Cultural Resources Supplemental Memorandum

Multnomah County | Earthquake Ready Burnside Bridge Project

Portland, OR

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Earthquake Ready Burnside Bridge Cultural Resources Supplemental Memorandum

Prepared for

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Acronyms, Initialisms, and Abbreviations

ac	acre
APE	Area of Potential Effects
API	Area of Potential Impact
DIY	Do-it-yourself
EIS	Environmental Impact Statement
EQRB	Earthquake Ready Burnside Bridge
NHLD	National Historic Landmark District
NRHP	National Historic Preservation Act
UPRR	Union Pacific Railroad

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Executive Summary

Multnomah County has developed potential design refinements for the Earthquake Ready Burnside Bridge Project Draft EIS Preferred Alternative to provide more a cost-effective design. This supplemental technical memorandum has been prepared to address only the design refinements and their possible effects to historic properties. The cultural resources technical report prepared for the Draft EIS provides the background contextual information that remains applicable for the supplemental memorandum. The design refinements will affect 13 historic properties. These effects are largely limited to changes in the settings of 12 properties and are therefore recommended as no adverse effects. The potential design refinements do not change the removal of the existing Burnside Bridge as described for the Draft EIS Preferred Alternative. The replacement of the existing bridge continues to be recommended as an adverse effect.

1 Introduction

In support of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Earthquake Ready Burnside Bridge (EQRB) Project, this supplemental technical memorandum has been prepared to evaluate the impacts of potential design refinements to the Preferred Alternative on cultural resources within the project's Area of Potential Effects (APE) and Area of Potential Impact (API). The intent of the design modifications is to reduce the overall cost and improve the affordability of the EQRB Project. This technical memorandum is a supplement to the Draft EIS technical reports and as such does not repeat all of the information in those reports, but instead focuses on the impacts of the design modification options, how they compare to each other, and how they compare to the version of the Preferred Alternative that was evaluated in the *EQRB Draft Environmental Impact Statement* (Multnomah County 2021c).

Much of the information included in the Draft EIS and Draft EIS technical reports, including project purpose, relevant regulations, analysis methodology and affected environment, is incorporated by reference because it has not changed, except where noted in this technical memorandum.

1.1 Project Location

The Project Area is located within the central city of Portland. The Burnside Bridge crosses the Willamette River connecting the west and east sides of the city. The Project Area encompasses a one-block radius around the existing Burnside Bridge and W/E Burnside Street, from NW/SW 3rd Avenue on the west side of the river and NE/SE Grand Avenue on the east side. Several neighborhoods surround the area including Old Town/Chinatown, Downtown, Kerns, and Buckman. Figure 1 shows the Project Area.

Figure 1. Project Area.

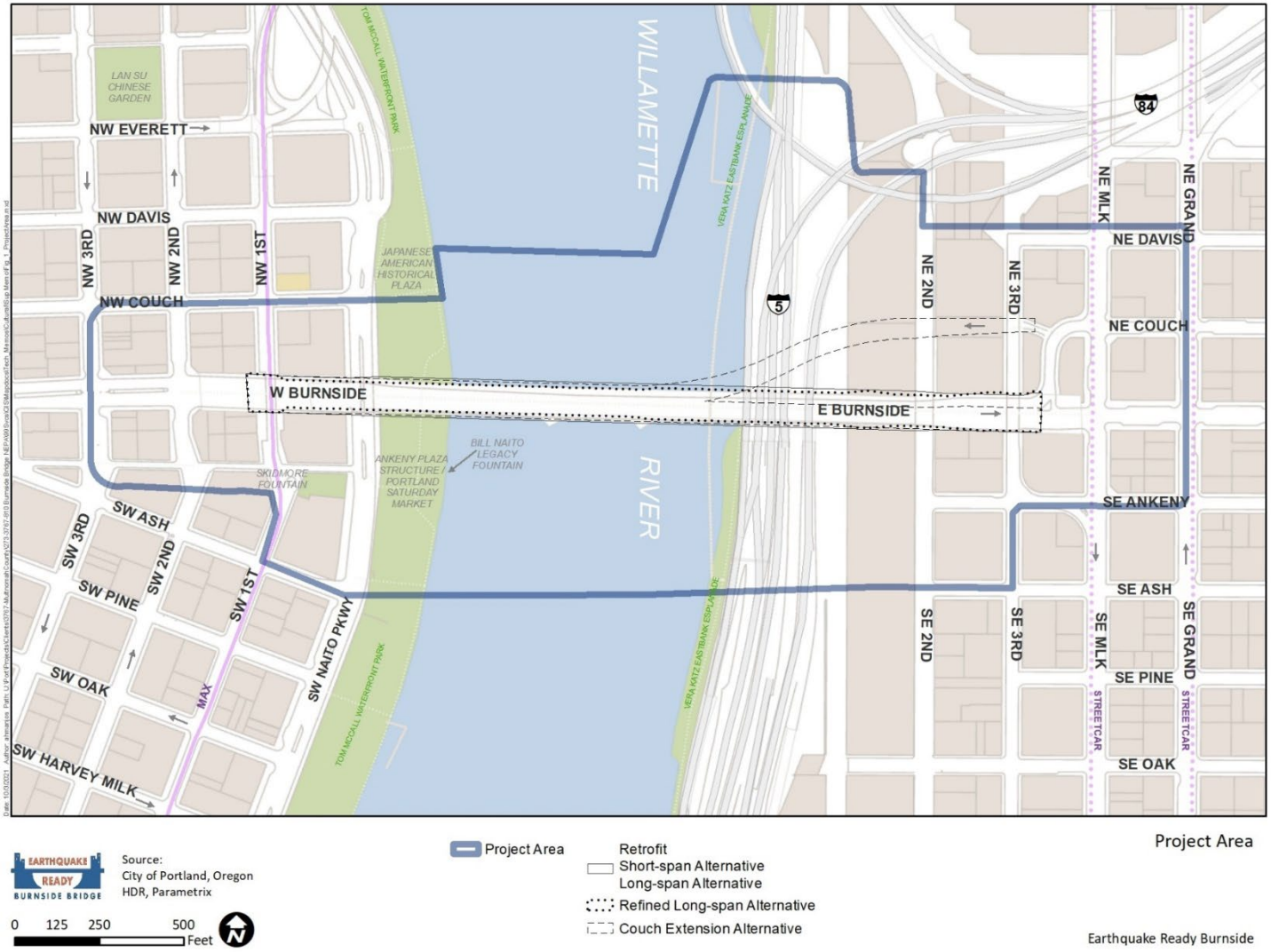
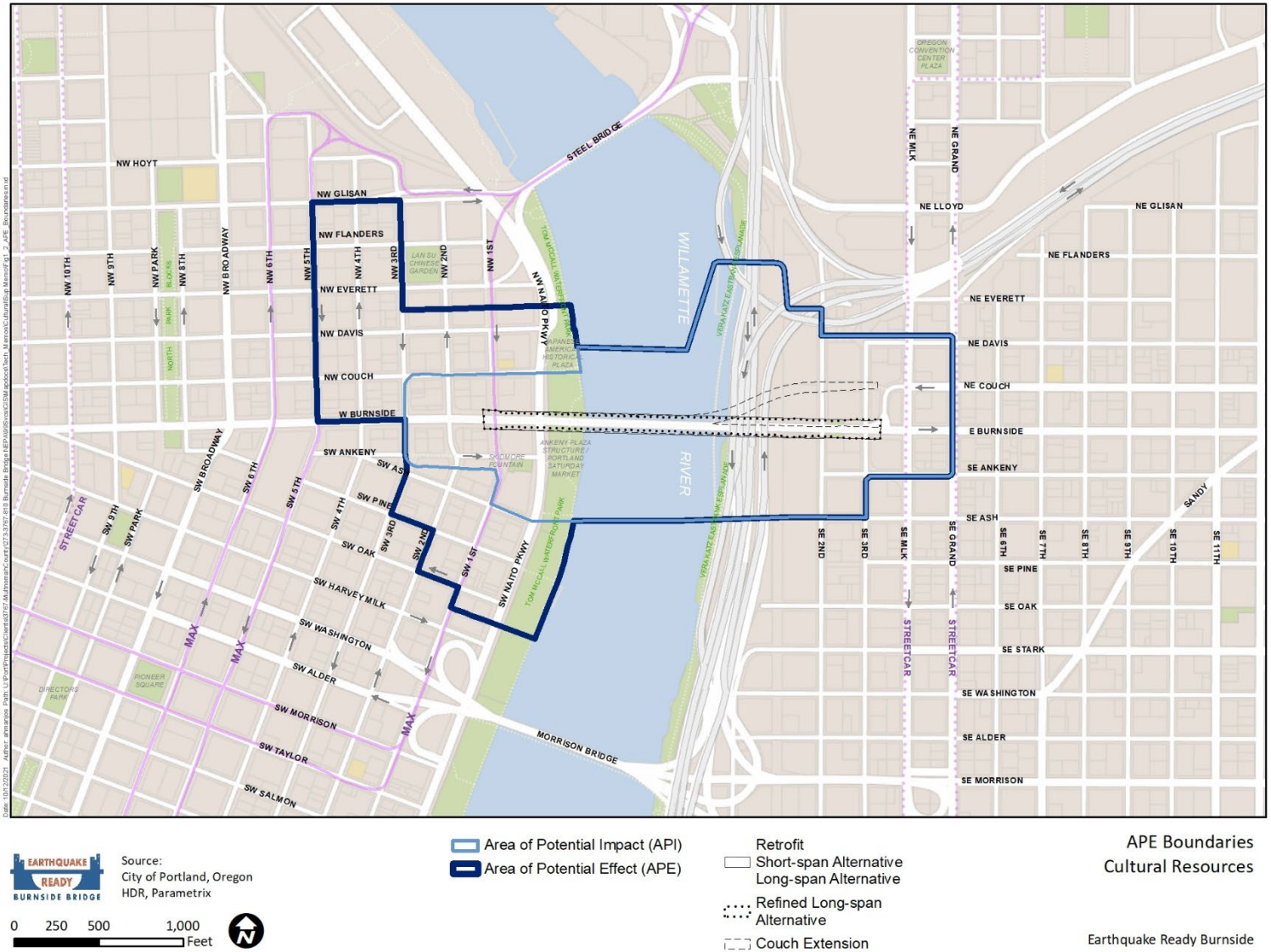


Figure 2. API and APE for cultural resources.



Source:
City of Portland, Oregon
HDR, Parametrix

0 250 500 1,000 Feet

Area of Potential Impact (API)
Area of Potential Effect (APE)

Retrofit
Short-span Alternative
Long-span Alternative
Refined Long-span Alternative
Couch Extension

APE Boundaries
Cultural Resources

Earthquake Ready Burnside

1.2 Project Purpose

The primary purpose of the Project is to build a seismically resilient Burnside Street lifeline crossing over the Willamette River that will remain fully operational and accessible for vehicles and other modes of transportation following a major Cascadia Subduction Zone earthquake. The Burnside Bridge will provide a reliable crossing for emergency response, evacuation, and economic recovery after an earthquake. Additionally, the bridge will provide a long-term safe crossing with low-maintenance needs.

2 Project Alternatives

This technical memorandum evaluates potential design refinements to the Draft EIS Preferred Alternative. All of the Project Alternatives evaluated in the Draft EIS are summarized in Chapter 2 of the Draft EIS and described in detail in the *EQRB Description of Alternatives Report* (Multnomah County 2021b). Briefly, the Draft EIS evaluated a No-Build Alternative and four Build Alternatives. One of the Build Alternatives, the Long-span Alternative, was identified as the Preferred Alternative. The potential refinements evaluated in this technical memorandum are collectively referred to as the Refined Long-span Alternative (Four-lane Version) or the Refined Long-span. The Refined Long-span includes project elements that were studied in the Draft EIS but have been modified, as well as new options that were not studied in the Draft EIS. These potential refinements and new options are intended to provide lower cost and, in some cases, lower impact designs and ideas that could be adopted to reduce the cost of the Draft EIS Preferred Alternative while still achieving seismic resiliency. The potential design refinements, and how they differ from the Draft EIS Long-span Alternative, are described below.

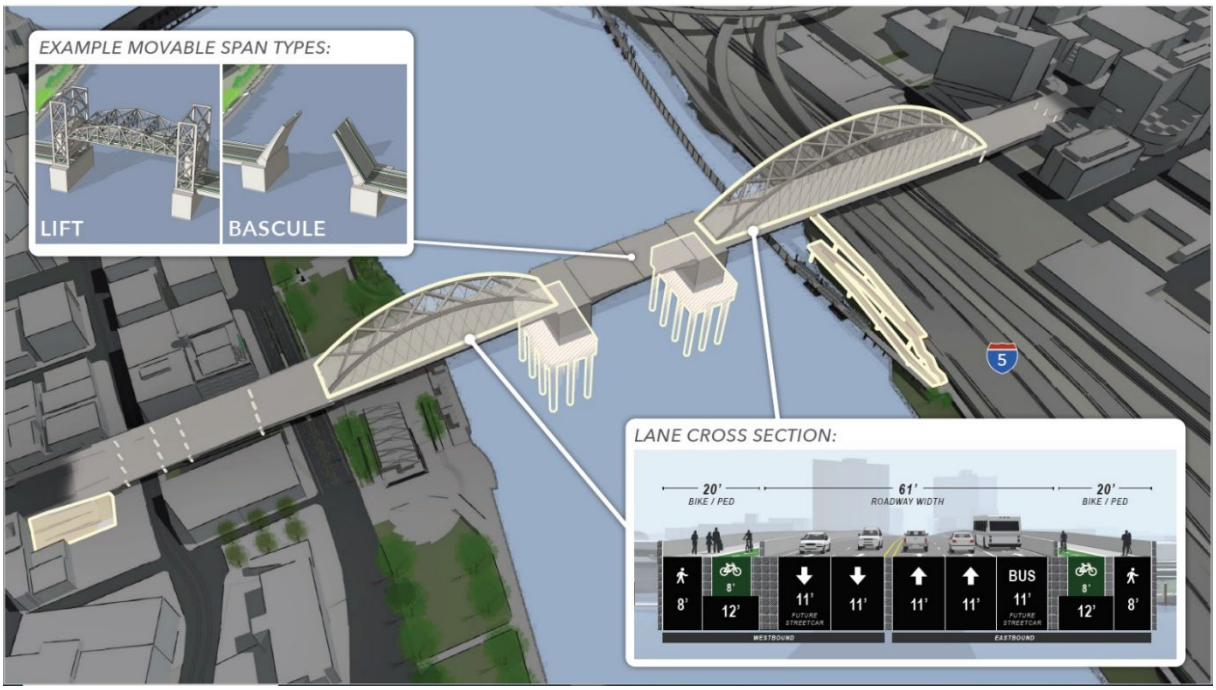
- Bridge width – The total width of the bridge over the river would be approximately 82 to 93 feet (the range varies depending on the bridge type and segment). For comparison, the Draft EIS Replacement Alternatives were approximately 110 to 120 feet wide over the river. The refined bridge width would accommodate approximately 78 feet for vehicle lanes, bike lanes, and pedestrians, which is comparable to the existing bridge.
    - The refined bridge design would accommodate four vehicle lanes (rather than five as evaluated in the Draft EIS). The following lane configuration options are being evaluated:
        - Lane Option 1 (Balanced) – Two westbound lanes (general-purpose) plus two eastbound lanes (one general-purpose and one bus-only lane)
        - Lane Option 2 (Eastbound Focus) – One westbound lane (general-purpose) plus three eastbound lanes (two general purpose and one bus only)
        - Lane Option 3 (Reversible Lane) – One westbound lane (general-purpose) plus two eastbound lanes (one general-purpose and one bus-only) plus one reversible lane (westbound AM peak and eastbound PM peak)

        - Lane Option 4 (General Purpose with Bus Priority) – Two westbound general-purpose lanes plus two eastbound general-purpose lanes, plus bus priority access (e.g., queue bypass) at each end of the bridge.
    - The width of the vehicle lanes would be, at minimum, 10 feet and could vary depending on how the total bridge width is allocated between the different modes.
    - The total width of the bicycle lanes and pedestrian sidewalks would be approximately 28 to 34 feet. This is wider than the existing bridge but narrower than what is described in the Draft EIS for the Replacement Alternatives. Physical barriers between vehicle lanes and the bicycle lanes would be in addition to the above dimensions.
    - The refined bridge would allow narrower in-water piers, due to less weight needing to be transferred to the in-water supports.
- Other design refinements being evaluated:
    - West approach – This memorandum evaluates a refined girder bridge type for the approach over the west channel of the river, Tom McCall Waterfront Park, and Naito Parkway. Compared to the cable-stayed and tied-arch options evaluated in the Draft EIS, this option would not only reduce costs but also avoid an adverse effect to the Skidmore/Old Town National Historic Landmark District. It would have two sets of columns in Tom McCall Waterfront Park compared to just one with the Draft EIS tied-arch option and five with the existing bridge.
    - East approach – This memorandum evaluates a potential span length change for the east approach tied-arch option that would minimize the risks and reduce costs associated with placing a pier and foundation in the geologic hazard zone that extends from the river to about E 2nd Avenue. The refined tied-arch option would be about 720 to 820 feet long and approximately 150 feet tall (the Draft EIS Long-span Alternative was the same height and 740 feet long). The refined alternative would place the eastern pier of the tied-arch span either on the east side of 2nd Avenue (Option 1) or just west of 2nd Avenue (Option 2). Increasing the length of the tied-arch span would also reduce the length and depth of the subsequent girder span to the east.
    - Americans with Disabilities Act (ADA) access – This memorandum evaluates a refined approach for providing direct ADA access between the bridge and the Eastbank Esplanade, as well as between the bridge and W 1st Avenue and the Skidmore Fountain MAX station. The Draft EIS evaluated multiple ramp, stair, and elevator options for these locations. This SDEIS memo evaluates a refined option that would provide enhanced ADA access at both locations using both elevators and stairs. These facilities would also provide pedestrian and potentially bicycle access. For the west end, there is also the potential for replacing the existing stairs with improved sidewalk access from the west end of the bridge to 1st Avenue.

Figure 4 highlights the elements of the Draft EIS Long-span Alternative that have been modified to create the Refined Long-span Alternative, as described above. Figure 3

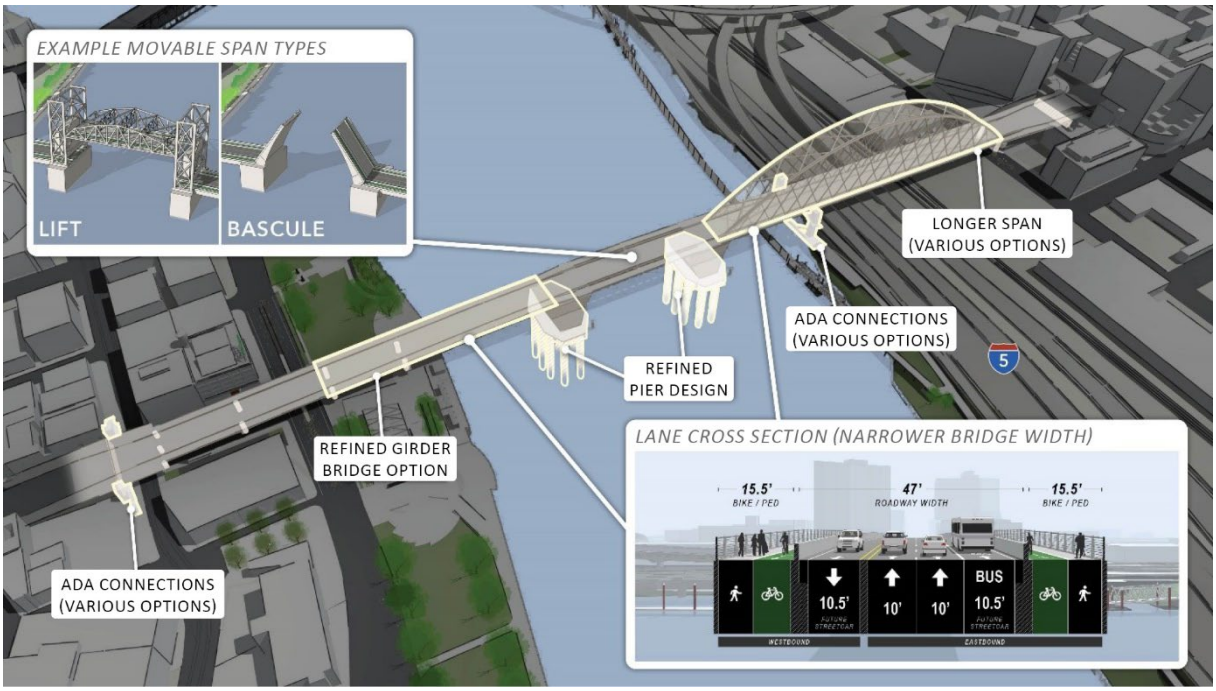
shows the Draft EIS Long-span Alternative and Figure 4 shows the Refined Long-span Alternative. Both figures include the tied-arch option for the east approach and the bascule option for the center movable span, but the east span could also be a cable-stayed bridge and the movable span could be a vertical lift bridge. For the west approach, the Draft EIS Long-span Alternative shows the tied-arch option while the Refined Long-span Alternative shows the refined girder bridge. The Refined Long-span Alternative image shows just one of the four possible lane configuration options being studied. All four configuration options, as well as many more graphics of the Refined Long-span Alternative, and how it compares to the Draft EIS Long-span Alternative, can be found in Chapter 2 of the *EQRB Supplemental Draft Environmental Impact Statement* (Multnomah County 2022). Figure 4 also shows just one of the possible ways to allocate the bridge width between vehicle lanes, bicycle lanes, and sidewalks; the total width of the bicycle and pedestrian facilities could range from approximately 28 to 34 feet.

Figure 3. Draft EIS Long-Span Alternative



Note: The Draft EIS Long-span Alternative included multiple bridge types for both the east and west approaches. This figure shows only the tied arch option.

Figure 4. Refined Long-Span Alternative



Notes: The Refined Long-span Alternative evaluated in this SDEIS includes both cable-stayed and tied- arch options for the east span. This figure shows only the tied- arch option. The Draft EIS studied, and SDEIS further studies, a bascule option and vertical lift option for the center movable span. The inset shows both options but the main figure shows the bascule option. This figure also shows just one of the lane configuration options considered in the SDEIS.

- Construction assumptions:
  - Construction duration – The expected duration of project construction is 4.5 to 5.5 years, dependent upon the design option. See Table 1 for more information regarding construction impact extent and closure timeframes.
  - Construction area – Compared to the Draft EIS Long-span Alternative, the main refinement is that the construction area would be smaller for the west approach south of the bridge, including a smaller area within Tom McCall Waterfront Park south of the bridge.
  - Construction access and staging – The construction access and staging is expected to be the same as that described in the Draft EIS.
  - Vegetation – The Refined Long-span Alternative would remove slightly fewer trees and vegetation impacts than the Draft EIS Long-span Alternative, primarily within Tom McCall Waterfront Park south of the bridge.
  - In-water work activity – The in-water work would be similar to that described in the Draft EIS, except that the replacement bridge in-water foundations would consist of a perched footing cap and a group of drilled shafts. Whereas the Draft EIS discusses the use of cofferdams to isolate in water work, the Refined Long-span Alternative would use a temporary caisson lowered to an elevation about mid height of the water column to construct footing caps, avoiding additional disturbance of the riverbed that would needed for a cofferdam. Additionally, the existing Pier 4 would be fully removed, Pier 1 would be partially

removed below the mudline, and Piers 2 and 3 would be removed to below the mudline. Existing in water piles would be removed, subject to the design option advanced.

- Temporary freeway, rail, street, and trail closures – Temporary closures are expected to be the same as those described in the Draft EIS.
- Access for pedestrians and vehicles to businesses, residences, and public services – Access is expected to be the same as that described in the Draft EIS.
- On-street parking impacts – On-street parking impacts are expected to be the same as those described in the Draft EIS.
- Property acquisitions and relocations – Property acquisitions and relocations are similar to those listed in the Draft EIS, except that they have been modified to reflect a narrower set of bridge design options.
- Temporary use of Governor Tom McCall Waterfront Park – The park area that would be temporarily closed for construction has changed since the Draft EIS. On the north side of the bridge, the closure area has been reduced to avoid removing 10 cherry trees and a berm that are part of the Japanese American Historical Plaza; this change would apply to all of the build alternatives. On the south side of the bridge, the park closure area has also been reduced to include only the area north of the Tom McCall Waterfront Park trellis; this revision applies only to the Refined Long-span Alternative.

Table 1. Construction Impacts, Closure Extents, and Timeframes by Build Alternative

Facility Impacted	Draft EIS Long-Span Alternative	Refined Long-Span Alternative
Gov. Tom McCall Waterfront Park	4.5-year closure within boundary of potential construction impacts	Same; Smaller closure area south of the bridge
Willamette River Greenway Trail	Portion of trail within Tom McCall Waterfront Park closed for same duration as park; detours in place for construction duration	Same
Japanese American Historical Plaza	Southern portion of plaza would be closed for same duration as Tom McCall Waterfront Park	Same
Ankeny Plaza Structure	Closure for duration of construction but no impacts to Ankeny Plaza structure	Plaza structure would not be closed during construction or impacted
Bill Naito Legacy Fountain	No closure of fountain and associated hardscape	Same
Vera Katz Eastbank Esplanade	18 months (this could extend to 3.5 to 4.5 years if project builds ramps rather than elevators and stairs for the ADA/bicycle/pedestrian connection); detours in place for construction duration	Same
Burnside Skatepark	4-month full closure	Same
River Crossing on Burnside Street	4- to 5-year closure	Same

Facility Impacted	Draft EIS Long-Span Alternative	Refined Long-Span Alternative
Saturday Market Location	4.5-year closure or use of alternative location	Same
Skidmore Fountain MAX Station	Approximately 5 weeks	Same
Navigation Channel/Willamette River Water Trail	Intermittent closures; 2 to 10 closures; each closure up to 3 weeks	Same
Overall Construction Duration	**4.5 to 5.5 years**	Same

3 Definitions

The following terminology is used when discussing geographic areas in the EIS:

- **Project Area** – The area within which improvements associated with the Project Alternatives would occur and the area needed to construct these improvements. The Project Area includes the area needed to construct all permanent infrastructure, including adjacent parcels where modifications are required for associated work such as utility realignments or upgrades. For the EQRB Project, the Project Area includes approximately a one-block radius around the existing Burnside Bridge and W/E Burnside Street, from NW/SW 3rd Avenue on the west side of the river and NE/SE Grand Avenue on the east side.
- **Area of Potential Impact (API)** – This is the geographic boundary within which physical impacts to the environment could occur with the Project Alternatives. The API is resource-specific and differs depending on the environmental topic being addressed. For all topics, the API will encompass the Project Area, and for some topics, the geographic extent of the API will be the same as that for the Project Area; for other topics (such as for transportation effects) the API will be substantially larger to account for impacts that could occur outside of the Project Area.
- **Area of Potential Effects (APE)** – For purposes of the National Historic Preservation Act, a project's APE is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist" (36 CFR 800.16(d)). The APE for the National Historic Preservation Act therefore extends outside the boundaries of the API. For ease of reference in this technical report, the term APE is used to represent both the API and APE, except in the discussion of the historic resource baseline survey.
- **Project vicinity** – The environs surrounding the Project Area. The project vicinity does not have a distinct geographic boundary but is used in general discussion to denote the larger area, inclusive of the Old Town/Chinatown, Downtown, Kerns, and Buckman neighborhoods.

4 Relevant Regulations

There has been no change in relevant statutes or regulations.

5 Analysis Methodology

The methodology employed for the *EQRB Cultural Resources Technical Report* (Multnomah County 2021a) was supplemented with a more focused assessment of potential project effects of the design modifications being considered on each of the specific resources for preparing the Finding of Effect forms.

6 Environment

Thirteen historic properties have been identified that would be potentially affected by the project*:*

- Skidmore/Old Town National Historic Landmark District (NHLD)
- White Stag Block (contributing resource in the NHLD)
- Bates Building (Portland Rescue Mission) (contributing resource in the NHLD)
- Burnside Hotel (contributing resource in the NHLD)
- Salvation Army Building (contributing resource in the NHLD)
- Reed Building (contributing resource in the NHLD)
- Ankeny Pump Station
- Portland Harbor Wall
- White Stag Sign
- Burnside Bridge
- Frigidaire/Templeton Building
- Union Pacific Railroad
- Burnside Skatepark

Of the resources not listed in the Skidmore/Old Town NHLD, the Burnside Bridge and the Frigidaire/Templeton Building are individually listed on the National Register of Historic Places (NRHP). The remaining five resources have been recommended as eligible for listing on the NRHP. The White Stag Sign was designated a city landmark in 1977.

Finding of Effect forms have been prepared for these resources and are provided in the appendix.

7 Impacts from the Design Modifications and Comparison to Draft EIS Alternatives

7.1 Skidmore/Old Town National Historic Landmark District

This NHLD consists of 57 contributing historic resources occupying approximately 20 city blocks in inner Northwest and Southwest Portland. The resources span 1857 to 1929 in age and represent one of the best surviving historic-period groupings of commercial buildings in the western United States, especially buildings of cast-iron architecture. The Skidmore/Old Town NHLD was listed on the NRHP in 1975 and designated an NHLD in 1978.

The EQRB Project's effects would be largely limited to five contributing resources within the NHLD on West Burnside from NW/SW Naito Parkway west to NW/SW 2nd Avenue. Those five resources are individually addressed below.

Figure 5. Representative photograph of the Skidmore/Old Town National Historic Landmark District. Looking southwest from the eponymous Skidmore Fountain.

Elements of the Refined Long-span Alternative that could affect the NHLD include elevators for ADA access on NW/SW 1st Avenue and West Burnside. The elevators would introduce new visual elements along West Burnside, thus altering a portion of the NHLD setting. This change in the setting along West Burnside would most directly affect 4 of the 20 blocks in the NHLD, with few of any effects for a substantial part of the NHLD. Construction of the elevators would be reviewed by the Portland Landmarks Commission and would need to meet the Skidmore/Old Town Historic District Design Guidelines. The Draft EIS Long-span Alternative includes ramp options at this location only on the south side of the bridge. The ramps would not have the above-deck vertical element of the elevators but would have a much larger footprint.

