected to impact the site.

DOE - Determined Eligible; The proposed Portland-Milwaukie LRT project will not require the acquisition of any land from this property. The visual impacts are considered to be minimal and not to have an adverse effect on the historic house.

DOE - Determined Eligible 2002: The 2003 LPA would require the acquisition of approximately 15’ of property along the south side of the site, impacting the setting by removing the trees and placing the facility a distance of approximately 12’ from the building.
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>11205 SE McLoughlin Blvd</td>
<td>ec</td>
<td>c.1934</td>
<td></td>
<td></td>
<td></td>
<td>12/1/2003</td>
</tr>
<tr>
<td>Kellogg Lake Outlet Structure</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DOE - determined eligible in 2003; The proposed Portland-Milwaukie LRT project will be sufficient distance from the historic property that it will not affect the historic structure.

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>12006 SE McLoughlin Blvd</td>
<td>EC</td>
<td>c.1878</td>
<td>Horizontal Board</td>
<td>LATE 19TH/20TH REVIVALS: Single Dwelling</td>
<td>Central Blk w/Proj Bays</td>
<td>11/21/2005</td>
</tr>
<tr>
<td>Birkemeier-Sweetland Home</td>
<td></td>
<td>c.1935</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DOE prepared 11/21/05 - Determined eligible; The proposed Portland-Milwaukie LRT project will be sufficient distance from the historic property that it will not affect the historic house.

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>12611 SE McLoughlin Blvd</td>
<td>NC</td>
<td>c.1950</td>
<td>STONE:Other/Undefined Vertical Board</td>
<td>Vernacular</td>
<td>Restaurant Other Commercial/Public</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>&quot;Drift on Inn&quot;</td>
<td></td>
<td>1</td>
<td></td>
<td>Vertical Board</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

lacks integrity

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>12615 SE McLoughlin Blvd</td>
<td>NP</td>
<td>c.1960</td>
<td>Vertical Board</td>
<td>Vernacular</td>
<td>Restaurant Other Commercial/Public</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Evaluation Codes: ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
# Architectural Survey Data for Milwaukie LRT

**Oregon State Historic Preservation Office**

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2316 SE Monroe St</td>
<td>NC c.1940</td>
<td>Asphalt</td>
<td>Vernacular</td>
<td>Single Dwelling</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>2326 SE Monroe St</td>
<td>EC c.1928</td>
<td>Stucco</td>
<td>Spanish Colonial Revival</td>
<td>Single Dwelling</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td>Spanish Revival Residence</td>
<td>1.5</td>
<td></td>
<td>Period Cottage</td>
<td></td>
</tr>
<tr>
<td>2403 SE Monroe St</td>
<td>NP c.1964</td>
<td>Stucco</td>
<td>LATE 20TH CENTURY: Other</td>
<td>Business</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td>Monroe Street Offices</td>
<td>1</td>
<td>WOOD:Other/Undefined</td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td>2425 SE Monroe St</td>
<td>NP c.1960</td>
<td>BRICK:Other/Undefined</td>
<td>Vernacular</td>
<td>Multiple Dwelling</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>BRICK:Other/Undefined</td>
<td></td>
<td>Other Apt./Hotel Plan</td>
<td></td>
</tr>
</tbody>
</table>

The proposed Portland-Milwaukie LRT project may require acquisition of a sliver of land along the west side of the property. The house sits up on a hill away from the proposed alignment and the setting would not be adversely affected by this acquisition.

The house lacks integrity.

Potentially eligible when reaches 50 year threshold.
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>R. Derwey House</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Central Passage</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>WOOD:Other/Undefined</td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td>Ford Motor Assembly Plant</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Rectangular Block</td>
<td>6/1/2002</td>
</tr>
</tbody>
</table>

DOE - Determined Eligible; masterID:30691; The proposed Portland-Milwaukie LRT project requires the acquisition of a portion of the property on the west side of the house. The proximity of the LRT track may introduce noise and visual aspects that would be considered adverse. Mitigation measures may be undertaken that would reduce the affect to "no adverse” dependent upon the final design.

DOE - Determined eligible - masterID:50252; The proposed Portland-Milwaukie LRT project remains in the existing right of way and will not require any acquisition of property associated with the building and there will be effect to the setting.
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2855 SE 15th Ave</td>
<td>NC 1947 1</td>
<td>Concrete Block Corrugated metal</td>
<td>Other / Undefined</td>
<td>Warehouse Other Commercial/Public</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>2927 SE 16th Ave</td>
<td>NP 1980 1</td>
<td>Corrugated metal</td>
<td>Modern Commercial</td>
<td>Warehouse Other Commercial/Public</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>3338 SE 17th Ave</td>
<td>NC 1940 2</td>
<td>Vinyl Siding</td>
<td>Modern Commercial</td>
<td>Business Commercial/Industrial Block</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>3390 SE 17th Ave</td>
<td>NP 1960 2</td>
<td>Poured Concrete</td>
<td>Utilitarian</td>
<td>Warehouse Warehouse</td>
<td>10/14/2007</td>
</tr>
</tbody>
</table>

Evaluation Codes:  ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished

lacks integrity
<table>
<thead>
<tr>
<th>Address/ Property Name</th>
<th>Eval./ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>3424 SE 17th Ave</td>
<td>NP</td>
<td>c.1987</td>
<td>CONCRETE: Other/Undefined</td>
<td>Utilitarian</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Warehouse</td>
<td></td>
</tr>
<tr>
<td>3500 SE 17th Ave</td>
<td>XD</td>
<td>c.1920</td>
<td>METAL: Other/Undefined</td>
<td>Utilitarian</td>
<td>Manufacturing Facility</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>King Brothers, Inc Pipe-Tanks-Welding</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3600 SE 17th Ave</td>
<td>NC</td>
<td>c.1923</td>
<td>Vertical Board</td>
<td>Modern Commercial</td>
<td>Business</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3700 SE 17th Ave</td>
<td>NC</td>
<td>c.1950</td>
<td>Structural Brick</td>
<td>Modern Commercial</td>
<td>Business</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>Portland General Electric</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

- lacks integrity

- lacks integrity - primary character defining feature, windows, altered

---

Evaluation Codes: ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>3825 SE 17th Ave</td>
<td>NC</td>
<td>1950</td>
<td>CONCRETE: Other/Undefined</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>Portland General Electric</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>-lacks integrity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3851 SE 17th Ave</td>
<td>NC</td>
<td>1950</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>Portland General Electric</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>Warehouse</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>lacks integrity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4139 SE 17th Ave</td>
<td>NC</td>
<td>1929</td>
<td>Vertical Board</td>
<td>Vernacular</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>lacks integrity</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Synthetic Stone</td>
<td>Service Bay/Business</td>
<td></td>
</tr>
</tbody>
</table>

Evaluation Codes:  ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
<table>
<thead>
<tr>
<th>Address/ Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>4535 SE 17th Ave</td>
<td>NC</td>
<td>c.1934</td>
<td>Synthetic Wood Products</td>
<td>Bungalow (Gen.)</td>
<td>Single Dwelling Other Late 20th Century Type</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>-lacks integrity, new siding and openings, new port cochere.</td>
<td></td>
</tr>
<tr>
<td>4629 SE 17th Ave</td>
<td>NC</td>
<td>c.1937</td>
<td>Vertical Board</td>
<td>Vernacular</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>lacks integrity</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DOE - Determined Eligible; The proposed Portland-Milwaukie LRT project remains in the existing right of way and will not require any acquisition of property associated with the building and there will be no effect to the setting.</td>
<td></td>
</tr>
<tr>
<td>4915 SE 17th Ave</td>
<td>NC</td>
<td>c.1947</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Evaluation Codes: ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
### Architectural Survey Data for Milwaukie LRT

#### Oregon State Historic Preservation Office

<table>
<thead>
<tr>
<th>Address/ Property Name</th>
<th>Eval./ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2040 SW 1st Ave</td>
<td>NP</td>
<td>c.1968</td>
<td>Pebble-finish Stucco</td>
<td>Modern Commercial</td>
<td>Business</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>2033 SW 4th Ave</td>
<td>NP</td>
<td>c.1990</td>
<td>Vertical Board</td>
<td>Other / Undefined</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>2425-2445 SE 8th Ave</td>
<td>EC</td>
<td>c.1957</td>
<td>Concrete Block</td>
<td>International</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
</tbody>
</table>

- **2040 SW 1st Ave**: 10/22/2007 NP Pebble-finish Stucco Modern Commercial Business Other Commercial/Public
- **2033 SW 4th Ave**: 10/14/2007 NP Vertical Board Other / Undefined Other Commercial/Public
- **2000 SW 5th Ave**: 10/22/2007 NP BRICK:Other/Undefined International College Central Block with Wings
- **2425-2445 SE 8th Ave**: 10/14/2007 EC Concrete Block International Warehouse

**Note:**
- Potentially eligible when reaches 50 year threshold; Proposed Portland-Milwaukie LRT Project would require taking a section of land on the east side of the building, but would not substantially alter the site or building, and therefore, would not be considered adverse. See map.
- The proposed Portland-Milwaukie LRT project will require acquisition of a portion of the site and building, and is considered to be an adverse effect unless mitigation measures can be made to minimize effects sufficiently to be considered "No Adverse". Design refinements are continuing as of the writing of this report.

**Evaluation Codes:**
- ES=eligible/significant
- EC=eligible/contributing
- NC=not eligible/non-contributing
- NP=not eligible/out of period
- UN=undetermined/lack of info
- XD=demolished
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2630 SE 9th Ave</td>
<td>NC</td>
<td>c.1916</td>
<td>Poured Concrete</td>
<td>CLASSICAL: other</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>Portland Gas and Coke</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

- lacks integrity

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>1606 SE Brooklyn St</td>
<td>NC</td>
<td>c.1958</td>
<td>Corrugated metal</td>
<td>Other / Undefined</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>Mobile Home</td>
<td></td>
</tr>
</tbody>
</table>

DOE - Determined eligible - masterID:50238; The proposed Portland-Milwaukie LRT project remains in the existing right of way and will not require any acquisition of property associated with the historic resource and will not affect the setting.

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eastmoreland Golf Course</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6/1/2002</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>100 SE Caruthers St</td>
<td>NP</td>
<td>1962</td>
<td>Wood Sheet</td>
<td>Northwest Regional</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>Knappton Towboat Co Offices</td>
<td>1</td>
<td></td>
<td>WOOD:Other/Undefined</td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

out of period and lacks integrity
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>342 SE Caruthers St</td>
<td>NP</td>
<td>c.1964</td>
<td>Poured Concrete</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>McCoy Millwork</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>405 SE Caruthers</td>
<td>NP</td>
<td>c.1961</td>
<td>CONCRETE: Other/Undefined</td>
<td>Vernacular</td>
<td>Other</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Inman Poulson garage</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>444 SE Caruthers St</td>
<td>NC</td>
<td>c.1955</td>
<td>CONCRETE: Other/Undefined</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Inman Poulson Lumber</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>539 SE Division St</td>
<td>NC</td>
<td>c.1954</td>
<td>CONCRETE: Other/Undefined</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

lacks integrity
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>619-627 SE Division St</td>
<td>NP</td>
<td>c.1959</td>
<td>Vertical Board</td>
<td>Vernacular</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>1305 SE Gideon St</td>
<td>NP</td>
<td>c.1970</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>1339 SE Gideon St</td>
<td>NC</td>
<td>c.1955</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td>1421 SE Gideon St</td>
<td>NC</td>
<td>c.1952</td>
<td>Poured Concrete</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
</tbody>
</table>

Evaluation Codes:  ES=eligible/significant   EC=eligible/contributing   NC=not eligible/non-contributing   NP=not eligible/out of period   UN=undetermined/lack of info   XD=demolished
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>1505 SE Gideon St</td>
<td>NP</td>
<td>c.1959</td>
<td>Shingle</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>1948</td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

also for future reference, lacks integrity due to large addition/window alterations

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2329-2339 SE Grand Ave</td>
<td>NC</td>
<td>1914</td>
<td>Horizontal Board</td>
<td>Vernacular</td>
<td>Lumber Industry</td>
<td>10/14/2007</td>
</tr>
<tr>
<td>Inman-Poulson Lumber Co</td>
<td></td>
<td>1.5</td>
<td>1939 WOOD:Other/Undefined</td>
<td></td>
<td></td>
<td>8/1/2002</td>
</tr>
</tbody>
</table>

lacks integrity; DOE - determined not eligible

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>1706 SE Haig St</td>
<td>NP</td>
<td>c.1970</td>
<td>CONCRETE: Other/Undefined</td>
<td>Modern Commercial</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>1612 SE Holgate Blvd</td>
<td>NC</td>
<td>c.1946</td>
<td>Horizontal Board</td>
<td>Vernacular</td>
<td>Single Dwelling</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>Other Late 20th Century Type</td>
<td></td>
</tr>
</tbody>
</table>

lacks integrity
## Architectural Survey Data for Milwaukie LRT

**Oregon State Historic Preservation Office**

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Yr.(s) Built</th>
<th>Materials</th>
<th>Orig./Arch. Classifs/Styles</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brooklyn Yard/Railroad</td>
<td></td>
<td></td>
<td></td>
<td>6/1/2002</td>
</tr>
</tbody>
</table>

DOE - Determined Eligible - turntable masterID:52160; roundhouse masterID:52161; The proposed Portland-Milwaukie LRT project may add the LRT track within the property boundaries, which is consistent with the current use of the yard and would not adversely affect the features for which the property is considered eligible for listing.

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Yr.(s) Built</th>
<th>Materials</th>
<th>Orig./Arch. Classifs/Styles</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2200 SE Mailwell Dr</td>
<td>NC c.1950</td>
<td>Concrete Block</td>
<td>Utilitarian</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Warehouse</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Warehouse</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Yr.(s) Built</th>
<th>Materials</th>
<th>Orig./Arch. Classifs/Styles</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>9304 SE Main St</td>
<td>NP c.1960</td>
<td>Poured Concrete</td>
<td>Modern Commercial</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td>BRICK:Other/Undefined</td>
<td>Warehouse</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Warehouse</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Yr.(s) Built</th>
<th>Materials</th>
<th>Orig./Arch. Classifs/Styles</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>9510 SE Main St</td>
<td>NP c.1968</td>
<td>Poured Concrete</td>
<td>Modern Commercial</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vertical Board</td>
<td>Warehouse</td>
<td></td>
</tr>
</tbody>
</table>

**Evaluation Codes:**
- ES=eligible/significant
- EC=eligible/contributing
- NC=not eligible/non-contributing
- NP=not eligible/out of period
- UN=undetermined/lack of info
- XD=demolished
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>9592 SE Main St</td>
<td>NC 2</td>
<td>c.1950</td>
<td>Poured Concrete, BRICK:Other/Undefined</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>9850 SE Main St</td>
<td>NP 1</td>
<td>c.1980</td>
<td>MODERN MATERIALS: Other, LATE 20TH CENTURY: Other</td>
<td>Business</td>
<td>Other Commercial/Public</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>11103 SE Main St</td>
<td>NP 1</td>
<td>c.1970</td>
<td>WOOD:Other/Undefined, BRICK:Other/Undefined</td>
<td>LATE 20TH CENTURY: Other</td>
<td>COMMERCIAL: General</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>5104 SE McLoughlin Blvd</td>
<td>NC 1</td>
<td>c.1941</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>COMMERCIAL: General</td>
<td>10/14/2007</td>
</tr>
</tbody>
</table>

-lacks integrity
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>5200 SE McLoughlin Blvd</td>
<td>NC</td>
<td>c.1956</td>
<td>CONCRETE: Other/Undefined</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/14/2007</td>
</tr>
</tbody>
</table>

- lacks integrity; changes in windows and additions

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
</table>

- Westmoreland Park

DOE - Determined eligible - masterID: 50345 casting pond; The proposed Portland-Milwaukie LRT project remains in the existing right of way and will not require any acquisition of property associated with the park and will not affect the setting.
<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oregon Worsted Co #1</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

2002 DOE - since then, demolished

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>8750 SE McLoughlin Blvd</td>
<td>NP</td>
<td>c.1960</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/22/2007</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>8890 SE McLoughlin Blvd</td>
<td>NP</td>
<td>c.1960</td>
<td>Concrete Block</td>
<td>Modern Commercial</td>
<td>Restaurant</td>
<td>10/22/2007</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval./Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>11100 SE McLoughlin Blvd</td>
<td>NP</td>
<td>c.1970</td>
<td>Horizontal Board</td>
<td>MODERN PERIOD: Other</td>
<td>Restaurant</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>Cash Spot</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
</tbody>
</table>

Mac's Pit built on this site c.1949 - replaced c.1970 with current building

Evaluation Codes: ES=eligible/significant EC=eligible/contributing NC=not eligible/non-contributing NP=not eligible/out of period UN=undetermined/lack of info XD=demolished
Architectural Survey Data for Milwaukie LRT
Oregon State Historic Preservation Office

<table>
<thead>
<tr>
<th>Address/ Property Name</th>
<th>Eval./ Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/ Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>11200 SE McLoughlin Blvd</td>
<td>EC</td>
<td>c.1900</td>
<td>Oregon Pacific and Union Pacific Railroads/Trestle</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3330 SW Moody Ave</td>
<td>NP 2</td>
<td>c.2004</td>
<td>BRICK:Other/Undefined</td>
<td>Modern Commercial</td>
<td>Business Other Commercial/Public</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>2505 SE Moores St</td>
<td>NP 1</td>
<td>c.1960</td>
<td>Vertical Board</td>
<td>MODERN PERIOD: Other</td>
<td>Business Other Commercial/Public</td>
<td>10/22/2007</td>
</tr>
<tr>
<td>1200 Naito Parkway</td>
<td>EC c.1910</td>
<td></td>
<td>Hawthorne Bridge</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The impact to the railroad overall is considered to not be an adverse effect due to the compatible nature of the uses. The railroad trestle, however, may be adversely impacted with the construction of a parallel structure that would obscure the east side of the trestle from view. Design considerations may be implemented that would mitigate the negative visual impacts, and will be determined at final design.

DOE - Determined Eligible - masterID:50257 - Portland Historic Landmark; The proposed Portland-Milwaukie LRT project is south of the bridge and will not affect the historic integrity or setting of the bridge, and will not have visual impacts that would change the character-defining features of the resource.

Evaluation Codes: ES=eligible/significant EC=eligible/contributing NC=not eligible/non-contributing NP=not eligible/out of period UN=undetermined/lack of info XD=demolished
**Architectural Survey Data for Milwaukie LRT**

**Oregon State Historic Preservation Office**

<table>
<thead>
<tr>
<th>Address/Property Name</th>
<th>Eval/Ht</th>
<th>Yr.(s) Built</th>
<th>Materials</th>
<th>Arch. Classifs/Styles</th>
<th>Orig. Use/Plan (Type)</th>
<th>Survey Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>8990 SE Ochoco St</td>
<td>NP</td>
<td>c.1960</td>
<td>Concrete Block</td>
<td>Utilitarian</td>
<td>Warehouse</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>Garage</td>
<td></td>
</tr>
<tr>
<td>600 SE Powell Blvd.</td>
<td>EC</td>
<td>c.1926</td>
<td></td>
<td></td>
<td></td>
<td>10/22/2007</td>
</tr>
<tr>
<td>Ross Island Bridge</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6/1/2002</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DOE - Determined Eligible -</td>
<td>masterID:52838 - Portland Historic Landmark; The proposed Portland-Milwaukie LRT project is south of the bridge and will not affect the historic integrity or setting of the bridge, and will not have visual impacts that would change the character-defining features of the resource.</td>
</tr>
<tr>
<td>2501 SE Reedway St</td>
<td>NC</td>
<td>c.1952</td>
<td>Poured Concrete</td>
<td>Modern Commercial</td>
<td>Warehouse</td>
<td>10/22/2007</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>Other Commercial/Public</td>
<td></td>
</tr>
<tr>
<td>2025 SW River Pkwy</td>
<td>NP</td>
<td>c.1995</td>
<td>Cement Fiber Siding</td>
<td>Neo-Classical Revival</td>
<td>Multiple Dwelling</td>
<td>10/14/2007</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td>Other Apt./Hotel Plan</td>
<td></td>
</tr>
</tbody>
</table>

**Total Resources Identified:** 80
### Architectural Survey Data for Portland - Milwaukie Light Rail 2

**Milwaukie, Clackamas County**

**SHPO Case #: 07 2748**

<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility Evaluation</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>12512 SE 27th Ave</td>
<td>c.1940</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12566 SE 27th Ave</td>
<td>c.1953</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>13121 SE McLoughlin Blvd</td>
<td>c.1970 1964</td>
<td>NP</td>
<td>no effect</td>
<td>See SHPO Concurrence form for more information</td>
</tr>
<tr>
<td>2535 SE Monroe St</td>
<td>c.1905</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2606 SE Monroe St</td>
<td>c.1925</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2607 SE Monroe St</td>
<td>c.1915</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12715 SE Oatfield Rd</td>
<td>c.1905</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12726 SE Oatfield Rd</td>
<td>c.1920</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12810 SE Oatfield Rd</td>
<td>c.1939</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12811 SE Oatfield Rd</td>
<td>c.1900</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
</tbody>
</table>

**Evaluation Codes:**

- **ES** = eligible/significant
- **EC** = eligible/contributing
- **NC** = not eligible/non-contributing
- **NP** = not eligible/out of period
- **UN** = undetermined/lack of info
- **XD** = demolished
<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>12876 SE Oatfield Rd</td>
<td>c.1965</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12905 SE Oatfield Rd</td>
<td>c.1955</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>13003 SE Oatfield Rd</td>
<td>c.1927</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2616 SE Park Ave</td>
<td>c.1930</td>
<td>EC</td>
<td>no adverse effect</td>
<td></td>
</tr>
<tr>
<td>2975 SE Park Ave</td>
<td>c.1956</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>3020 SE Park Ave</td>
<td>c.1935</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12025 SE River Rd</td>
<td>c.1925</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12108 SE River Rd</td>
<td>c.1930</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>3302 SE 16th Ave</td>
<td>c.1978</td>
<td>NP</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>3314-3318 SE 16th Ave</td>
<td>c.1975</td>
<td>NP</td>
<td>no effect</td>
<td></td>
</tr>
</tbody>
</table>

Evaluation Codes: ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
### Architectural Survey Data for Portland - Milwaukie Light Rail 2

**Portland, Multnomah County**

**SHPO Case #: 07 2748**

<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility Evaluation</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>3330 SE 16th Ave</td>
<td>c.1910</td>
<td>EC</td>
<td>no adverse effect</td>
<td>See SHPO Concurrence form for 3330 and 3338 SE 16th together</td>
</tr>
<tr>
<td>3338 SE 16th Ave</td>
<td>c.1910</td>
<td>EC</td>
<td>no adverse effect</td>
<td>See SHPO Concurrence form 3330 and 3338 SE 16th together</td>
</tr>
<tr>
<td>4038 SE 16th Ave</td>
<td>c.1925</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4244 SE 16th Ave</td>
<td>c.1925</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4326 SE 16th Ave</td>
<td>c.1924</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4414 SE 16th Ave</td>
<td>c.1925</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4806 SE 16th Ave</td>
<td>c.1913</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4816 SE 16th Ave</td>
<td>c.1913</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4904 SE 16th Ave</td>
<td>c.1913</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4914 SE 16th Ave</td>
<td>c.1925</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
</tbody>
</table>

**Evaluation Codes:**
- **ES** = eligible/significant
- **EC** = eligible/contributing
- **NC** = not eligible/non-contributing
- **NP** = not eligible/out of period
- **UN** = undetermined/lack of info
- **XD** = demolished
<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>3625 SE 17th Ave</td>
<td>c.1926</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>4886-4915 SE 17th Ave</td>
<td>c.1940</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2000 SW 1st Ave</td>
<td>c.1965</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12320 SE 25th Ave</td>
<td>c.1900</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>12302 SE 26th Ave</td>
<td>c.1939</td>
<td>NC</td>
<td>no effect</td>
<td>Refer to separate SHPO Concurrence Form for more information.</td>
</tr>
<tr>
<td>12952 SE 27th Pl</td>
<td>c.1920</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2032 SW 5th Ave</td>
<td>c.1940</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2001-2011 SW 6th Ave</td>
<td>c.1902</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2021-2027 SW 6th Ave</td>
<td>c.1880</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>300 SE Caruthers Ave</td>
<td>1900</td>
<td>EC</td>
<td>no adverse effect</td>
<td>Please refer to separate SHPO Concurrence Form for this property for more information.</td>
</tr>
</tbody>
</table>

Evaluation Codes: ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility Evaluation</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1246 SE Clinton St</td>
<td>c.1909</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1950</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>619-627 SE Division St</td>
<td>c.1959</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>1720 SE Franklin St</td>
<td>c.1902</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>1735 SE Franklin St</td>
<td>c.1900</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2230 SE Grand Ave</td>
<td>c.1965</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2320 SE Grand Ave</td>
<td>c.1958</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2525 SE Harrison St</td>
<td>c.1952</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>1528 SE Holgate Blvd</td>
<td>c.1928</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>1534 SE Holgate Blvd</td>
<td>c.1915</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>1639 SE Holgate Blvd</td>
<td>c.1931</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
</tbody>
</table>

Evaluation Codes:  ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility Evaluation</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>525 SW Jackson St</td>
<td>c.1894</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>614 SW Jackson St</td>
<td>c.1928</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>3236 SE Johnson Creek Blvd</td>
<td>c.1936</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2625 SE Lark St</td>
<td>c.1920</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3121 SW Moody Ave</td>
<td>c.1916</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3325 SW Moody Ave</td>
<td>c.1951</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1624 SE Pardee St</td>
<td>c.1927</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1509 SE Powell Blvd</td>
<td>c.1965</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1625 SE Rhone St</td>
<td>c.1913</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>1635 SE Rhone St</td>
<td>c.1926</td>
<td>EC</td>
<td>no adverse effect</td>
<td>See SHPO Concurrence form for more information</td>
</tr>
</tbody>
</table>

Evaluation Codes:  ES=eligible/significant  EC=eligible/contributing  NC=not eligible/non-contributing  NP=not eligible/out of period  UN=undetermined/lack of info  XD=demolished
<table>
<thead>
<tr>
<th>Address</th>
<th>Yr(s) Built</th>
<th>Eligibility</th>
<th>Effect</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>2311 SE Wren St</td>
<td>c.1945</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2313 SE Wren St</td>
<td>c.1953</td>
<td>EC</td>
<td>no adverse effect</td>
<td></td>
</tr>
<tr>
<td>2315 SE Wren St</td>
<td>c.1955</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2316 SE Wren St</td>
<td>c.1922</td>
<td>EC</td>
<td>no effect</td>
<td></td>
</tr>
<tr>
<td>2320 SE Wren St</td>
<td>c.1952</td>
<td>NC</td>
<td>no effect</td>
<td></td>
</tr>
</tbody>
</table>

Total Resources Identified: 65  
# Eligible: 37  
# Not Eligible: 28

Evaluation Codes:  
ES = eligible/significant  
EC = eligible/contributing  
NC = not eligible/non-contributing  
NP = not eligible/out of period  
UN = undetermined/lack of info  
XD = demolished
December 17, 2009

Mr. Steve Poyser, Ph.D.
State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97301-1271

Re: Portland to Milwaukie Light Rail Transit project - Final EIS—Historic Built Environment Analysis SHPO Case # 07-2748

Dear Dr. Poyser:

Thank you for taking the time to meet with the project team on November 3, 2009 to discuss and tour the Portland to Milwaukie Light Rail Transit Project (PMLRT). The project is continuing efforts that were initiated with the 2008 PMLRT Supplemental Draft Environmental Impact Statement (SDEIS), which draws upon the previous efforts of two NEPA documents, the 2002 South Corridor SDEIS, and the 1998 South-North Transit Corridor DEIS.

Your office has previously reviewed the PMLRT SHPO data base submitted for the SDEIS in March 2008 and concurred with the eligibility and effect findings presented. This new Selective Reconnaissance Level Survey (RLS) includes properties in the revised APE and the grouping is titled Portland-Milwaukie Light Rail 2 to distinguish it from the first database. The expanded APE primarily includes properties located near intersections which must be improved to comply with safety standards. The Section 106 portion of the RLS includes a preliminary evaluation of the impacts to historic built environmental resources in the final revised APE. As discussed on the tour, the project team has prepared seven (7) individual SHPO Concurrence Forms to provide additional information about the project effects. Specific information about the identified properties within the expanded APE is in the enclosed documentation.
We would like to receive your comments by January 18, 2009. Please advise if this timeline requires adjustment. Thank you for your consideration and we look forward to receiving your comments. If you have any questions you can contact Steve Saxton of my staff at 206-220-4311.

Sincerely,

[Signature]

R.F. Krochalis
Regional Administrator

Cc: Bridget Wieghart, Metro
    David Unsworth, TriMet

Enclosures:
1. Map showing the location of the potential resources
2. Seven (7) individual SHPO Concurrence Forms
3. Determination of effect summary
4. Architectural survey data summary
5. SHPO database statistics report
6. SHPO database grouping information form
7. Oregon Historic Site Forms
8. Historic building reports/counts
Cover Sheet
for
"Section 106" Reconnaissance Level Surveys

Submit this Cover Sheet to the Oregon SHPO along with all survey materials (see checklist below).

Survey Project Name: Portland - Milwaukie Light Rail 2
City: Portland
County: Multnomah
Survey Type: Section 106 RLS
Survey Sponsor: FTA/Metro/TriMet
Surveyor Name: Rosalind Keeney, Senior Cultural Resources Specialist, Parametrix 541-752-3449

Survey Boundaries: The area surveyed is bounded on the west by SW 5th Ave. in Portland and extends southward to Milwaukie along either side of McLoughlin Blvd to approximately 13121 SE McLoughlin Blvd.

Survey Summary/Comments:

This survey was done to review potentially historic properties in the expanded APE for the FEIS which builds upon the APE used for the SDEIS RLS (RLS and 106 Portland-Milwaukie Light Rail) submitted in 2006. The expansion is primarily comprised of intersection improvement areas required for safety. The selection of inventoried properties within the revised APE one-half block within the Portland grid system, and 150 on either side of the alignment outside the grid system (including all properties in the revised APE that will be affected to provide context for the resources that are potentially eligible. It included assessing properties built between 1890 and 1967.

The "use" of land from NRHP-eligible resources will require a Section 4(f) review for historic properties. A determination of "no adverse effect" and the signed SHPO concurrence is intended to be used by the FTA in reaching a Section 4(f) De Minimis Finding consistent with the US Department of Transportation's Section 6009(a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) Pub. L. 109-59, amended existing Section 4(f) legislation at Section 138 of Title 23 and Section 303 of Title 49, United States Code. On March 12, 2008, FHWA issued a Final Rule on Section 4(f), which moves the Section 4(f) regulation to 23 CFR 774 and provides updated direction for Section 4(f) evaluations, including de minimis determinations.

In addition to relying upon the eligibility of historic resources for the NRHP for their eligibility as Section 4(f) resources, the Section 4(f) evaluation relies upon the determination of effects from the Section 106 process in determining whether or not there is a use of a Section 4(f) resource in the following ways:

If an alternative has a direct use of land from an historic site, but there is a finding of "no adverse effect" in the Section 106 process, a Section 4(f) de minimis finding would result. If the use results in an "adverse effect" in the Section 106 process, a Section 4(f) de minimis finding can not be made.

If an alternative avoids a direct use of land from an historic site, but has proximity impacts that are determined to have "no adverse effect" through the Section 106 process, there would be no constructible use under the Section 4(f) evaluation.

The Section 106 process requires consultation to resolve any adverse effects. Commitments made in the Section 106 process and documented in the MOA may also satisfy the requirement under Section 4(f) to minimize harm resulting from the use of a historic property.

106 Case #: 07 2748
Eligibility Evaluation: Both Elig. and Inelig. Resources
Effect Determination: No Adverse Effect

106 Comments:
The effects to eligible historic resources are included in the database comments. Summarized they are:
- 625 Jackson St. SW, residence, Portland, 1894, no effect
- 614 Jackson St SW, apartment, Portland, 1928, no effect
- 2001-2011 8th Ave SW, apartment, Portland, 1882, no effect
- 2021-2027 8th Ave SW, apartment, Portland, 1869, no effect
- 2000 1st Ave SW Portland State Building, 1965, no effect
- 3121 SW Moody, Zidell, industrial site, Portland, 1916, no adverse effect
- 3325 Moody Ave SW, industrial, Portland, 1951, no effect
- 618-627 SE Division, industrial, Portland, 1959, no effect
- 390 Caruthers and Water Ave, Portland, OPR Switching Yard, Portland 1891-2009, no adverse effect
- 1735 Franklin SE, residence, Portland, 1900, no effect
- 1528 Holgate Blvd SE, residence, Portland, 1928, no effect
- 1354 Holgate Blvd. SE, residence, Portland, 1915, no effect
- 1330 16th Ave, SE, residence, Portland, 1910, no adverse effect
- 3338 16th Ave SE, residence, Portland, 1910, no adverse effect
- 4038 16th Ave SE, residence, Portland, 1925, no effect
- 4244 16th Ave SE, residence, Portland, 1925, no effect
- 4326 16th Ave SE, residence, Portland, 1924, no effect
- 4414 16th Ave SE, residence, Portland, 1925, no effect
- 4806 16th Ave SE, residence, Portland, 1913, no effect
- 4816 16th Ave SE, residence, Portland, 1913, no effect
- 4904 16th Ave SE, residence, Portland, 1913, no effect
Cover Sheet
for
"Section 106" Reconnaissance Level Surveys
Submit this Cover Sheet to the Oregon SHPO along with all survey materials (see checklist below).