Another design element (of both the Draft EIS Long-span and the Refined Long-span) with possible effects would be the new center span, which could be either a vertical lift or bascule lift span. A vertical lift would create a new visual element that would be visible from the NHLD. This would be somewhat ameliorated by its distance from the NHLD (300 to 500 feet), and it would not be visible at street level through much of the NHLD.

The western approach with the Refined Long-span Alternative would be a girder span that maintains the open character of the existing span and maintains existing views toward and from the District. As described further for the five individual resources in the NHLD, the western approach would no longer be physically attached to the adjacent buildings, which would minimize their potential damage during a major earthquake and would restore some visual elements of their historic façades. Changes to the buildings would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. The girder bridge of the Refined Alternative avoids the visual impact of the tied-arch and cable-stayed bridge options of the Draft EIS Long-span. These tall, modern structures would not be compatible with the character and visual appearance of the District and would obstruct historic views from and to the District. As such, the girder bridge type associated with the Revised Long-span avoids what would otherwise be an adverse effect on the District with the Draft EIS Long-span tall bridge options.

Because none of the impacts associated with the Refined Long-span Alternative would alter the characteristics of the NHLD that qualify it as an NHLD nor alter the NHLD's integrity, a no adverse effects finding has been recommended for the Skidmore/Old Town National Historic Landmark District. Like all Section 106 recommendations from the Project team, this recommendation is subject to Federal Highway Administration and State Historic Preservation Office review and concurrence.

7.2 White Stag Block

The White Stag Block is defined by NW Naito Parkway on the east, NW Couch Street on the north, NW 1st Avenue on the west, and West Burnside on the south. The Block is composed of three historic buildings: the Bickel Block (1883) at NW Naito Parkway and NW Couch Street; the Skidmore Block (1889) at NW 1st Avenue and West Burnside; and the Willamette Tent and Awning Building (1910) at West Burnside and NW Naito Parkway. The three buildings have been combined into one complex that serves as the University of Oregon's Portland campus.

When the Burnside Bridge was constructed in the mid-1920s, the southern façades of the Skidmore Block and Willamette Tent and Awning Building were truncated and rebuilt. In this process, the new western approach span was physically attached to adjacent buildings. The girder approach span of the Revised Long-span Alternative would eliminate this attachment and create an opening between the approach span and the adjacent buildings (the Draft EIS Long-span would as well). Separating the bridge approach from the building would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including minimizing material loss and visual changes to retain historic character. Creating this separation would enhance the ability of the White Stag Block to survive a major earthquake (the White Stag Block has been seismically retrofitted). It would also provide greater public visibility of the ground-level façade of the Skidmore Block, which has been obscured under the existing bridge approach span since 1926.

Figure 6. The Skidmore Block on the left and the Willamette Tent and Awning Building on the right, looking northeast from the Burnside Bridge. The Bickel Block, which is the third building in the White Stag Block, is behind the Willamette Tent and Awning Building.

Because the changes would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, there would be no impacts to the historic character of the White Stag Block. A no adverse effects finding is therefore recommended for the Refined Alternative for the White Stag Block.

7.3 Bates Building

The Bates Building was constructed in 1885 as a hotel. It is on the north side of West Burnside extending west from NW 1st Avenue. It is currently occupied by the Portland Rescue Mission. Its southern façade was reduced for the construction of the Burnside Bridge in 1925–1926.

Both the Draft EIS Long-span and the Refined Long-span Alternatives would include replacement of the existing sidewalk but should not otherwise affect the Bates Building. Removal of the existing sidewalk would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including minimizing material loss and visual changes to retain historic character. There is no evidence the Bates Building has been seismically retrofitted.

Because the changes would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, there would be no impacts to the historic character of the Bates Building. A no adverse effects finding is therefore recommended for the Refined Alternative for the Bates Building.

Figure 7. The Bates Building, looking north along West Burnside.

7.4 Burnside Hotel

The Burnside Hotel is at the northeast corner of NW 2nd Avenue and West Burnside. It was constructed circa 1901 as a hotel and altered for construction of the Burnside Bridge in 1925–1926.

Both the Draft EIS Long-span and the Refined Long-span Alternatives would have similar effects as on the Bates Building. Both the Draft EIS Long-span and the Refined Long-span would include replacement of the existing sidewalk but should not otherwise affect the Burnside Hotel. Removal of the existing sidewalk would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including minimizing material loss and visual changes to retain historic character. There is no evidence the Burnside Hotel has been seismically retrofitted.

Because the changes would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, there would be no impacts to the historic character of the Burnside Hotel. A no adverse effects finding is therefore recommended for the Refined Alternative for the Burnside Hotel.

Figure 8. The Burnside Hotel, looking northeast from the Intersection of West Burnside and NW 2nd Avenue.

7.5 Salvation Army Building

The Salvation Army Building is at the southeast corner of SW 2nd Avenue and West Burnside. It was constructed in 1904, presumably for commercial uses. The 1909 Sanborn map depicts the building occupied by five stores: two facing onto Burnside and three facing onto SW 2nd Avenue. When it was acquired by the Salvation Army is unknown. As late as 1950, it was mapped as a restaurant and hotel (Sanborn 1908-1950:I:74).

The Draft EIS Long-span and the Refined Long-span would have similar effects as for the Bates Building and the Burnside Hotel. As with the Burnside Hotel, the Salvation Army Building is situated where the current approach span reaches street level, which would also be true of the refined girder span. It is therefore unlikely that any of the original façade has been hidden or obscured by the present span and would now become visible. Removal of the existing sidewalk would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including minimizing material loss and visual changes to retain historic character. There is no evidence the Salvation Army Building has been seismically retrofitted.

Because the changes would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, there would be no impacts to the historic character of the Salvation Army Building. A no adverse effects finding is therefore recommended for the Refined Alternative for the Salvation Army Building.

Figure 9. The Salvation Army Building, looking southeast at the intersection of West Burnside and NW 2nd Avenue.

7.6 Reed Building

The Reed Building was constructed in 1890 as a warehouse. It was acquired in 2007 by Mercy Corps, which constructed a new building to the east of the Reed Building. The Reed Building was renovated and seismically retrofitted for use by Mercy Corps. The building sits approximately 25 feet south of the Burnside Bridge west approach. Two buildings that once occupied that space were removed in the 1960s and a surface parking lot now fills that space.

None of the Build Alternatives would directly affect the Reed Building. The number of bents for the Refined Long-span girder bridge approach would be substantially reduced compared to existing, thus providing a more open view to the north. Although a change in the setting, it does not “restore” a historic perspective as the Reed Building never had direct frontage onto the at-grade Burnside Street.

A no adverse effects finding is therefore recommended for the Refined Alternative for the Reed Building.

Figure 10. The Reed Building, looking northeast from the intersection of SW 1st Avenue and SW Ankeny. The new Mercy Corps building is to the right.

7.7 Ankeny Pumping Station

The Ankeny Pumping/Pump Station was constructed in 1929 as a critical facility for the Front Street Interceptor Project to consolidate stormwater and sewer lines in downtown Portland. A major addition was made in 1952.

The Refined Long-span girder bridge (as well as the Draft EIS Long-span bridge options) would alter the setting to the north through reduction in the number of bents under the new west approach and removal of Pier 1 immediately north of the Pump Station. The station continues to serve an important function in the city's water and sewer system. Its structural integrity must therefore be maintained. Other than the change to setting, the design modifications would not affect the Ankeny Pumping Station.

A no adverse effects finding is therefore recommended for the Ankeny Pumping Station.

Figure 11. The Ankeny Pumping Station, looking southwest from the Burnside Bridge.

7.8 Portland Harbor Wall

The Portland Harbor Wall (also referenced as the seawall) was constructed in 1929 in association with the Front Street Interceptor Project, although its purpose was to protect the downtown business district from floods. The Harbor Wall extends for a mile along the western bank of the Willamette River. A railing of concrete panels was constructed in the early 1930s but was largely replaced by the current metal railing with development of Waterfront Park in the 1970s.

The Harbor Wall was constructed around the pre-existing Burnside Bridge Pier 1. The Refined Long-span Alternative includes removing Pier 1 and constructing a paved surface to the edge of river across the gap left by removal of the pier. This would also

involve removal of the Harbor Wall railing around Pier 1 (new Figure 7.8b), which is one of two remaining segments of the 1930s concrete railing. The other remaining segment is along the river face of the Ankeny Pumping Station and would not be removed. The Draft EIS Long-span Alternative would also remove Pier 1 but would not cover the gap left by removal of the pier.

The removal of Pier 1 and the associated Harbor Wall railing would be conducted according to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including matching the design, color, texture, and materials in the construction of the new paved surface and minimizing material loss and visual changes to retain historic character. The removal of Pier 1 and the associated Harbor Wall railing would affect approximately 150 linear feet of the Harbor Wall. This represents only 3 percent of the total length of the Harbor Wall. The planned pavement to replace the Pier 1 location would establish a more complete linear alignment for the Harbor Wall with the top of the riverbank.

Because the changes would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, there would be no impacts to the historic character of the Portland Harbor Wall. A no adverse effects finding is therefore recommended for the Refined Alternative for the Portland Harbor Wall.

Figure 12. The Harbor Wall, looking southwest from the Burnside Bridge.

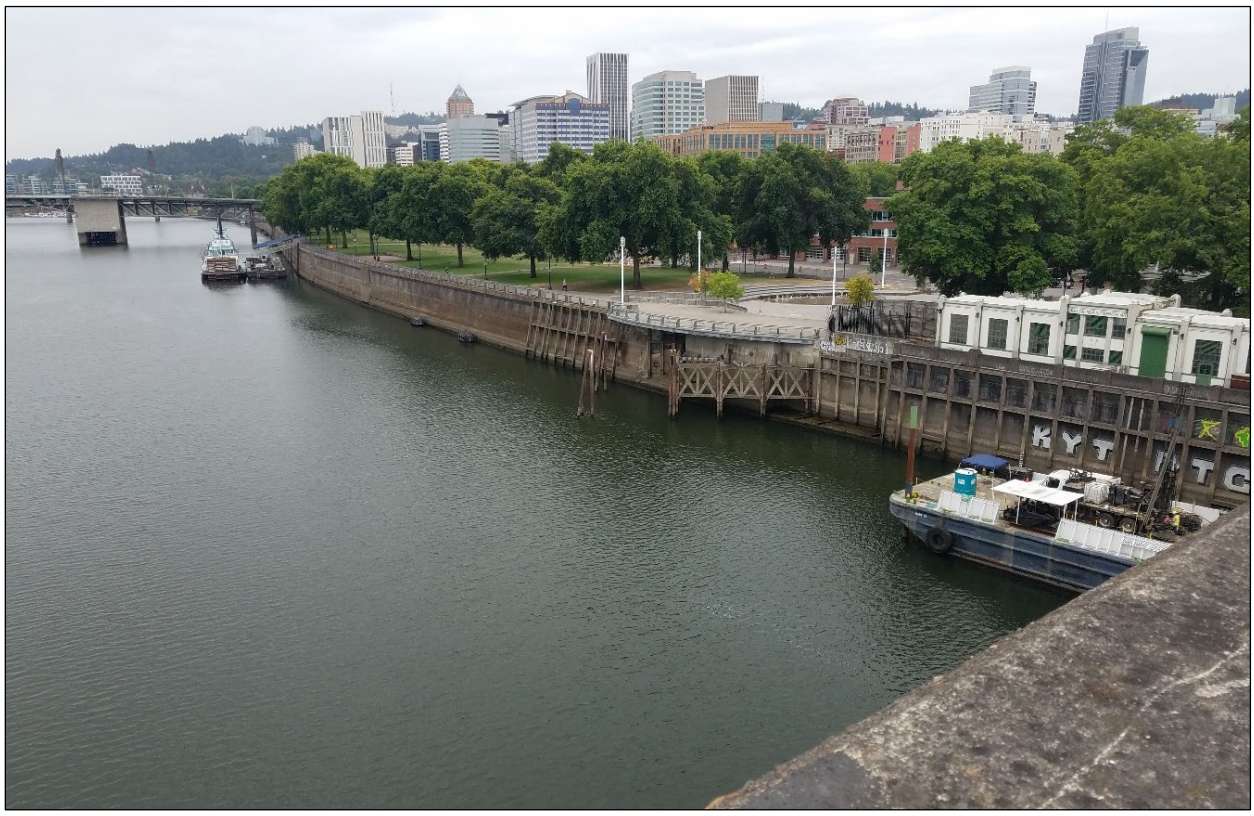


Figure 13. Surviving segment of the original concrete panel Harbor Wall railing surrounding Pier 1. Looking east.

7.9 White Stag Sign

The White Stag Sign was constructed in 1940 on top of the Willamette Tent and Awning Building as an advertisement for White Satin Sugar. The Hirsch-Weiss Manufacturing Company acquired the sign in 1957 and changed the imagery to show a leaping white stag, which was its corporate logo (the company manufactured sportswear). In 2010, the sign was donated to the City of Portland. Some changes were made in the sign lettering, but the white stag image was retained. The White Stag Sign is situated within the boundaries of the Skidmore/Old Town NHLD but dates after the period of significance for the District. It was designated a City landmark in 1977 and has been determined eligible for listing in the NRHP as an individual historic property.

Situated at the west end of the Burnside Bridge, the White Stag Sign has gained status as an unofficial welcome to the central business district. The image of the leaping stag has been widely copied by Portland businesses and organizations as emblematic of the city.

None of the design modifications would directly affect the White Stag Sign. The center vertical lift span option includes towers that would partially obscure the view of the sign looking to the west. This effect would diminish as one moves west and the present open viewshed would be maintained west of the center span. The impact would be avoided with the bascule lift option.

A no adverse effects finding is recommended for the Refined Alternative for the White Stag Sign.

Figure 14. The White Stag Sign, looking up from NW Naito Parkway.

7.10 Burnside Bridge

The present Burnside Bridge was constructed in 1925–1926 to replace the earlier bridge constructed in 1892–1894. The 1890s bridge was a swing-span truss bridge of wrought iron and steel. The 1920s bridge is a bascule lift bridge of concrete and was the first Willamette River bridge whose design was defined by both engineers and an architect. The bridge was listed on the NRHP in 2012 as one of four Willamette River bridges in a Multiple Property Documentation.

The Refined Long-span Alternative applies only to elements of a new bridge that would completely replace the existing bridge. They therefore do not alter the Draft EIS recommendation of an adverse effects finding for the Burnside Bridge.

Figure 15. Aerial view to the west of the Burnside Bridge.

7.11 Frigidaire/Templeton Building

The Frigidaire Building was constructed in 1929 to serve as the location for the retail sales of Frigidaire refrigerators. Those sales were relocated in 1933, and the building was subsequently occupied by the Oregon Liquor Control Commission. It was used by Ronald Templeton from 1959 to 1997, hence its secondary name. With very minor alterations, the building has retained its original character and was individually listed in the NRHP in 1989 as a property in the Portland Eastside Multiple Property Documentation.

The Frigidaire Building was constructed to be attached to the eastern approach of the Burnside Bridge. The bridge sidewalk provided direct public access to the building interior and to display windows. The design modifications would substantially reduce the sidewalk connection, which was an integral element of the building design. In addition, the cable-stayed option for the eastern approach would introduce diagonal cables directly in front of the Frigidaire Building. The bridge balustrade would be lost with demolition of the bridge. A new railing would be required for safety around the new opening between the Frigidaire Building and the sidewalk. This railing should be sensitive in design to the historic character of the Frigidaire Building.

These changes would compromise the feeling and setting of the Frigidaire Building but no other elements of the historic resource. It is therefore recommended that the Refined Alternative would not have an adverse effect with the tied-arch bridge nor with the cable-stayed bridge as long as cables are not located between the sidewalk and the building thus obscuring the building frontage from the sidewalk.

Figure 16. The Frigidaire/Templeton Building, looking west.

7.12 Union Pacific Railroad

The Union Pacific Railroad (UPRR) alignment through the APE occupies the route of the Oregon & California (O&C) Railroad constructed in 1868. The O&C was developed by Benjamin Holladay, an important and controversial figure in early railroad construction in Oregon. The O&C was subsequently incorporated into the Southern Pacific Railroad system in the 1880s. The Southern Pacific was acquired by the UPRR in 1996. The segment of the historic O&C alignment within the current APE represents a tiny fraction of the entire O&C alignment. Other than the alignment itself, there are no known extant features of the O&C in the APE. The UPRR alignment has been recommended eligible for the NRHP under Criterion A for its importance in the early economic development of Oregon and under Criterion B for its association with Holladay.

The design modifications would affect the setting of the UPRR by reducing the number of bents and constructing a new visual element with either a tied-arch or cable-stayed approach span crossing over the UPRR. No bridge across the Willamette existed in this area when the O&C was constructed. The presence of the railroad led to gradual but steady industrial development along the associated waterfront. The existing bridge bents are elements of the industrial setting. Reduction in the number of bents would not substantially affect the setting. There would be no other effects to the railroad.

A no adverse effects finding is therefore recommended for the Refined Alternative for the UPRR.

Figure 17. The UPRR, looking south from the Burnside Bridge.

7.13 Burnside Skatepark

A group of skaters constructed the Burnside Skatepark in 1990 on vacant City land under the eastern approach of the Burnside Bridge on the east side of NE/SE 2nd Avenue. The skatepark has continued to evolve in “do-it-yourself” (DIY) form since 1990. Although on City land and with City approval, it was built without permits, it is managed entirely by the skaters and a skatepark board, and it is not a City park.

Burnside Skatepark has national and international iconic status as the model of a DIY skatepark. It has influenced the design and construction of other DIY skateparks as well as skateparks constructed in public parks. It has therefore been recommended eligible for the NRHP under Criterion A and Criteria Consideration G for its influence on skatepark design and the evolution on skating as a sport over the past 30 years and under Criterion C for the dynamic nature of its design.

One existing bridge bent is situated near the western edge of the skatepark and has been incorporated into skatepark features. All Build Alternatives would remove the uppermost segment of this bent, with the remainder of the bent remaining in place to continue as an element of the skatepark. The Refined Alternative cable-stayed option would remove the existing bents and place new support columns a considerable distance west of the skatepark. The Refined Alternative tied-arch options (A and B) would be supported by two columns on the west side of NE/SE 2nd Avenue opposite the skatepark. This placement of the columns would affect the skatepark setting.

The skatepark is situated in an industrial district with some recent development for retail and residential uses. A finding of no adverse effect is recommended for the Refined Alternative cable-stayed option and for the tied-arch option. While the columns for the tied-arch option would affect the immediate setting of the skatepark, they would not affect the overall industrial setting.

Figure 18. Burnside Skatepark, looking northeast from NE/SE 2nd Avenue.

8 Potential Mitigation

The potential mitigation measures presented in the *EQRB Cultural Resources Technical Report* (Multnomah County 2021a) are still under consideration. Additional mitigation measures could include the following:

Mitigation for the Demolition of the Burnside Bridge

- Many of the images of the 1926 Burnside Bridge in the collections of the City of Portland are not scanned and available online. Identify historic photographs and other visual materials in the City of Portland archives that depict the 1926 Burnside Bridge including images made during design, construction, dedication, and use of the bridge between 1926 and the present day. Scan these photographs and make them publicly available through the City of Portland archives portal online. These images may also be used in other mitigation and documentation efforts.
- Expand on the proposal to update/refresh/bolster the existing Historic American Engineering Record documentation of the Burnside Bridge and upgrade the image quality of the illustration plates in the narrative document. Make a better-quality set of Historic American Engineering Record images available online.
- Manufacture a three-dimensional model of the bridge of durable materials for documentation and public exhibition.
- Create a digital three-dimensional scan of the bridge to support other mitigation, such as interpretation. Perhaps the three-dimensional scan could also be used to create a file that people could download and use to print their own three-dimensional model.
- Record a video of the bridge opening and closing.
- Record a video of the bridge cab interior during opening and closing. With narration from operator explaining the process of opening and closing the bridge.
- Record a video of the internal bridge machinery during the opening and closing sequence.
- Record a video record of the bridge demolition/deconstruction.
- Design and construct interpretive/educational signage on the history of the bridge for placement on the bridge and/or adjacent locations.
- Prepare and publish a history of the lower Willamette River bridges (from the Sellwood Bridge to the St. Johns Bridge) in the context of the human and environmental history of the lower Willamette River.
- Commission a LEGO expert to create an instruction booklet and parts list so people could download and order their own LEGO to build a Burnside Bridge model at home.

Although removal of Pier 1 is not recommended as an adverse effect on the Portland Harbor Wall, reuse of those portions of the original Harbor Wall railing that would be removed should be considered.

9 Agency Coordination

Coordination has continued with appropriate Oregon Department of Transportation staff. In addition, coordination has been undertaken with State Historic Preservation Office staff on definition of the APE and preliminary findings. Coordination has also been conducted with National Park Service staff to address potential project effects in the Skidmore/Old Town NHLD.

10 Preparers

Name	Professional Affiliation	Education	Years of Experience
David V. Ellis	WillametteCRA	MPA	47
Adam Alsobrook	WillametteCRA	BS Architecture, Registered Architect	19

11 References

Multnomah County

2021a. EQRB Cultural Resources Technical Report. Project Library | Multnomah County (multco.us)

2021b. EQRB Description of Alternatives. Project Library | Multnomah County (multco.us)

2021c. EQRB Draft Environmental Impact Statement. Project Library | Multnomah County (multco.us).

2022. EQRB Supplemental Draft Environmental Impact Statement. Project Library | Multnomah County (multco.us).

Sanborn Map and Publishing Company

1908-1909 *Insurance Maps of Portland, Oregon*. Sanborn Map & Publishing Company, New York, Portland, Oregon.

1908-1950 *Insurance Maps of Portland, Oregon*. Sanborn Map & Publishing Company, New York, Portland, Oregon.

Appendix A.
Finding of Effect Forms

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ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	Street Address: 30 NW Naito Parkway	
City, County: Portland, Multnomah	Latitude: 45.522743 Longitude: (-)122.669336	
Surveyor: Elizabeth O'Brien	Affiliation: WillametteCRA	Date Recorded: 07/12/2019

Photo:

Photo Caption: Ankeny Pump Station, facing southwest from the Burnside Bridge (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. Willamette Cultural Resources Associates (WillametteCRA) has recommended the Ankeny Pump Station as individually eligible for listing on the National Register of Historic Places. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Ankeny Pump Station. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long Span alternative would require replacing the existing bridge with a new bridge, known as the Long Span option. The Long Span alternative would construct a new bridge on the same alignment as the current bridge. The existing approach span would be a girder. The number of bents on the western approach in Waterfront Park would be reduced from four to two (existing bents would be removed only to ground level). The Ankeny Pumping Station is immediately adjacent to the bridge's Pier 1. The Refined Long Span alternative would reinforce Pier 1 through the use of jet grouting as it is situated on and in soils subject to liquefaction in an earthquake. Other than demolition of the current approach span and construction of a new span (which includes reinforcement of Pier 1), no other activities are proposed at this time in the vicinity of the Ankeny Pumping Station.

3. Identification and Description of the Historic Resource

The Ankeny Pumping Station is a poured concrete pumping station building constructed in 1927-1929 as a part of the Front Street Intercepting Sewer project along Portland's waterfront. The project consisted of building a mile-long seawall along the Willamette River harbor line and an accompanying sewer system running from Jefferson Street to Glisan Street.

The purpose of the intercepting sewer project was to consolidate sewage outflow to the river from downtown Portland, with the seawall serving to minimize the threat of flooding in the city's central business district. The pumping station is situated on public property at the base of SW Ankeny Street, just south of the Burnside Bridge in Section 3, Township 1 North, Range 3 East, Willamette Meridian. The concrete building is situated next to the Willamette River and the Harbor Wall, which was constructed at the same time as the pumping station. Today, the pumping station is incorporated into Tom McCall Waterfront Park (built 1974) and is bordered by a concrete retaining wall and walkway within the park.

The building was constructed in the Art Deco style expressed through vertical pilasters defining each bay and rising above the roofline topped by pyramidal caps. Each pilaster has a single rectilinear flute and base. The building is organized by a center mass slightly elevated above two flanking three-bay wings. The center mass

projects westward in a third wing added in 1952. The central bay is framed by corner pilasters rising above the roof, subdivided into three bays defined by slightly smaller pilasters.

Large, metal multi-light window bays rest on a continuous concrete sill. Some of the windows may be replacements but are similar in design to the original. Period (likely 1950s) metal-bracketed sconces with hanging acorn globes hang from each pilaster.

The building's original footprint measured approximately 100' x 20' with an approximate height of 30'. The 1929 building was constructed of poured concrete with a "4 foot concrete slab floor" resting on timber piles driven into a timber crib structure, "capped with a 2 foot concrete seal" (Laurgaard 1933). The pumping station was built into the harbor wall bulkhead and considered as an "integral" part of the seawall (Laurgaard 1933:17). The pump room is situated below ground level, and the main floor originally divided into three rooms. A comfort station was planned for the north room and the others devoted to electrical equipment and a control room (Laurgaard 1933:17). Five pumps were installed into the building operated by automatic "float controlled switches" (Laurgaard 1933:18).

The east façade is divided by the center bay and three-bay wide wings. Most of the detailing is original except for a metal retractable door in the north bay adjacent to the center bay. A pedestrian door is situated in the adjacent bay. Lighting sconces hang from each pilaster, near the top of the wing windows. Several of the windows have metal vents that do not appear in a 1928 photograph. The center bay is inscribed above the second-floor windows with "MUNICIPAL SEWAGE PUMPING PLANT" and below "1929 AD."

The west primary façade is oriented towards SW Naito Parkway. A center projecting wing, constructed in 1952, is three bays in width, and the recessed north and south wings are two bays wide. The center bay is slightly elevated and subdivided into three bays with similar pilasters as the east façade. Multi-light windows light the first and second levels of the center bay. Modern steel fencing secures the space between the north and south wings.

The north façade consists of the single bay wide south wing and the single bay wide west wing. Each bay features double doors at the ground level and above metal multi-light transom windows. Modern metal fencing protects the area north of the building.

The south façade is a single bay wide with tall, metal double doors with four-light windows. Tall corner pilasters frame the south bay. The west projecting wing's south façade has a metal clad shed roof canopy protecting a pedestrian entry. Poured concrete walls topped by metal fencing enclose a service yard. The yard is accessed by massive metal, hinged gates. The west projecting wing was added in the early 1950s and completed in 1952, designed much in the manner as the original building. New equipment was added to meet the growing demands on the system and to pump sewage to a pumping station and sewage treatment plant on the east side of the Willamette River (*Oregonian* 1952:14). Other unspecified modifications occurred in the 1960s and 1990s. More recent changes are to the exterior setting of fencing (2007) and retaining wall in front of the building. Tice Electric Company replaced the interior electrical system in 2017. Catena Consulting Engineers completed a recent seismic upgrade (Catena 2019).

One of only two remaining segments of the original Harbor Wall railing extend along the river face of the Ankeny Pump Station enclosure.

There are currently six pumps, two 250HP and four 200HP, housed in the pumping station (Tice Electric Company 2019). The Pump Station has been seismically retrofitted.

The Ankeny Pump Station has been recommended eligible for listing in the National Register under Criteria A and C. It is recommended eligible under Criterion A for its pivotal role in the Front Street Interceptor Project, one of the City's first major efforts to address pollution of the Willamette River, as well as redevelopment of the waterfront in the city center. Under Criterion C, the Pump Station is an important contribution for both its Art Deco style and as an engineering facility that continues to serve its original purpose.

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be

unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the preferred alternative would replace the existing bridge with a new bridge, known as the Long Span option.

The Long Span alternative would construct a new bridge on the same alignment as the current bridge, which would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

The proposed Refined Long Span alternative would involve construction of a new bridge on the same alignment of the current bridge. The adjacent Pier 1 would be removed and the existing four bents would be replaced by two bents in Waterfront Park. According to 36 CFR Part 800.5(a)(1), adverse effects occur when an undertaking directly or indirectly alters characteristics of a historic property that qualify it for inclusion in the NRHP; future and cumulative effects of the undertaking also need to be considered. An example listed in 800.5(a)(2) is “visual, atmospheric, or audible intrusions” (36 CFR 800.5).

The undertaking will not affect the integrity of location, design, materials, workmanship, feeling, and association of the Ankeny Pumping Station. Replacing four bents with two and removal of Pier 1 would alter the setting, providing a more open view from the Station to the north and northwest. The current Burnside Bridge had been constructed three years before the Pumping Station. Pier 1 and the existing bents were therefore present when the Pumping Station was constructed. There is no evidence, however, that the bridge defined or influenced either the location or design of the Pumping Station. This change in setting is therefore not considered so substantial as to adversely affect the Pumping Station’s eligibility for listing on the NRHP. In sum, the project will have a No Adverse Effect on the Ankeny Pumping Station historic property

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge Project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed Refined Long Span alternative would not adversely affect the Ankeny Pump Station’s eligibility for listing under Criteria A and C nor its integrity. WillametteCRA recommends a Finding of No Adverse Effect for this historic property.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

8. Sources

Catena
2019 Ankeny Pump Station. Electronic document, https://www.catenaengineers.com/project.php?id=202, accessed July 25, 2019.

Laurgaard, Olaf
1933 *Treatise on the Design, Test & Construction of the Front St. Intercepting Sewer and Drainage System in Portland, Oregon, Including Intercepting Sewer, Pumping Plant, & Concrete Bulkhead-Wall on Gravel filled Timber Cribs*. American Society of Civil Engineers, New York.

Oregonian [Portland, Oregon]
1952 Pipe Starts Beneath Willamette to Carry Sewage. 18 July:14.