<table>
<thead>
<tr>
<th>Address</th>
<th>Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>4914 16th Ave. SE, residence,</td>
<td>Portland, 1925, no effect</td>
</tr>
<tr>
<td>Portland, 1925, no effect</td>
<td>16th Ave. SE, residence,</td>
</tr>
<tr>
<td>11635 SE Rhone, residence,</td>
<td>Portland, 1926, no adverse</td>
</tr>
<tr>
<td>Portland, 1926, no adverse</td>
<td>effect</td>
</tr>
<tr>
<td>1625 Rhone SE, residence,</td>
<td>Portland, 1926, no effect</td>
</tr>
<tr>
<td>3236 SE Johnson Cr. Blvd,</td>
<td>residence, Portland, 1936,</td>
</tr>
<tr>
<td>residence, Portland, 1936, no effect</td>
<td></td>
</tr>
<tr>
<td>2536 SE Monroe, residence,</td>
<td>Milwaukee, 1905, no effect</td>
</tr>
<tr>
<td>Milwaukee, 1925, no effect</td>
<td>2606 SE Monroe, residence,</td>
</tr>
<tr>
<td>Milwaukee, 1925, no effect</td>
<td>Milwaukee, 1915, no effect</td>
</tr>
<tr>
<td>12020 SE 25th Ave, residence,</td>
<td>Milwaukee, 1900, no effect</td>
</tr>
<tr>
<td>Milwaukee, 1927, no effect</td>
<td>2616 SE Park Ave, residence,</td>
</tr>
<tr>
<td>Milwaukee, 1930, no adverse</td>
<td>3020 SE Park, residence,</td>
</tr>
<tr>
<td>Milwaukee, 1935, no effect</td>
<td>Milwaukee, 1925, no effect</td>
</tr>
<tr>
<td>12025 SE River Road, residence</td>
<td>Milwaukee, 1930, no effect</td>
</tr>
<tr>
<td>Milwaukee, 1938, no effect</td>
<td>2311 SE Wren, residence,</td>
</tr>
<tr>
<td>Milwaukee, 1953, no adverse</td>
<td>Wren, residence, Milwaukee,</td>
</tr>
<tr>
<td>2313 Wren, residence, Milwaukee</td>
<td>1953, no adverse effect</td>
</tr>
</tbody>
</table>

To Be Completed by SHPO Staff

SHPO Evaluation of Survey Project
- Approved
  - Conditionally Approved
  - Returned for Corrections

SHPO Comment on NR Eligibility Evaluations
- Concur
- Do Not Concur
- Returned for Additional Data

SHPO Comment on Effect Determinations
- Concur
- Do Not Concur
- Returned for Additional Data

Checklist of Required Items:
1. Completed "Cover Sheet" (in data base and hard-copy)
2. 106 Case # Obtained from SHPO and included on form
3. Survey data submitted in electronic format
4. Properly labeled photos (digital photos incl. with data)
5. Properly marked survey map
6. Copy of USGS Map Showing Location of Surveyed Area

Optional Items
- Research Design Completed Prior to Survey
- Completed Survey Forms (Field Forms)
- Final Report

SHPO Staff Signature: ________________________________ Date: ________________
Oregon Cover Sheet

for
Reconnaissance Level Surveys and 106 Compliance
Submit this Cover Sheet to SHPO along with all survey materials (see checklist below).

Survey Project Name: Portland - Milwaukie LRT
City: Portland
County: Multnomah
Survey Type: Selective Baseline
Survey Sponsor: Parametrix
Surveyor Name: Julie Osborne/Kimball Fitzgerald

# Contributing Properties: 17
# Non-contributing Properties: 64
Average Surveyed (estimate using USGS quad): 110

Survey Boundaries: The area surveyed is bounded on the west by SW 8th Ave and spans southeastward to Milwaukie along either side (north/south) of McLoughlin Blvd.

Survey Summary: The selection of inventoried properties within the APE (one-half block within the Portland grid system, and 150 on either side of the alignment outside the grid system) was based on several factors: (1) It was to build on the information prepared for the 2002 SEIS; (2) it included all properties along the transit line that will be affected to provide context for the resources that are potentially eligible; (3) it included assessing properties built between 1957 and 1957 that may become eligible when they reach the 50-year age criterion.

106 Effect: The effects to eligible historic resources are included in the database comments. Summarized they are:
- 2300 SE Harrison, Milwaukie Middle School, No Adverse Effect
- 2406 SE Harrison, Residence, No Adverse Effect
- 2326 SE Monroe St, Spanish Revival Residence, No Adverse Effect
- 2001 SE Holgate, Brooklyn Yard, No Adverse Effect
- 911205 SE McLoughlin Blvd., Kellogg Lake Outlet, No Effect
- 12006 SE McLoughlin Blvd., Birkemeier–Swedeland Home, No Effect
- 2505 SE 11th Ave., Ford Motor Assembly Plant, No Effect
- 4784 SE 17th Ave., Iron Hibernian Building, No Effect
- 2425 SE Bybee Blvd., Eastmoreland Golf Course, No Effect
- 7606 SE McLoughlin Blvd., Westmoreland Park, No Effect
- 1200 Naiko Parkway, Hawthorne Bridge, No Effect
- 600 SE Powell Blvd., Ross Island Bridge, No Effect
- 9002 SE McLoughlin Blvd., ODOT Region Office, Adverse Effect with possible design refinements or mitigation options to reduce effect
- 2206 SE Washington, R. Derwey House, Adverse Effect with possible design refinements or mitigation options to reduce effect
- 2426 SE 8th Ave., Royal Foods, Adverse Effect, with possible design refinements or mitigation options to reduce effect
- 911200 SE McLoughlin Blvd., Oregon Pacific & Union Pacific Railroad/Trestle, No Adverse Effect to Railroad track/grade; Adverse Effect to Trestle with possible design refinements or mitigation options to reduce effect
- 2005 SW 9th Ave., Portland State School Building, No Adverse Effect (NP, however, due to acquisition of property, Included for review)

To Be Completed by SHPO Staff

SHPO Evaluation of Survey Project

Approved

Conditionally Approved

Returned for Corrections

SHPO Comment on Effect Determinations

Concur

Do Not Concur

Return for Additional Data

Checklist of Required Items:

1. ___ Research Design Completed Prior to Survey
2. ___ Properly Marked Survey Map
3. ___ Copy of USGS Map Showing Location of Surveyed Area
4. ___ Completed Survey Forms (Field Forms)
5. ___ Survey Data Submitted in Electronic Format
6. ___ Properly Labeled Photos
7. ___ Final Report, including outline of historic contexts and recommendations for future action
8. ___ Completed "Cover Sheet"
9. ___ Duplicates of everything: one for SHPO and one for the contracting community or agency.

SHPO Staff Signature: [Signature]

Date: 4/22/08

Oregon State Historic Preservation Office, 725 Summer Street NE, Suite C, Salem OR 97301
63400 0807
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

SHPO Case Number: 07 2748

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653

Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: 3330 SE 16th Ave and 3338 SE 16th Ave

City and County: Portland, Multnomah Co.

Property or Project Name, if applicable: Portland Milwaukie Light Rail Project

Owner: ☒ Private ☐ Local Gov ☐ State Gov ☐ Federal Gov ☐ Other

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures? ☒ YES ☐ NO — If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC

☐ YES — Individually ☐ YES — In a district ☒ NO

DONT KNOW

Is the property over 50 years old?

☑ YES ☐ NO ☐ DON'T KNOW

Skip if property is listed in the National Register

Construction date: 1910

☐ Check box if date is estimated

Roof Type(s) and Material(s): Hip

Window Type(s) and Material(s): wood double hung

Siding Type(s) and Material(s): horizontal wood

Has the property been physically altered or changed?

☐ No Changes ☒ Few Changes ☐ Major / Many Changes

Skip if property is listed in the National Register

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY — Check the appropriate box

Eligibility is based on age (50 years or older) and integrity (retention of historic building features), the minimum qualifications for listing in the National Register. If choosing to contest the eligibility of a property the applicant must demonstrate that the property is not eligible for the National Register using the Criteria listed in National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation."

☒ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already HISTORIC (Listed in the National Register of Historic Places)

☐ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.

SECTION 3: APPLICANT DETERMINATION OF EFFECT — Check the appropriate box

☐ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the Historic property will not be impacted physically or visually.

☒ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: ☑ Concur with the eligibility determination above.

☐ Do not concur with the eligibility determination above.

Effect: ☑ Concur with the effect determination above.

☐ Do not concur with the effect determination above.

Signed: [Signature]

Date: 1/7/2010

Comments:

Oregon State Historic Preservation Office
Revised 08/2009
Both buildings have minor alterations, but primarily as built and retain integrity of material and design. Their original setting has been changed by the addition of two commercial/industrial buildings built close and next to the residences in the 1970s.

SECTION 5: PROJECT DESCRIPTION
Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

The non-historic commercial buildings to the north will be removed to accommodate a widening of SE 17th Street and a reconstructed SE Powell Boulevard off-ramp. The reconstructed streetscape to the north and east of the property will include widened sidewalks with street trees, and a portion of the remnant parcel will be used for a landscaped/vegetated stormwater treatment facility.

<table>
<thead>
<tr>
<th>REQUIRED</th>
<th>☒ 3 – 4, color, 4 x 5 photographs of the subject property, digital or print. One photo is sufficient for vacant property</th>
</tr>
</thead>
<tbody>
<tr>
<td>AS NEEDED</td>
<td>☒ Project area map, for projects including more than one tax lot</td>
</tr>
<tr>
<td>Contact SHPO staff with questions</td>
<td>☒ Additional drawings, reports, or other relevant materials</td>
</tr>
</tbody>
</table>

SECTION 6: AGENCY CONTACT INFORMATION
Federal, State, or Local Agency Name:___________
Contact Name and Title:___________
Street Address, City, Zip:___________
Phone:___________ Email:___________

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301
Aerial view of 3330 SE 16th and 3338 SE 16th the two non historic industrial/commercial buildings to be removed.

Project map showing right of way to be acquired.
View of front façade 3330 SE 16th Ave.

View of front façade 3380 SE 16th Ave.
View of 3330 and 3338 SE 16th Ave. side by side.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

Shpo Case Number: 07 2748

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: 12302 SE 26th Avenue

City and County: Milwaukie, Clackamas Co.

Property or Project Name, if applicable: Portland-Milwaukie Light Rail

Owner: ☑ Private ☐ Local Gov ☐ State Gov ☐ Federal Gov ☐ Other

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures? ☑ YES ☑ NO – If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC ☑ YES – Individually ☑ YES – In a district ☑ NO ☑ DON'T KNOW

Is the property over 50 years old? ☑ YES ☑ NO ☑ DON'T KNOW

Skip if property is listed in the National Register

Construction date: 1939 ☑ Check box if date is estimated

Roof Type(s) and Material(s): gable

Window Type(s) and Material(s): double hung wood

Siding Type(s) and Material(s): shingles

Has the property been physically altered or changed? ☑ No Changes ☑ Few Changes ☑ Major / Many Changes

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY – Check the appropriate box

Eligibility is based on age (50 years or older) and integrity (retention of historic building features), the minimum qualifications for listing in the National Register. If choosing to contest the eligibility of a property the applicant must demonstrate that the property is not eligible for the National Register using the criteria listed in National Register Bulletin 10, “How to Apply the National Register Criteria for Evaluation.”

☐ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already HISTORIC (Listed in the National Register of Historic Places)

☒ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.

SECTION 3: APPLICANT DETERMINATION OF EFFECT – Check the appropriate box

☐ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

☒ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: ☑ Concur with the eligibility determination above.

☐ Do not concur with the eligibility determination above.

Effect: ☑ Concur with the effect determination above.

☐ Do not concur with the effect determination above.

Signed: [Signature]

Date: 1/7/2010

Comments:

Oregon State Historic Preservation Office
Revised 08/2008

Page 1 of 2
OREGON SHPO CLEARANCE FORM

SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

The second story windows of the residence have been replaced with aluminum sliding windows.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

The light rail project would permanently acquire a strip of land on the northeastern portion of the property, modifying the downward slope to the north and constructing a retaining wall to accommodate a new trail on the public right of way below the property. Light rail would run along the edge of McLoughlin Boulevard. The light rail project would temporarily acquire the full property because the building cannot be occupied during construction. Mature trees on and along the parcel boundaries would be removed, and replacement trees and landscaping would be provided after construction. The house would not be physically altered, and would be returned to private use after construction.

| REQUIRED | 3 - 4, color, 4 x 5 photographs of the subject property, digital or print. One photo is sufficient for vacant property |
| AS NEEDED | Project area map, for projects including more than one tax lot Additional drawings, reports, or other relevant materials |

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name:
Contact Name and Title:
Street Address, City, Zip:
Phone: Email:

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301
Aerial View of the residence at 12320 SE 26th, Milwaukie, Oregon.

Project drawing showing property acquisition along McLoughlin Blvd.
View of 12320 SE 26th Ave looking east from 26th Ave. Note windows replaced on the gable ends of the second story of the house.
OREGON SHPO CLEARANCE FORM

Looking south from the corner of McLoughling Blvd and 26th Ave. Note replacement window in the hip roof gable dormer.

View of the area adjacent to McLoughlin Blvd. where the new light rail and pedestrian path will be placed. Note the large deciduous trees at the bottom of the slope. 26th Ave. is at the bottom of the photograph.
OREGON SHPO CLEARANCE FORM

Photograph showing 12302 SE 26th Ave in the upper right hand side and trees and shrubs in front of the house facing McLoughlin Blvd.

View of the house from 26th Ave. showing shrubs, trees and ivy on the tax lot.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: 13121 SE McLoughlin Blvd

City and County: Milwaukie, Clackamas Co.

Property or Project Name, if applicable: Elks Lodge, Portland Milwaukie Light Rail Project

Owner: ☑ Private ☐ Local Gov ☐ State Gov ☐ Federal Gov ☐ Other

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures? ☑ YES ☐ NO – If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC
☐ YES – Individually ☑ YES – In a district ☐ DON'T KNOW

Is the property over 50 years old?
☐ YES ☑ NO ☐ DON'T KNOW

Skip if property is listed in the National Register

Construction date: 1970 ☑ Check box if date is estimated

Roof Type(s) and Material(s): shed and low gable

Window Type(s) and Material(s): fixed wood frame

Siding Type(s) and Material(s): brick and wood

Has the property been physically altered or changed?
☐ No Changes ☐ Few Changes ☑ Major / Many Changes

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

Eligibility is based on age (50 years or older) and integrity (retention of historic building features), the minimum qualifications for listing in the National Register. If choosing to contest the eligibility of a property the applicant must demonstrate that the property is not eligible for the National Register using the criteria listed in National Register Bulletin 15, “How to Apply the National Register Criteria for Evaluation.”

☐ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already HISTORIC (Listed in the National Register of Historic Places)

☑ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

☒ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

☐ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: ☑ Concur with the eligibility determination above.

☐ Do not concur with the eligibility determination above.

Effect: ☑ Concur with the effect determination above.

☐ Do not concur with the effect determination above.

Signed: ____________________________ Date: 1/7/2010

Comments:

Oregon State Historic Preservation Office

Revised 08/2009
OREGON SHPO CLEARANCE FORM

SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

Refer to brief history of the Elks Lodge on page 7.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

The project will require some right-of-way from the north end of the parking lot side of the property for access to a park and ride structure and parking area. The lodge building is located at a higher elevation facing McLoughlin Blvd.

| REQUIRED                                                                 |
| 3 – 4, color, 4 x 5 photographs of the subject property, digital or print. |
| One photo is sufficient for vacant property                            |

| AS NEEDED | Contact SHPO staff with questions |
|  Project area map, for projects including more than one tax lot |
| Additional drawings, reports, or other relevant materials |

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name:

Contact Name and Title:

Street Address, City, Zip:

Phone: Email:

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301

Oregon State Historic Preservation Office  Revised 08/2009
View of the front façade of the Elks Lodge looking at the main entry area.
Aerial View of the Milwaukie Elks Lodge.

Project right of way acquisitions in red.
View of the windows in the south wing of the Elks Lodge.

View of the back façade of the Elks Building showing the back parking lot and the entry into the bowling alley.
View of the back façade of the Elks Lodge looking south toward the outdoor swimming pool fenced area.

Looking north toward the south end of the Elks Lodge which houses the office, restaurant and bowling alley.
OREGON SHPO CLEARANCE FORM
Milwaukie Elks Club History

The Milwaukie Elks originally met in a building in downtown Milwaukie in the 1940s. In 1957 the lodge purchased the property that the current building is located and moved the old building from the downtown location up to the new location on McLoughlin Blvd. The members met in the old building until the new building was finished in 1964. The original architectural drawings indicate that the first half of the building was constructed in 1964 and designed by Hayslip and Tuft known primarily for their school buildings. Joe Towle was a Grand Master at the lodge in the early 1960s and worked with Hayslip and Tuft on the plan of the building. The first half of the building included the original lodge meeting area, offices, a restaurant and the bowling alley. The second half of the building was constructed in 1970 and was designed by Frank Kendall, who also designed the Gateway Elks Lodge in Portland in 1972. Frank Kendall was an Elks Grand Master at the Gateway Elks Lodge at that time. The new section of the building includes the current main entrance on the first floor and a gymnasium on the lower level with an entrance from the back parking lot.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

SHPO Case Number: 07 2748

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: Between Caruthers and Market near OMSI  300 Caruthers used in the database

City and County: Portland, Multnomah County

Property or Project Name, if applicable: Oregon Pacific Railroad Switching Yard Portland-Milwaukie Light Rail

Owner:  ☐ Private  ☐ Local Gov  ☐ State Gov  ☐ Federal Gov  ☐ Other

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures?  ☐ YES  ☒ NO – If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC  ☒ YES – Individually  ☐ YES – In a district  ☐ NO  ☐ DON'T KNOW

Is the property over 50 years old?  ☒ YES  ☐ NO  ☐ DON'T KNOW

Skip if property is listed in the National Register  Construction date: 1890  ☒ Check box if date is estimated

Roof Type(s) and Material(s): NA  Window Type(s) and Material(s): NA

Siding Type(s) and Material(s): NA

Has the property been physically altered or changed?  ☐ No Changes  ☐ Few Changes  ☒ Major / Many Changes

Skip if property is listed in the National Register

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

Eligibility is based on age (50 years or older) and integrity (retention of historic building features), the minimum qualifications for listing in the National Register. If choosing to contest the eligibility of a property the applicant must demonstrate that the property is not eligible for the National Register using the Criteria listed in National Register Bulletin 15, “How to Apply the National Register Criteria for Evaluation.”

☒ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already HISTORIC (Listed in the National Register of Historic Places)

☐ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

☐ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

☒ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility:  ☒ Concur with the eligibility determination above.

☐ Do not concur with the eligibility determination above.

Effect:  ☒ Concur with the effect determination above.

☐ Do not concur with the effect determination above.

Signed:  

Date:  7/2/2015

Comments:
SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

The history of this line dates back to the 1890s. The tracks in the Oregon Pacific Railroad switching yard have been owned by several railroads over the years and the tracks have been moved to accommodate the needs of the different railroads over the past 90 years (refer to attached map showing track location changes in 1936, 1956, 1970 an 1998, for additional history of the OPR refer to page 8).

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

The Portland – Milwaukee Light Rail project would reconfigure the location of the switching yard so that the new light rail line would not have to cross the existing OPR switching tracks. OPR would retain its ability to service railroad locomotives and cars. The OPR mainline tracks would not be changed or altered and the railroad would retain its existing route. The alignment for the new transitway would proceed east and cross the Oregon Pacific Railroad (OPR) line at grade. To avoid safety conflicts between light rail and freight rail, the OPR switching yard, which the light rail tracks would otherwise cross every 7 minutes or more frequently, would be relocated to the north of its existing location. The facility would still provide for connections to the UPRR, which is essential to the OPR operations.

REQUIRED

☐ 3 – 4, color, 4 x 5 photographs of the subject property, digital or print.
One photo is sufficient for vacant property

AS NEEDED

☐ Project area map, for projects including more than one tax lot
☐ Additional drawings, reports, or other relevant materials

Contact SHPO staff with questions

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: FTA/Metro/TriMet

Contact Name and Title: _______________________________

Street Address, City, Zip: ______________________________

Phone: ______________________________ Email: ______________________________

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301
Portland – Milwaukie Light Rail OPR switching yard showing project area and track location changes.
OPR tracks near 4th and Caruthers showing historic passenger car parked on the tracks on the left.

OPR switching yard tracks with the Martin Luther King Jr. Overpass at the top of photograph.
Example of old and spare tracks at the OPR switching yard.
OREGON SHPO CLEARANCE FORM

OPR History

Source: http://www.oregonpacificrr.com/eastportlandbranch.html

The Oregon Pacific Railroad is a family owned and operated railroad that operates two branches in the greater Portland Metro Area. It is owned by Richard “Dick” Samuels and is entirely operated and run by members of the Samuels family.

The original East Portland Branch consists of the remaining trackage between the East Portland Yard and the Oregon Pacific shops at Milwaukie, Oregon. The trackage includes the remains of the Portland Traction Company Boring branch line and includes some of the most scenic railroad trackage in Portland, along the Willamette River. This line is primarily used to interchange freight rail traffic from the Milwaukie Industrial Park to the Union Pacific at the OPR's East Portland Yard.

The history of this line dates back to the 1890s. The current Oregon Pacific Railroad East Portland Branch is essentially the last 5 miles of what was once a vast network of electric railroads that extended all over Portland and into Oregon City, Gladstone, Boring and as far as Estacada. It started in 1891, when the East Side Railway Co. was incorporated to build a line from the Columbia River to Eugene. By July, 1891, the line we know today as the East Portland Branch of the Oregon Pacific was constructed. During the 1890s, the line operated essentially in East Portland and Milwaukie, reaching as far as Gladstone and Oregon City. Motive power was a combination of steam engines, electric engines, and electric trolleys. In 1901, the line was taken over by the Portland City & Oregon Railroad Co.

In 1901, construction of one of the branch lines from Milwaukie to Estacada began. The line was built to allow construction of several major electric power dams in the Estacada area. In 1902, the railroad was renamed the Oregon Water Power & Railway Company. The line was completed by 1903, with the dams finished by 1907. For decades, the line operated both as a freight line and passenger line using mostly electric engines and trolleys, with power supplied by the electric dams. By 1906, the company was sold to Portland General Electric and Portland Railway Company. By 1908, all of the electric interurban railroads within the City of Portland and the lines discussed above were merged into the Portland Railway Light and Power Co.

During the 1920s and 1930s, the Estacada line served passengers, freight, and even had several logging railroads built off of it. The interurban line, which includes the current line from East Portland to Milwaukie, served local industry and switched many companies within East Portland, interfacing with the Southern Pacific. In the 1930s the Estacada Branch was abandoned east of the trestle site ending at Boring.

In approximately 1951, the Portland Traction Company purchased the old war housing property that was located in Milwaukie with the intention of turning it into an industrial park. The PTC then sold sections of the property off to business with the stipulation that the business locate and use rail. As a consequence, every business in the park had a rail spur running into it. While most of the Portland Traction Company had electric power for its electric engines, the new Milwaukie Industrial Park was never converted for electric operation and for this reason the PTC decided to purchase two diesel switchers. Apparently, around that time period, the PTC relocated the shops from Milwaukie to the East Portland Yard.

By the late 1950s, the era of electric engines, overhead power lines and trolleys had come to an end the operation used exclusively diesels. In approximately 1962, the Union Pacific and Southern Pacific jointly acquired the Portland Traction Company. Over the decades, between the 1930s and 1980s, the line was cut back, piece by piece. Street lines in Portland were abandoned to make way for new streets, buildings and highway bridges. The branch line to Oregon City was the first major branch line of the PTC to be abandoned. By the early 1960s, most businesses along the branch were gone and the line only served a paper mill at the end of the 8 mile Long Branch. However, the paper mill could be served by the SP from its mainline instead. The line closed in the early 1960s and the track was removed by 1968.

In the 1970s and 1980s, the PTC began to languish as rail traffic declined. By the 1980s, the last remaining trackage was the line between the East Portland Yard, interconnecting with the Southern Pacific to north that extended south to Milwaukie and then east to Boring. Approximately 22 miles of track. However, the majority of traffic came from the Milwaukee industrial park.

In 1986, the PTC sent notices to its shippers that it intended to abandon its Boring branch and were looking at options to continue service to the remaining customers at the Milwaukee Industrial Park. This would become the birth of the idea of Mr. Samuels owning and operating a railroad. In 1986 he wrote the parent companies of the PTC that he was interested in taking over the operations of the PTC. The PTC had received permission to abandon the Boring line and was interested in selling the remaining trackage to Mr. Samuels to avoid abandonment proceedings. Mr. Samuels stipulated that he wanted the salvage rights to the Boring line in exchange for taking over the PTC, so that he could use the good track on the Boring branch in the future refurbishing of the line between Milwaukie and East Portland.

By the late 1980s, the track was abandoned east of Milwaukie and sold to the local governments who turned it into a bike trail. During this same period, Mr. Samuels, who owned a steel company in Milwaukie that was a customer of the PTC, saw an opportunity to save the fledgling railroad. With the UP and SP wanting to abandoned or sell the line, Mr. Samuels stepped up and formed the East Portland Traction Company, to distinguish himself from the Portland Traction Company. Rather than being abandoned, operations were shifted over to Mr. Samuels's ownership. Between 1987 and 1991, both companies operated on the line, with Mr. Samuels having the contract to scrap out the former Boring branch and the PTC continuing operations between Milwaukie and East Portland.

In 1987 Mr. Samuels formed Samuels Pacific Industries as a non-railroad company which he would conduct his rail scrapping business. By 1991, the Portland Traction Company was no more and Mr. Samuels now had control and ownership of the last 5 miles of this historic railroad under his company, the EAST Portland Traction Company. Mr. Samuels sold his steel company and dedicated his working life to revitalizing the railroad. Many people thought he was crazy, but former customers of the PTC began to realize that he was serious when he personally visited each company, and offered his phone number and his services day or night, any day of the week. Soon business picked up on a railroad that many thought would be abandoned.

Oregon State Historic Preservation Office
Revised 08/2009
OREGON SHPO CLEARANCE FORM

In the 20 years since Mr. Samuels has formed the East Portland Traction Company and began a new chapter in this historic railroad, a lot has changed on the branch. Due to the changing occupants of the various complexes of the Milwaukee Industrial park, customers come and go and often the shipments change. The railroad now shares much of its former right of way with a new bike trail and a number of major public events, including steam train rides, have occurred. The last remaining active street trackage in East Portland was torn up by the City of Portland for development and other projects. Of course, the OPR mainline and East Portland Yard still exist and operate as normal the rails remain with only the street covering removed.

The majority of the OPR's freight traffic is handled over the Molalla Branch, but the East Portland Branch has its share of car loads. The two operations are separated by about 22 miles of Union Pacific track. However, the Oregon Pacific does not operate on the Union Pacific, instead interchanging with the UP at the East Portland Yard and at the interchange in Canby. When locomotives and equipment need to move between the two operations, they are dead headed on Union Pacific trains, just like regular freight, with smaller equipment being moved by truck. The Oregon Pacific typically maintains motive power and other equipment at each operation to minimize the need to move equipment between the two railroad branches.

For much of its life, the East Portland Line was double track from the East Portland Yard to the Milwaukee Industrial Park. In the 1960s, the eastern line was removed and the Oregon Pacific Railroad operated the western single track. By the late 1990s, Metro and the Oregon Pacific negotiated a deal, where Metro would be allowed to expand its Springwater trail on part of the Oregon Pacific right of way in exchange for Metro covering a significant portion of the cost of redoing and upgrading part of the East Portland line. This occurred in 1999 and 2000 as the East Portland line was relocated to the eastern right of way and upgraded. The western right of way was rebuilt as a paved trail and opened to the public in 2003.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: near Kellogg Lake and E. Lake Road
City and County: Milwaukie, Clackamas County
Property or Project Name, if applicable: Tillamook Line of the UP RR trestle, Portland Milwaukie Light Rail

<table>
<thead>
<tr>
<th>Owner:</th>
<th>□ Private</th>
<th>□ Local Gov</th>
<th>□ State Gov</th>
<th>□ Federal Gov</th>
<th>□ Other</th>
</tr>
</thead>
</table>

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures? □ YES □ NO - If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC

| □ YES - Individually | □ YES - In a district | □ DON'T KNOW |

Is the property over 50 years old? □ YES □ NO □ DON'T KNOW

Construction date: 1900 ☑ Check box if date is estimated

| Roof Type(s) and Material(s): | NA |
| Window Type(s) and Material(s): | NA |

Siding Type(s) and Material(s): NA

Has the property been physically altered or changed? □ No Changes □ Few Changes □ Major / Many Changes

Skip if property is listed in the National Register

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

Eligibility is based on age (50 years or older) and integrity (retention of historic building features), the minimum qualifications for listing in the National Register. If choosing to contest the eligibility of a property the applicant must demonstrate that the property is not eligible for the National Register using the Criteria listed in National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation."

☒ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already HISTORIC (Listed in the National Register of Historic Places)

☐ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

☒ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

☐ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: ☑ Concur with the eligibility determination above.
☐ Do not concur with the eligibility determination above.

Effect: ☑ Concur with the effect determination above.
☐ Do not concur with the effect determination above.

Signed: [Signature]
Date: 7/7/2010
Comments:
The trestle was constructed in circa 1900 and has been repaired and maintained over the years but is generally remains as built.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

The project requires the use of railroad right of way, and would build a structure parallel and on the east side of the trestle, but does not physically alter the trestle. The new light rail bridge would be approximately 6 feet high higher than the trestle and make it less visible for people to view from the east side, but it would make it more visible to the passengers riding the light rail and in the station area to the north. Vehicle traffic southbound on McLoughlin Boulevard will still have a good view of the trestle.

The main aspects of integrity important to understanding the historic significance of the trestle are: Location (not being changed), Design (not being changed), Materials (not being changed), workmanship (not being changed), and association (not being changed). While some views of the trestle would be altered, the visual characteristics are less important to the historic significance of the trestle.

Historic setting of the trestle:

- **Topography.** The trestle crosses from a bluff overlooking Kellogg Creek/Lake to a hill to the south side of McLoughlin Boulevard. The function and design considerations were influenced by the need to cross over the lake and maintain railroad grades to continue to the south. The project is not changing the topographic setting.
- **Design features, including Relationship to open space or nearby public viewpoints, and settings influence on Design:** The trestle was designed for a rural area to the north of the established town, and was not a densely developed area during historic period. Open spaces or the planned park nearby is not a factor of setting that is particularly important to understanding the trestle’s historic importance to railroading or community development. The trestle’s design is unlikely to have been influenced by visual or aesthetic aspects of the local setting, as there are no apparent design elements such as curves or aesthetic design features that are not typical of a wooden trestle, indicating that the setting was important to the RR function, aesthetics.
- **Design materials.** The crossing is accomplished through the use of standard trestle materials/design of the period, and will not be affected. The design materials do not appear to be uniquely affected by the setting required.
- **Subsequent park development may have taken into consideration the trestle, but not the other way around.** The subsequent development probably changed the vegetation, not the RR.

Setting is therefore not a significant character defining element for making the trestle eligible for the NRHP or for understanding the historic significance of the structure. Topography, design features and design materials are the most important and are not being changed. The project would therefore not have an adverse effect to that topographical aspect of integrity under 106.

**REQUIRED**

- 3 – 4, color, 4 x 5 photographs of the subject property, digital or print.
  One photo is sufficient for vacant property

**AS NEEDED**

- Project area map, for projects including more than one tax lot

  Additional drawings, reports, or other relevant materials

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: Federal Transit Administration

Contact Name and Title: __________________________________________

Street Address, City, Zip: ________________________________________

Phone: __________________________ Email: __________________________

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301
Looking southwest at the Tillamook Line of the Union Pacific Railroad trestle over Kellogg Lake.
Tillamook Line of the Union Pacific Railroad trestle.
OREGON SHPO CLEARANCE FORM Revised

SECTION 1: PROPERTY INFORMATION | SHPO Case Number: 07 2748

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653.
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: 7605 SE McLoughlin Blvd

City and County: Milwaukie, Multnomah County

Property or Project Name, if applicable: Westmoreland Park Historic District, Portland - Milwaukie Light Rail Project

Owner: □ Private □ Local Gov □ State Gov □ Federal Gov □ Other

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures? □ YES □ NO – If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC: □ YES – Individually □ YES – In a district □ NO

Is the property over 50 years old? □ YES □ NO □ DON’T KNOW

Skip if property is listed in the National Register: Construction date: 1937 -39 □ Check box if date is estimated

Roof Type(s) and Material(s): NA

Window Type(s) and Material(s): NA

Siding Type(s) and Material(s): NA

Has the property been physically altered or changed? □ No Changes □ Few Changes □ Major / Many Changes

Skip if property is listed in the National Register

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

Eligibility is based on age (50 years or older) and integrity (retention of historic building features), the minimum qualifications for listing in the National Register. If choosing to contest the eligibility of a property the applicant must demonstrate that the property is not eligible for the National Register using the Criteria listed in National Register Bulletin 15, “How to Apply the National Register Criteria for Evaluation.”

□ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already HISTORIC (Listed in the National Register of Historic Places)

□ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

□ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

□ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

□ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: □ Concur with the eligibility determination above.