Tice Electronic Company
2019 Ankeny Pump Station Upgrade. Electronic document, https://ticeelectric.com/project/ankeny/, accessed July 25, 2019.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Maps and Figures

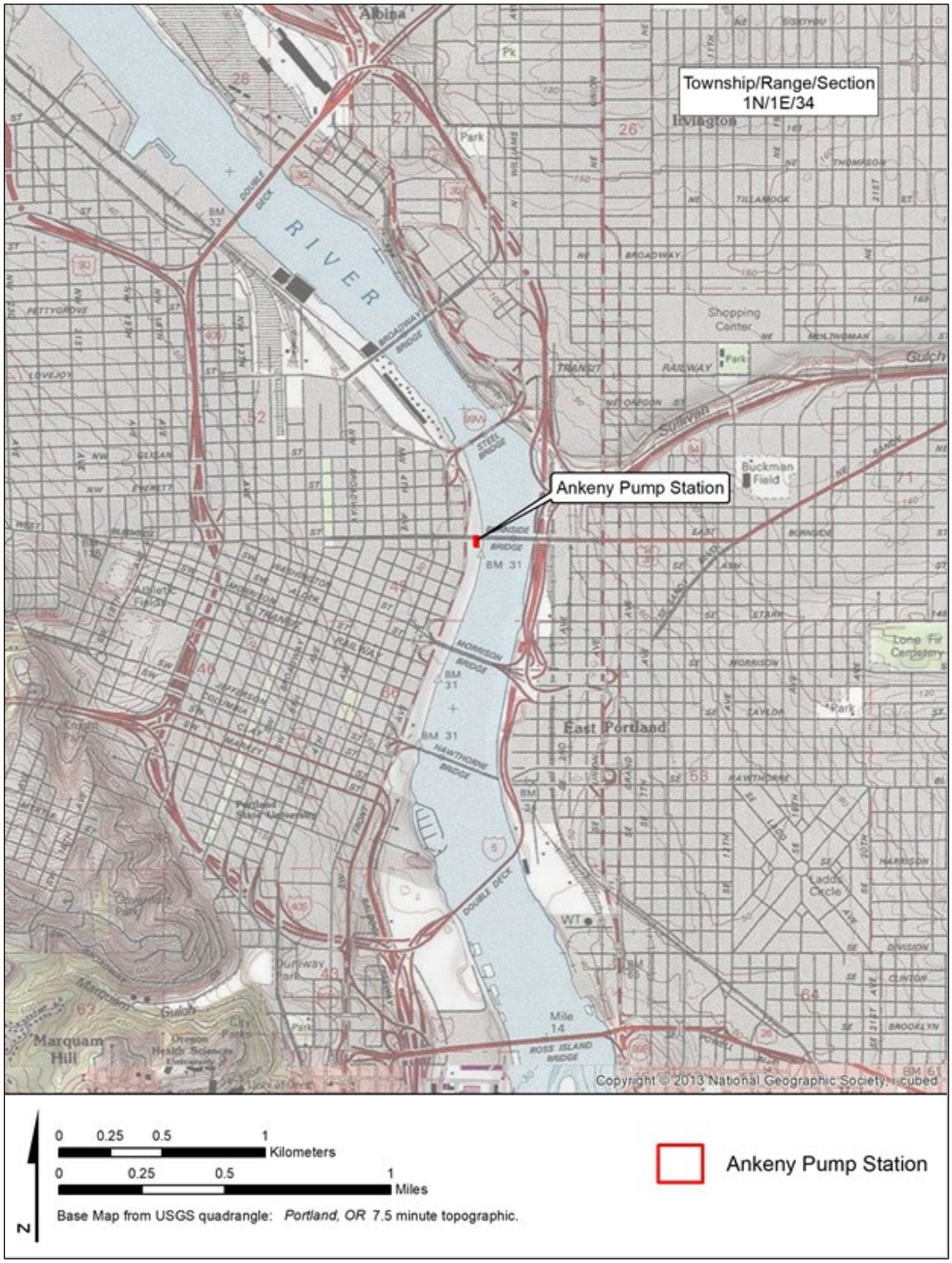

Figure 1. Location map.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Figure 2. Overview of Ankeny Pump Station.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

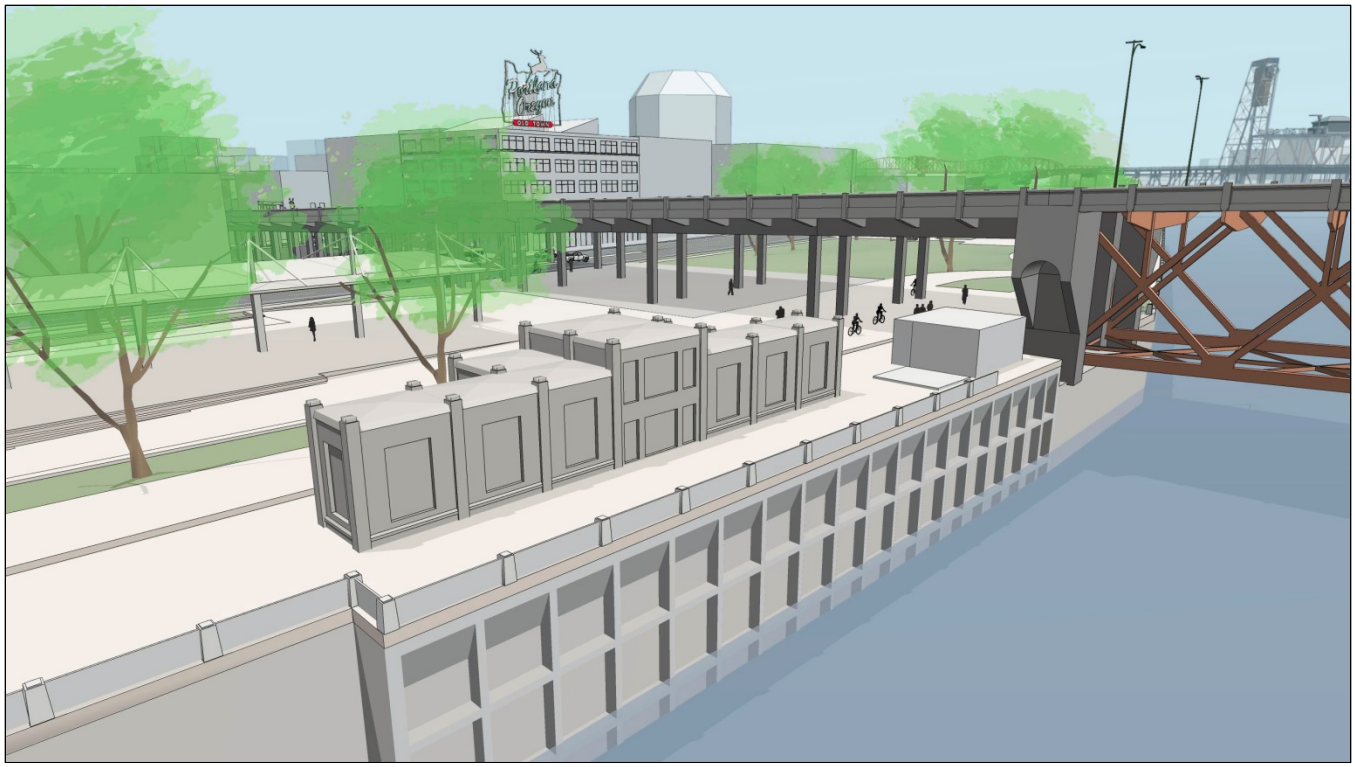

Figure 3. Ankeny Pumping Station, artist's rendering of existing conditions (Fat Pencil Studio, 2021), oblique view looking northwest.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

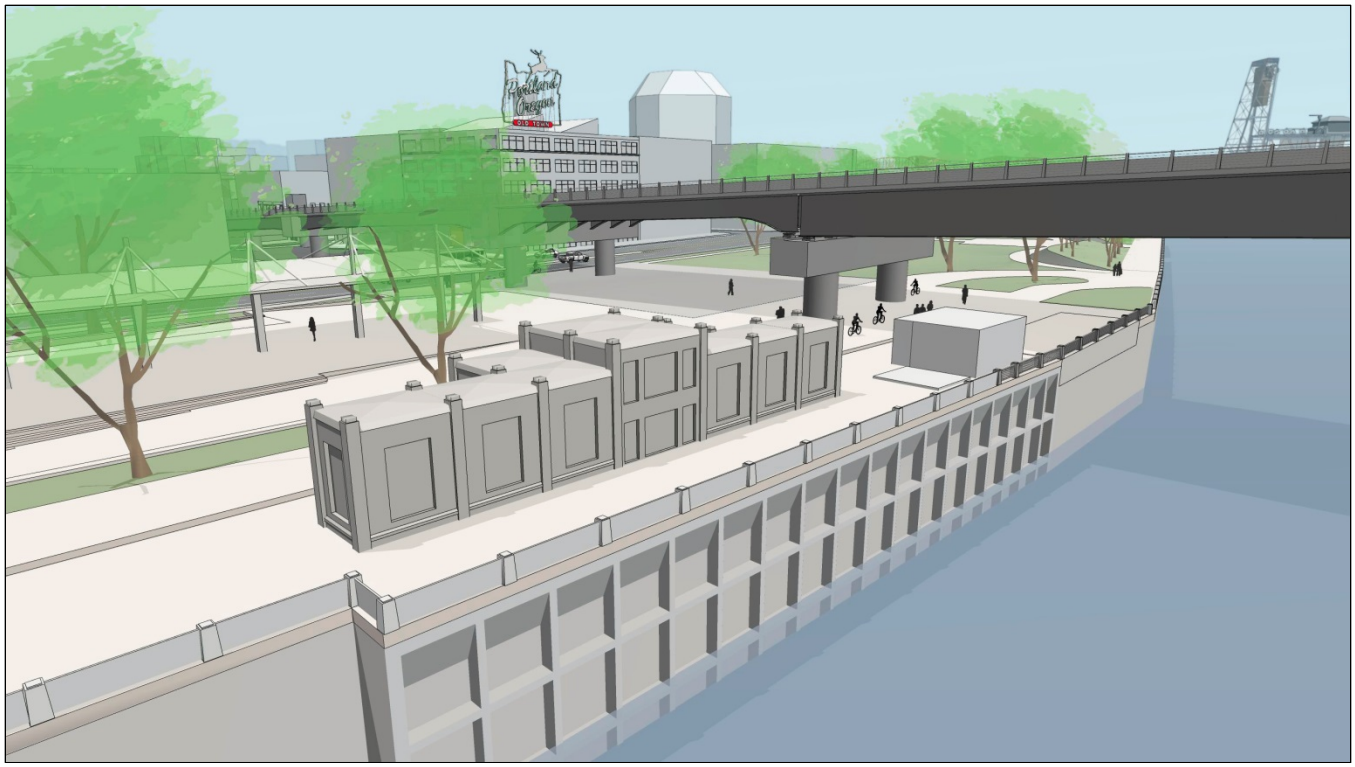

Figure 4. Ankeny Pumping Station, artist's rendering (Fat Pencil Studio, 2021), oblique view looking northwest. This figure illustrates the setting of the Pump Station after demolition of the existing Burnside Bridge, removal of Pier 1, and replacement of the west approach with a girder span.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Figure 5. Ankeny Pumping Station on the right, artist's rendering of existing conditions (Fat Pencil Studio, 2021), looking north.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Figure 6. Ankeny Pumping Station on the right, artist's rendering (Fat Pencil Studio, 2021) of altered setting with demolition of the existing Burnside Bridge and columns for the new girder span. Looking north.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Photographs

Figure 7. Ankeny Pump Station, facing east (Elizabeth O'Brien, 2019).

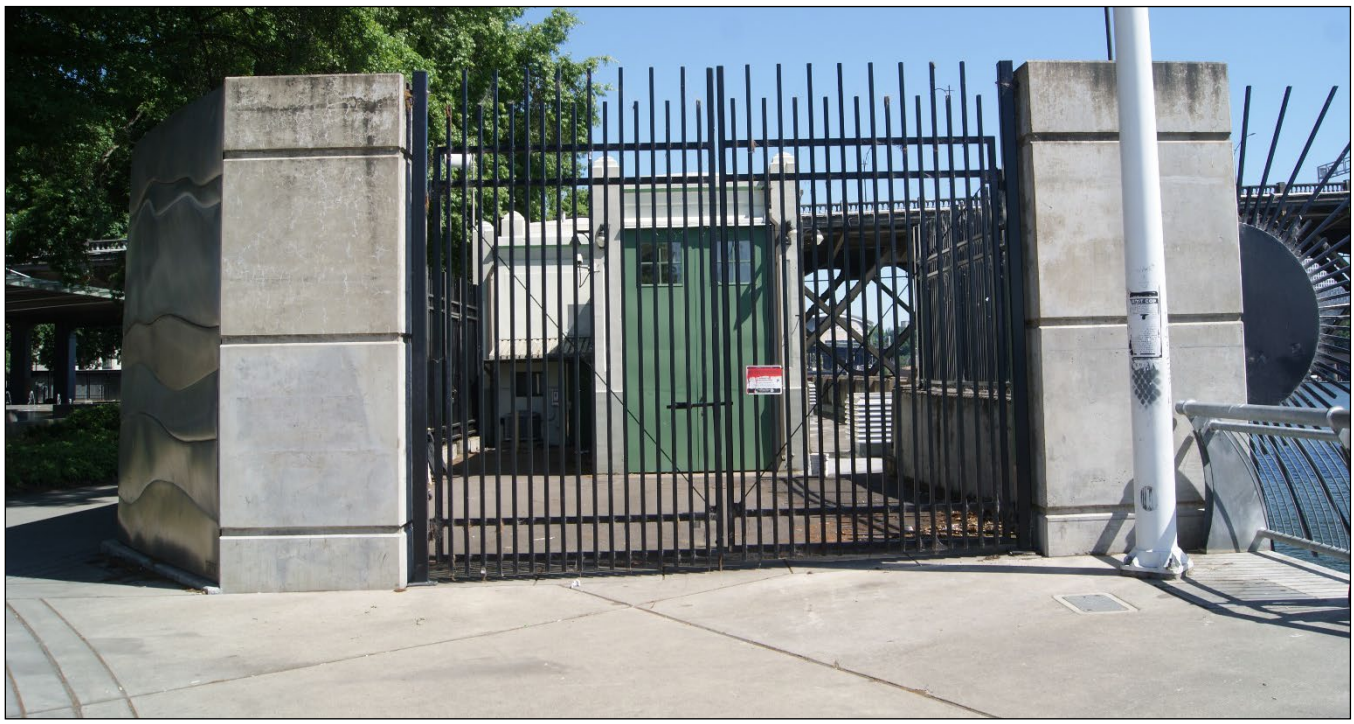

Figure 8. Ankeny Pump Station, facing north (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

Figure 9. Ankeny Pump Station on the right; Pier 1 and existing Bent 19 on the left, facing east (David V. Ellis, 2021).

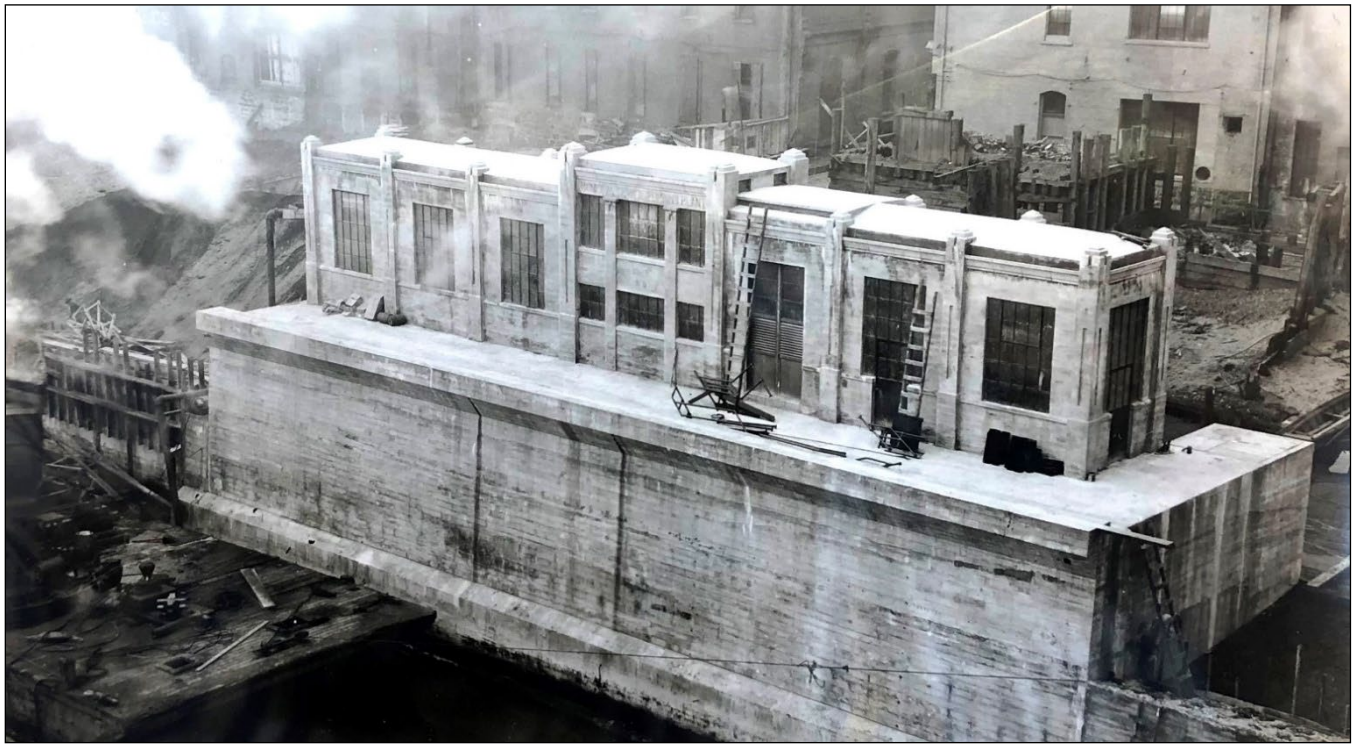

Figure 10. Final construction of the Ankeny Pump Station in1929, looking southwest (Portland City Archives).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (Ankeny Pump Station)	
Street Address: 30 NW Naito Parkway	City, County: Portland, Multnomah

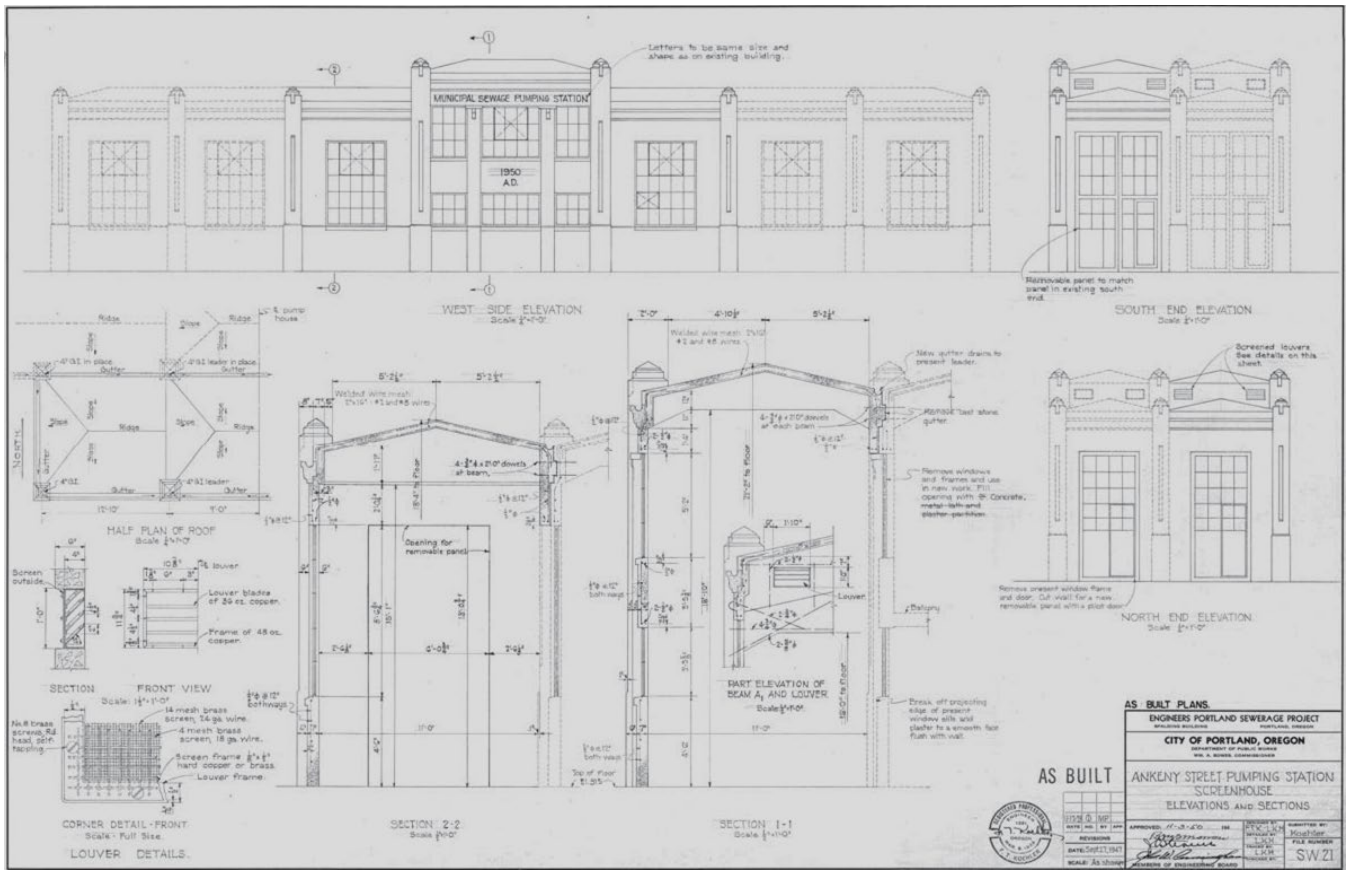

Figure 11. The 1951 As Built plan for the expansion of Ankeny Pumping Plan (available at Building Permit Center).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]		
Property Name: Bates Building	Street Address: 101-117 West Burnside Street	
City, County: Portland, Multnomah	Latitude: 45.523244 Longitude: (-) 122.671636	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/25/2021

Photo:

Photo Caption: Bates Building, looking northwest (Elizabeth O'Brien, 2019)

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The Bates Building at 101-117 West Burnside Street is a contributing resource in the Skidmore/Old Town Historic District, which was listed in the National Register of Historic Places (NRHP) in 1975 and designated as a National Historic Landmark (NHL) in 1977. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Bates Building. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The Bates Building is addressed as 101-117 West Burnside Street and is located at the north side of the west approach of the Burnside Bridge and on the west side of NW First Avenue (Portland Maps) (Figures 1 through 4). The Bates Building was designed by an unknown architect and constructed in 1885. It was originally used as a hotel. It is a three-story, brick masonry commercial block designed in a utilitarian style. The building was extensively altered in 1925 to make way for the construction of the west approach of the Burnside Bridge (NRHP 2008:23:24). The storefront level has large display windows and an arched central entrance. Other alterations were made to the building in 1981; some windows were replaced in 2003. The Bates Building was not included in the City of Portland Historic Resource Inventory of 1984 and was originally classified as not contributing to the significance of the Skidmore/Old Town Historic District. However, this classification has been changed to contributing. The alterations of the storefront are deemed reversible and other character-defining features of the building are intact.

The existing west approach of the Burnside Bridge will be removed and replaced with a new west approach span as part of the proposed undertaking. The westernmost edge of the existing west approach span is located immediately to the south of the Bates Building, and a bulkhead retaining wall is located underneath the span on the west side of First Avenue (Figures 5 through 11). The overall configuration, width, and slope of the road prism along the south façade of the Bates Building will not change as part of the proposed undertaking. The existing concrete sidewalk will be replaced with a concrete sidewalk with the same elevation and slope along the south façade of the Bates Building (Figures 12 through 19).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the preferred alternative would replace the existing bridge with a new bridge, known as the Long Span option. The Refined Long-span Alternative would construct a new bridge on the same alignment as the current bridge, which would necessitate the demolition of the existing Burnside Bridge.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

5. Evaluation of Effects

Location: The proposed replacement of the Burnside Bridge will not require the Bates Building to be relocated or removed, therefore, the undertaking will have no effect to the resource's integrity of location.

Setting: The proposed replacement of the Burnside Bridge will not alter the current relationship of the Bates Building to the sidewalk level along the north side of the west approach span or at the west side of NW First Avenue. Concrete sidewalks will be replaced in kind with concrete sidewalks. Therefore, the setting of the Bates Building would not be adversely affected by the proposed undertaking.

Design: The proposed replacement of the Burnside Bridge will not alter the physical form, structure, and style of the Bates Building; therefore, the undertaking will have no effect to the resource's integrity of design.

Materials: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical elements of the Bates Building, therefore, the undertaking will have no effect to the resource's integrity of materials.

Workmanship: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical evidence of the historic construction techniques used to build the Bates Building, therefore, the undertaking will have no effect to the resource's integrity of workmanship.

Feeling: The proposed replacement of the Burnside Bridge will not alter the physical features which collectively convey the historic character of the Bates Building; therefore, the undertaking will have no effect to the resource's integrity of feeling.

Association: The proposed replacement of the Burnside Bridge will not diminish or eliminate the direct link that the Bates Building has to important historic events or persons significant to our past, therefore, the undertaking will have no effect to the resource's integrity of association.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span alternative would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The replacement of the existing west approach span of the Burnside Bridge would have no adverse effect to the Bates Building for either direct or indirect effects.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

8. Sources

EarthExplorer
1951 Aerial Photograph, Entity ID 1QO0000020014, 25 October. United States Geological Survey. Electronic resource, https://earthexplorer.usgs.gov/, accessed August 2021.

Google Earth
2021 "Burnside Bridge." Electronic resource, https://earth.google.com/web/, accessed August 2021.

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Portland Archives
1935a "Aerial of Downtown Portland including Burnside, Steel and Broadway Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number A2005-005.1449.10, Record Number AP/476. Electronic resource, https://efiles.portlandoregon.gov/Record/2043501/, accessed August 2021.
1935b "Aerial view of the downtown waterfront near the Burnside and Steel Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number 2000-03, Record Number AP/666. Electronic resource, https://efiles.portlandoregon.gov/Record/2298287/, accessed August 2021.

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2021 "101-117 W Burnside St." Electronic resource, https://www.portlandmaps.com/detail/property/101-117-W-BURNSIDE-ST/R140343_did/, accessed August 2021.

Sanborn Map Company (Sanborn)
1908a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1908b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1950a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.
1950b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.