□ Do not concur with the eligibility determination above.

Effect: □ Concur with the effect determination above.

□ Do not concur with the effect determination above.

Signed: [Signature]

Date: [Date]

Comments:
SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

Westmoreland Park constructed in 1936-39 and was determined eligible for the National Register of Historic Places (NRHP) in 1998 as a Historic District. The park has been changed and updated over the years to accommodate recreational needs but is considered NRHP-eligible for its contribution as a major recreational facility in Portland built as a Works Progress Administration (WPA) project. It is also considered significant as a designed historic landscape. For more detailed historic discussion of the park history refer to Westmoreland Park Finding of Effect Addendum.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

The project would convert the Duck Pond into a wetland and habitat mitigation site changing it from man-mad pond into a riparian wetland. The visual change from pond to riparian wetland was determined an adverse effect by the SHPO for a similar project proposed by the City of Portland and the Army Corps of Engineers in 2003 because it would alter the historic landscaping of the Westmoreland Park Historic District.

To convert the pond, the concrete liner of the Duck Pond, which was added in 1952, would be removed, fill would be placed in the pond, and vegetation would be planted on the fill to establish the riparian zone; in addition, concrete panels along Crystal Springs shoreline, which were likely added in the 1950s, would be removed and reshaped into a desirable slope and planted with native plants.

The alteration to the park would be in keeping with the recreational capacity of the park and not alter any other contributing resources in the park. Although converting the Duck Pond into a riparian area would alter the original design of the park, a significant water feature will remain as a contributing element of the park with the added positive effect of enhancing the water flow through the park so that native fish could return to the water source. Refer to the Westmoreland Park Finding of Effect Addendum for a draft version of the proposed park changes.

The park would remain eligible for the NRHP as a significant WPA recreation facility in Portland.

**REQUIRED**
- ☑ 3 – 4, color, 4 x 5 photographs of the subject property, digital or print.
  - One photo is sufficient for vacant property

**AS NEEDED**
- ☑ Project area map, for projects including more than one tax lot
- ☑ Additional drawings, reports, or other relevant materials

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: Federal Transit Administration Region X

Contact Name and Title: Linda Gehrke, Deputy Regional Administrator

Street Address, City, Zip: 915 Second Ave, Room 3142 Seattle, WA 98174

Phone: 206-220-4463  Email: linda.gehrke@FTA.dot.gov

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301
Map of Westmoreland Park.
Westmoreland Park, located between SE Bybee Blvd. (north), McLoughlin Blvd. (east), SE Nehalem St (south) and SE 22 Avenue (west). Eastmoreland Golf Course is located on the east side of McLoughlin Blvd.
Looking north at the Duck Pond.
February 1, 2010

Mr. Steve Poyer, Ph.D.
Review and Compliance Specialist
Oregon Parks and Recreation Dept
State Historic Preservation Office
725 Summer St NE, Suite C
Salem OR 97301

Re: Portland–Milwaukie Light Rail FEIS – Historic Built Environment Analysis
   SHPO Case # 07-2748

Dear Mr. Poyer:

Thank you for taking time to meet with us on January 25, 2010 to talk about the Milwaukie Light Rail Project. As discussed, we are continuing efforts that were initiated with the 2008 Portland–Milwaukie Light Rail SDEIS which included the efforts conducted for the 2002 South Corridor Supplemental Draft Environmental Impact Statement (SDEIS) and the 1998 South-North Transit Corridor Project Draft Environmental Impact Statement (DEIS).

You reviewed the Portland-Milwaukie Light Rail Project SHPO database submitted for the SDEIS in March 2008 and concurred with the eligibility and effect findings. You then reviewed the Section 106 forms we submitted on December 15, 2009 and generally agreed with our findings. However, in our discussion on January 25, 2010, we revealed our recent discovery of noise and vibration impacts on some historic properties. In order to fully disclose those impacts, we are submitting for your review five new and/or revised individual SHPO Concurrence Forms to provide additional information about the project effects for the following properties:

1. 1635 SE Rhone: The Final EIS assessment of Noise and Vibration indicates that this residence would have traffic noise impacts that require mitigation. (T15 on Map)
2. 2405 SE Harrison: The Final EIS assessment of Noise and Vibration indicates that this residence would have light rail noise impacts that require mitigation. (R33 on Map)
3. 2326 SE Monroe: The Final EIS assessment of Noise and Vibration indicates that this residence would have light rail noise and vibration impacts that require mitigation. (R37 on Map)
4. 2313 SE Wren Street: The Final EIS assessment of Noise and Vibration indicates that this residence would have light rail noise impacts that require mitigation. (R 43 on Map)
5. 2206 SE Washington Street: The Final EIS assessment of Noise and Vibration indicates that this residence would have vibration impacts that require mitigation. ($11 on Map)

In addition, as you requested, we compiled additional historical information about the property at 7605 SE McLoughlin Blvd., West Moreland Park. We are submitting a revised, more inclusive form on that property.

We request your concurrence by February 5, 2010.

Thank you for your consideration of this information. We look forward to receiving your comments.

Sincerely,

[Signature]
Linda Gehrke
Deputy Regional Administrator

cc: Steve Saxton, FTA
    Bridget Wieghart, Metro
    Dave Unsworth, TriMet
# OREGON SHPO CLEARANCE FORM

## SECTION 1: PROPERTY INFORMATION

| SHPO Case Number: 07 2748 |

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653. Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Street Address: 1635 SE Rhone Street # 2 revised

City and County: Portland, Multnomah Co.

Property or Project Name, if applicable: Portland Milwaukie Light Rail

Owner: [x] Private  [ ] Local Gov  [ ] State Gov  [ ] Federal Gov  [ ] Other

**If there is not a street address, include the Township, Range, and Section, cross streets, or other address description**

Are there one or more buildings or structures?  [x] YES  [ ] NO – If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC  [x] YES  [ ] NO  [ ] DON'T KNOW

Is the property over 50 years old?  [x] YES  [ ] NO  [ ] DON'T KNOW

**Skip if property is listed in the National Register**

Construction Date: 1926  [x] Check box if date is estimated

Roof Type(s) and Material(s): side gable  
Window Type(s) and Material(s): double hung wood

Siding Type(s) and Material(s): shingles

Has the property been physically altered or changed?  [ ] No Changes  [x] Few Changes  [ ] Major / Many Changes

**SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY** - Check the appropriate box

- The property **IS ELIGIBLE** for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already **HISTORIC** (Listed in the National Register of Historic Places)

- The property **IS NOT ELIGIBLE** for listing in the National Register because it is not yet 50 years old, or it is 50 years old but many / major changes have been made.

**Be sure to describe these changes in Section 4 for buildings that are at least 50 years old.**

**SECTION 3: APPLICANT DETERMINATION OF EFFECT** - Check the appropriate box

- The project has **NO EFFECT** on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

- The project will have only a minor impact on the historic property, therefore there is **NO ADVERSE EFFECT** to the historic property. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

- The project will have a major impact on the historic property, therefore there is an **ADVERSE EFFECT** to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, additions, etc.

## STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

**Eligibility:**  [ ] Concur with the eligibility determination above.  [ ] Do not concur with the eligibility determination above.

**Effect:**  [x] Concur with the effect determination above.  [ ] Do not concur with the effect determination above.

Signed: [Signature]

Date: 2/5/10

Comments:
SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

The residence at 1635 SE Rhone was determined eligible for the NRHP under Criteria C. Constructed in circa 1926, this wood frame residence is architecturally significant as a good example of a shingled side facing gable roof Craftsman Bungalow with small gable roof porch and as a contributing historic resource in the Brooklyn Neighborhood because it has integrity of design, materials and workmanship of a small Bungalow.

The residence has a sky light on the roof, some porch remodel and doors have been replaced on the side basement entrance to the building.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

A small amount of right of way will be required from the side yard of the property. The acquisition was determined to be an effect but not adverse because it would not effect the residence only a small strip acquisition on the 17th Avenue side of the building. The light rail project will reconstruct SE 17th Street to include light rail in a center median and reconstruction of the sidewalk immediately adjacent to the parcel. This could alter or remove existing vegetation on edge of the parcel and require a one to two foot high retaining wall at its southwest corner. Replacement landscaping would be provided. A commercial building across the street would be removed and would be replaced by a widened SE 17th Street with a 14 foot sidewalk and landscaped median with street trees.

New information obtained by the Noise and Vibration Technical Report indicate that the residence at 1635 SE Rhone would have some noise impacts. The report states that there would be no light rail noise impact but that there would be a Traffic Noise impact to 1635 SE Rhone. The current noise level would be increased to a 67 and 69 the FTA impact criterion is at 85 for a significant impact which requires mitigation. During Final Design, further testing will be conducted to better understand the noise loss due to existing windows on the north, east and south facing windows and doors. The mitigation proposed for the noise impact would be to add replace windows and potentially doors to the house on the affected sides. The proposed noise mitigation would reduce the noise impacts and reduce the traffic noise to the one dBA lower than the existing level, thus eliminating the impact. This building would also be impacted by train vibration. During Final Design, the project will conduct detailed testing to determine if mitigation is warranted. Mitigation would consist of a ballast mat underneath the tracks and would not affect the structure.

The project would have "no adverse effect" on the house at 1635 SE Rhone but, because replacing windows on the historic building would have an effect on the house, and replacing windows could result in an adverse effect if done inappropriately, the MOA will include a stipulation that requires that the sound mitigation measures meet the Secretary of the Interior's Standards for Rehabilitation for replacing windows on a historic building to avoid an adverse effect.

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: Federal Transit Administration Region X
Contact Name and Title: Linda Gerhke, Deputy Regional Administrator
Street Address, City, Zip: 915 Second Ave, Room 3142 Seattle, WA 98174
Phone: 206-220-4463 Email: linda.gehrke@fta.dot.gov

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem OR, 97301
OREGON SHPO CLEARANCE FORM

Aerial view of 1635 SE. Rhone St.

View of front façade of 1635 SE Rhone St.

Area where ROW will be acquired
17th Avenue side of 1635 SE. Rhone. Showing the proximity of the street and sidewalk to the side yard.

View of the 17th Ave. side of SE 1625 Rhone St. showing proximity of the house to the existing sidewalk and the windows that would be replaced.
View of corner of Rhone and SE 17th Ave. showing sidewalk area.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

<table>
<thead>
<tr>
<th>Address: 2326 SE Monroe, Milwaukie Oregon</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property or Project Name, if applicable: Portland – Milwaukie Light Rail Project</td>
</tr>
</tbody>
</table>

| Owner: ☒ Private     ☐ Local Gov ☐ State Gov ☐ Federal Gov ☐ Other |

If no street address, include Township, Range, and Section, cross streets, or other address description.

| Are there one or more buildings or structures? ☐ YES ☒ NO, If no, skip to Section 4 and append photo |

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC.

| ☐ YES - Individually ☐ YES – In a district Skip to Section 2 if listed |
| ☒ NO ☐ DON’T KNOW |

| Is the property over 50 years old? ☒ YES ☐ NO ☐ DON’T KNOW |
| Construction date: 1928 |
| Check box if date is estimated |

| Has the property been physically altered or changed? ☐ No Changes ☒ Few Changes ☐ Major / Many Changes |

Describe the existing alterations (including replacement siding or windows). Attach additional sheets or drawings as needed.

No major alterations.

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

| ☒ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already LISTED IN THE NATIONAL REGISTER OF HISTORIC PLACES. |

| ☐ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old and / or major / many changes have been made. Be sure to describe these changes in Section 1 - use additional sheets if needed. |

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

| ☐ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually. |

| ☒ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, not all, siding or windows, new vents, etc. |

| ☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, etc. |

STATE HISTORIC PRESERVATION OFFICE COMMENTS - Official use only

| Eligibility: ☒ Concur with the eligibility determination above. |
| ☐ Do not concur with the eligibility determination above. |

| Effect: ☐ Concur with the effect determination above. |
| ☐ Do not concur with the effect determination above. |

Signed: [Signature]

Date: 2/5/2010

Comments:
SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

This house at 2326 SE Monroe Street, built in 1928, is architecturally significant and eligible for the NRHP under Criterion C. The character-defining features of the house include the stucco finish, tile roof and arched openings. It is one of the best remaining examples of a Spanish Revival style residence in Milwaukie. There are no known alterations.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), and other materials as necessary. For vacant lots, please describe the use.

New information obtained by the Noise and Vibration Technical Report indicate that the residence at 2326 SE Monroe, Milwaukie Oregon would have some secondary impacts. The report states that there would be no traffic noise impacts but that there would be Light Rail noise and vibration impacts. The noise impact brings the noise level up to a level that requires mitigation based on FTA impact criterion. During Final Design, the transmission loss of the existing windows and doors will be tested to determine if they need to be replaced. The mitigation proposed for the noise impact would be to replace existing windows on the front facade (west) and possibly the north side facing Monroe Street with sound insulating windows. The proposed noise mitigation would reduce the noise impacts to acceptable levels for a residence. During Final Design, further testing will be conducted for potential vibration impacts, The potential vibration impacts will be addressed by track and ballast treatments built into the project to eliminate the impact resulting in “no adverse effect”. The inclusion of vibration mitigation would be located under the tracks and would not affect the building.

Because replacing windows on the historic building would have an effect on the house, and replacing windows could result in an adverse effect if done inappropriately, the MOA will include a stipulation that requires that the sound mitigation measures meet the Secretary of the Interior's Standards for Rehabilitation for replacing windows on a historic building to avoid an adverse effect.

REQUIRED

☒ 3 – 4, color, 4 x 5 photographs of the subject property, digital or print. One photo is sufficient for vacant property

AS NEEDED

☐ Project area map, for projects including more than one tax lot

☐ Additional drawings, reports, or other relevant materials

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: Federal Transit Administration Region X

Contact Name and Title: Linda Gehrke, Deputy Regional Administrator

Address: 915 Second Ave, Room 3142 Seattle, WA 98174

Phone: 206-220-4463 Email: linda.gehrke@fta.dot.gov
Aerial view of 2326 SE Monroe, Milwaukie, Oregon.
View of 2326 SE Monroe showing proximity of front of house to rail tracks.

View of 2326 SE Monroe looking southeast from Monroe showing north and west facades.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Address: 2405 SE Harrison, Milwaukie Oregon

Property or Project Name, if applicable: Portland Milwaukie Light Rail Project

Owner: [ ] Private [ ] Local Gov [ ] State Gov [ ] Federal Gov [ ] Other

If no street address, include Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures? [ ] YES [ ] NO, If no, skip to Section 4 and append photo

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC. [ ] YES - Individually [ ] YES – In a district Skip to Section 2 if listed [ ] NO [ ] DON’T KNOW

Is the property over 50 years old? [ ] YES [ ] NO [ ] DON'T KNOW

Construction date: 1916 [ ] Check box if date is estimated

Has the property been physically altered or changed? [ ] No Changes [ ] Few Changes [ ] Major / Many Changes

Describe the existing alterations (including replacement siding or windows). Attach additional sheets or drawings as needed.

No major alterations.

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

[ ] The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already LISTED IN THE NATIONAL REGISTER OF HISTORIC PLACES.

[ ] The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old and / or major / many changes have been made. Be sure to describe these changes in Section 1 - use additional sheets if needed.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

[ ] The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

[ ] The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, not all, siding or windows, new vents, etc.

[ ] The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: [ ] Concur with the eligibility determination above.

[ ] Do not concur with the eligibility determination above.

Effect: [ ] Concur with the effect determination above.

[ ] Do not concur with the effect determination above.

Signed: [Signature]

Date: 2/5/2010

Comments:
SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

The 1916 one-story Craftsman Bungalow is a good example of its kind in the older Milwaukie area. Architecturally significant, its character-defining features including bracketed eaves, original multi-light double-hung windows, wood shingle siding, and two-part glazed and paneled garage doors. There are no known alterations.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), and other materials as necessary. For vacant lots, please describe the use.

New information developed for the light rail project Final Environmental Impact Statement’s Noise and Vibration evaluation indicate that the residence at 2405 SE Harrison, Milwaukie Oregon would have some noise impacts that would need to be addressed to avoid impacts to the site’s residential use. The project would have light rail noise impacts related to train movements and the use of bells at crossing gates. Without noise reduction treatments, the noise levels would exceed FTA’s impact criteria for residential properties. The project is now including noise reduction measures including a noise wall to be erected along the right of way between light rail and the existing freight rail tracks. The noise wall could be up to 220 feet in length, where a safety wall was already being proposed, and could range in height from 6 to 8 feet depending on the placement relative to the tracks. However, since the project must also provide for adequate sight distance near intersections, the noise wall may need to be shortened, and residential sound insulation involving window replacement and potentially additional insulation for exterior walls could be used for further reduce noise levels to acceptable levels under the FTA criterion.