United States Geological Survey (USGS)
1990 "Portland, OR Quadrangle, 7.5 Minute." TopoView. Electronic resource, https://ngmdb.usgs.gov/topoview/, accessed August 2021.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Maps and Figures

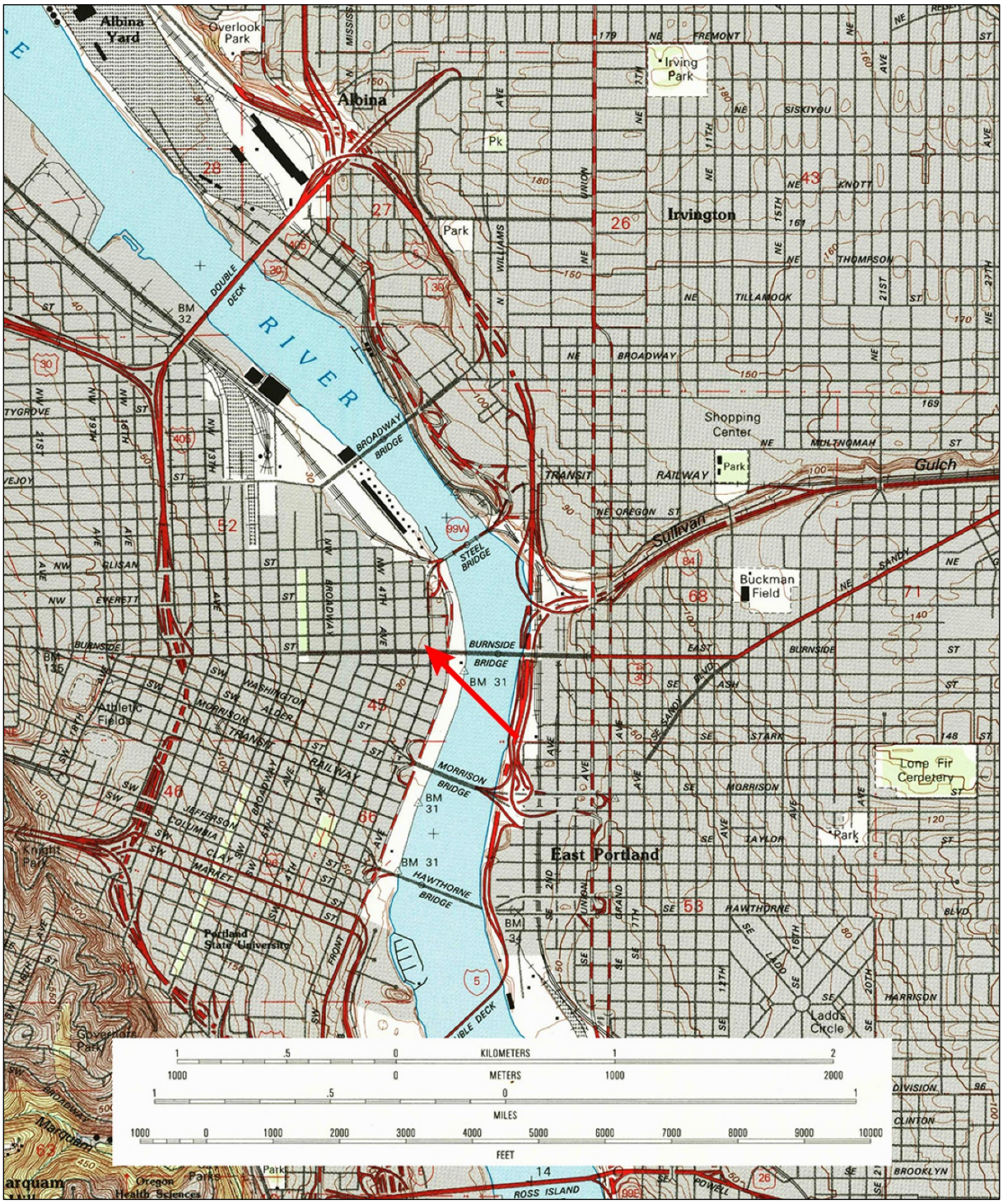

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of the Bates Building (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

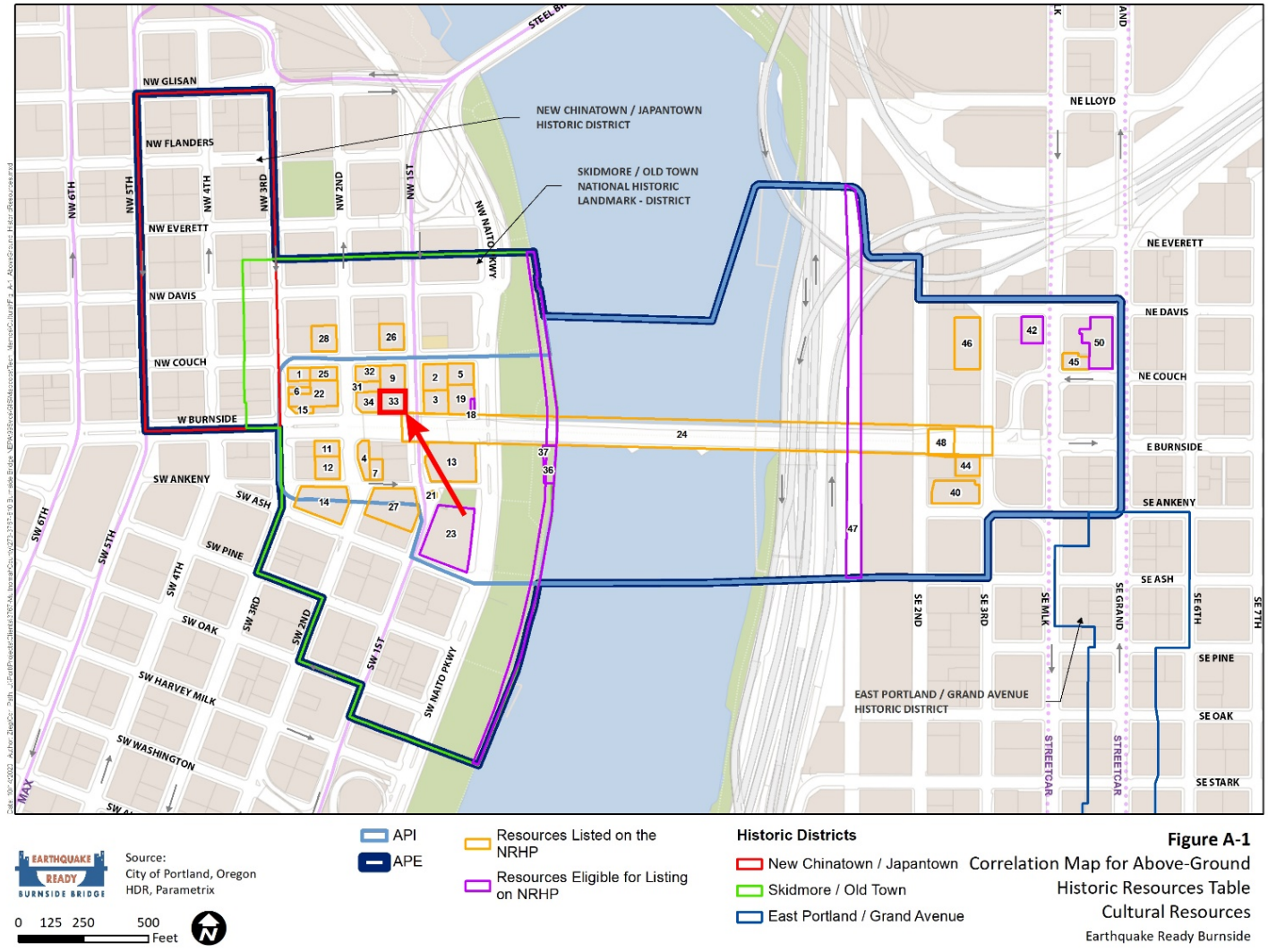

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the Bates Building, which is outlined in red.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Figure 3: Aerial photograph with location of the Bates Building indicated by red line (Google Earth).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Figure 4: 1951 aerial photograph with location of the Bates Building indicated by red line (USGS EarthExplorer).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

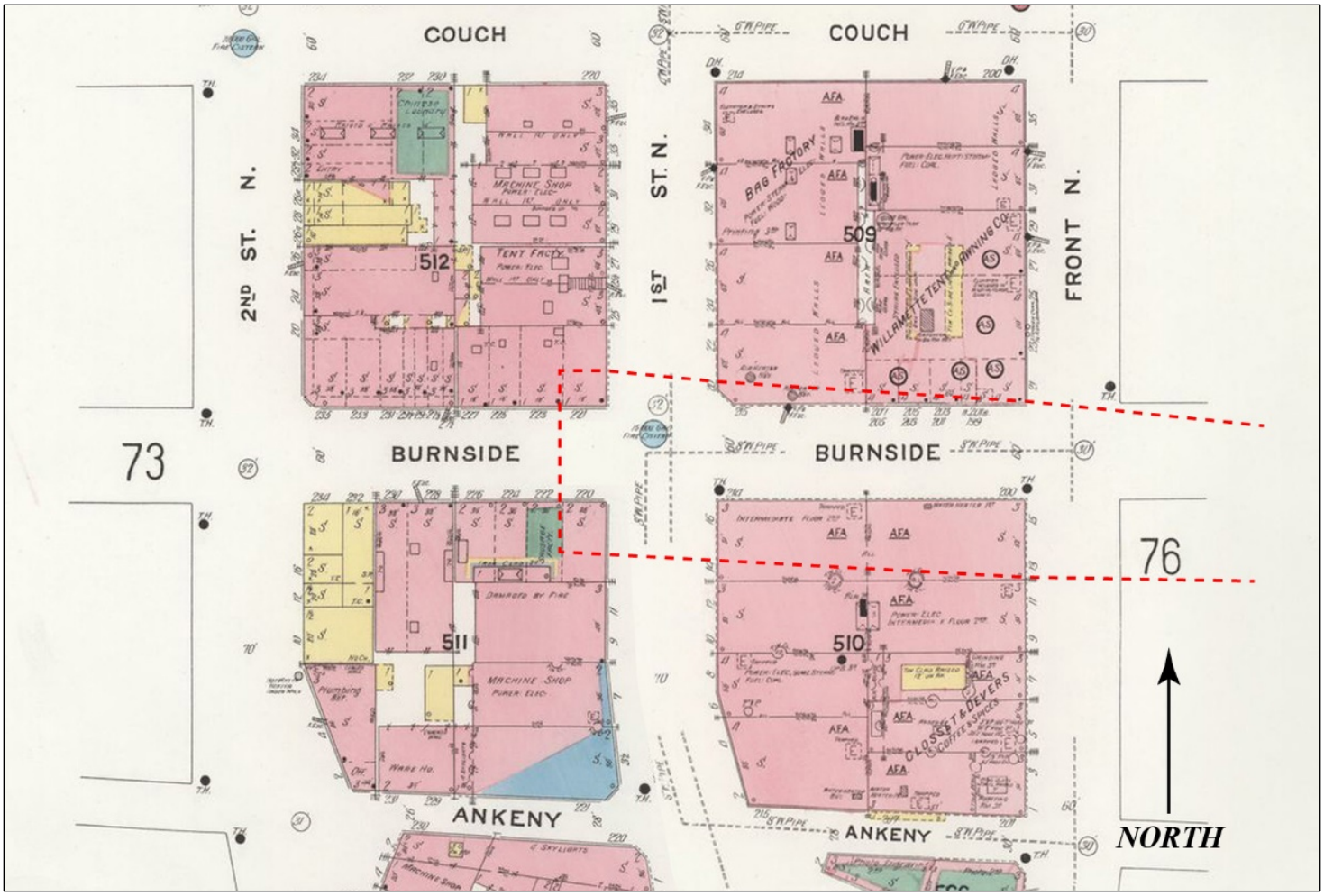

Figure 5: Sanborn maps, Volume 1, 1908. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

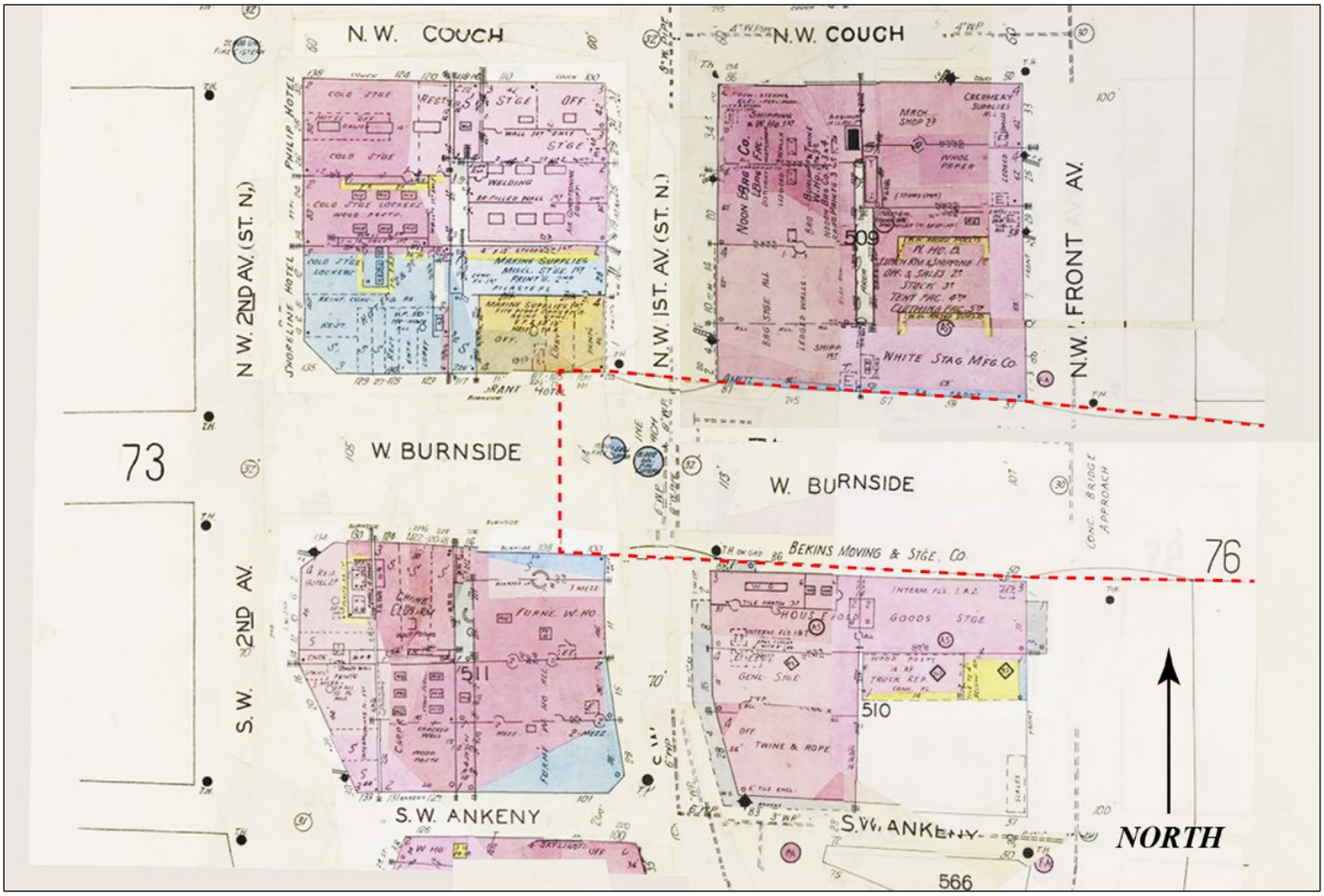

Figure 6: Sanborn maps, Volume 1, 1950. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

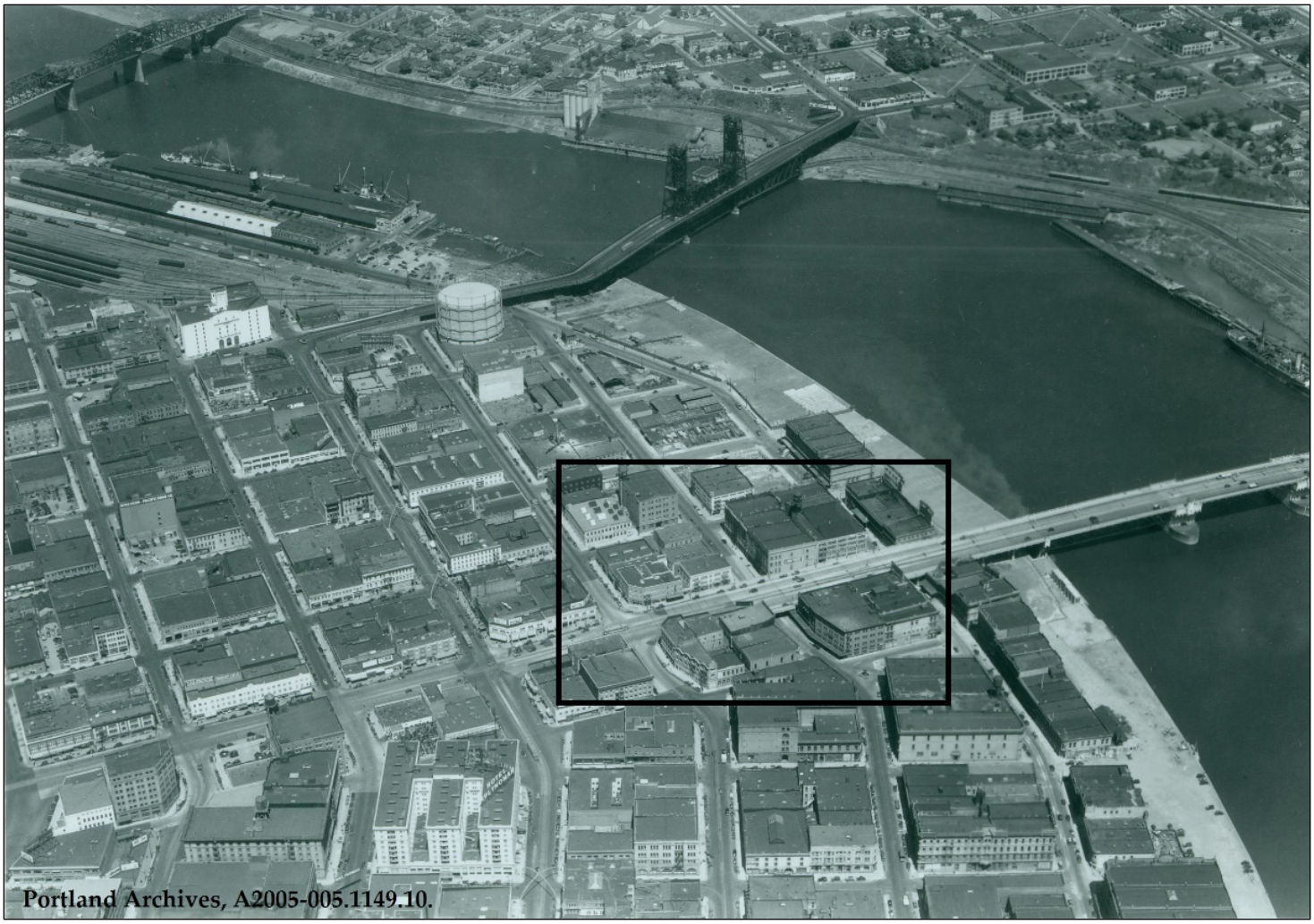

Figure 7: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Black box indicates excerpt in Figure 8 below (Portland Archives, A2005-005.1149.10).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

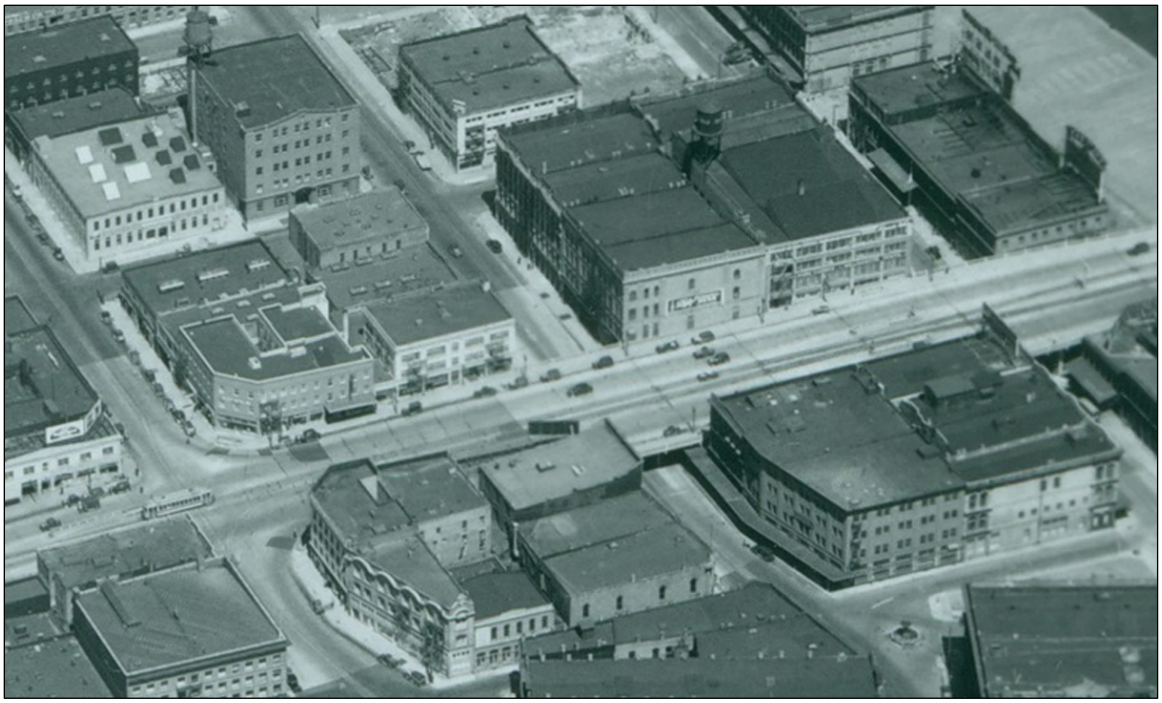

Figure 8: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Excerpt of Figure 7 above (Portland Archives, A2005-005.1149.10).

Figure 9: Aerial view of the downtown waterfront near the Burnside and Steel Bridges, December 31, 1935 (Portland Archives, 2000-03).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

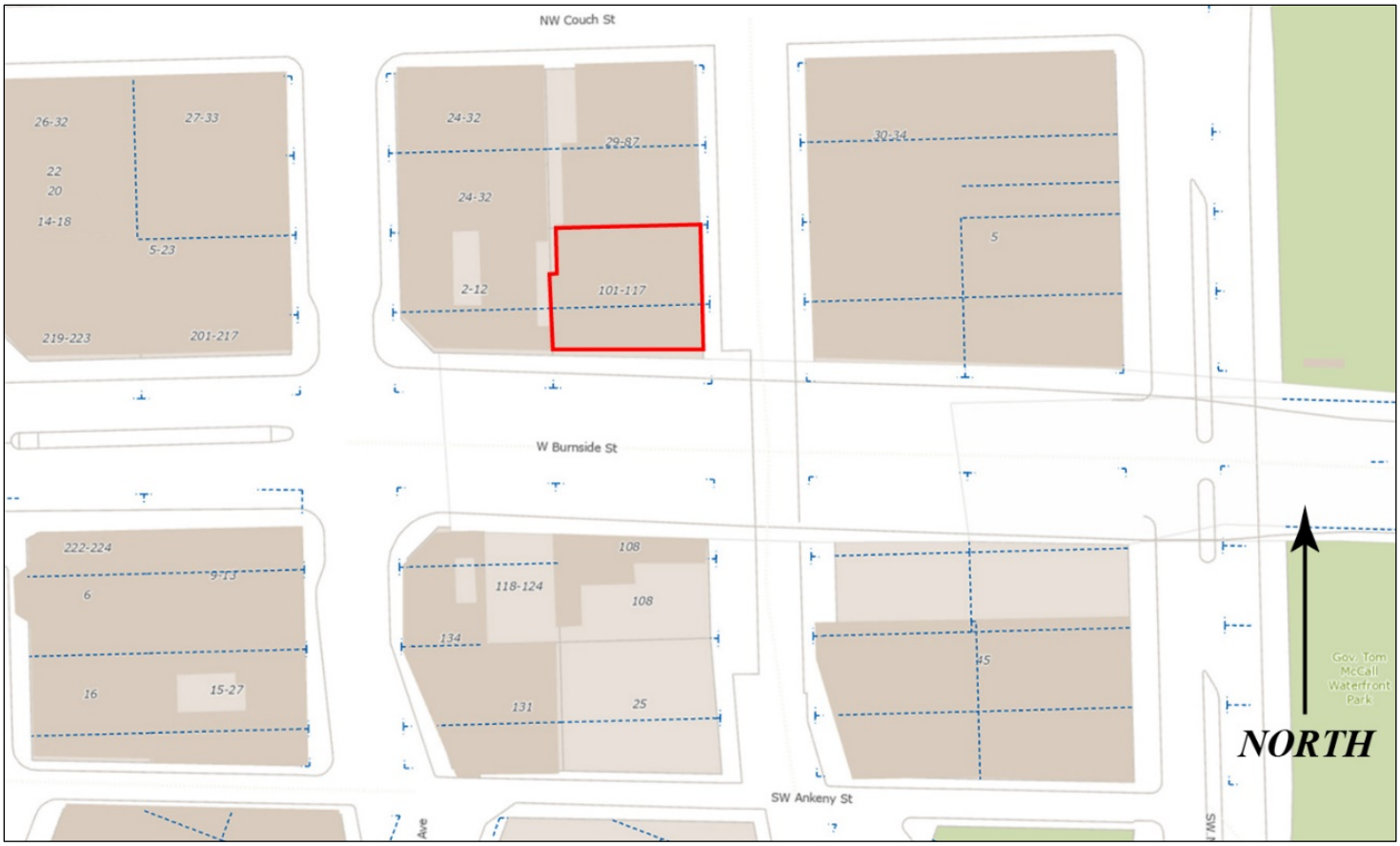

Figure 10: Footprint of the Bates Building superimposed on property line map (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

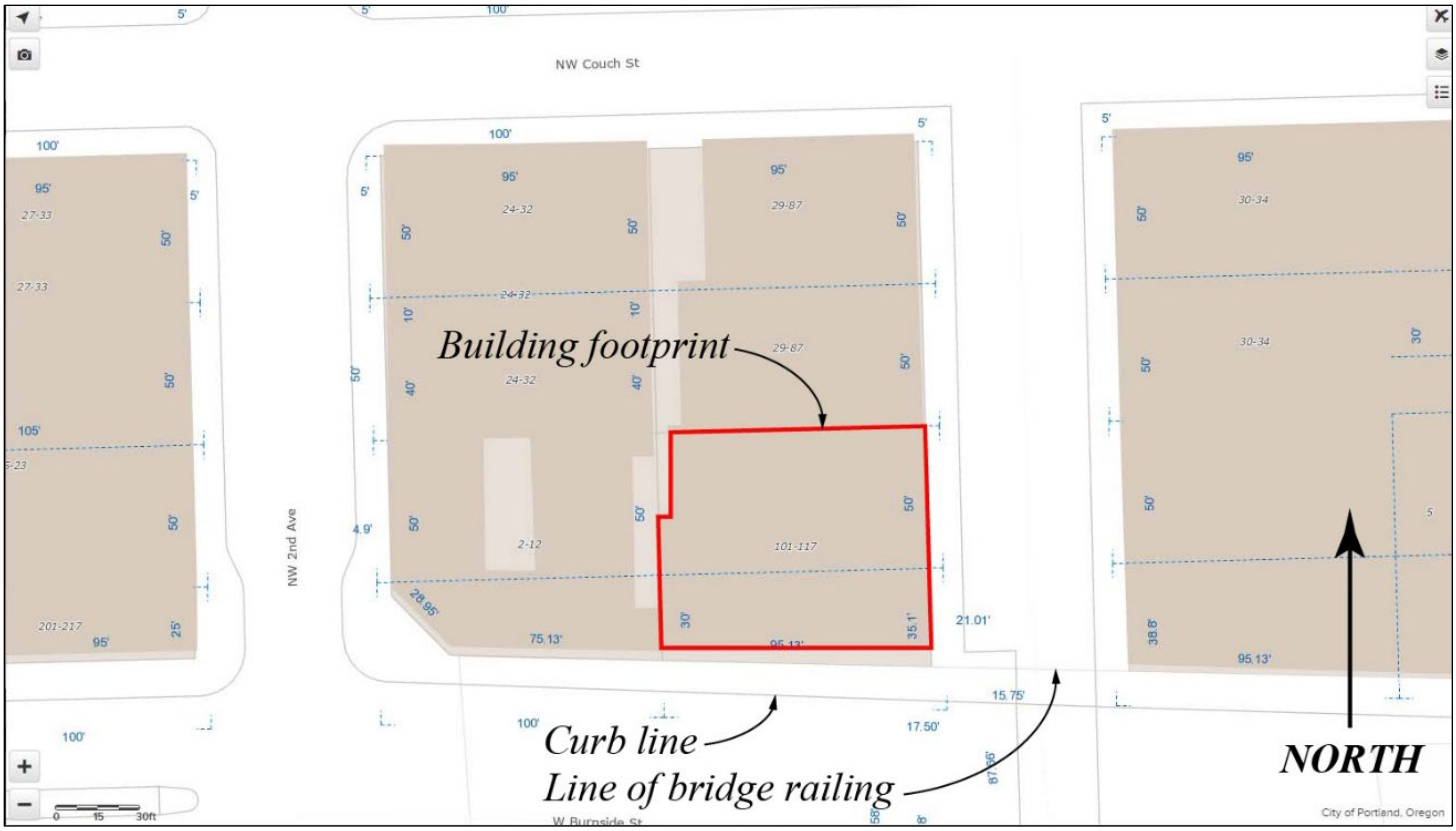

Figure 11: Footprint of the Bates Building superimposed on property line map, with elements of existing Burnside Bridge indicated (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Photographs

Figure 12: Bates Building, view looking north (Elizabeth O'Brien, 2019).

Figure 13: Bates Building, detail of entry at sidewalk, view looking northwest (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Figure 14: Bates Building, section of sidewalk and balustrade at west approach to east, view looking north (Elizabeth O'Brien, 2019).

Figure 15: Bates Building, east façade and sidewalk, view looking south (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

Figure 16: Bates Building, artist's rendering of existing condition of west approach, aerial view looking northwest (Fat Pencil Studio, 2021).

Figure 17: Bates Building, artist's rendering of replacement west approach span, including proposed elevator; aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Bates Building	
Street Address: 101-117 West Burnside Street	City, County: Portland, Multnomah

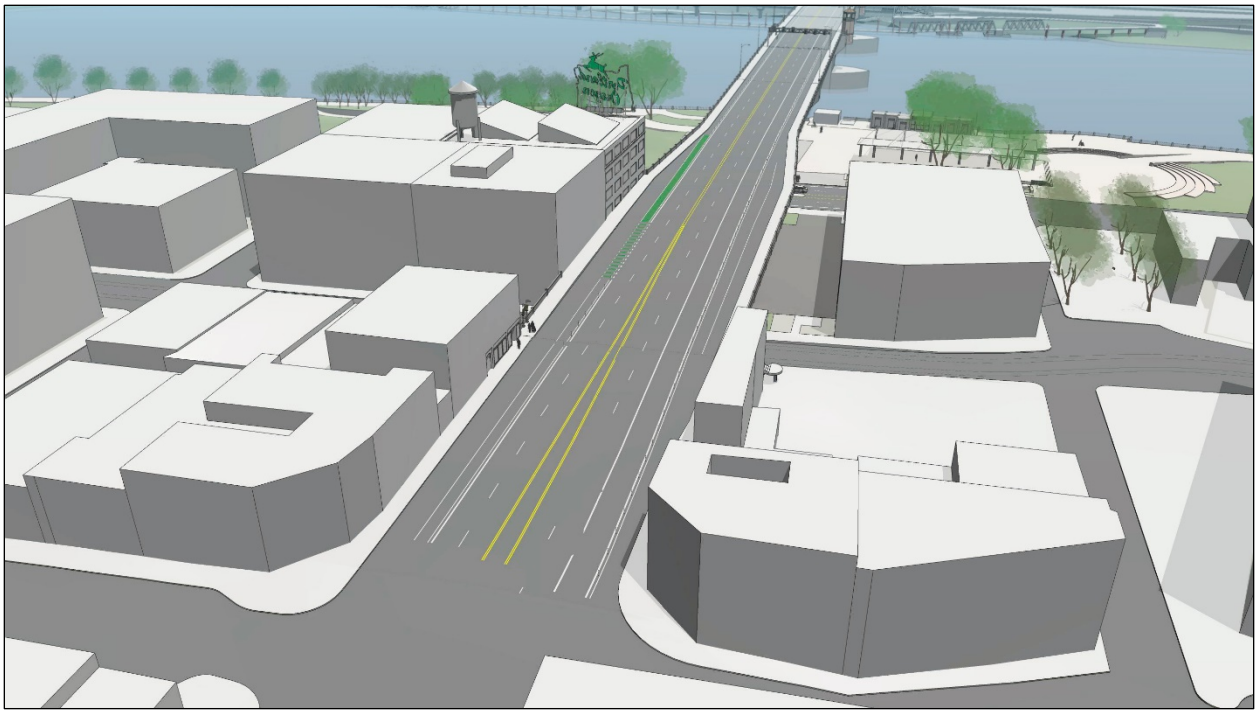

Figure 18: Bates Building, artist's rendering of existing condition of west approach, aerial view looking northeast (Fat Pencil Studio, 2021).

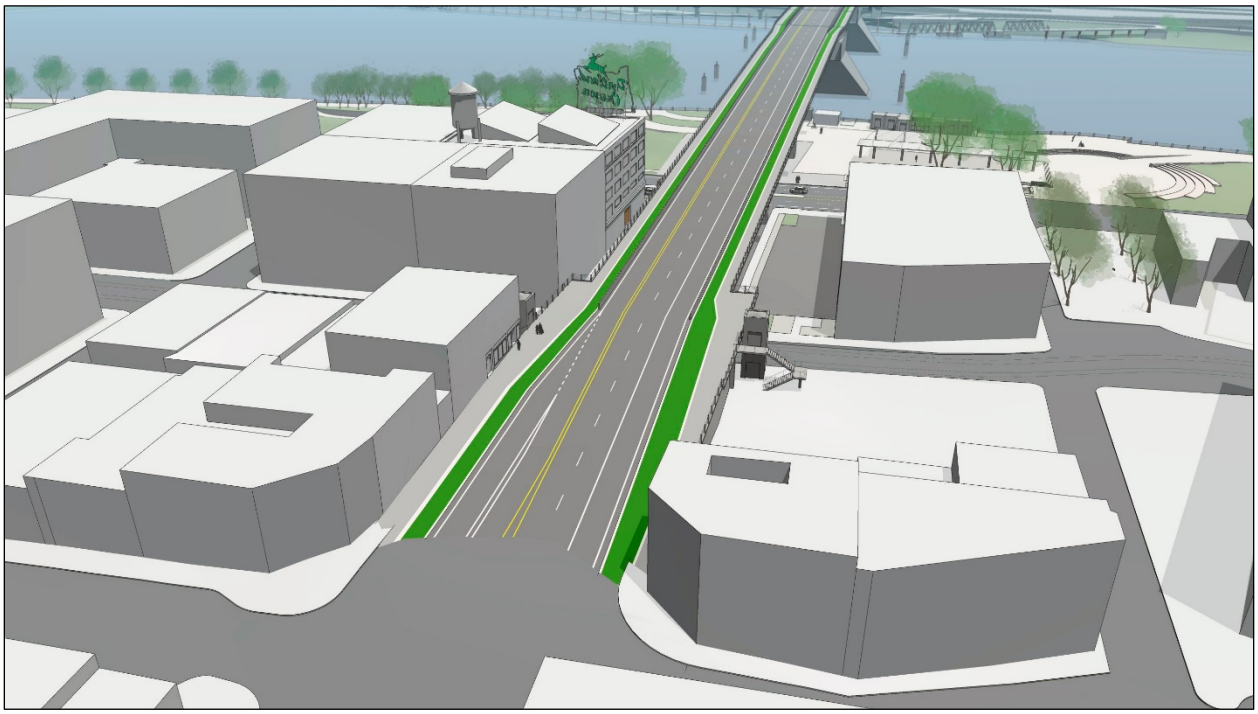

Figure 19: Bates Building, artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]		
Property Name: Burnside Bridge	Street Address: West Burnside Street	
City, County: Portland, Multnomah	Latitude: 45.523042 Longitude: (-) 122.667545	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/10/2021

Photo:

Photo Caption: Burnside Bridge, aerial photograph looking southwest (Multnomah County)

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected ☒ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The Burnside Bridge was listed in the National Register of Historic Places (NRHP) on November 14, 2012. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have an adverse effect on the Burnside Bridge. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge, which necessitates the demolition of the existing Burnside Bridge.

3. Identification and Description of the Historic Resource

The Burnside Bridge spans the Willamette River at River Mile 12.7 in downtown Portland. The bridge is located at the geographic center of the city and connects West Burnside Street and East Burnside Street. It is the second bridge at this location, and the Burnside Bridge serves as an important transportation corridor linking Portland's downtown core on the west bank of the Willamette River with business and residential districts in East Portland. The Burnside Bridge was listed in the NRHP on November 14, 2012, as part of the *Willamette River Highway Bridges of Portland, Oregon* Multiple Property Documentation.

During the planning of the second Burnside Bridge, Portland citizens pressed the authorities to make the bridge and approaches more ornamental and less utilitarian. In July 1923, Multnomah County Commissioners hired Portland architects Chester A. Houghtaling and Leigh L. Dougan to cooperate with the bridge engineers and devote their attention to the outward aesthetic appearance of the bridge. The architects were paid $10,000 (about $155,000 in 2021 dollars) to design the features of the structure most visible to the public, such as the operator towers and catwalks, kiosks, pylons, handrails, light fixtures, trolley poles, and the outer faces of the piers, abutments, and bridge spans. The architects were also asked to make provisions for future aesthetic treatments should funding not be available. Artistic renderings of the proposed bridge design were published in the *Oregonian* newspaper on January 1, 1924. These renderings included details such as the decorative treatments of the interior piers, the configuration of the operator towers, the appearance of the light fixtures, and the arrangement of trolley poles along the centerline of the bridge deck. Interestingly, the rendering of the bridge shows the two fixed main spans as concrete arch structures instead of steel trusses.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

The current Burnside Bridge was originally designed by engineers Ira G. Hedrick and Robert E. Kremers, who were both dismissed from the project following a complex political controversy over the initial contract award by the Multnomah County Commissioners in April 1924. Hedrick and Kremers were paid $25,000 (about $374,000 in 2021 dollars) to release the rights to their designs. Noted bridge engineer Gustav Lindenthal was hired to alter their plans and direct the construction of the bridge, which was completed in May 1926 for a total cost of $4.5 million, or about $67.3 million in 2021 dollars. This construction cost included both the main spans of the bridge and the approach spans on the east and west banks of the Willamette River.

The three (3) main spans of the Burnside Bridge measure 788 feet long between abutment walls. The central span of the bridge is a double leaf Strauss bascule that measures 252 feet between the trunnions. Each leaf is 126 feet long and constructed of riveted steel members, topped with a 4.75” concrete road deck. An ornamental cast-steel and cast-iron railing is located on both sides of each operable leaf. Each leaf weighs about 930 tons, with each leaf balanced with a counterweight of 1,700 tons. This operable central span provides approximately 200 feet of horizontal clearance when open. The Burnside Bridge is noted as one of the heaviest lift bridges in the United States. When it was completed in May 1926, it was also the largest double-leaf bascule bridge that had ever been constructed.

The central operable span is flanked on each side by massive interior piers constructed of reinforced concrete. Each of these interior piers was constructed *in situ* using large timber caissons measuring 78 feet by 68 feet and over 80 feet tall. The caissons for the abutment piers measured 68 feet by 36 feet and were 55 feet tall. Each caisson was built on the riverbank and then towed into the Willamette River, where they were sunk to the riverbed, which allowed for the underwater excavation of the bridge pier foundations. The upper section of each interior pier features machicolations supported by corbelled arches, which project from both the north (downriver) and south (upriver) sides of each interior pier. Rectangular recessions in the wall surface above the machicolations are centered on the arches below and create false windows. An octagonal-plan operator tower is located on the upriver side of each interior pier. The towers are situated above three of the corbelled supports which project outward from the face of the interior pier. The faces of the abutment piers that face upriver and downriver also feature details similar to those of the interior piers, such as the corbelled supports, cast concrete moldings, corbelled arches, and machicolations. The picturesque, almost castle-like design of the abutment and interior piers illustrate the profound influence that the architects Houghtaling and Dougan exerted over the appearance of the Burnside Bridge.

The central operable span is flanked by two (2) steel deck truss side spans. Each of these 268-foot-long side spans are double-intersection Warren trusses, which are also known as lattice trusses. These trusses are subdivided by vertical posts from the top chords of the truss to the diagonal intersections, creating sub-vertical elements. These truss spans have been noted as an extremely rare type of truss in Oregon, with the Ross Island and Sellwood Bridges, also in Portland and designed by Gustav Lindenthal, comprising two additional examples of this rare truss type. An ornate cast concrete spindle-type railing is located along each side of the road deck and sidewalks on the side spans. There are also a total of thirty-four (34) approach spans. These include nineteen (19) reinforced concrete spans on the west approach to the main spans; and seven (7) concrete and eight (8) steel spans on the east approach. Even though these approach spans tie the three (3) main spans of the bridge to the adjacent surface streets, they are not considered part of the main bridge structure.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge, which would necessitate the demolition of the existing Burnside Bridge.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

5. Evaluation of Effects

As it currently exists, the Burnside Bridge is located in its original alignment and remains on its original abutment and interior piers. The bridge is substantially "as-built," and the original steel and concrete structural character defining features of the structure remain intact. The Burnside Bridge also possesses integrity of feeling and association, and the original character, design, and appearance of the structure clearly conveys its relationship to the history of Portland.

Location: The demolition of the Burnside Bridge would destroy the structure's integrity of location and would therefore constitute an adverse effect to this NRHP-listed structure.

Setting: Removal of the Burnside Bridge would permanently destroy the structure's integrity of setting and would therefore constitute an adverse effect to this NRHP-listed structure.

Design: Demolition of the Burnside Bridge would permanently remove the combination of structural elements which create the overall form, structure, and style of the structure, and this loss of design integrity would therefore constitute an adverse effect to this NRHP-listed structure.

Materials: The original concrete and steel materials of the Burnside Bridge were combined by the designers in a certain manner to create the structure, and the complete removal of all these character defining features would destroy the structure's integrity of materials. This complete loss of material integrity would constitute an adverse effect to this NRHP-listed structure.

Workmanship: The Burnside Bridge represents the skillful work of several distinct building trades who worked in concert to create the structure and all its component parts. One example of a particular type of workmanship on this bridge would be the riveted steel members of the distinctive trusses which carry the bridge deck between Piers 1 and 2 and Piers 3 and 4. Riveting is a labor-intensive process and is practically never used in construction anymore, so the riveted steel trusses are physical representations of bridge-building technology at the time the bridge was constructed. Removing all the character defining features of the structure in a manner which removes evidence of particular skills or construction techniques would therefore destroy the bridge's integrity of workmanship, which would constitute an adverse effect to this NRHP-listed structure.

Feeling: The character defining features of the Burnside Bridge express the particular historic period of time during which the bridge was constructed, and removal of these features adversely affects the ability of the structure to convey the relationship that the bridge has to the broader patterns of our collective history. Therefore, demolition would destroy the structure's integrity of feeling, which would constitute an adverse effect to this NRHP-listed structure.

Association: The demolition of the Burnside Bridge would destroy the ability of the structure to serve as an overall representation of the bridge designer's talent and the skill of the workers who built it. Permanently severing the relationship of the historic structure with the people who designed and built it destroys the integrity of association of the bridge, which would therefore constitute an adverse effect to this NRHP-listed structure.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span option would necessitate complete removal of the existing Burnside Bridge, which is listed in the NRHP. The demolition of the Burnside Bridge would constitute an adverse effect on this NRHP-listed resource.

8. Sources

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1923 "Morrison Bridge Held Safe as Any." 7 June:13.
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1924 "Multnomah County's $5,000,000 Bridge Programme." 1 January:37.
1924 "Engineer's New Drawing of Burnside Bridge Gives Idea of How Impressive Span Will Look When Draw Is Open for Ships." 23 November:24.
1925 "City of Portland to Spend $6,437,000 for Three New Bridges." 1 January:44.

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Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

Maps and Figures

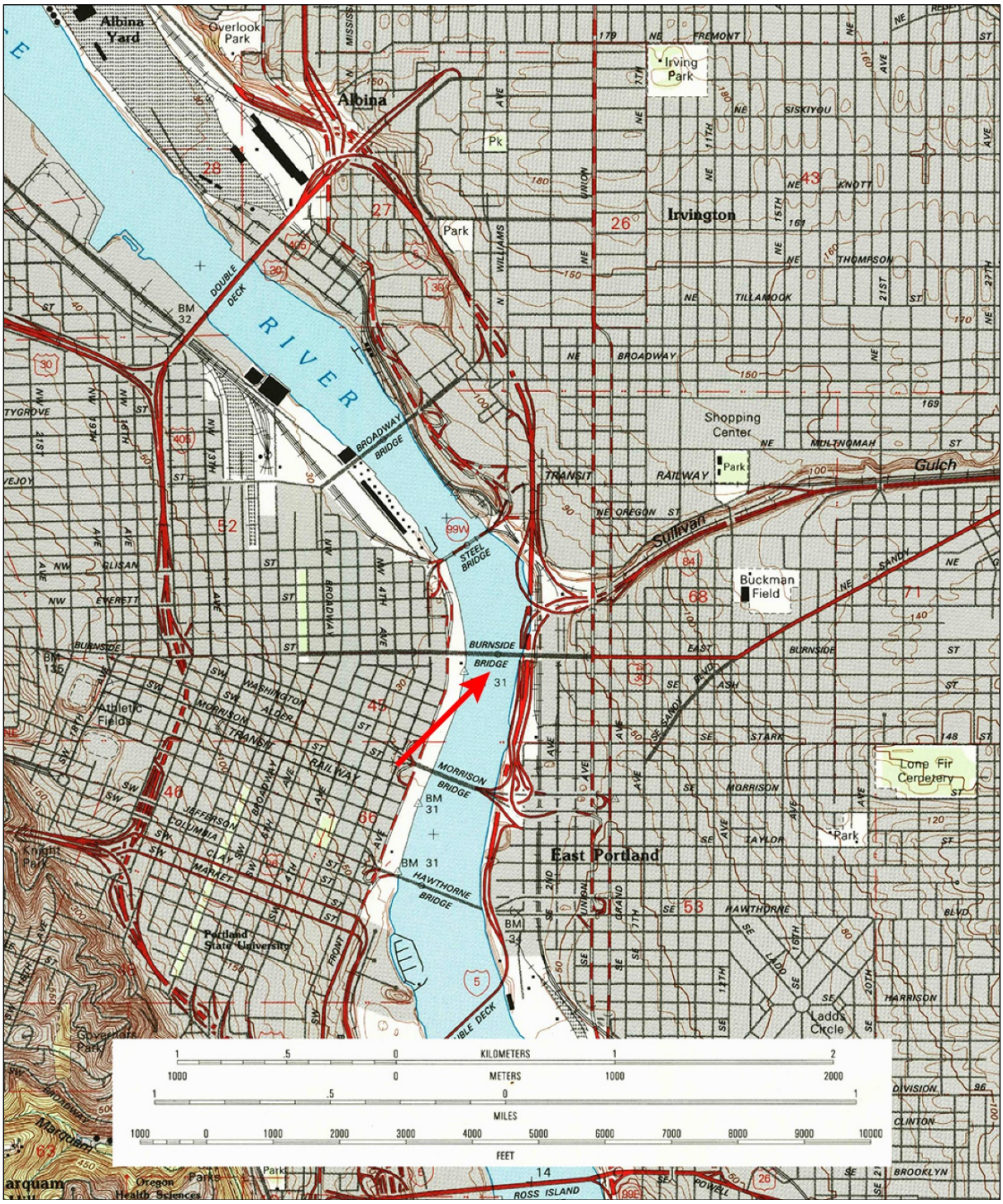

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of Burnside Bridge (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

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Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

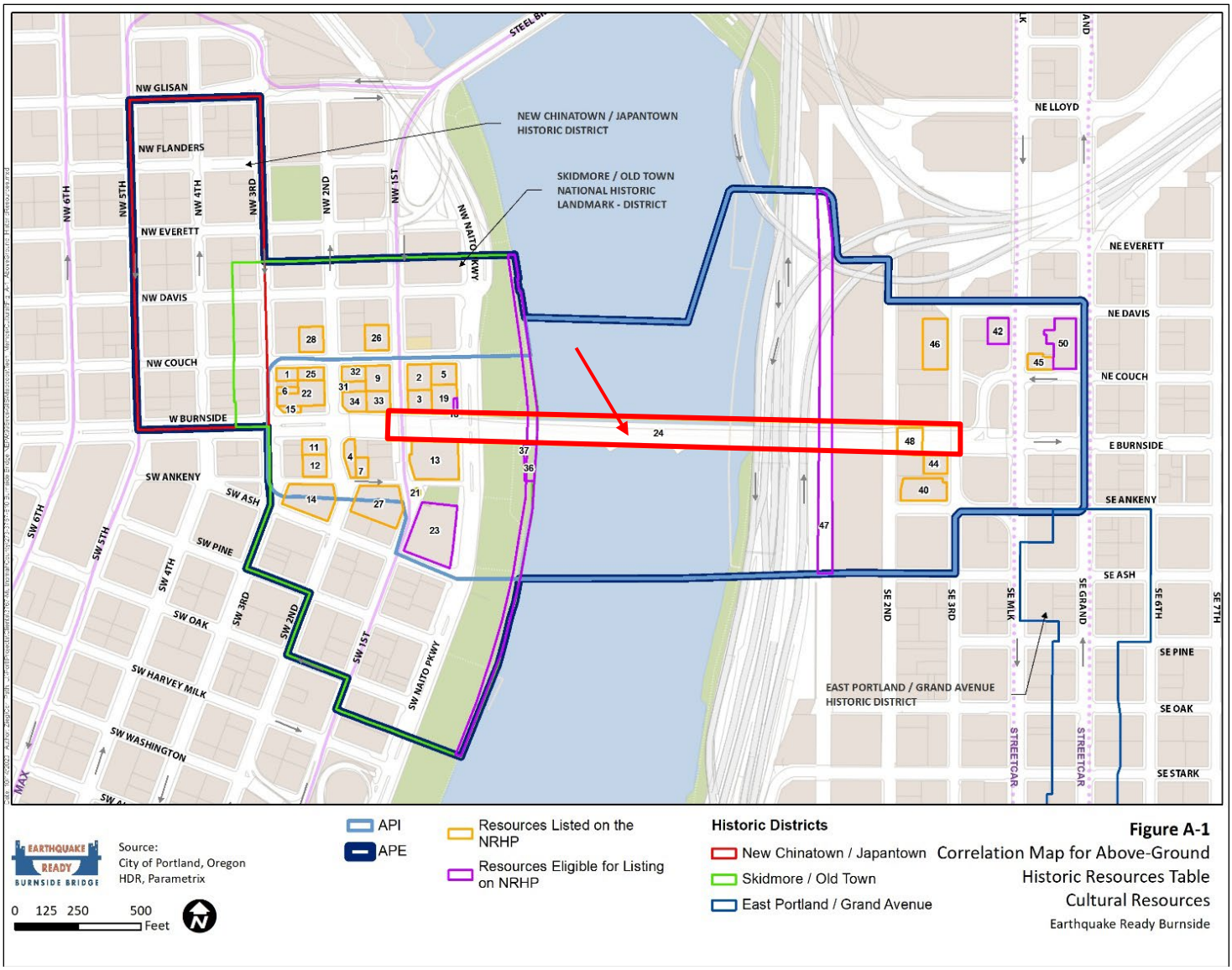

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the Burnside Bridge, which is outlined in red.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
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Street Address: West Burnside Street	City, County: Portland, Multnomah

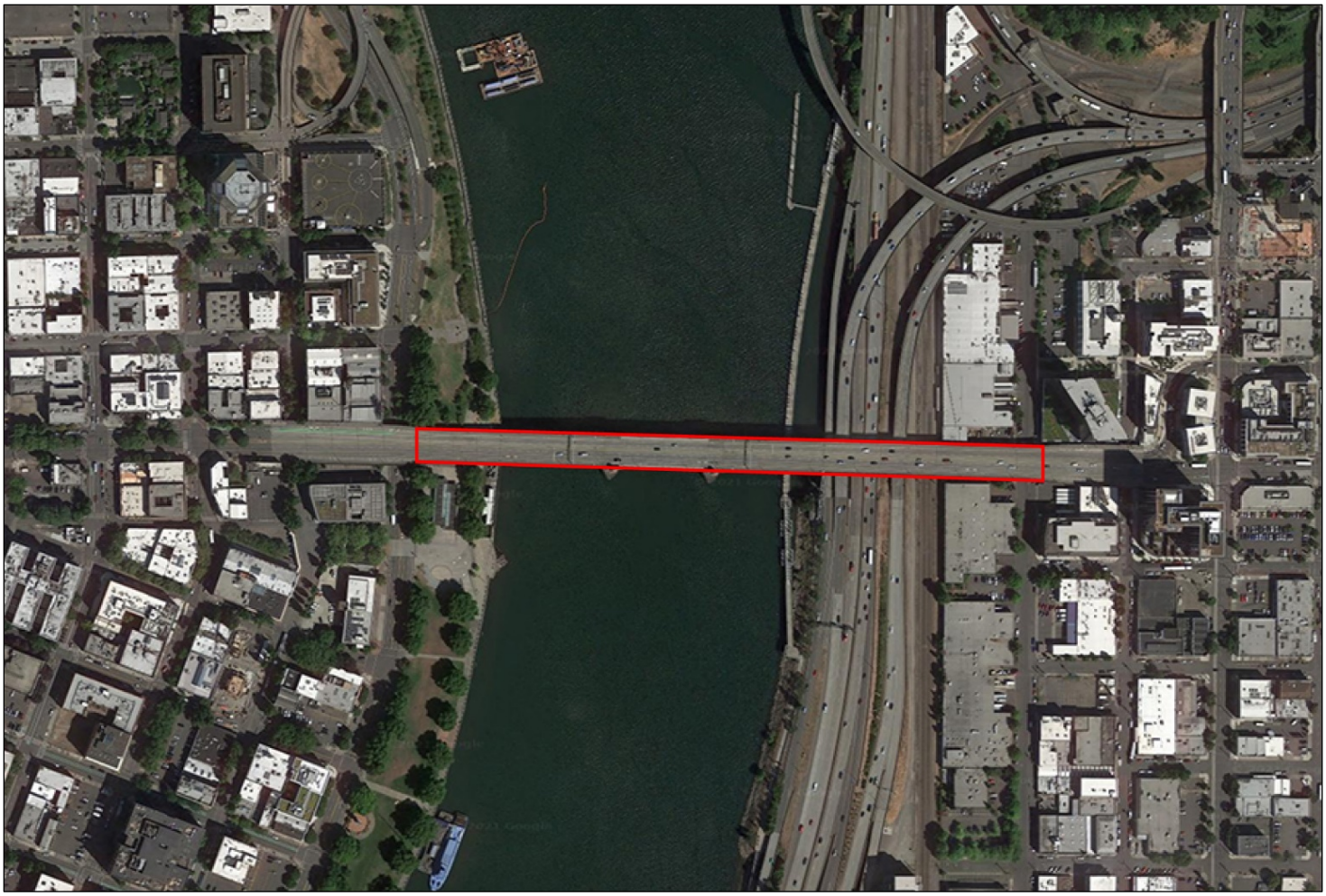

Figure 3: 2021 aerial photograph with Burnside Bridge NRHP designation boundary indicated by red line (Google Earth; NRHP 2012).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

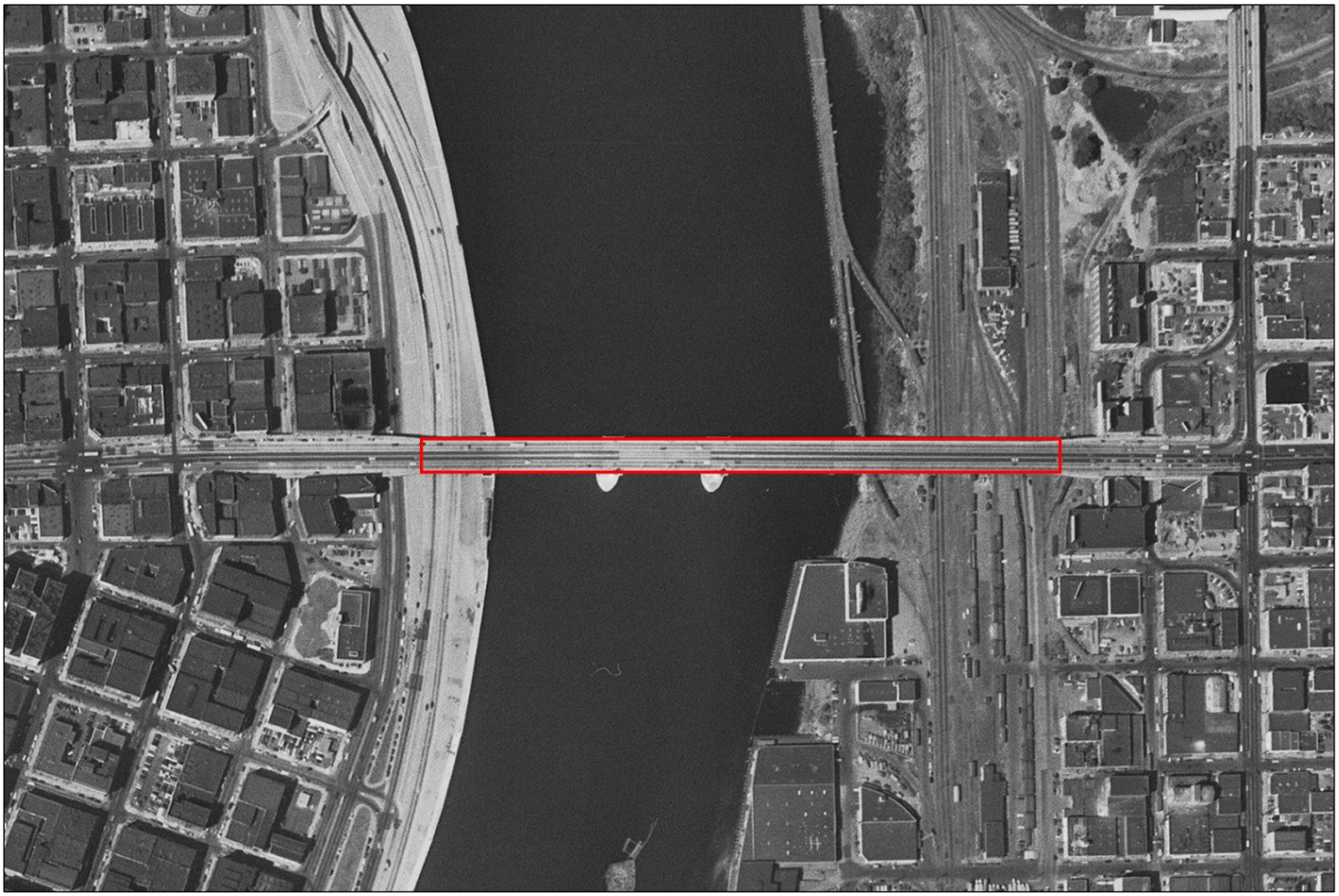

Figure 4: 1951 aerial photograph with Burnside Bridge NRHP designation boundary indicated by red line (USGS EarthExplorer; NRHP 2012).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

Photographs

Figure 5: Burnside Bridge, Portland, Ore., circa 1926-1949 postcard by Cross & Dimmitt, collection of Adam Alsobrook.

Figure 6: Burnside Bridge, Portland, Oregon, circa 1926-1942, postcard by Eddy, collection of Adam Alsobrook.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

Figure 7: Fire boat passing through the Burnside Bridge, Willamette River, Portland, Oregon, circa 1926-1942, postcard by Sawyer Scenic Photos, collection of Adam Alsobrook.

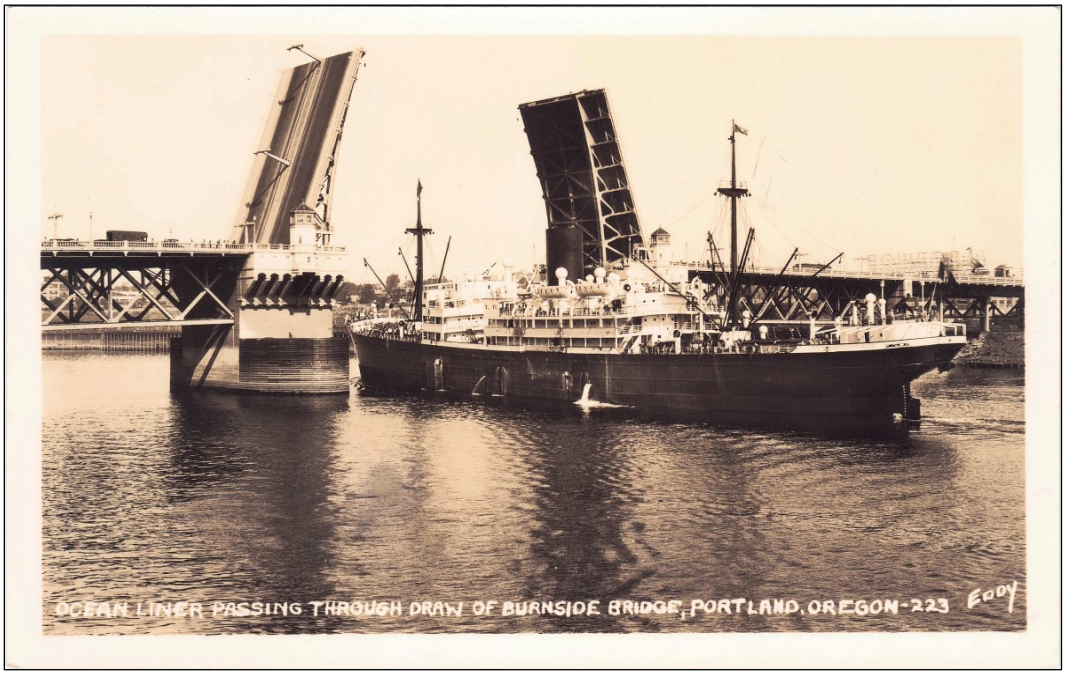

Figure 8: Ocean liner passing through draw of Burnside Bridge, Portland, Oregon, circa 1930-1950, postcard by Eddy, collection of Adam Alsobrook.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

Figure 9: General perspective of Burnside Bridge, looking northeast. Burnside Bridge, Spanning Willamette River at Burnside Street, Portland, Multnomah County, OR. Photos from Survey HAER OR-101 (Library of Congress).