Placing a noise wall near the historic building but within the existing rail right of way would involve visual change in the area, but would not constitute an adverse effect due to change of setting, since the home will retain its visual and functional connections to the adjacent residential neighborhood along the existing railroad tracks, and to the Milwaukie downtown. The replacement of windows would involve an alteration to the home and could result in an adverse effect if done inappropriately.

The proposed project noise mitigation measures would result in “no adverse effect” but the MOA will include a stipulation that requires that the sound mitigation measures be designed so as to have the least visual and setting impact as possible to retain the character of the historic building to avoid an adverse effect. The MOA will also include a stipulation that requires that the residential sound mitigation measures meet the Secretary of the Interior’s Standards for Rehabilitation for replacing windows or adding insulation to a historic building to avoid an adverse effect.

REQUIRED

☐ 3 – 4, color, 4 x 5 photographs of the subject property, digital or print.
  One photo is sufficient for vacant property

AS NEEDED

☐ Project area map, for projects including more than one tax lot

☐ Additional drawings, reports, or other relevant materials

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: Federal Transit Administration Region X

Contact Name and Title: Linda Gehrke, Deputy Regional Administrator

Address: 915 Second Ave, Room 3142 Seattle, WA 98174

Phone: 206-220-4463 Email: linda.gehrke@fta.dot.gov
View of the front façade of 2405 SE Harrison, Milwaukie Oregon.

Aerial view of 2405 SE Harrison St. and likely location of noise wall.

Existing Railroad alignment

Likely placement of the noise wall between RR right of way and edge of property.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653
Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Address: 2313 SE Wren, Milwaukie Oregon

Property or Project Name, if applicable: Portland Milwaukie Light Rail Project

Owner:  ☒ Private  □ Local Gov  □ State Gov  □ Federal Gov  □ Other

If no street address, include Township, Range, and Section, cross streets, or other address description

Are there one or more buildings or structures?  ☐ YES  ☐ NO, If no, skip to Section 4 and append photo

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC.  ☐ YES - Individually  ☐ YES - In a district Skip to Section 2 if listed  ☐ NO  ☐ DON'T KNOW

Is the property over 50 years old?  ☐ YES  ☐ NO  ☐ DON'T KNOW

Construction date: 1953  ☐ Check box if date is estimated

Has the property been physically altered or changed?  ☐ No Changes  ☒ Few Changes  ☐ Major / Many Changes

Describe the existing alterations (including replacement siding or windows). Attach additional sheets or drawings as needed.

No major alterations.

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

☒ The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already LISTED IN THE NATIONAL REGISTER OF HISTORIC PLACES.

☐ The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old and / or major / many changes have been made. Be sure to describe these changes in Section 1 - use additional sheets if needed.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

☐ The project has NO EFFECT on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

☒ The project will have only a minor impact on the historic property, therefore there is NO ADVERSE EFFECT to the historic property. Minor impacts include replacement of some, not all, siding or windows, new vents, etc.

☐ The project will have a major impact on the historic property, therefore there is an ADVERSE EFFECT to the historic property. Major Impacts include full or partial demolition, complete residing, full window replacement, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility:  ☐ Concur with the eligibility determination above.

☐ Do not concur with the eligibility determination above.

Effect:  ☐ Concur with the effect determination above.

☐ Do not concur with the effect determination above.

Signed:  [Signature]

Comments:  [Comments]

Date:  2/5/2018

Oregon State Historic Preservation Office
Revised 07/2010

Page 1 of 2
SECTION 4: ALTERATIONS

Only complete this section for buildings that are at least 50 years old or older. Describe any material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Attach additional pages as necessary.

Constructed in circa 1953 the house at 2313 Wren is one story wood Ranch style residence features a low hipped roof, horizontal wood windows, brick facing in the entry area and an attached garage. The Ranch style is a uniquely American domestic architectural style. First built in the 1920s, and extremely popular in the United States during the 1940s to 1970s. Ranch style houses typically were one story with a long low roofline with a large overhanging eaves and a rectangular, L-shaped or U-shaped design. It is architecturally significant as a contributing historic resource because it has integrity of design, materials and workmanship.

SECTION 5: PROJECT DESCRIPTION

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), and other materials as necessary. For vacant lots, please describe the use.

New information obtained by the Noise and Vibration Technical Report indicate that the residence at 2313 Wren, Milwaukie Oregon would have some noise impacts. The report states that there would be no Vibration or traffic noise impacts but that there would be a Light Rail noise impact. The impact brings the noise level up to a level that requires mitigation based on FTA impact criterion. The mitigation will include a noise wall to be erected to abate the increased noise level; the location to be determined. The house is located at the top of the tax lot with the back of the lot descending several feet down a slope until it reaches McLoughlin Boulevard. The 6 to 8 foot high noise wall will be located at the bottom of the long slope at the bottom of the property and will be either incorporated into the retaining wall for the slope or along a wall separating the light rail tracks and right of way from the regional trail to be built on the south side of the tracks, in an existing public right of way now owned by Clackamas County. It is anticipated that neither the retaining wall or the noise wall will not obscure territorial views from the house or change the setting of the house and that it would be a “no adverse effect.”

However, placing a noise wall or a retaining wall near a historic building could have a visual effect on the setting of the house so the MOA will include a stipulation that requires that the sound mitigation measure and retaining wall be designed to have the least visual and setting impact as possible to retain the character of the historic building.

REQUIRED

☐ 3 – 4, color, 4 x 5 photographs of the subject property, digital or print.
   One photo is sufficient for vacant property

AS NEEDED

Contact SHPO staff with questions

☐ Project area map, for projects including more than one tax lot

☐ Additional drawings, reports, or other relevant materials

SECTION 6: AGENCY CONTACT INFORMATION

Federal, State, or Local Agency Name: Federal Transit Administration Region X

Contact Name and Title: Linda Gehrke, Deputy Regional Administrator

Address: 915 Second Ave, Room 3142 Seattle, WA 98174

Phone: 206-220-4463 Email: linda.gehrke@fta.dot.gov
View of the front façade of 2313 SE Wren in Milwaukie, Oregon.

Aerial view of 2313 SE Wren showing the area where the sound wall will likely be located.
OREGON SHPO CLEARANCE FORM

SECTION 1: PROPERTY INFORMATION

SHPO Case Number: 07 2748

Use this form for projects subject to Oregon SHPO review under 36 CFR 800 (Section 106) or ORS 358.653. Fill all blanks completely and attach listed items on page 2. Use additional sheets if needed. Do not write in shaded areas.

Address: 2206 SE Washington, Milwaukie Oregon

Property or Project Name, if applicable: **R. Derwey House**, Portland Milwaukie Light Rail Project

Owner:  
[ ] Private  [ ] Local Gov  [ ] State Gov  [ ] Federal Gov  [ ] Other

If no street address, include Township, Range, and Section, cross streets, or other address description:

Are there one or more buildings or structures?  
[ ] YES  [ ] NO, If no, skip to Section 4 and append photo

Is the property listed in the National Register of Historic Places? If yes, the property IS HISTORIC.  
[ ] YES - Individually  [ ] YES – In a district Skip to Section 2 if listed  
[ ] NO  [ ] DON'T KNOW

Is the property over 50 years old?  
[ ] YES  [ ] NO  [ ] DON'T KNOW
Construction date: 1925  
Check box if date is estimated

Has the property been physically altered or changed?  
[ ] No Changes  [ ] Few Changes  [ ] Major / Many Changes

Describe the existing alterations (including replacement siding or windows). Attach additional sheets or drawings as needed. The building has been converted into an office, has an exterior stairway added and some original windows replaced

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

[ ] The property IS ELIGIBLE for listing in the National Register because it is 50 years old and has no or few changes, was determined eligible in a previous study, or is already **LISTED IN THE NATIONAL REGISTER OF HISTORIC PLACES**.

[ ] The property IS NOT ELIGIBLE for listing in the National Register because it is not yet 50 years old and / or major / many changes have been made. Be sure to describe these changes in Section 1 - use additional sheets if needed.

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

[ ] The project has **NO EFFECT** on a historic property, either because there is no eligible historic property involved or the historic property will not be impacted physically or visually.

[ ] The project will have only a minor impact on the historic property, therefore there is **NO ADVERSE EFFECT** to the historic property. Minor impacts include replacement of some, not all, siding or windows, new vents, etc.

[ ] The project will have a major impact on the historic property, therefore there is an **ADVERSE EFFECT** to the historic property. Major impacts include full or partial demolition, complete residing, full window replacement, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility:

[ ] Concur with the eligibility determination above.
[ ] Do not concur with the eligibility determination above.

Effect:

[ ] Concur with the effect determination above.
[ ] Do not concur with the effect determination above.

Signed:  
[Signature]

Comments:
[Signature]

Date: 2/5/2010

Oregon State Historic Preservation Office
Revised 01/2010
**SECTION 4: ALTERATIONS**

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), and other materials as necessary. For vacant lots, please describe the use.

Constructed in circa 1925 the house at 2206 SE Washington is architectural significant as the best known example of a Dutch Colonial style building in Milwaukie. This two-and-one-half story Dutch Colonial style house was built for a well-known Milwaukie jeweler and watchmaker named R. Derwey.

**SECTION 5: PROJECT DESCRIPTION**

Describe what work will be done, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

An effect to this building was identified in Locally Preferred Alternative (LPA) to Park Avenue and the MOS to Lake Alternative in the FEIS. That effect was caused by the acquisition of land along the west side to within approximately 10 feet of the historic house causing a visual impact and regarded as an “adverse effect”.

Further analysis conducted for the light rail project’s Final EIS assessment of Noise and Vibration indicate that the residence at 2206 Washington, Milwaukie Oregon would have vibration impacts if no additional impact minimization measures are provided. The project applied a residential impact standard, which is more conservative; even though the house’s current use is for a business. The project will conduct further testing during Final Design and if still found to be an impact, would incorporate vibration dampening measures for the track and ballast along the light rail line, eliminating the potential for the level of vibration that would constitute an impact. These measures would not constitute a visual change to setting, beyond the alterations previously identified for the light rail project.

Although the project will have “no adverse effect” to the house, to mitigate for the right of way acquisition on the west side of the house at 2206 SE Washington in Milwaukie, the MOA will include a stipulation that mature landscaping will be added to the side of the property near the new light rail to mitigate the setting visual affect caused by the removal of trees and landscaping and removal of a shed on the property’s sideyard.

---

**REQUIRED**

- 3 – 4, color, 4 x 5 photographs of the subject property, digital or print.
- One photo is sufficient for vacant property

**AS NEEDED**

- Project area map, for projects including more than one tax lot
- Additional drawings, reports, or other relevant materials

Contact SHPO staff with questions

**SECTION 6: AGENCY CONTACT INFORMATION**

Federal, State, or Local Agency Name: Federal Transit Administration Region X

Contact Name and Title: Linda Gehrke, Deputy Regional Administrator

Address: 915 Second Ave, Room 3142 Seattle, WA 98174

Phone: 915 Second Ave, Room 3142 Seattle, WA 98174 Email: linda.gehrke@fta.dot.gov

---

Oregon State Historic Preservation Office Revised 01/ 2010 Page 2 of 2
Aerial View of 2206 SE Washington showing where the vibration mitigation will likely occur within the yellow boundary.

View of the front façade of 2206 SE Washington.
<table>
<thead>
<tr>
<th>Map ID</th>
<th>Site Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>525 SW JACKSON ST</td>
</tr>
<tr>
<td>2</td>
<td>614 SW JACKSON ST</td>
</tr>
<tr>
<td>3</td>
<td>2001-2011 SW 6TH AVE</td>
</tr>
<tr>
<td>4</td>
<td>2321 SW HAWTHORNE BLVD</td>
</tr>
<tr>
<td>5</td>
<td>500 SE CARUTHES</td>
</tr>
<tr>
<td>6</td>
<td>1200 SW 1ST AVE</td>
</tr>
<tr>
<td>7</td>
<td>2008 SW GRAND AVE</td>
</tr>
<tr>
<td>8</td>
<td>3320 SE GRAND AVE</td>
</tr>
<tr>
<td>9</td>
<td>1600 SE ASHLEY ST</td>
</tr>
<tr>
<td>10</td>
<td>7200 SW POINSETT BLVD</td>
</tr>
<tr>
<td>11</td>
<td>2011 SW MOSSY AVE</td>
</tr>
<tr>
<td>12</td>
<td>460 SW KENWORTH ST</td>
</tr>
<tr>
<td>13</td>
<td>1200 SW 16TH AVE</td>
</tr>
<tr>
<td>14</td>
<td>601-607 SW 16TH AVE</td>
</tr>
<tr>
<td>15</td>
<td>606 SW 16TH AVE</td>
</tr>
<tr>
<td>16</td>
<td>2021-2027 SW 6TH AVE</td>
</tr>
<tr>
<td>17</td>
<td>2000-2208 SE 16TH AVE</td>
</tr>
<tr>
<td>18</td>
<td>2000 SW 1ST AVE</td>
</tr>
<tr>
<td>19</td>
<td>2032 SW 5TH AVE</td>
</tr>
<tr>
<td>20</td>
<td>2320 SE GRAND AVE</td>
</tr>
<tr>
<td>21</td>
<td>2230 E/ SE GRAND AVE</td>
</tr>
<tr>
<td>22</td>
<td>619-627 SE DIVISION PL</td>
</tr>
<tr>
<td>23</td>
<td>1246 SE CLINTON ST</td>
</tr>
<tr>
<td>24</td>
<td>1509 SE POWELL BLVD</td>
</tr>
<tr>
<td>25</td>
<td>3121 SW MOODY AVE</td>
</tr>
<tr>
<td>26</td>
<td>1735 SE FRANKLIN ST</td>
</tr>
<tr>
<td>27</td>
<td>3302 SE 16TH AVE</td>
</tr>
<tr>
<td>28</td>
<td>3325 SW MOODY AVE</td>
</tr>
<tr>
<td>29</td>
<td>3314-3318 SE 16TH AVE</td>
</tr>
<tr>
<td>30</td>
<td>1720 SE FRANKLIN ST</td>
</tr>
<tr>
<td>31</td>
<td>3330 SE 16TH AVE</td>
</tr>
<tr>
<td>32</td>
<td>3338 SE 16TH AVE</td>
</tr>
<tr>
<td>33</td>
<td>3625 SE 17TH AVE</td>
</tr>
<tr>
<td>34</td>
<td>1625 SE RHONE ST</td>
</tr>
<tr>
<td>35</td>
<td>1635 SE RHONE ST</td>
</tr>
<tr>
<td>36</td>
<td>4038 SE 16TH AVE</td>
</tr>
<tr>
<td>37</td>
<td>4244 SE 16TH AVE</td>
</tr>
<tr>
<td>38</td>
<td>4326 SE 16TH AVE</td>
</tr>
<tr>
<td>39</td>
<td>4414 SE 16TH AVE</td>
</tr>
<tr>
<td>40</td>
<td>4806 SE 16TH AVE</td>
</tr>
<tr>
<td>41</td>
<td>4816 SE 16TH AVE</td>
</tr>
<tr>
<td>42</td>
<td>4904 SE 16TH AVE</td>
</tr>
<tr>
<td>43</td>
<td>4915 SE 17TH AVE</td>
</tr>
<tr>
<td>44</td>
<td>4914 SE 16TH AVE</td>
</tr>
<tr>
<td>45</td>
<td>3236 SE JOHNSON CREEK BLVD</td>
</tr>
<tr>
<td>46</td>
<td>4905 SE HARRIMAN BLVD</td>
</tr>
<tr>
<td>47</td>
<td>2313 SE WREN ST</td>
</tr>
<tr>
<td>48</td>
<td>2315 SE WREN ST</td>
</tr>
<tr>
<td>49</td>
<td>2320 SE WREN ST</td>
</tr>
<tr>
<td>50</td>
<td>2316 SE WREN ST</td>
</tr>
<tr>
<td>51</td>
<td>12302 SE 26TH AVE</td>
</tr>
<tr>
<td>52</td>
<td>12320 SE 25TH AVE</td>
</tr>
<tr>
<td>53</td>
<td>2625 SE LARK ST</td>
</tr>
<tr>
<td>54</td>
<td>2525 SE RIVER RD</td>
</tr>
<tr>
<td>55</td>
<td>2535 SE RIVER RD</td>
</tr>
<tr>
<td>56</td>
<td>2606 SE RIVER RD</td>
</tr>
<tr>
<td>57</td>
<td>2607 SE MONROE ST</td>
</tr>
<tr>
<td>58</td>
<td>2606 SE MONROE ST</td>
</tr>
<tr>
<td>59</td>
<td>2605 SE MONROE ST</td>
</tr>
<tr>
<td>60</td>
<td>2607 SE MONROE ST</td>
</tr>
<tr>
<td>61</td>
<td>2606 SE MONROE ST</td>
</tr>
<tr>
<td>62</td>
<td>2607 SE MONROE ST</td>
</tr>
<tr>
<td>63</td>
<td>2608 SE 27TH AVE</td>
</tr>
<tr>
<td>64</td>
<td>2609 SE 27TH AVE</td>
</tr>
<tr>
<td>65</td>
<td>2610 SE 27TH AVE</td>
</tr>
</tbody>
</table>
Historic Resources Identified in the Revised APE for SHPO Section 106 Database, Portland-Milwaukie Light Rail 2