Figure 10: General view of double leaf bascule drawspan of Burnside Bridge, looking northeast. Burnside Bridge, Spanning Willamette River at Burnside Street, Portland, Multnomah County, Oregon. Photos from Survey HAER OR-101 (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Bridge	
Street Address: West Burnside Street	City, County: Portland, Multnomah

Figure 11: Detail of the operator's houses and drawspans of Burnside Bridge, looking northeast. Burnside Bridge, Spanning Willamette River at Burnside Street, Portland, Multnomah County, Oregon. Photos from Survey HAER OR-101 (Library of Congress).

Figure 12: General view of Burnside Bridge, looking northwest. Burnside Bridge, Spanning Willamette River at Burnside Street, Portland, Multnomah County, OR. Photos from Survey HAER OR-101 (Library of Congress).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]		
Property Name: Burnside Hotel	Street Address: 2-12 NW 2nd Avenue	
City, County: Portland, Multnomah	Latitude: 45.523306 Longitude: (-) 122.672469	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/25/2021

Photo:

Photo Caption: Burnside Hotel, looking north (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The Burnside Hotel at 2-12 NW 2nd Avenue is a contributing resource in the Skidmore/Old Town Historic District, which was listed in the National Register of Historic Places (NRHP) in 1975 and designated as a National Historic Landmark (NHL) in 1977. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Burnside Hotel. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The Burnside Hotel is addressed as 2-12 NW 2nd Avenue and is located at the northeast corner of NW 2nd Avenue and West Burnside Street (Portland Maps) (Figures 1 through 4). The Burnside Hotel is a three-story, utilitarian style, brick masonry commercial building constructed circa 1901. It was originally constructed with just two stories; the third floor was probably added in 1925-1926 when the building was reconstructed in association with construction of the Burnside Bridge. The building was later known as the Burnside Lodging House and the Burnside Rooming House. The building was extensively altered in 1925 to make way for the construction of the west approach of the Burnside Bridge. In 1928, the building became the S.P. Hotel and was owned by Japanese-Americans. The Burnside Hotel was not included in the City of Portland Historic Resource Inventory of 1984 and was originally classified as not contributing to the significance of the Skidmore/Old Town Historic District. However, this classification has been changed to contributing. (NRHP 2008:17:18).

There are storefront windows along the south, southwest, and west facades of the building which have been altered from their original condition (NRHP 2008:18). The existing west approach of the Burnside Bridge will be removed and replaced with a new west approach span as part of the proposed undertaking. The overall configuration, width, and slope of the road prism in the section of West Burnside Street adjacent to the Burnside Hotel will not change as part of the proposed undertaking (Figures 5 through 10). The existing concrete sidewalk will be replaced with a concrete sidewalk with the same elevation and slope along the south, southwest, and west facades of the Burnside Hotel building (Figures 11 through 18).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge. The Refined Long-span alternative would construct a new bridge on the same alignment as the current bridge, which would necessitate the demolition of the existing Burnside Bridge.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

5. Evaluation of Effects

Location: The proposed replacement of the Burnside Bridge will not require the Burnside Hotel to be relocated or removed, therefore, the undertaking will have no effect to the resource's integrity of location.

Setting: The proposed replacement of the Burnside Bridge will not alter the current relationship of the Burnside Hotel to the sidewalk level along West Burnside Street and NW 2nd Avenue. Concrete sidewalks will be replaced in kind with concrete sidewalks with a slightly different cross-section that the current cross-section but otherwise unchanged. Therefore, the setting of the Burnside Hotel would not be adversely affected by the proposed undertaking.

Design: The proposed replacement of the Burnside Bridge will not alter the physical form, structure, and style of the Burnside Hotel; therefore, the undertaking will have no effect to the resource's integrity of design.

Materials: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical elements of the Burnside Hotel, therefore, the undertaking will have no effect to the resource's integrity of materials.

Workmanship: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical evidence of the historic construction techniques used to build the Burnside Hotel, therefore, the undertaking will have no effect to the resource's integrity of workmanship.

Feeling: The proposed replacement of the Burnside Bridge will not alter the physical features which collectively convey the historic character of the Burnside Hotel; therefore, the undertaking will have no effect to the resource's integrity of feeling.

Association: The proposed replacement of the Burnside Bridge will not diminish or eliminate the direct link that the Burnside Hotel has to important historic events or persons significant to our past, therefore, the undertaking will have no effect to the resource's integrity of association.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span alternative would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The replacement of the existing west approach span of the Burnside Bridge would have no adverse effect to the Burnside Hotel for either direct or indirect effects.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

8. Sources

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1950b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.

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1990 "Portland, OR Quadrangle, 7.5 Minute." TopoView. Electronic resource, https://ngmdb.usgs.gov/topoview/, accessed August 2021.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Maps and Figures

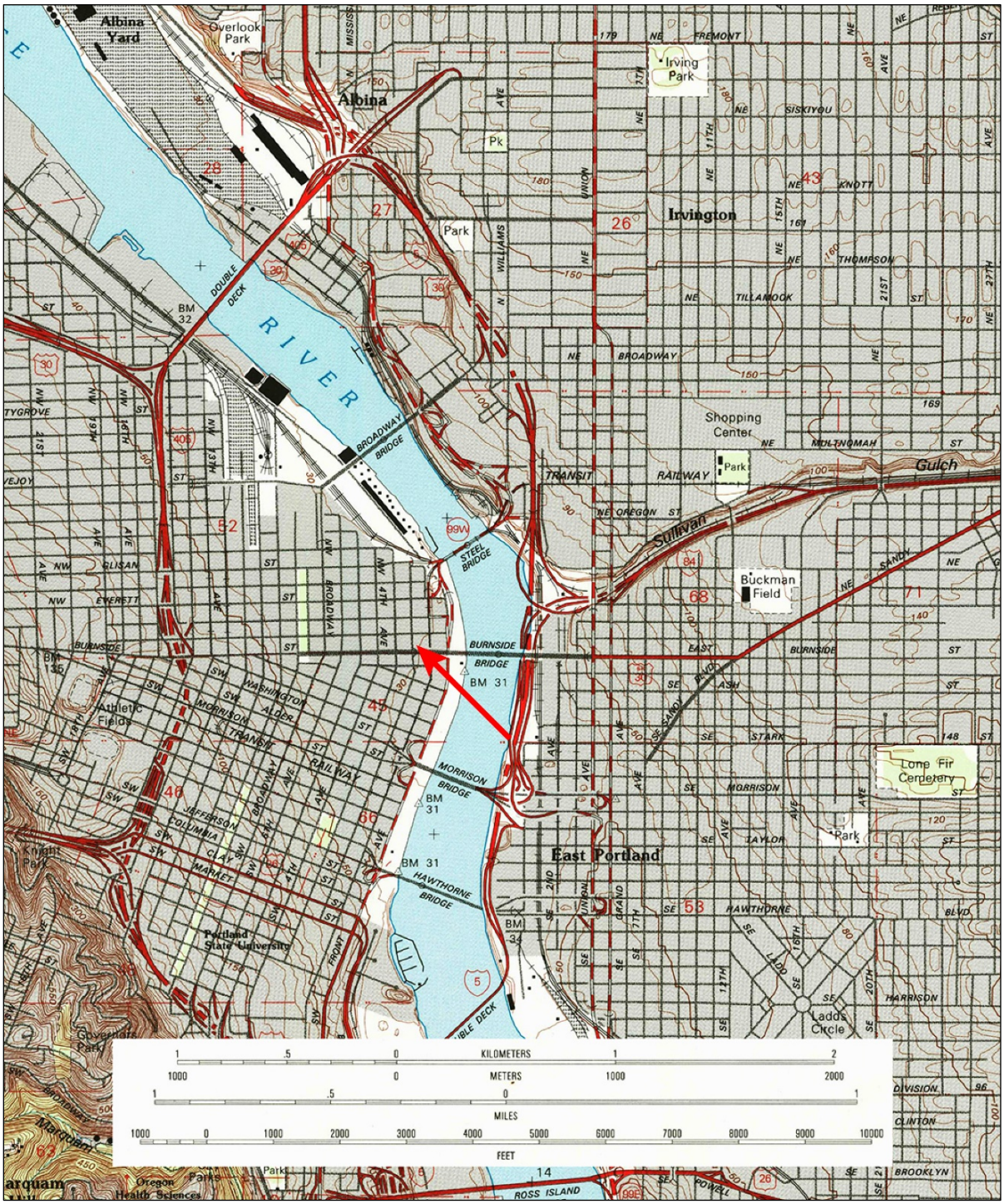

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of the Burnside Hotel (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

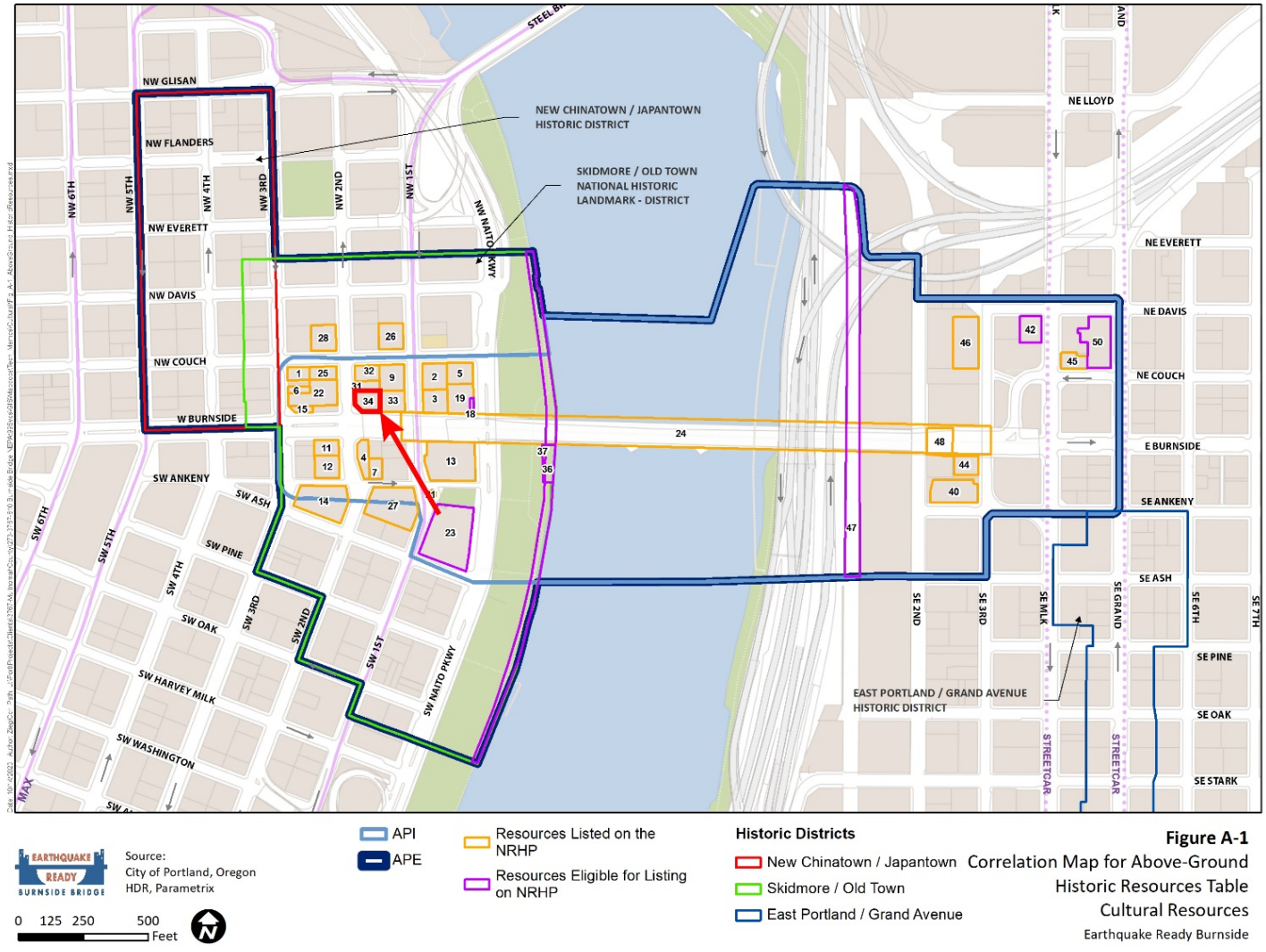

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the Burnside Hotel, which is outlined in red.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Figure 3: Aerial photograph with location of the Burnside Hotel indicated by red line (Google Earth).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Figure 4: 1951 aerial photograph with location of the Burnside Hotel indicated by red line (USGS EarthExplorer).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

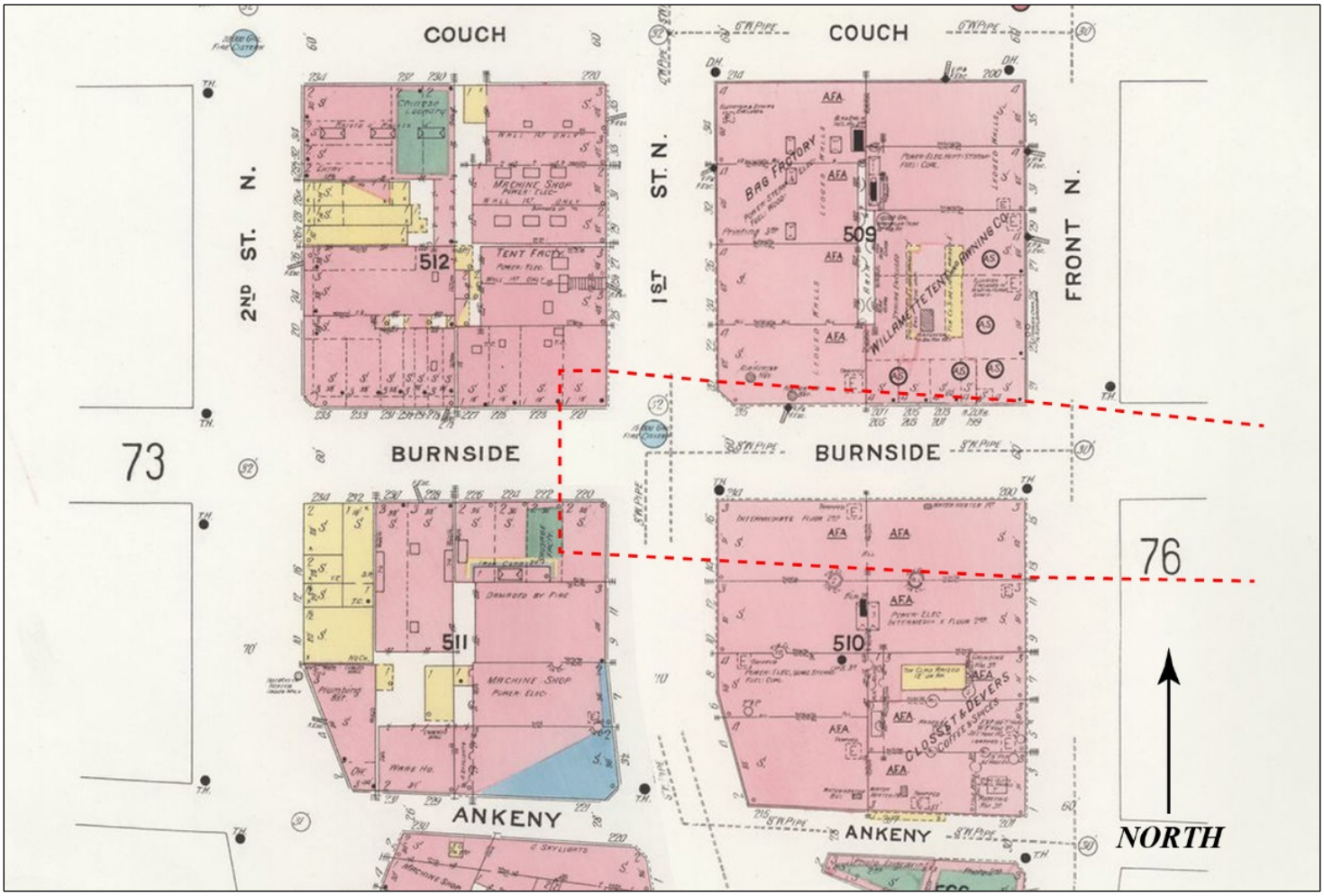

Figure 5: Sanborn maps, Volume 1, 1908. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

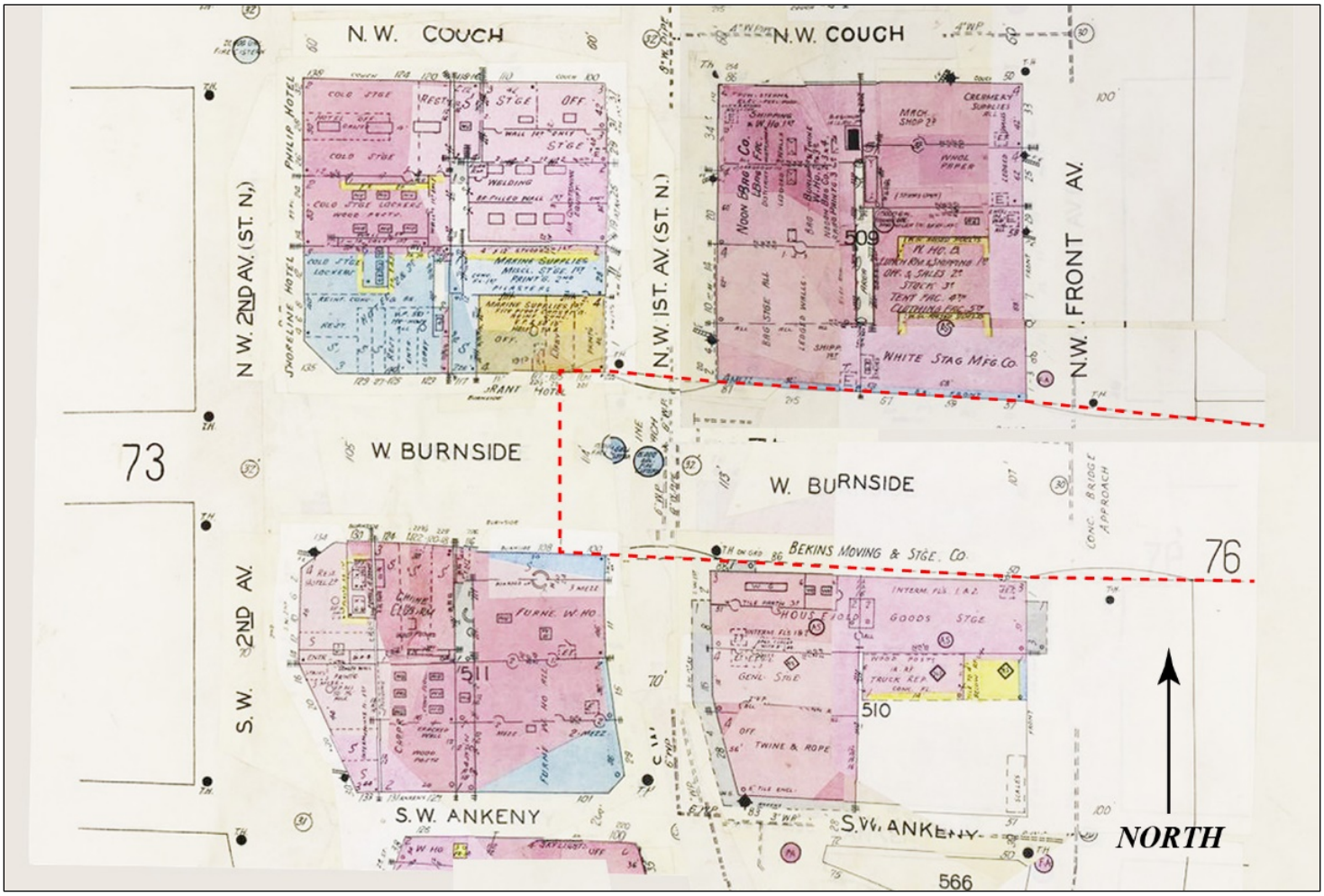

Figure 6: Sanborn maps, Volume 1, 1950. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

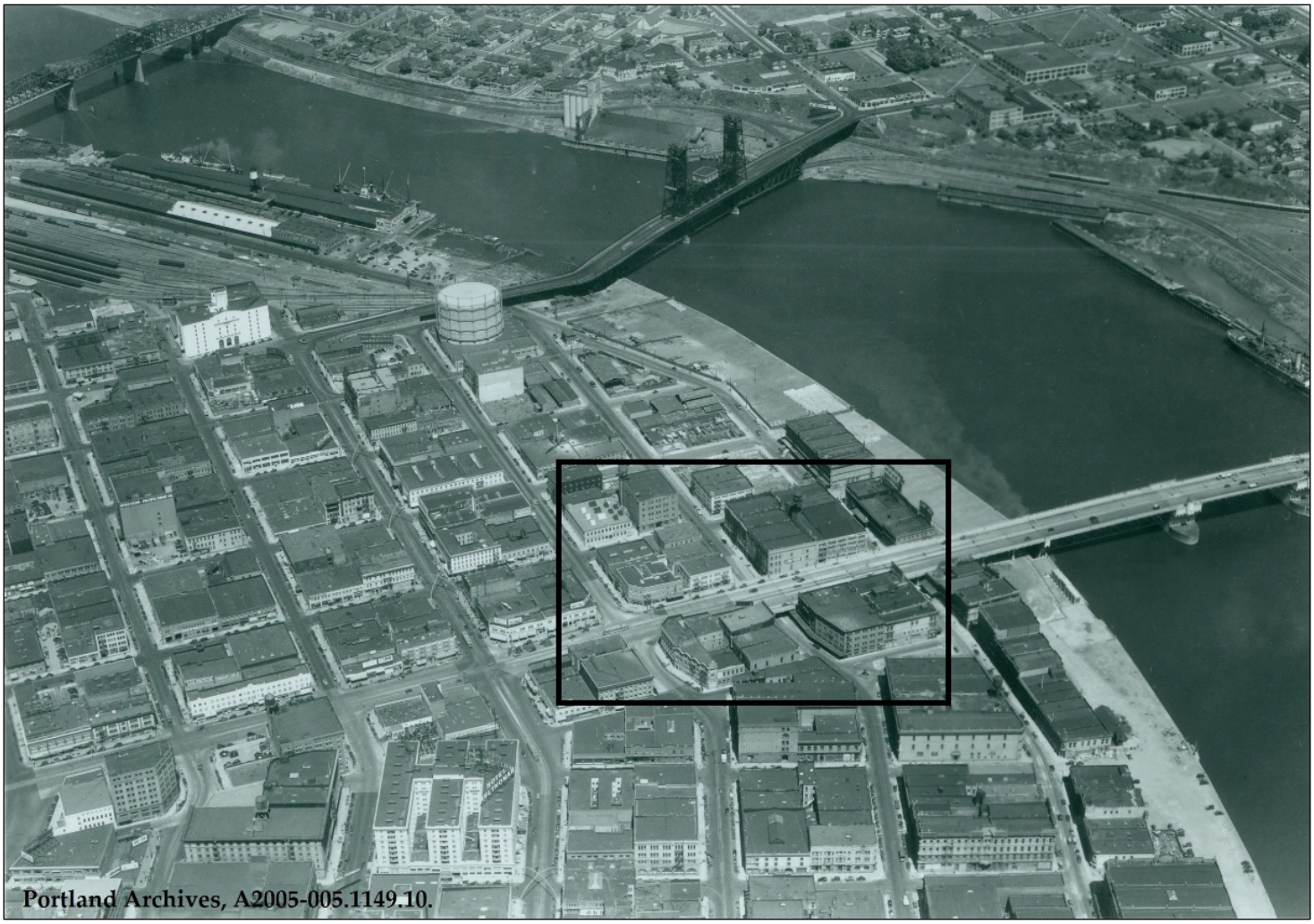

Figure 7: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Black box indicates excerpt in Figure 8 below (Portland Archives, A2005-005.1149.10).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

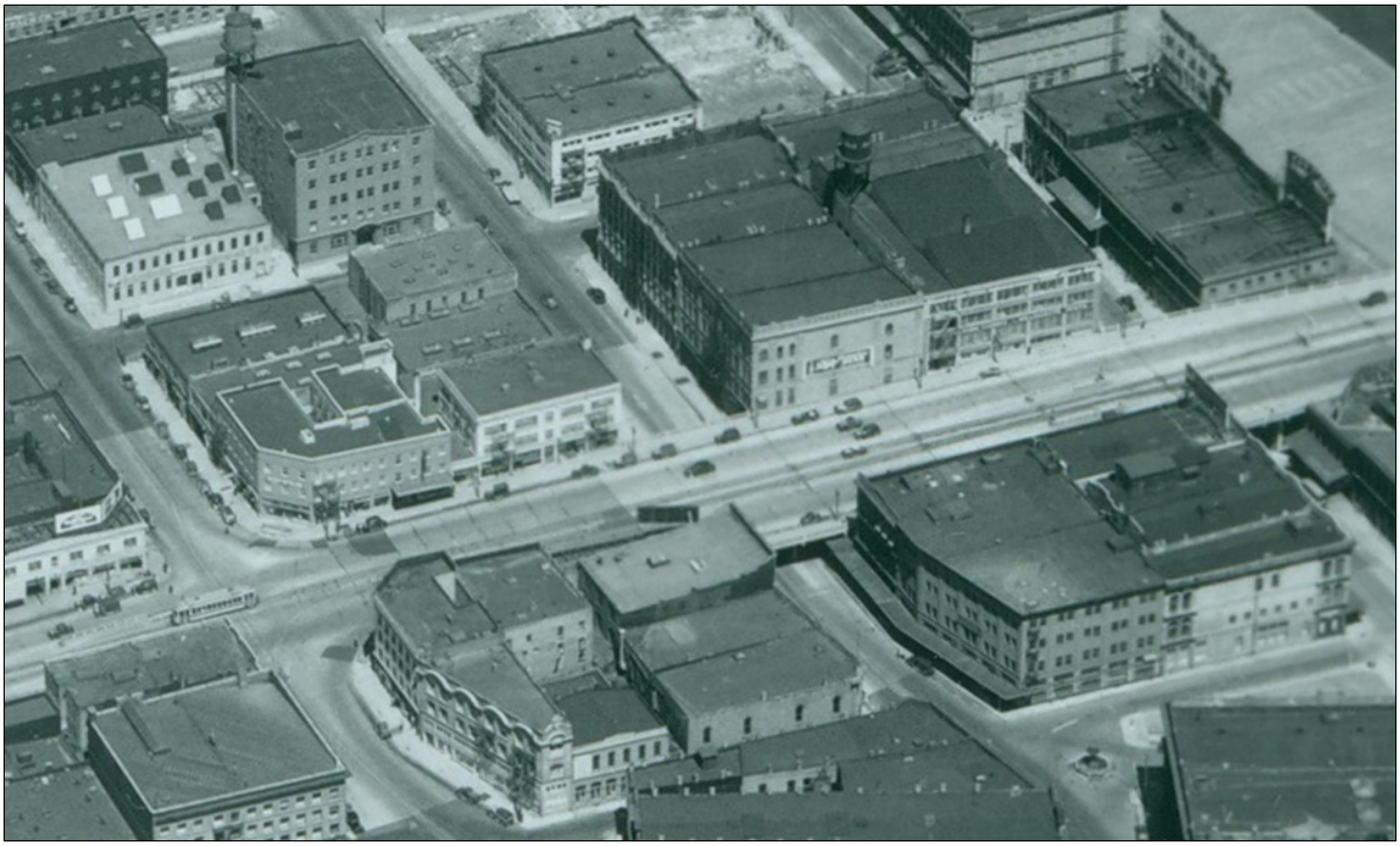

Figure 8: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Excerpt of Figure 7 above (Portland Archives, A2005-005.1149.10).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Figure 9: Footprint of the Burnside Hotel superimposed on property line map (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

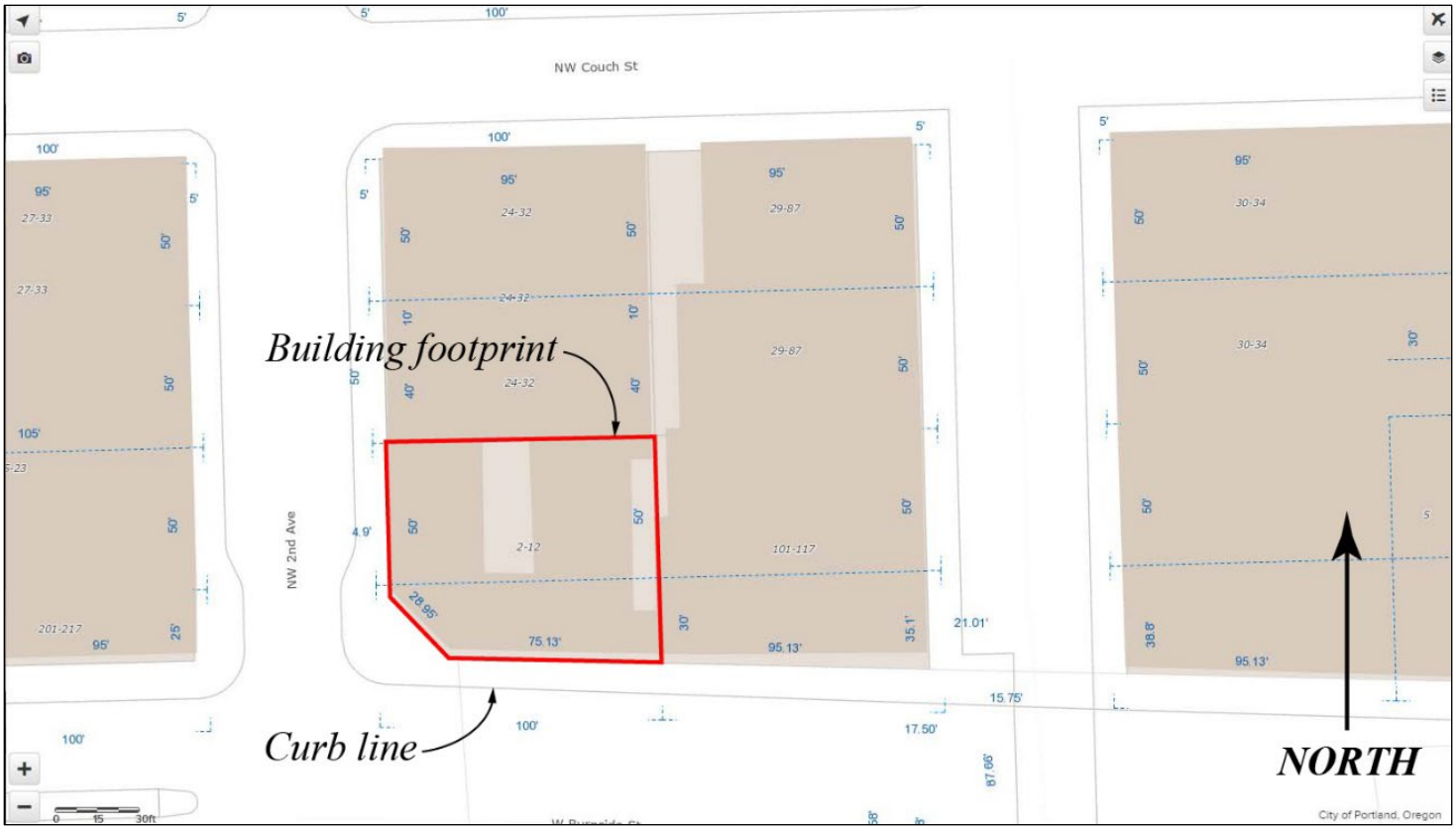

Figure 10: Footprint of the Burnside Hotel superimposed on property line map, with elements of existing Burnside Bridge indicated (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Photographs

Figure 11: Burnside Hotel, view looking north (Elizabeth O'Brien, 2019).