Portland-Milwaukie Light Rail 2 Database Map
Milwaukie, Oregon

Map ID | Site Address
--- | ---
1 | 525 SW JACKSON ST
2 | 614 SW JACKSON ST
3 | 2001-2011 SW 6TH AVE
4 | 2021-2027 SW 6TH AVE
5 | 300 SE CARUTHERS
6 | 2000 SW 1ST AVE
7 | 2032 SW 5TH AVE
8 | 2320 SE GRAND AVE
9 | 2230 E/ SE GRAND AVE
10 | 619-627 SE DIVISION PL
11 | 1246 SE CLINTON ST
12 | 1509 SE POWELL BLVD
13 | 3121 SW MOODY AVE
14 | 1735 SE FRANKLIN ST
15 | 3302 SE 16TH AVE
16 | 1625 SE RHONE ST
17 | 1635 SE RHONE ST
18 | 4038 SE 16TH AVE
19 | 4244 SE 16TH AVE
20 | 4326 SE 16TH AVE
21 | 4414 SE 16TH AVE
22 | 1639 SE HOLGATE BLVD
23 | 1528 SE HOLGATE BLVD
24 | 1534 SE HOLGATE BLVD
25 | 1624 SE PARDEE ST
26 | 4806 SE 16TH AVE
27 | 4816 SE 16TH AVE
28 | 4904 SE 16TH AVE
29 | 4915 SE 17TH AVE
30 | 4914 SE 16TH AVE
31 | 3236 SE JOHNSON CREEK BLVD
32 | 2525 SE HARRISON ST
33 | 2607 SE MONROE ST
34 | 2535 SE MONROE ST
35 | 2606 SE MONROE ST
36 | 12025 SE RIVER RD
37 | 12108 SE RIVER RD
38 | 2313 SE WREN ST
39 | 2311 SE WREN ST
40 | 2315 SE WREN ST
41 | 2320 SE WREN ST
42 | 12302 SE 26TH AVE
43 | 12320 SE 25TH AVE
44 | 12512 SE 27TH AVE
45 | 12566 SE 27TH AVE
46 | 12715 SE OATFIELD RD
47 | 2975 SE PARK AVE
48 | 12726 SE OATFIELD RD
49 | 2616 SE PARK AVE
50 | 12810 SE OATFIELD RD
51 | 12811 SE OATFIELD RD
52 | 12876 SE OATFIELD RD
53 | 12905 SE OATFIELD RD
54 | 13003 SE OATFIELD RD
55 | 13121 SE MCGLOUGHLIN BLVD

Portland-Milwaukie LRT Footprint

Scale in Feet

Date: 12/4/2009  File: Mil_LRT_Base_Section_106.mxd
APPENDIX D – MEMORANDUM OF AGREEMENT
MEMORANDUM OF AGREEMENT

AMONG
THE FEDERAL TRANSIT ADMINISTRATION, 
TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT (TRIMET), AND OREGON STATE 
HISTORIC PRESERVATION OFFICE (SHPO)

IMPLEMENTING 
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT

REGARDING THE PORTLAND-MILWAUKIE LIGHT RAIL PROJECT

RECITALS:

By the authority granted in ORS 190.110 and 283.110, state agencies may enter into agreements with units of local government or others state agencies for the performance of any or all functions and activities that a party to the agreement, its officers, or agents have the authority to perform.

By the authority granted in ORS 366.558, the State of Oregon may enter into cooperative agreements with the United States Federal Government for the performance of work on projects with the allocation of costs on terms and conditions and

WHEREAS the Portland-Milwaukie Light Rail project (Project) involves the development of light rail extending from Portland, Oregon, to the City of Milwaukie and north Clackamas County, and includes a new Willamette River Bridge and other facilities needed in support of the light rail system; and

WHEREAS the Project has involved the preparation of Draft, Supplemental and Final Environmental Impact Statements (DEIS, SDEIS and FEIS), in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 et seq.), as amended, and pursuant to 23 Code of Federal Regulations (CFR) Part 771, for the development of light rail extending from Portland, Oregon, to the City of Milwaukie and north Clackamas County, and including a new Willamette River Bridge and other facilities needed in support of the light rail system; and

WHEREAS the Federal Transit Administration (FTA) is the NEPA lead agency for the Portland-Milwaukie Light Rail Project, located in Multnomah and Clackamas Counties, Oregon, with Metro and TriMet as local lead agencies; and

WHEREAS, FTA has determined that the Project is an undertaking, as defined in 36 CFR § 800.16(y), subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470f and its implementing regulations, 36 CFR § 800; and

WHEREAS, FTA has determined that construction and operation of the Project will result in effects to historic properties and has consulted with the Oregon State Historic
Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP) pursuant to 36 CFR Parts 800.6 and 800.14; and

WHEREAS, “Signatories” means the required and invited signatories (FTA, Oregon SHPO, TriMet); “Concurring Parties” means Consulting Parties that have signed this Memorandum of Agreement (Agreement); and “Consulting Parties” means Signatories, Concurring Parties, all interested and affected tribes, and other interested parties consulted on the Project, regardless of whether they agreed to sign the Agreement; and

WHEREAS, the Federal Transit Administration and the Oregon SHPO have agreed to be signatory parties to this Agreement; and

WHEREAS, federally recognized tribes including the Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of the Siletz Indians, Confederated Tribes of the Warm Springs Reservation of Oregon, and Cowlitz Indian Tribe, and a non-federally recognized tribe, the Chinook Indian Tribe, have been consulted early in and throughout the Section 106 process and regarding this Agreement and invited to concur in the Agreement; and

WHEREAS, FTA has consulted with the above-listed Indian tribes for which the Area of Potential Effect (APE) has cultural significance, and have invited the tribes to sign this Agreement as concurring parties; and

WHEREAS, FTA in consultation with the Oregon SHPO and the interested tribes have defined the undertaking’s APE in accordance with 36 CFR 800.16(d) to cover all construction or operation activities associated with the undertaking as well as those areas needed for wetland mitigation, stormwater facilities, staging and casting yards; and

WHEREAS, the FTA, in conjunction with Metro and TriMet, and in consultation with the Oregon SHPO, conducted cultural resource studies in accordance with 36 CFR 800 as part of project planning and the preparation of the FEIS to identify and evaluate historic properties, which are resources listed on or eligible for listing in the National Register of Historic Places (National Register), that are located within the APE; including archaeological surveys to facilitate archaeological site evaluation and assessment of effects in the area where ground-disturbing activities might affect archaeological historic properties; and inventory, evaluation and assessment of effects to historic buildings and structures that are historic properties identified within the areas of potential effects; and

WHEREAS, research investigations for the FEIS, employing professional techniques defined in a research design agreed to by Oregon SHPO, determined the likely presence of archaeological historic properties and outlined their potential character (predictive assessment), providing reasonable estimates of the potential adverse effects (e.g., likelihood that potential resources would need to be protected in place, and that opportunities exist to avoid, minimize and/or mitigate impacts); and

WHEREAS, access to conduct archaeological investigations necessary to discover potential buried historic properties is restricted in portions of the Project due to the actively and intensively used urban landscapes, such as roadways, sidewalks, existing buildings, and parking lots, and conducting archaeological subsurface excavations in these areas is practically and logistically problematic or prevented; and
WHEREAS, some private properties within the direct effect area of the APE have not been surveyed due to access restrictions or are occupied by existing structures; and

WHEREAS execution and implementation of this Agreement satisfies the responsibilities the National Historic Preservation Act Section 106 process, as codified in 36 CFR 800 Subpart B; and

WHEREAS, FTA and the Oregon SHPO have agreed that the undertaking will have an adverse effect upon three historic properties and FTA has consulted with the Oregon SHPO in accordance with Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) and its implementing regulations (36 CFR 800) to mitigate the Adverse Effect on these properties; and

WHEREAS, FTA has determined, and SHPO has concurred, that the undertaking will have no adverse effect upon certain other historic properties, as outlined in the FEIS and associated technical reports; and

WHEREAS, Metro and TriMet have participated in the consultation with tribes; and other information gathering has not identified any Traditional Cultural Properties in the Project area; and

WHEREAS, while background research and related archaeological investigations have not identified human remains in the APE, an Inadvertent Discovery Plan to address the potential discovery of human remains during construction has been negotiated among signatories and consulting parties and is in place for the Project; and

WHEREAS, in accordance with 36 CFR 800.6(a) (1), FTA has notified the ACHP of its adverse effect determination and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR 800.6(a) (1) (iii); and

WHEREAS, pursuant to 36 CFR 800.4(b)(2), 800.5(a)(3) and 800.6(c)(6), and because access to some areas is practically and logistically restricted due to factors such as property-owner consent, the presence of buildings, or due to the active use of roads that prevent or preclude full identification and evaluation of archaeological resources that may be historic properties prior to the approval of the undertaking, FTA, Metro, TriMet, and the Oregon SHPO, in consultation with consulting parties and the ACHP, have chosen to implement a phased process and have developed procedures in this Agreement to ensure that the identification and evaluation of archaeological historic properties, assessment of effects, and development of treatment and mitigation plans for unforeseen effects to properties discovered during implementation of the undertaking are properly coordinated with all phases of the design, construction, and operation of the undertaking; and

WHEREAS, in accordance with 36 CFR 800.2(d)(3), FTA used procedures under the NEPA and NHPA to involve the public in the undertaking and solicit their views on historic properties and has distributed the SDEIS and FEIS to appropriate state and federal agencies as well as other stakeholders, partners, and the public; and
WHEREAS, pursuant to 36 CFR 800.13, FTA, TriMet, the Oregon SHPO and the ACHP have developed procedures in this Agreement to ensure that the identification and evaluation of historic properties, assessment of effects, and development of treatment and mitigation plans for unforeseen effects to previously identified historic properties and/or properties discovered during implementation of the undertaking are properly coordinated with all phases of the design and construction of the undertaking; and

WHEREAS, the FTA will issue a Record of Decision (ROD) following the publication of the FEIS issued by the FTA, anticipated in Spring/Summer 2010; and

NOW, THEREFORE, FTA, TriMet and Oregon SHPO agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

-STIPULATIONS-

FTA, in cooperation with Metro and TriMet, will ensure that the following measures are carried out:

I. GENERAL REQUIREMENTS

A. As a condition of the award of any assistance under the Federal-Aid Highway and the New Starts 5309 Programs, FTA shall require that Metro and TriMet carry out the requirements of this Agreement, and all applicable laws.

B. Signatories and Consulting Parties shall keep sensitive cultural resources information confidential to the extent allowed by state and federal law. Information concerning archaeological sites is exempted from the Freedom of Information Act (FOIA) as per ORS 192.501(11) and should be excluded from all public documents and stipulations placed upon confidential documents that only approved personnel and/or qualified archaeologists [as defined by ORS 390.235(6)(b)] can access.

C. Activities carried out pursuant to this Agreement shall meet the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716 as revised) as well as existing standards and guidelines for historic preservation activities established by the Oregon SHPO.

D. FTA, Metro, and TriMet will ensure that all work carried out under this Agreement is conducted by or under the direct supervision of a person or persons meeting the Secretary of the Interior’s Professional Qualification Standards (36 CFR 61).

E. All resource management documents as specified under this Agreement will be completed prior to any construction and within two months of the release of the 90% design documents for the Project. Nothing in this Agreement shall be construed as indicating acceptance by the Consulting Parties of the resource management documents, which have yet to be developed.
FTA shall in good faith attempt to reach a consensus on the contents of the resource management documents with the Consulting Parties.

The confidential resource management documents, available to approved personnel, pertain to the archaeological portion of the Project and include the following.

1. Monitoring Plan & Inadvertent Discovery Plan (Attachment A).
2. Documentation for archaeological investigations not yet completed.
   a. High Probability Areas to be tested and archaeological sites that were not investigated prior to the FEIS completion due to access.
   b. Archaeological sites found during construction monitoring. (This report would be done during or by the end of construction in 2015.)
3. Mitigation/treatment plans for significant archaeological sites.
   a. For sites found during High Probability Area testing and archaeological sites that were not investigated prior to the FEIS completion due to access, if they are found to be significant resources.
   b. Archaeological sites found during construction monitoring. (This report would be done during or by the end of construction in 2015.)

F. FTA shall retain ultimate responsibility for complying with all federal requirements pertaining to direct government-to-government consultation with Indian tribes. Notwithstanding any other provision of this stipulation, FTA shall honor the request of any of the Indian tribes listed herein for direct government-to-government consultation regarding the Project.

G. Study of portions of the Project’s APE have been sufficiently completed for Section 106 review prior to the publication of the FEIS and, notwithstanding the Project’s need to comply with inadvertent discovery requirements, no further Section 106 activities are expected to be conducted in those areas where cultural resource studies have been completed and SHPO has concurred that no further archaeological investigations are necessary. Attachment A is based on the Section 106 Technical Report, including its inventory report, and defines those areas where additional steps, such as archaeological monitoring during construction, are needed.

H. Definitions in 36 CFR 800.16 will be used for purposes of this Agreement.

II. PUBLIC PARTICIPATION

FTA, Metro, and TriMet have ensured that public participation in the Section 106 review process has been carried out in a manner that has also been integrated with FTA’s public participation and review requirements pursuant to 23 CFR Part 771, leading to the publication of the FEIS. Documentation on historic and archaeological properties (some with locational information removed) have been made available for review to the general public offices as part of the SDEIS and FEIS publication and related public review. In accordance with Section 304 of the National Historic Preservation Act of 1966, as amended, the signatories and participating Concurring Parties to this Agreement will withhold from disclosure to the public, information about the location, character, or ownership of a historic property if it is determined that disclosure may (1) cause a significant invasion of privacy, (2) risk harm to a historic property, or (3) impede the use of a traditional religious site by practitioners (4) contains archaeological site description or location information.
The views of the Metro, TriMet, interested parties, and the general public will be considered by FTA with respect to the terms of this Agreement. Should any member of the public raise a timely and substantive objection pertaining to the manner in which the terms of this Agreement are carried out, at any time during its implementation, the FTA shall take the objection into account by consulting with the objector to resolve the objection. When FTA responds to an objection, it shall notify Metro and TriMet of the objection and the manner in which it was resolved. FTA may request assistance of the Metro and TriMet to resolve objections.
III. MITIGATING ADVERSE EFFECTS TO SPECIFIC HISTORIC PROPERTIES

A. Royal Foods Warehouse and Office, 2425 SE 8th Ave. Portland

The warehouse is eligible for the National Register of Historic Places (NRHP) and will be adversely affected by demolition. Mitigation measures include:

a. Documentation shall be done according to the Oregon SHPO documentation standards by June 2013. Provide two complete sets of documentation to the Oregon SHPO, including photos, for deposit at the Oregon Historical Society and the Allied Arts and Architecture Library at the University of Oregon. Send a third set without photos to be archived at the SHPO office. Photos should be printed on proof sheets. A fourth full set may be required in cases where there is a local repository that is interested in receiving the materials. The following items are required for all state level documentation:

1. Architectural description of the building: *Description should not be less than 500 words and use appropriate architectural terms.*

2. Building history: *History of not less than 500 words discussing at least when the building was constructed and by whom, the building or structure’s use over time, and any important persons or events associated with the resource. The project shall contact the Oregon SHPO for research suggestions.*

3. Bibliography: *Include a bibliography of all resources used in the preparation of the document, including sources for appended archival materials described in item 8.*

4. United States Geological Survey (USGS) Map with the location of the property marked: *A portion of the entire map may be printed for free from a website such as topoquest.com and marked by hand.*

5. Scale site plan of the subject building or structure and adjacent buildings and structures on the same tax lot: *Drawing may be done by hand as long as it reasonably to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use of each building, structure, object, and adjacent streets on the map should be labeled.*

6. Scale Floor plans for each floor of the subject building or structure: *Drawing may be done by hand as long as it reasonably to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use or each space should be labeled.*

7. Photographs of the building or structure interior and exterior: *Photos may be taken as 35mm black-and-white 4x6 images or as color digital images. Digital and print images and prints must meet all aspects of the Oregon SHPO Digital Photo Checklist available at the SHPO website: http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhp_documents.shtml*

8. Archival materials: *If available, include original architectural drawings or maps, brochures, photos, newspaper clippings, or other archival items of interest relating to the history of the building or structure.*