Figure 12: Burnside Hotel, view looking northeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Figure 13: Burnside Hotel, view looking north (Elizabeth O'Brien, 2019).

Figure 14: Burnside Hotel, view looking east (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Figure 15: Burnside Hotel, view along sidewalk at south façade, view looking east (Elizabeth O'Brien, 2019).

Figure 16: Burnside Hotel, view along sidewalk at south façade, view looking west (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Burnside Hotel	
Street Address: 2-12 NW 2nd Avenue	City, County: Portland, Multnomah

Figure 17: Burnside Hotel, artist's rendering of existing condition of west approach, aerial view looking northeast (Fat Pencil Studio, 2021).

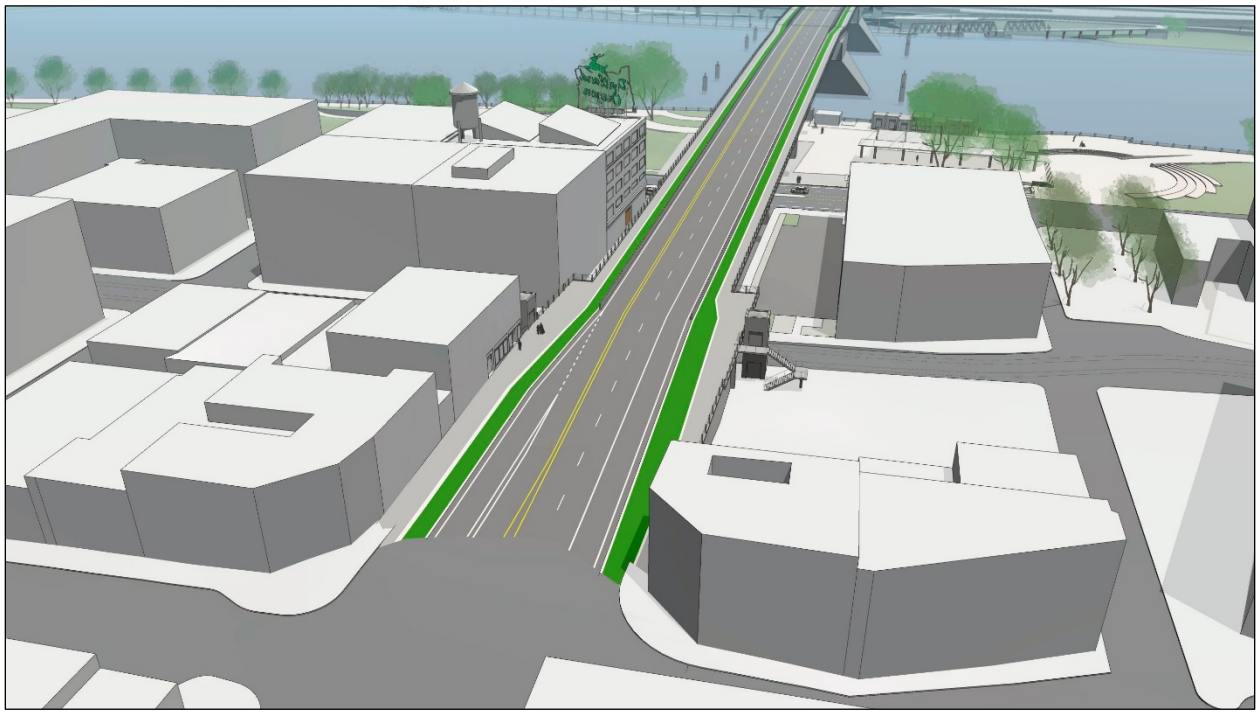

Figure 18: Burnside Hotel, artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Burnside Skatepark	Street Address: E. Burnside and E. 2nd Avenue	
City, County: Portland, Multnomah	Latitude: 45.522965 Longitude: (-)122.66345	
Surveyor: Elizabeth O'Brien	Affiliation: WillametteCRA	Date Recorded: 07/12/2019

Photo:

Photo Caption: Burnside Skatepark, facing northeast from East Second Avenue (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. Willamette Cultural Resources Associates (WillametteCRA) has recommended the Burnside Skatepark as individually eligible for listing on the National Register of Historic Places. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Burnside Skatepark. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would require replacing the existing bridge with a new bridge on the same alignment as the current bridge. The number of bents on the eastern approach would be reduced (existing bents would be removed only to ground level). The uppermost portion of the existing bent in the Burnside Skatepark would be removed; the remainder of the bent would continue to be used as a feature in the Skatepark. No new bents would be placed in the Skatepark. The Skatepark would be closed for approximately four months during construction and there may be additional limited access during other stages of demolition of the eastern approach span and construction. No other activities are proposed at this time in the vicinity of the Burnside Skatepark.

3. Identification and Description of the Historic Resource

The Burnside Skatepark is a poured concrete skatepark structure. Construction began in 1990 and has continued to evolve in design over time. It is situated on City of Portland property underneath the east side of the Burnside Bridge in Section 34, Township 1 South, Range 3 East, Willamette Meridian. The Skatepark occupies approximately 7,000 square feet. A concrete wall at the rear of the park faces NE/SE Second Avenue and a series of features such as bowls, banks, etc. The space below the bridge was completely built up by 1997. Since then, many of the features have been replaced since the park was first constructed excluding the concrete wall facing Second Avenue. Although situated on City land, the Skatepark is not a City park. The Burnside Skatepark is recommended as eligible for the NRHP under Criteria A and C and Criteria Consideration G. Its significance lies in its influence at a national and international scale in the design of both do-it-yourself (DIY) skateparks and public skateparks that have been constructed to reflect features found at Burnside Skatepark. Burnside Skatepark is noteworthy under Criterion C for its early use of concrete and for its evolving and dynamic physical character as elements are continually modified. The Skatepark is the responsibility of a core group of active skaters, many of whom consider it to be a sacred space. “Burnside’s unique growth and evolution—through the sweat and blood of a handful of dedicated individuals—have matured into one of the best skateparks in the world. Burnside and its creators are true pioneers, setting the stage for community built skateparks across the country” (SKATEPARK.com 2020).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge. This alternative would have no effect on the Skatepark.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge, which would necessitate the demolition of the existing Burnside Bridge. The Refined Long-span alternative includes two options for the eastern approach, cable-stayed or tied arch spans.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

5. Evaluation of Effects

The proposed Refined Long-span alternative would involve construction of a new bridge on the same alignment of the current bridge. Only the uppermost portion of the existing bent in the Skatepark below the bridge deck would be removed. The rest of that bent would remain in place; Skatepark features include that bent. The cable-stayed option would place new columns some distance west of the Skatepark. The tied arch span would place new columns on the west side of NE/SE 2nd Avenue opposite the Skatepark. These columns would constitute a slight change in the setting of the Skatepark. In addition, the Skatepark would be closed for a short period of time during construction and there may other times in which there may be limited access. According to 36 CFR Part 800.5(a)(1), adverse effects occur when an undertaking directly or indirectly alters characteristics of a historic property that qualify it for inclusion in the NRHP; future and cumulative effects of the undertaking also need to be considered. An example listed in 800.5(a)(2) is "visual, atmospheric, or audible intrusions" (36 CFR 800.5).

The placement of new columns would introduce a new element to the setting. The setting of the Skatepark is industrial and is a defining element of its setting. In addition, following demolition of the existing approach span and during construction of the new span the Skatepark would be open to the sky for relatively short periods of time. These exposures would potentially constitute visual and atmospheric intrusions with temporary effects on feeling and setting. However, there would be no long-term effects of these aspects of integrity or on location, design, materials, workmanship, and association of the Burnside Skatepark. The Skatepark would maintain its NRHP eligibility. The project will therefore have No Adverse Effect on the Burnside Skatepark historic property.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge Project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 20 representative of 18, which continues to meet regularly. A representative of Burnside Skatepark serves on the Community Task Force, and there have been two separate meetings with Skatepark Board representatives to discuss project effects on the Skatepark Meetings of Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed Refined Long-span alternative would not adversely affect the Burnside Skatepark's eligibility for listing under Criteria A and C and its integrity. WillametteCRA recommends a Finding of No Adverse Effect for this historic property.

8. Sources

SKATEPARK.com
2020 Burnside Skatepark. Electronic document, http://skatepark.com/skateparks/Portland/Oregon/Burnside+Skatepark/497, accessed October 25, 2020.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Maps and Figures

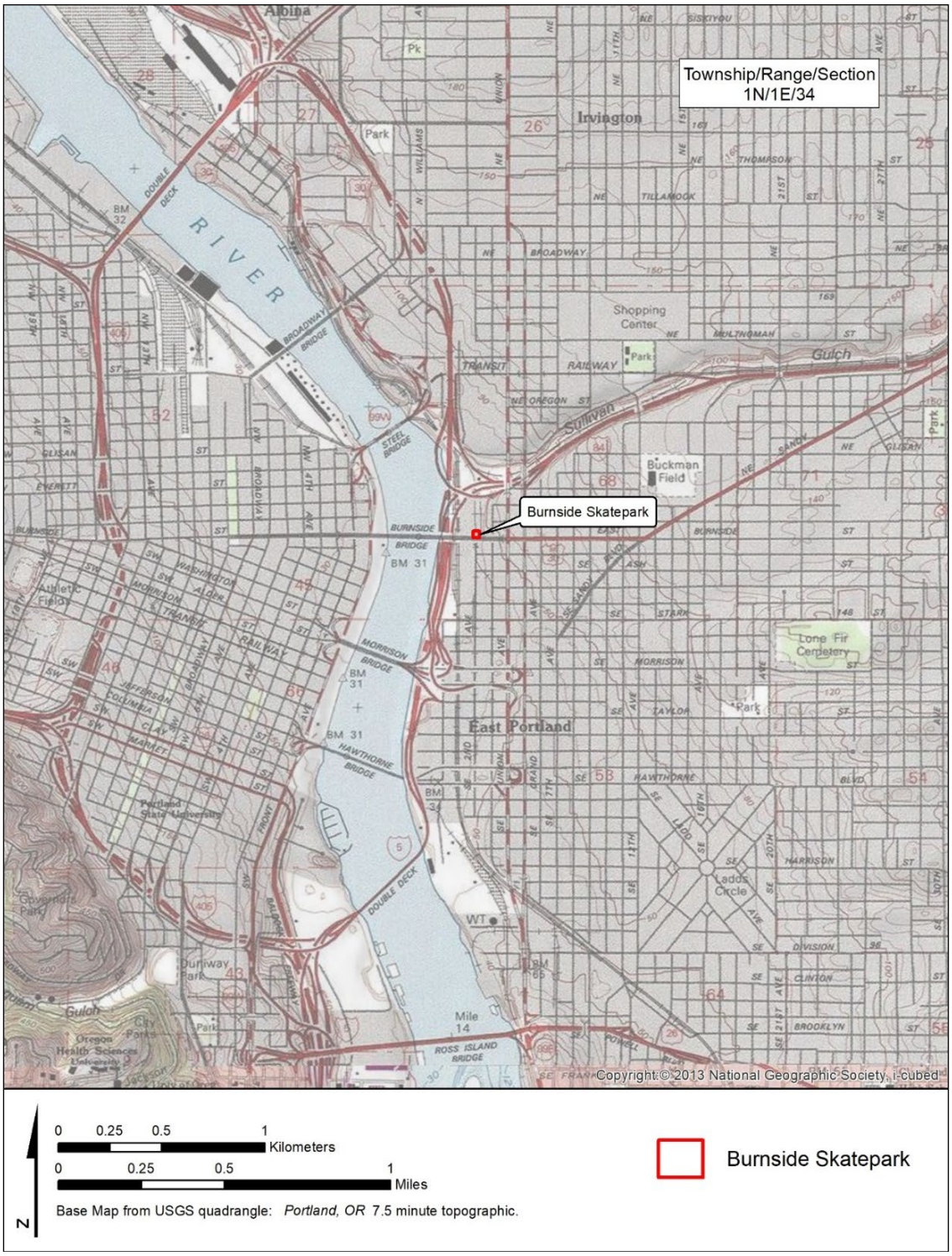

Figure 1. Location map.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Figure 2. Overview of Burnside Skate Park.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

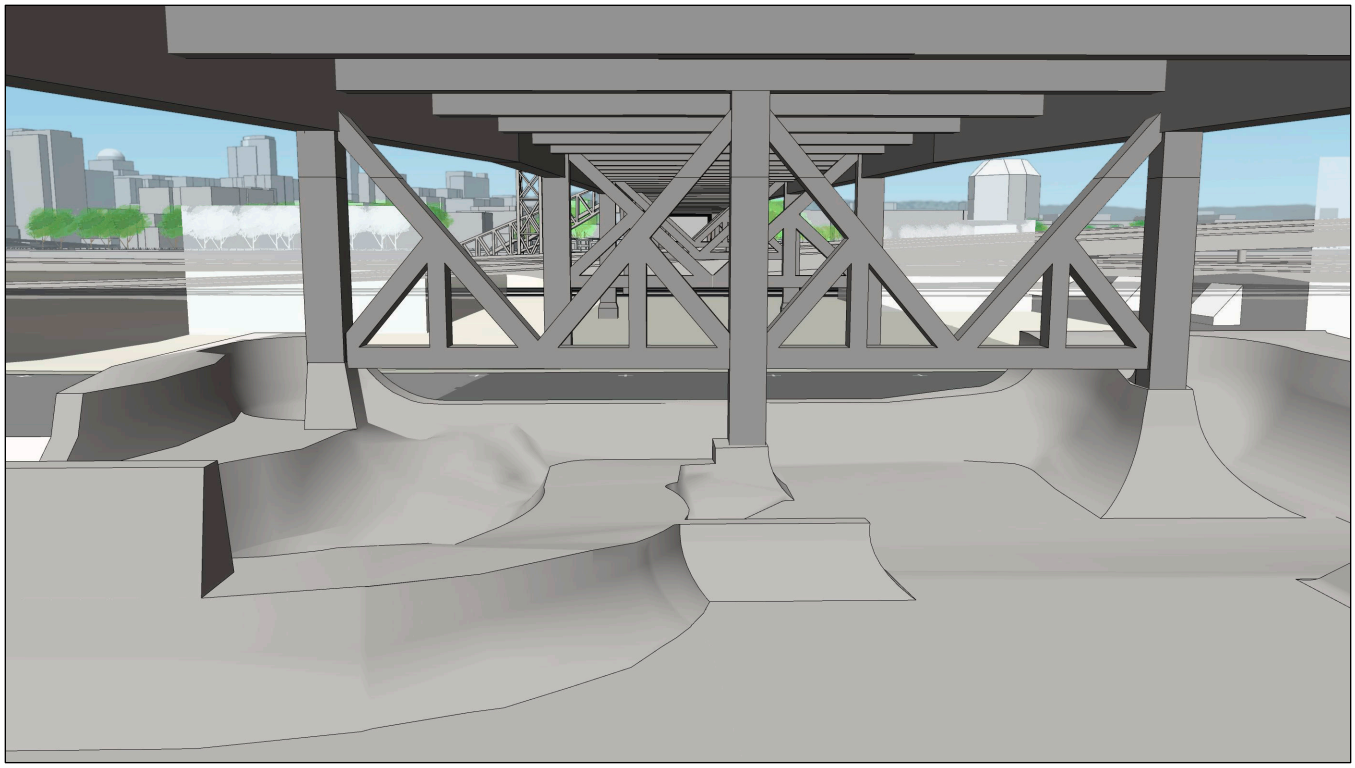

Figure 3. Burnside Skatepark, artist's rendering (Fat Pencil Studio, 2021), existing conditions showing Bent 27 in the Skatepark. View looking west.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

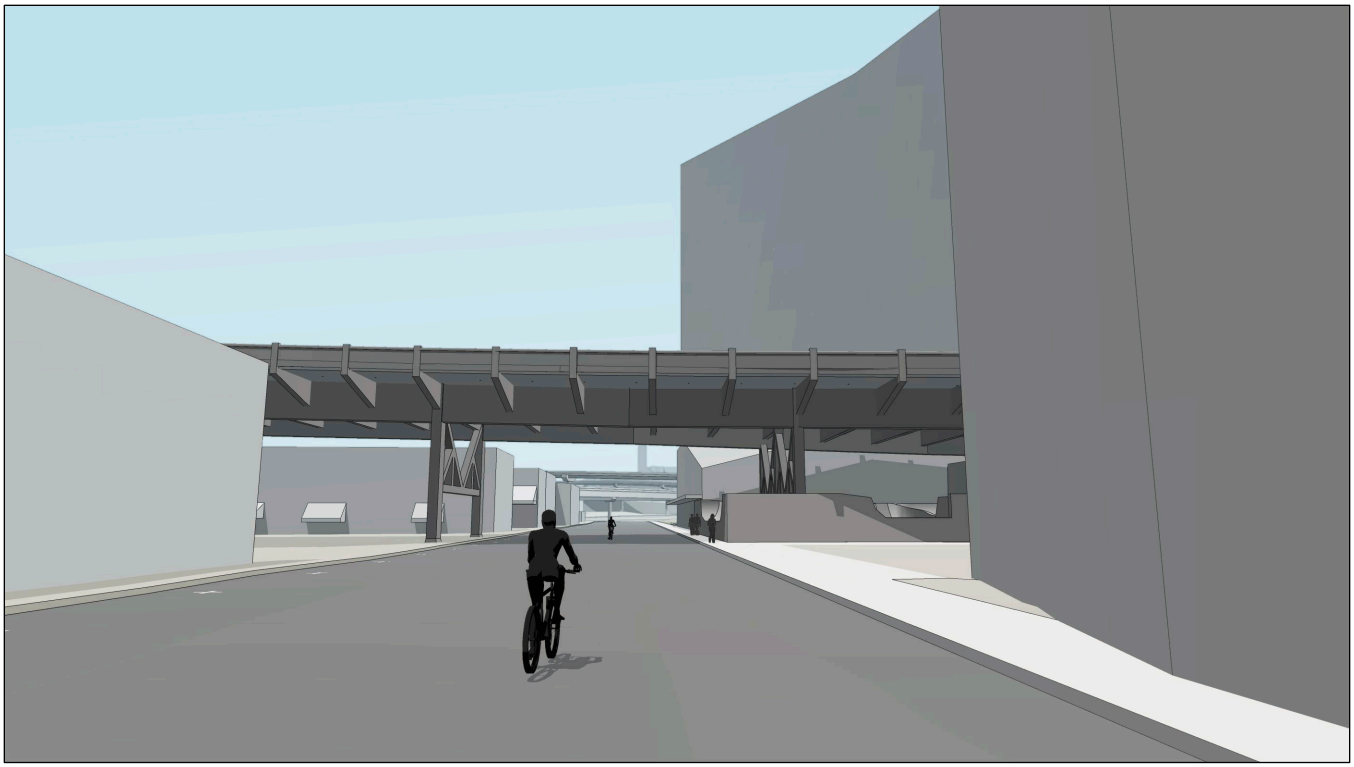

Figure 4. Burnside Skatepark, artist's rendering (Fat Pencil Studio, 2021), existing condition.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Figure 5. Burnside Skatepark, artist's rendering (Fat Pencil Studio, 2021), proposed conditions with a tied arch span. Existing Bent 27 would be truncated at the top and two new columns placed on the west side of NE/SE 2nd opposite the Skatepark. View looking northeast.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Photographs

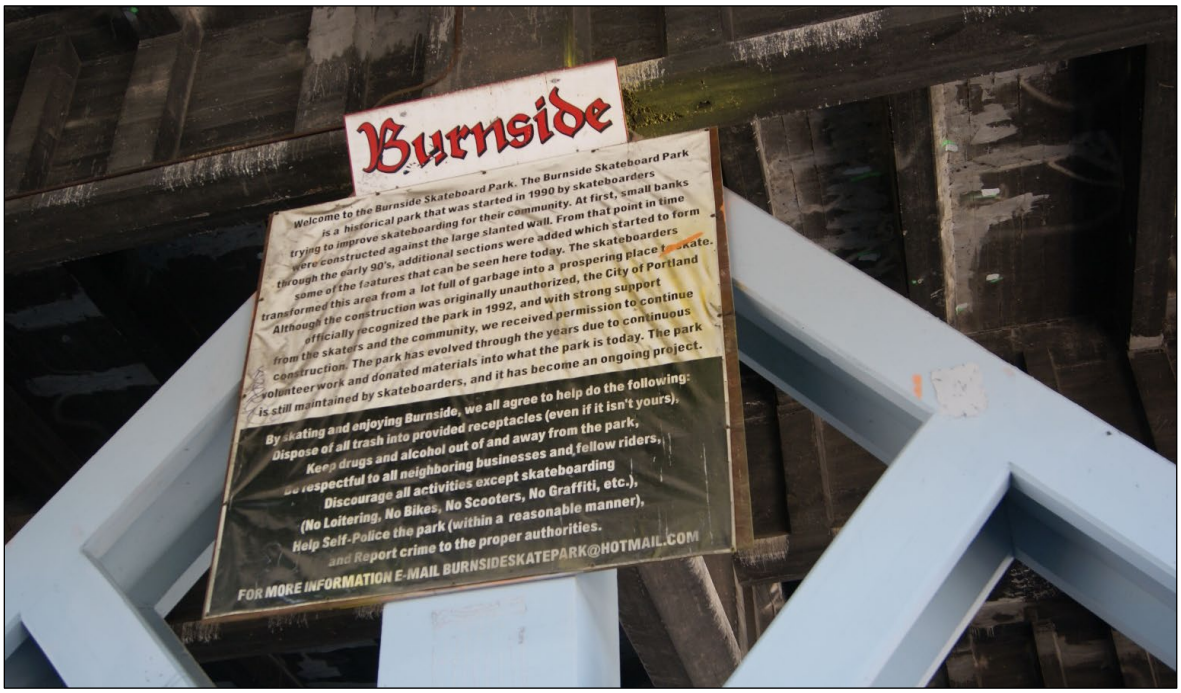

Figure 6. Posted Burnside Skatepark "rules," facing east (Elizabeth O'Brien 2019).

Figure 7. Burnside Skatepark showing incorporation of bridge bents into Skatepark design, facing northeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Figure 8. Burnside Skatepark, facing northeast from SE Second Avenue (Elizabeth O'Brien, 2019).

Figure 9. Early DIY construction at the Burnside Skatepark, circa 1990-1993, looking south along SE 2nd Avenue (Photo courtesy www.burnsideproject.org, used with permission).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: E. Burnside and E. 2nd Avenue	City, County: Portland, Multnomah

Figure 10. Past example of Skatepark art. The view is towards the east (photo courtesy of Burnside Skatepark Facebook).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Frigidaire Building	Street Address: 230 East Burnside Street	
City, County: Portland, Multnomah	Latitude: 45.522926 Longitude: (-) 122.662582	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 09/17/2021

Photo:

Photo Caption: Frigidaire Building, looking southwest (Elizabeth O'Brien, 2019)

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The Frigidaire Building at 230 East Burnside Street was listed in the National Register of Historic Places (NRHP) on March 8, 1989 (Figures 1 through 4). Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have *no adverse effect* on the Frigidaire Building. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The preferred alternative would replace the existing bridge with a new bridge, known as the Long Span option. The Long Span alternative would construct a new bridge on the same alignment as the current bridge. The East Approach Span of the current Burnside Bridge features reinforced concrete sidewalks and balustrades along the north and south side of the bridge deck (Figures 5, 6, 7, 8, 9, 15, 16, 18, 21, 24, and 27). The sidewalk on the south side of the bridge deck directly abuts the north façade of the Frigidaire Building. The elevation of the sidewalk along the north façade of the Frigidaire Building slopes from a high point at the northwest corner of the building to a low point at the northeast corner. The sidewalk is also sloped slightly away from the north building façade toward the bridge deck to allow water to drain off the walking surface. The sidewalk provided pedestrian access to the recessed public entry and former retail showroom spaces, though the recessed entry is currently fenced off to prevent unauthorized entry or occupation (Figure 17).

3. Identification and Description of the Historic Resource

The Burnside Bridge was completed in May 1926 (NRHP 2012). Sections of the reinforced concrete balustrades were omitted along the south side of the east approach in anticipation of future development on the vacant lots located to the east and west of present-day SE Third Avenue. Historic photographs show temporary guardrails with horizontal bars or pipes installed at the gaps in the reinforced concrete balustrades (Figures 5, 6, 7, 8, and 11).

In January 1929, the Frigidaire Company announced their plans to construct a new warehouse and office building to house their growing sales of refrigerators in Portland (*Oregonian* 1929a). By March 1929, the architectural firm of Knighton & Howell were preparing plans for a 100-foot by 82-foot, three-story concrete and steel building (*Oregonian* 1929b, 1929c). A building permit was issued to Oscar E. Heintz in mid-April 1929 to construct the building at 11 East Third Street North (present-day SE Third Avenue) (*Oregonian* 1929d). Less than two weeks later the $38,000 (about $608,000 in 2021 dollars) construction contract was officially awarded to the Anderson Construction Company (*Oregonian* 1929e).

The Frigidaire Building was officially opened for business on September 1, 1929 (*Oregonian* 1929f). Oscar E. Heintz owned the building, which he leased to the Frigidaire Company (*Oregonian* 1929f). According to the *Oregonian* newspaper, the building "abuts the east approach to the Burnside bridge [sic] only the upper story faces the street, the other two being below the level of the bridge" (*Oregonian* 1929f).

In July 1933, Frigidaire shifted from direct retail sales to offering their products through selected dealers. Portland's Sunset Electric Company became wholesale distributor of Frigidaire residential refrigerators and commercial refrigeration equipment and moved Frigidaire sales and service to their existing location at 937 NW Glisan Street (*Oregonian* 1933). After Frigidaire vacated the premises, George L. Sammis, vice president and general manager of the Sunset Electric Company, was selected as the administrator of the Oregon Liquor Control Commission (*Oregonian* 1934a). Not long after, the Commission began using the lower levels of the building as a liquor distribution warehouse and opened a retail liquor store on the uppermost level of the building (*Oregonian* 1934b, 1934c, 1934d). The Oregon Liquor Control Board occupied the building until the 1940s (NRHP 1989). Ronald J. Templeton, an auto parts dealer, was associated with the building from 1959 until 1997, when he sold it to Joanne M. Ferrero and Warren H. Lawson (Portland Business Journal 2004; Multnomah County Assessor 2021). Artiste Lofts LLC purchased the building in 2004, and the property ownership changed three more times between 2004 and 2012 (Multnomah County Assessor 2021).

The Frigidaire Building is rectangular in plan and is two stories tall over a raised basement. The building footprint measures approximately 100 feet by 82 feet with the long axis of the building oriented in an east west direction. The structure of the building is concrete on steel frame. The basement level of the building is accessible from SE 2nd Avenue to the west and the main level of the building is accessible from SE 3rd Avenue to the east. The uppermost level of the building is accessible from the sidewalk along the south side of the East Approach Span of the Burnside Bridge.

The primary façade of the building faces north toward the East Approach Span of the Burnside Bridge. The upper portion of the primary façade above the sidewalk level is clad with Willamina brick and has a centrally located recessed entry with a scribed concrete floor surface. Painted concrete pilasters are located to each side of the entry and feature shallow scrolled brackets at the underside of the lintel over the entrance opening. A cast concrete recessed sign panel is located on the upper portion of the façade over the recessed entry. The 1989 NRHP nomination noted that the building name was inscribed in this panel, but this feature is no longer extant. A cast concrete cornice above the sign panel projects slightly from the face of the building. This cornice is capped with a symmetrical cast concrete decorative design of acroteria and curvilinear scrollwork flanking a centrally located square element topped with a finial.

A painted wood storefront system wraps along the three walls inside the recessed entry, and a pair of painted wood double doors with single-light vision panels is centrally located within the recessed entry. There is a large single-light transom above the double doors. Two equally sized, wood framed storefront windows flank the double doors. These large panes of glass are mounted above bulkheads clad with black glazed ceramic tile that has a horizontal ceramic tile pencil line detail inset below the uppermost course of field tiles. A band of painted wood sash transom windows above the storefront doors and windows spans the full width of the recessed entry. Equally spaced, painted wood turned spindles are mounted on the outside of the upper band of transom windows and form a decorative grille. The west and east walls of the recessed entry have storefront window arrangements identical to those of the south wall. There are two painted wood storefront display

windows located on each side of the centrally located recessed entry. These storefront display windows are all equally sized and feature details identical to the storefront windows located inside the recessed front entry, such as the black glazed ceramic tile bulkheads, large plate glass display windows, and painted wood sash transoms with a decorative grille of painted wood turned spindles.