B. Westmoreland Park, 7605 SE McLoughlin

Westmoreland Park has been determined eligible as a NRHP Historic District and will be adversely affected by converting the Duck Pond into a riparian area. Mitigation measures include:
a. Documentation for Westmoreland Park shall be done according to the Oregon SHPO documentation standards by June 2013. Provide two complete sets of documentation to the Oregon SHPO, including photos, for deposit at the Oregon Historical Society and the Allied Arts and Architecture Library at the University of Oregon. Send a third set without photos to be archived at the SHPO office. Photos should be printed on proof sheets. A fourth full set may be required in cases where there is a local repository that is interested in receiving the materials. The following items are required for all state level documentation:

1. Architectural description of the building [property]: Description should not be less than 500 words and use appropriate architectural terms.
2. Building [property] history: History of not less than 500 words discussing at least when the building was constructed and by whom, the building [property] or structure’s use over time, and any important persons or events associated with the resource. The project shall contact the Oregon SHPO for research suggestions.
3. Bibliography: Include a bibliography of all resources used in the preparation of the document, including sources for appended archival materials described in item 8.
4. United States Geological Survey (USGS) Map with the location of the property marked: A portion of the entire map may be printed for free from a website such as topoquest.com and marked by hand.
5. Scale site plan of the subject building or structure and adjacent buildings and structures on the same tax lot: Drawing may be done by hand as long as it reasonably to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use of each building, structure, object, and adjacent streets on the map should be labeled.
6. Scale Floor plans for each floor of the subject building or structure: Drawing may be done by hand as long as it reasonable to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use or each space should be labeled.
7. Photographs of the building or structure interior and exterior: Photos may be taken as 35mm black-and-white 4x6 images or as color digital images. Digital and print images and prints must meet all aspects of the Oregon SHPO Digital Photo Checklist available at the SHPO website: [http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhpdocuments.shtml](http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhpdocuments.shtml)
8. Archival materials: If available, include original architectural drawings or maps, brochures, photos, newspaper clippings, or other archival items of interest relating to the history of the building or structure.

b. Publish documentation, as described above, of the park’s history on the City of Portland website for duration of not shorter than June 2013 to December 2015. The website will be professionally designed.

c. As additional mitigation, the Project will develop an interpretive panel or display at the Bybee Station, describing the historic attributes and features of Westmoreland Park, including the Duck Pond and its relationship to WPA-era projects, and also the general timeline for development of Westmoreland Park and adjacent neighborhoods of the City by date of Project completion (December 2015). The Project will consult with a historian that meets Secretary of Interior Standards and will ask SHPO to comment to the design.

d. The Project, with the City of Portland, will prepare National Register nomination materials for a different park within the City, and will formally submit these materials to the SHPO for approval. The Project will (i) consult with SHPO to determine whether the selected property is indeed eligible, (ii) provide draft documents to SHPO for comment, and (iii) make all
necessary revisions to meet the requirements of the National Park Service for National Register nominations. Nomination materials are to be completed within 24 months of the execution of this agreement. This stipulation will be considered complete once the SHPO has found the nomination to be complete and ready for submission to the Keeper of the National Register.

e. TriMet will execute an interlocal agreement with the City of Portland incorporating the above conditions prior to providing funds for construction within Westmoreland Park.

C. Derwey House, 2206 SE Washington, Milwaukie

The R. Derwey House has been determined eligible for the NRHP and will be adversely affected by changing the setting and acquiring approximately 10 feet of land from the side yard near the railroad tracks. Mitigation measures include:

a. Documentation shall be done according to the Oregon SHPO documentation standards by June 2013. Provide two complete sets of documentation to the Oregon SHPO, including photos, for deposit at the Oregon Historical Society and the Allied Arts and Architecture Library at the University of Oregon. Send a third set without photos to be archived at the SHPO office. Photos should be printed on proof sheets. A fourth full set may be required in cases where there is a local repository that is interested in receiving the materials. The following items are required for all state level documentation:

1. Architectural description of the building: *Description should not be less than 500 words and use appropriate architectural terms.*

2. Building history: *History of not less than 500 words discussing at least when the building was constructed and by whom, the building or structure’s use over time, and any important persons or events associated with the resource. The project shall contact the Oregon SHPO for research suggestions.*

3. Bibliography: *Include a bibliography of all resources used in the preparation of the document, including sources for appended archival materials described in item 8.*

4. United States Geological Survey (USGS) Map with the location of the property marked: *A portion of the entire map may be printed for free from a website such as topoquest.com and marked by hand.*

5. Scale site plan of the subject building or structure and adjacent buildings and structures on the same tax lot: *Drawing may be done by hand as long as it reasonably to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use of each building, structure, object, and adjacent streets on the map should be labeled.*

6. Scale floor plans for each floor of the subject building or structure: *Drawing may be done by hand as long as it reasonable to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use or each space should be labeled.*

7. Photographs of the building or structure interior and exterior: *Photos may be taken as 35mm black-and-white 4x6 images or as color digital images. Digital and print images and prints must meet all aspects of the Oregon SHPO Digital Photo Checklist available at the SHPO website: [http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhpp_documents.shtml](http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhpp_documents.shtml)
8. Archival materials: If available, include original architectural drawings or maps, brochures, photos, newspaper clippings, or other archival items of interest relating to the history of the building or structure.

D. Other Historic Resources
Some historic properties have been found to have “no adverse effect” by the Project and will be minimally affected. For those NRHP-eligible resources the following measures are included:

1) According to the Noise and Vibration Technical Report for the FEIS, projected increases in noise and vibration require mitigation for four (4) additional historic built environment resources at 1635 SE Rhone in Portland, and 2405 SE Harrison, 2326 SE Monroe, and 2313 SE Wren in Milwaukie. After mitigation, these impacts would be reduced to levels that have “no adverse effect.” The mitigation measures would not alter the characteristics for which the properties are considered eligible for the NRHP. However, because mitigation for the impacts may require residential sound insulation such as window replacement, the mitigation action could have adverse effects to the historic buildings if done inappropriately. This Agreement requires that all noise and vibration impacts meet the Secretary of the Interior Standards for Rehabilitation and be finished by December 2014. This includes:
   a) Replace in kind an entire window using the same sash and pane configuration and other design details.
   b) Retrofit the existing windows to meet noise mitigation criteria if possible.
   c) The property owner must be consulted
   d) SHPO must approve any mitigation measures.

2) For 2313 SE Wren in Milwaukie and 1635 SE Rhone in Portland where a small right of way acquisition is required, the property owners will be fully compensated in accordance with FTA policy and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Where landscaping will be removed from the properties due to construction, replacement landscaping shall be offered to mitigate the visual impact by December 2014.

IV. MITIGATING ADVERSE EFFECTS TO SPECIFIC ARCHAEOLOGICAL SITES
Identification of archaeological and historic archaeological properties and assessment of effect have been completed for areas within which investigations were allowed by landowners and access has been secured by the Project. No archaeological resources that are eligible for listing in the NRHP have yet been identified within the portion of the Project APE where there may be direct impacts. If any archaeological sites are discovered that may be eligible for listing on the National Register of Historic Place, then consultation with SHPO regarding documentation, evaluation, assessment, and mitigation measures, if necessary, will be necessary.

V. PRINCIPLES TO COMPLETE ARCHAEOLOGICAL INVESTIGATIONS
Archaeological excavations have not been completed for all areas of the Project where there may be construction activities within the APE. Some areas have been investigated and some areas contain archaeological resources that may require additional archaeological investigations. The preliminary field findings and recommendations to complete inventory, resource evaluations, and assessment of effect on archaeological historic properties are included in Attachment A.
Circumstances dictate that some of the activities needed to complete all steps of the Section 106 process will be carried out after the FEIS/ROD is issued, and will follow the protocols established in Attachment A.

VI. PROGRAMMATIC APPROACH FOR ARCHAEOLOGICAL RESOURCES

A. FTA will ensure that if completion of any additional subsurface testing, inadvertent discovery, and site eligibility determinations result in additional findings of effect, these findings will be reviewed by the Oregon SHPO and consulting Tribes. The Oregon SHPO shall review all information regarding site eligibility. If SHPO concurs that there are no archaeological sites eligible for listing on NRHP and/or there are no effects or adverse effects to significant archaeological resources, then no further archaeological investigations will be necessary. If the findings reveal there may be an adverse effect to a significant archaeological resource, then the FTA will notify SHPO and the appropriate Tribes and continue consultation to resolve the adverse effects. FTA will review the effects and provide a mitigation plan with a range of solutions to be considered for implementation as well as the level of effort for the data recovery, analysis, curation, and interpretation options and provide this information to SHPO and the appropriate Tribes for concurrence.

B. The options to be considered will take into account whether the significance of the resource calls for preservation in place, data recovery, and documentation through monitoring, further research, or other mechanisms. All proposed mitigation options will be compatible with the historic qualities and characteristics that qualify the property as eligible for listing in the National Register, and will be developed in consultation with the Signatories to this Agreement.

C. Archaeological treatment plans will be developed for any sites that are determined eligible for listing on the National Register and that may be adversely affected by the Project. To minimize the adverse effect to eligible archaeological sites the plan will consider a variety of protective measures such as construction modifications, buffering, protective walls or fencing and construction monitoring. For those archaeological sites determined to be eligible and where adverse impacts are unavoidable, a mitigation plan is necessary. This plan may include a variety of measures such as data recovery plan or other alternatives.

D. Following the completion of the mitigation phase of the process, FTA will ensure that the applicable analysis, documentation, and report preparation and submittal is completed on the mitigation prior to the start or continuation of construction in affected locations. All cultural material recovered and data produced on public non-federal land as a result of the Project will be curated in a permanent curation facility approved by the Oregon SHPO in accordance with 36 CFR 79 and tribal consultation, as dictated by the SHPO permit. Artifacts collected on private land will be curated as dictated by the SHPO permit. All curation actions shall be completed by June 2015.

VII. REVIEW OF FUTURE DESIGN CHANGES

If any design changes having the potential to cause effects to historic properties are made to the undertaking outside the current APE, including additional staging, construction access, wetland or stormwater mitigation sites, FTA, in consultation with Metro and TriMet, will conduct a
cultural resources assessment as required by 36 CFR 800, to identify and evaluate the effects upon historic properties, and will consult to resolve any additional adverse effects.

FTA will ensure that avoidance of adverse effects to historic properties is the preferred treatment during the design phase and will utilize all feasible, prudent and practicable measures to avoid adverse effects. All design enhancements that may affect historic properties in the Project corridor will be subject to review and concurrence by FTA, Metro and TriMet. The Project final mitigation plan will address potential design modifications and aesthetic treatments foreseen in final design.

VIII. ARCHAEOLOGICAL RESOURCES NOT PREVIOUSLY IDENTIFIED

This section describes procedures to be followed by the construction contractors and Project engineers, which ensure appropriate consideration of archaeological resources if encountered during construction. The FTA and Project contractors shall:

1) Discuss pre-construction requirements, including:
   a) Educational briefings by professional archaeologists,
   b) Briefing materials for construction contractor personnel and FTA engineers and inspectors;
   c) Protocol for inadvertent discovery, including contact telephone numbers for contractor personnel and FTA engineers and inspectors as per ORS 97.740-97.760 (Indian Graves and Protected Objects) and ORS 358.905-358.955 (Archaeological Objects and Sites).

2) Provide background information on the context of anticipated resources within the Project to the construction contractor;

3) Identify in lay terms the nature of primary archaeological resources indicators (e.g. high densities of fire modified rock; high density historical municipal or industrial middens) that may represent a significant resource and which require consideration by professional archaeologist and consideration by Consulting Parties;

4) Identify relevant procedures and contractor responsibilities for the inadvertent discovery of archaeological objects or sites (ORS 358.905-.955); including site protection and evaluation by a qualified archaeologist; and

5) Ensure that the Project plans and documents note the areas to be included in construction monitoring under the supervision of a qualified archaeologist and that all archaeological site locations are kept confidential.

IX. INADVERTENT DISCOVERY OF HUMAN REMAINS

If human remains are encountered during the implementation of the Project activities, all activity in the vicinity of the discovery will cease and the appropriate authorities notified as outlined in the Inadvertent Discovery Plan as per ORS 97.740-.760

(Attachment A).
X. DISPUTE RESOLUTION

Should any Signatory or Concurring Party to this Agreement object at any time to any actions proposed or the manner in which the terms of this Agreement are implemented, the Signatory parties will consult with such party to resolve the objection. If FTA determines that such objection cannot be resolved, FTA will:

Forward all documentation relevant to the dispute, including the FTA’s proposed resolution, to the ACHP. The ACHP will provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA will prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, Signatories and Concurring Parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.

If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FTA will prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and Concurring Parties to the Agreement, and provide them and the ACHP with a copy of such written response.

FTA’s responsibilities to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

XI. AMENDMENTS

This Agreement may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all of the Signatories is filed with the ACHP.

XII. DURATION AND TERMINATION

This Agreement will take effect immediately upon execution by the Signatory parties. FTA will send a copy of the executed Agreement to the ACHP, regardless of ACHP participation in the process. The terms of this Agreement will be satisfactorily fulfilled upon completion of the Project. Prior to such time, FTA may consult with the other participating parties to reconsider the terms of the Agreement and propose its amendment. Unless terminated, this Agreement will be in effect until December 2015 or such time as FTA, in consultation with all Signatory and Concurring Parties, determines that all of its terms have been satisfactorily fulfilled, whichever is later.

If any Signatory to this Agreement determines that its terms will not or cannot be carried out, that party will ensure immediately consult with the other parties to attempt to develop an amendment per Stipulation XI above. If within thirty days (30) days (or another time period agreed to by all Signatories) an amendment cannot be reached, any signatory may terminate the Agreement upon written notification to the other Signatories.
Once the Agreement is terminated, and prior to work continuing on the undertaking, FTA must either (a) execute a Memorandum of Agreement pursuant to 36 CFR 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. FTA will notify the Signatories as to the course of action it will pursue.

XIII. **Archeological Resources Retrieved and Preserved.**

If archeological resources are retrieved and deemed by the SHPO to be significant and worthy of preservation, any costs associated with such resource retention shall be the responsibility of TriMet.

XIV. **Compliance with Section 106.**

With the execution and implementation of this Agreement the responsibilities the National Historic Preservation Act Section 106 process, as codified in 36 CFR 800 Subpart B are deemed satisfied.
SIGNATORIES:

Federal Transit Administration

Mr. Richard Krochalis, Region X Administrator

Date 6/17/10

Oregon State Historic Preservation Officer

Roger Roper, Assistant Director, Heritage Programs

Date 6/15/10

Tri-County Metropolitan Transportation District of Oregon

Fred Hansen, General Manager

Date 6/14/10
MOA attachments regarding archaeological resources are privileged information not for public disclosure; complete documentation is on file with TriMet and FTA.
APPENDIX E – APE MAPS
Figure 1. Proposed Portland-Milwaukie Light Rail Transit project APE showing previously studied areas. Figures 2 and 9 show the APE at Ruby Junction.
Figure 2. Ruby Junction work location within proposed Portland-Milwaukie Light Rail Transit Project APE.
Figure 3. Proposed Portland-Milwaukie Light Rail Transit project APE, previously studied areas, and guide for detailed map figures (Figures 4-8).
Figure 4. Proposed Portland-Milwaukie Light Rail Transit project APE showing areas (in bold) proposed for monitoring. Archaeological high probability areas (HPA) are overlaid onto the project footprint and associated work areas, rather than the full APE.
Figure 5. Proposed Portland-Milwaukie Light Rail Transit project APE showing areas (in bold) proposed for monitoring. Archaeological high probability areas (HPA) are overlaid onto the project footprint and associated work areas, rather than the full APE.
Figure 6. Proposed Portland-Milwaukie Light Rail Transit project APE showing areas (in bold) proposed for monitoring. Archaeological high probability areas (HPA) are overlaid onto the project footprint and associated work areas, rather than the full APE.
Figure 7. Proposed Portland-Milwaukie Light Rail Transit project APE showing areas (in bold) proposed for monitoring. Archaeological high probability areas (HPA) are overlaid onto the project footprint and associated work areas, rather than the full APE.
Legend

Archaeological High Probability Area (HPA)

2008 Riverfront Park Survey (AINW)

2007 Trolley Trail Survey (AINW)

2005 McLoughlin Blvd Survey (OSMA)

2003 South Corridor Alignment (AINW)

1998 South-North Corridor Alignment (Larson)

1998 Level 3 Fiber Optic Survey (AINW)

2009 Light Rail Footprint

2009 Light Rail Staging Areas

2009 Section 106 APE for Light Rail Transit Project

Figure 8. Proposed Portland-Milwaukie Lightrail Transit project APE showing areas (in bold) proposed for monitoring. Archaeological high probability areas (HPA) are overlaid onto the project footprint and associated work areas, rather than the full APE.
Figure 9. Ruby Junction portion of the Portland-Milwaukie Light Rail Transit project APE showing areas (in bold) proposed for monitoring, previous surveys, and archaeological resources. Archaeological high probability areas (HPA) are overlaid onto the project footprint and associated expansion parcels, rather than the full APE.