The lower level of the primary façade below the sidewalk level is constructed of painted board form concrete. There are two large window openings located at this façade toward the northeast corner of the building. Each of these steel sash windows has a five-equal-light wide by five-equal-light tall configuration. Each of these windows has a center pivot operable sash that is three-lights-wide by two-lights-tall. There may have once been other window or door openings at this level, but these openings have been blocked up at some point.

The east façade is clad with a painted stucco plaster pargecoat over an unknown substrate. has a small, recessed double door entry at ground level near the southeast corner of the building. However, this entry appears to be a modification and enlargement of an original loading door opening. There are nine steel sash windows at the ground level of the east façade, and eight of these windows have their headers aligned. There are two steel sash windows mounted in the wall above the recessed entry. Each of these windows features a four-equal-light-wide by two-equal-light tall configuration. Four larger steel sash windows in a four-equal-light wide by six-equal-light tall configuration are located to the north of the recessed entry. Each of these windows has a center pivot operable sash that is two-lights-wide by two-lights-tall. There are two additional steel sash windows to the north of the four taller windows, and each of these windows is four-equal-lights wide by three-equal-lights tall. There is another steel sash window mounted lower in the east façade which has a five-equal-light wide by two-equal-light high configuration. A single entrance door is located between this window and the northeast corner of the building. It appears that this window and door were once located underneath a stairway mounted on the east façade of the building which connected the sidewalk along SE 3rd Avenue with the sidewalk on the south side of the East Approach Span of the Burnside Bridge above. There are eight equally sized window openings at the uppermost level of the east façade, and each of these window openings is centered on the eight equally spaced windows at the ground level façade. Each of these windows is identical size and has operable double hung sashes with transom sashes above. All the sashes have a three-equal-vertical-light configuration. There is a storefront display window at the northeast corner of the building at the uppermost level, and the design and configuration of this window is almost identical to the storefront windows along the north façade of the building, with the exception of not having a black glazed ceramic tile bulkhead underneath.

The south façade of the building is completely obscured by an adjacent taller building to the south of the Frigidaire Building. The west façade is clad with a painted stucco plaster pargecoat over an unknown substrate. There are large loading door openings and steel sash windows at the lowest (basement) level of the west building façade, though these window and door openings are almost constantly concealed by parked vehicles. The next level above the basement features ten identical, equally spaced steel sash windows, each in a four-equal-light wide by six-equal-light tall configuration. Each of these windows has a center pivot operable sash that is two-lights-wide by two-lights-tall. The windows at the uppermost level of the west façade appear to be a mirror image of the corresponding windows on the east façade of the building. Like the corresponding windows on the east façade, these windows are also centered above the windows beneath them.

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4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge the same alignment as the current bridge, which would necessitate the demolition of the existing Burnside Bridge.

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5. Evaluation of Effects

The team applied the Section 106 criteria of adverse effect (36 CFR 800.5) to assess the potential direct and indirect effects of the proposed Long Span option on the Frigidaire Building, which was listed in the NRHP in 1989. According to the criteria, "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative."

Note: The structure of the replacement east approach span has not yet been finalized. The replacement east approach span will be either a tied arch structure or cable-stayed structure.

Location: The Frigidaire Building is not being moved or removed, so the integrity of location would not be affected by the undertaking (Figures 18 through 31).

Setting: The reinforced concrete sidewalk and balustrades along the south side of the East Approach Span bridge deck are historic features that contribute to the historic setting of the Frigidaire Building. When the Burnside Bridge is replaced, the building will be permanently disconnected from the bridge structure, and the historic sidewalk and balustrades will be permanently removed. A walkway will be constructed to connect the main entrance to the new sidewalk. Removal of these features would somewhat alter the building's integrity of setting, however, not to such an extent that the undertaking would constitute an adverse effect to this NRHP-listed resource (Figures 19, 20, 22, 23, 25, 26, 28, 29, and 31).

Furthermore, the introduction of diagonal cable-stay structural elements along the north side of the Frigidaire Building would constitute *no adverse effect* to this NRHP-listed resource, provided that the cable-stay structural elements are placed as far away from the building façade as possible, such as between the north side of the new sidewalk and the new travel lanes (Figures 20, 23, 26, and 29).

Design: The overall integrity of form, plan, internal space, structure, and style of the Frigidaire Building will not be altered by the removal of the East Approach Span of the Burnside Bridge. However, removal of the historic reinforced concrete sidewalk and balustrades connected to the Frigidaire Building will alter the relationship that the upper-level north façade of the building has with the adjacent public sidewalk space. Removal of the sidewalk would result in the storefront windows and entrance no longer having the same spatial relationship to the adjacent public right-of-way space that they have had for the past ninety years. However, the effects of this alteration are mitigated by the potential transparency of the new railing along the south edge of the sidewalk, which will allow pedestrians to see into the display windows of the Frigidaire Building. Therefore, it is recommended that the undertaking would constitute *no adverse effect* to this NRHP-listed building, provided that the new sidewalk railing design is as transparent as possible without compromising safety (Figures 19, 20, 22, 23, 25, 26, 28, 29, and 31).

Materials: The removal of the East Approach Span of the Burnside Bridge would not damage or remove the physical elements of the Frigidaire Building considered character defining features integral to the historic nature of the building. Therefore, the proposed undertaking would not adversely affect the historic material integrity of this NRHP-listed resource.

Workmanship: Care must be taken during demolition of the East Approach Span to protect the examples of fine craftsmanship evident in the Frigidaire Building, such as the woodwork grille of the transoms above the storefront windows, the glazed ceramic tile bulkhead, and the Willamina face brick masonry. However, since these character defining features will remain intact, the proposed undertaking would not adversely affect the integrity of the historic workmanship evident in this NRHP-listed resource.

Feeling: The upper level of the Frigidaire Building features large storefront windows along the entire north façade of the building, which were used historically to display goods offered for sale inside the upper-level showroom. Domestic refrigeration equipment was displayed while Frigidaire occupied the building, and alcoholic beverages were displayed when the Oregon Liquor Control Board used the building. These storefront windows are positioned so users of the East Approach Span sidewalk had an excellent view of the goods on display. The removal of the continuous concrete sidewalk along the north façade of the building would somewhat alter the historic sense of the period of time when the building was used for the sales of goods and also somewhat alter the ability of the public to appreciate the design, materials, and workmanship of the prominent storefront windows. However, the effects of this alteration are mitigated by the potential transparency of the new railing along the south edge of the sidewalk, which will allow pedestrians to see into the display windows of the Frigidaire Building. Therefore, it is recommended that the undertaking would constitute *no adverse effect* to this NRHP-listed building, provided that the new sidewalk railing design is as transparent as possible without compromising safety (Figures 19, 20, 22, 23, 25, 26, 28, 29, and 31).

Furthermore, the introduction of diagonal cable-stay structural elements along the north side of the Frigidaire Building would constitute *no adverse effect* to this NRHP-listed resource, provided that the cable-stay structural elements are placed as far away from the building façade as possible, such as between the north side of the new sidewalk and the new travel lanes (Figures 20, 23, 26, and 29).

Association: The removal of the East Approach Span of the Burnside Bridge will not diminish or eliminate the direct link that the Frigidaire Building has to important historic events or persons significant to our past, so the integrity of association would not be affected by the undertaking.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

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7. Conclusion

In summary, the Refined Long-span alternative would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The removal of the existing historic east approach span and construction of a new east approach span with either a tied arch or cable-stayed structure would constitute *no adverse effect* to the NRHP-listed Frigidaire Building, provided that the cable-stay structural elements are placed as far away from the building façade as possible, and also provided that the new sidewalk railing design is as transparent as possible without compromising safety.

8. Sources

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1926a "Business Building Added." 10 January:30.
1926b "New Bridge Spans East Third Street with Attractive Viaduct." 8 February:7.
1926c "Burnside Street Undergoes Change." 30 May:18.
1926d "Hotel Bridgeport." 20 June:38.
1929a "Frigidaire Plans Building." 6 January:20.
1929b "Frigidaire to Get Home." 14 March:9.
1929c "'Frigidaire' Will Build." 17 March:26.

1929d "Daily City Statistics." 18 April:16.
1929e "Contracts Closed for Two Buildings." 21 April:22.
1929f "Frigidaire Branch Formally Opened." 8 September:20.
1929g "Frigidaire Moves Into New Home Here." 8 September:20.
1933 "The Sunset Electric Company." 5 July:2.
1934a "Sammis Chosen as Liquor Boss." 7 January:1.
1934b "Liquor Commission to Move." 20 February:12.
1934c "Liquor Office Moved." 23 February:14.
1934d "Liquor Offices Moved." 24 February:2.

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ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Maps and Figures

Include aerial or sketch map delineating the property boundary and the locations of all contributing and non-contributing features within the property boundary and maps showing the location of proposed project actions. These can include available engineering drawings or plans, preferably on aerial maps.

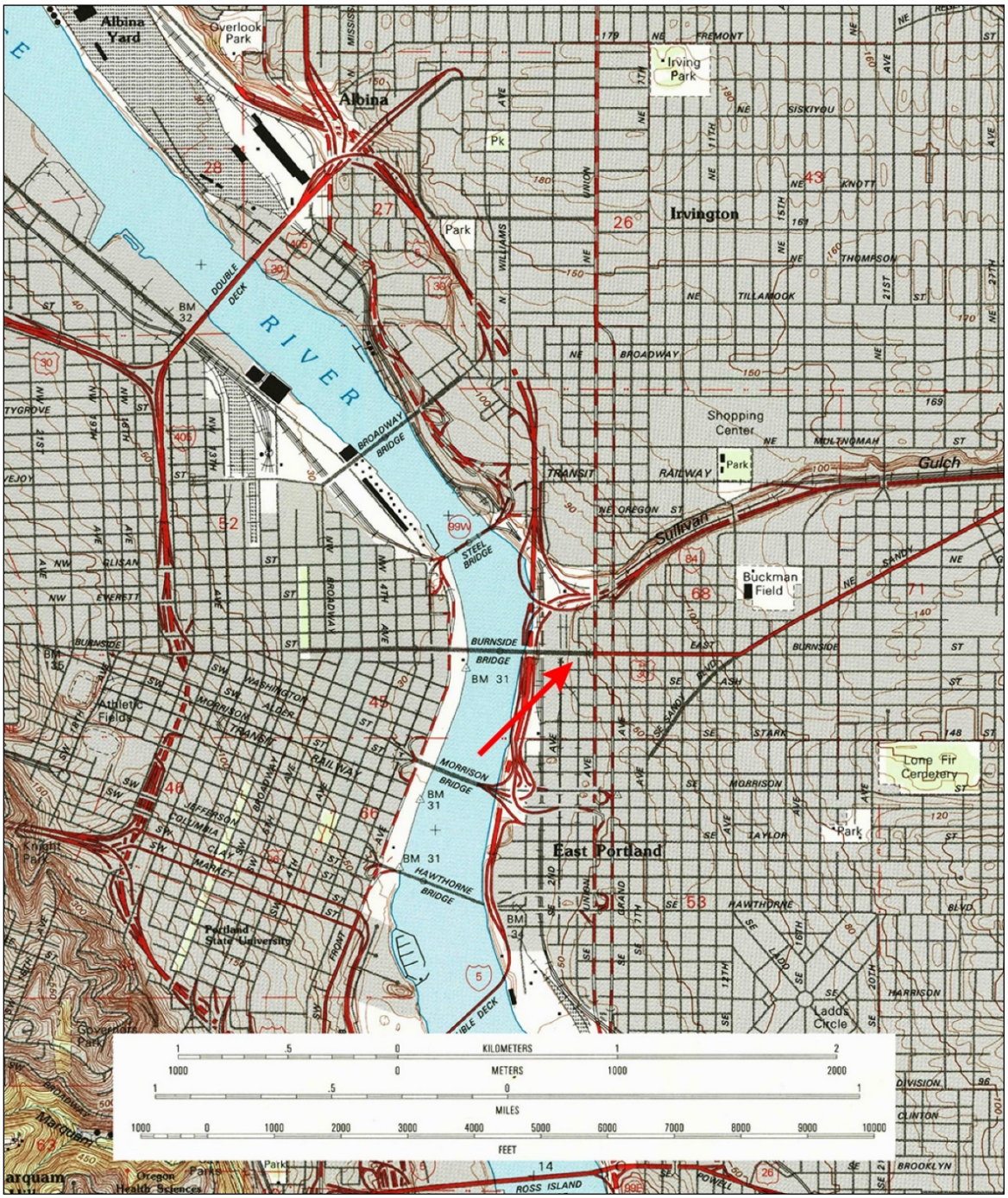

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of Frigidaire Building (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

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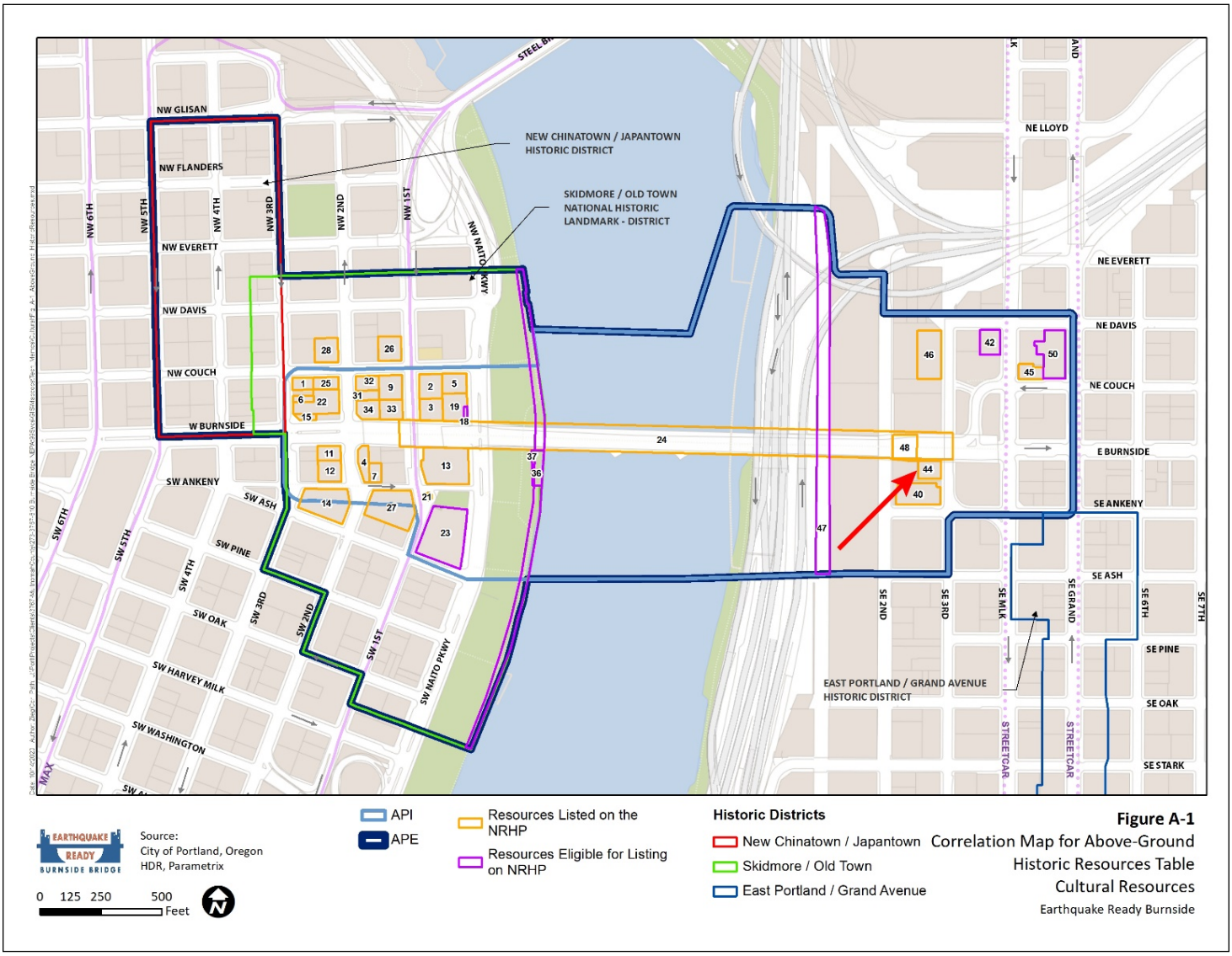

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of Frigidaire Building.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

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Figure 3: Aerial photograph with location of Frigidaire Building indicated by red line (Google Earth).

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Figure 4: 1951 aerial photograph with location of Frigidaire Building indicated by red line (USGS EarthExplorer).

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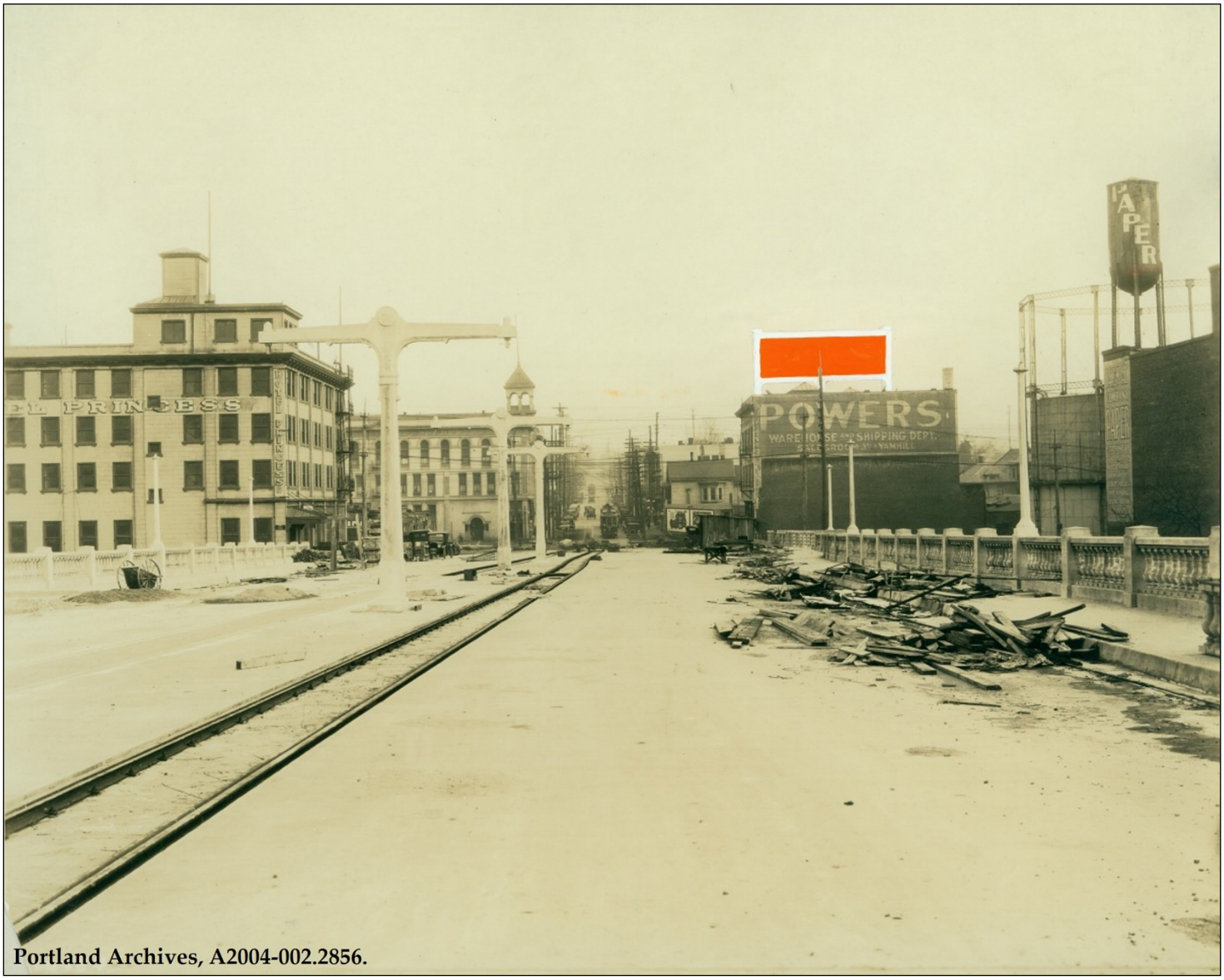
Photographs

Provide multiple images of the property that highlight where project actions may be occurring. Depending on the scope and scale of the project, this could include photos of contributing features, non-contributing features, and/or the overall setting of the property. Provide captions under each image with the following format: Property name, facing [direction] (Photographer, YYYY).



Portland Archives, A2004-002.2856.

Figure 5: East Burnside Bridge looking east to Union Ave bridge almost completed. Note the section of guardrail on the right side of image that is different than the concrete balustrade of the east approach, which is where the Frigidaire Building was built in 1929 (Portland Archives, A2004-002.2856). [NOTE: The Portland Archives dates this photo as December 31, 1926. However, based on the almost-finished condition of the bridge, this image was likely taken between February and May 1926. Also, the Hotel Princess became the Bridgeport Hotel between May and June 1926, which further reinforces the likely date of the image (*Oregonian* 1926a, 1926c, 1926d).

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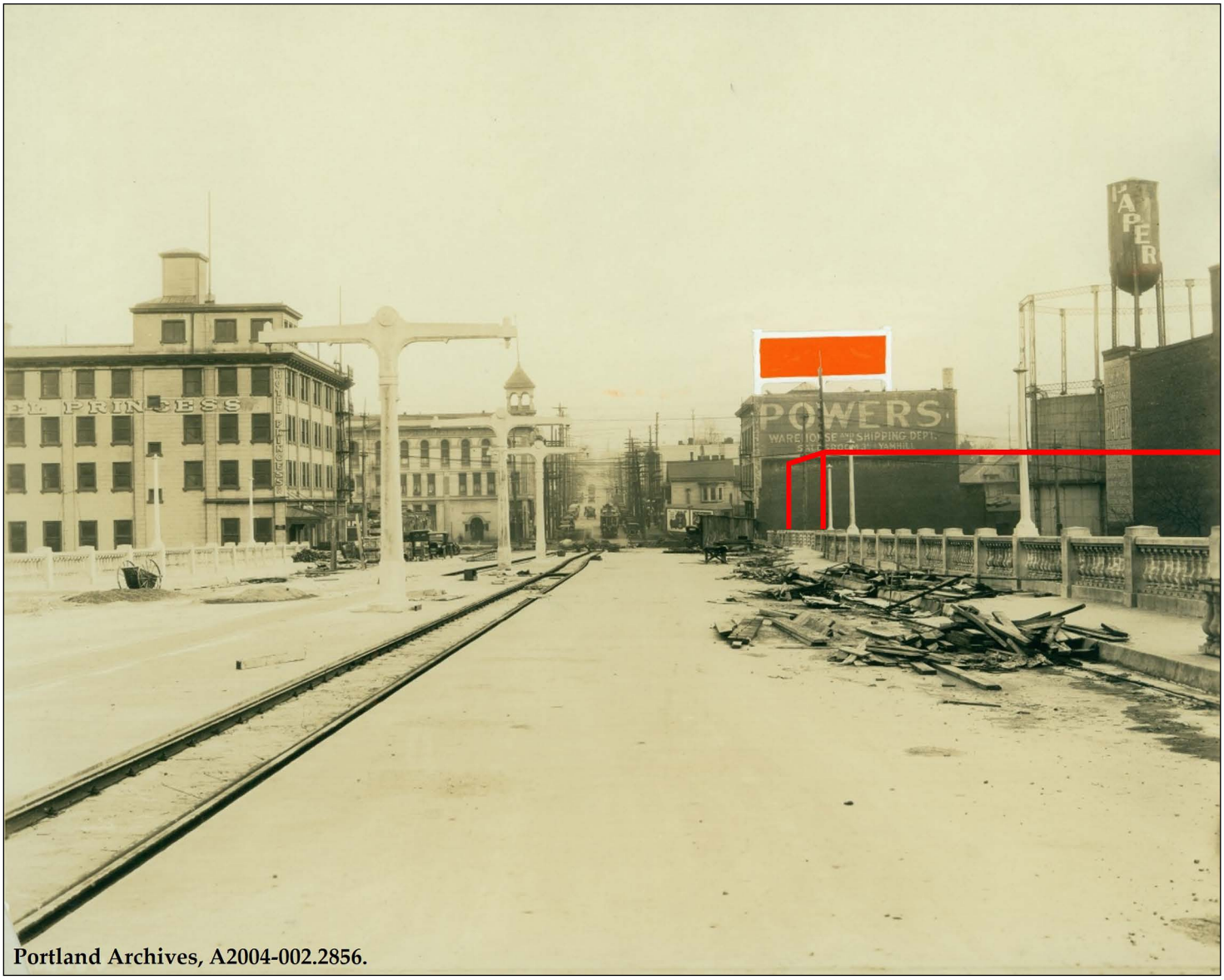

Portland Archives, A2004-002.2856.

Figure 6: East Burnside Bridge looking east to Union Ave bridge almost completed, May 1926 (see note in Figure 5 caption regarding the date of this image). Red lines indicate present-day location of the Frigidaire Building, which was constructed in 1929 (Portland Archives, A2004-002.2856).

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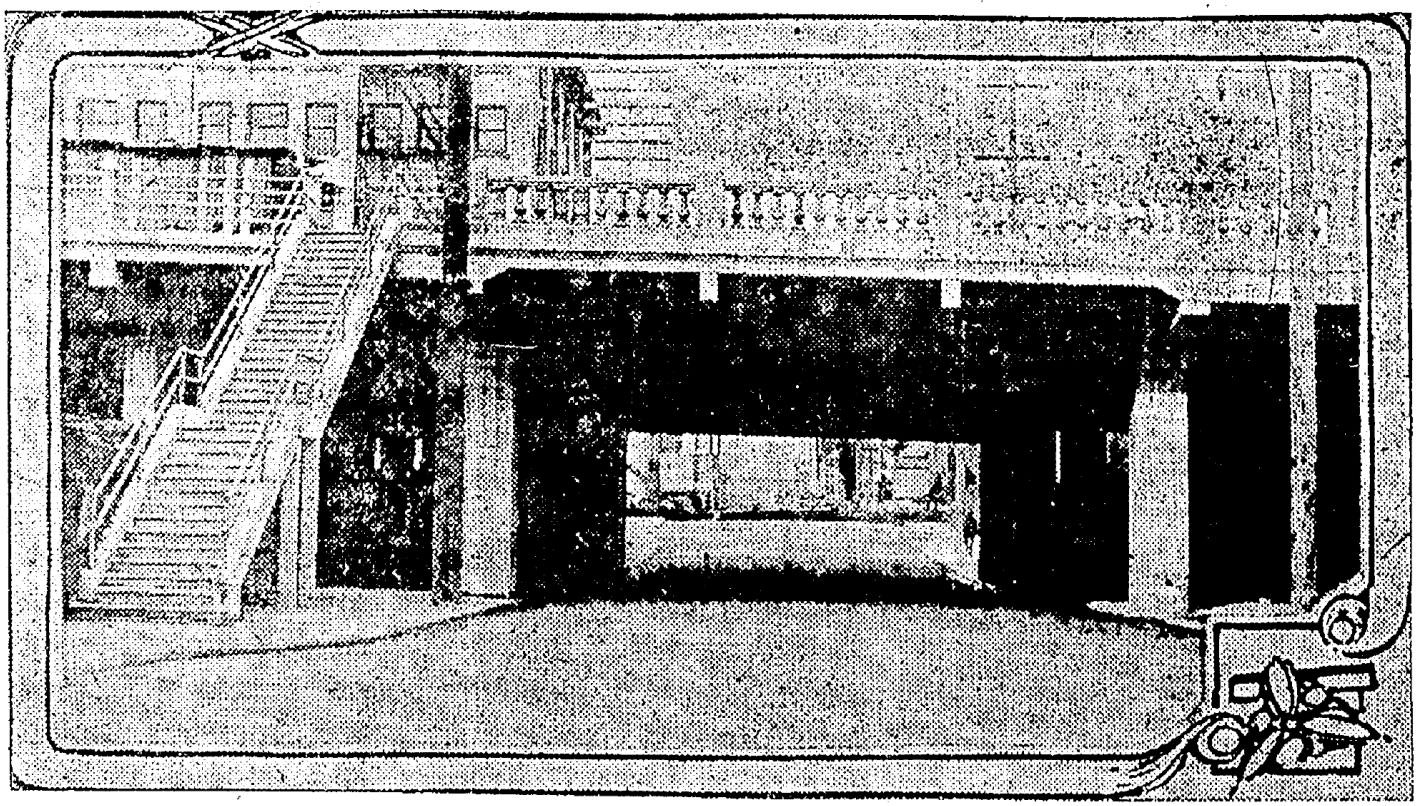
NEW BRIDGE SPANS EAST THIRD STREET WITH ATTRACTIVE VIADUCT



VIEW OF HUGE SPAN SHOWING METHOD USED IN CLEARING EAST SIDE DRIVEWAY.

The new Burnside bridge, which is now getting along toward completion, spans East Third street with an attractive viaduct. Similar viaducts, it was announced, will be used in construction of the west side approach in spanning Front and First streets.

A photograph of the viaduct over East Third street which was taken yesterday by The Oregonian's staff photographer gives some idea of the tremendous size of the new bridge and the splendid workmanship used in building the understructure of the great span.

An attractive stairway of concrete leads from the sidewalk on the west side of East Third street onto the bridge.

East Third street where it extends under the bridge has recently been paved to connect with the paved driveway to the south.

Figure 7: Photograph from the February 8, 1926, issue of the *Oregonian* newspaper. The Frigidaire Building is located to the left of the stairway. Note the section of guardrail to the left of the stair that is different than the concrete balustrade of the east approach (*Oregonian* 1926b).

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Figure 8: Photograph of Trolley Poles and Trolleys on the Burnside Bridge, circa 1926, courtesy Steve Dotterer. Note the section of guardrail to the west of the stair that is different than the concrete balustrade of the east approach. The Frigidaire Building was constructed immediately to the west of the stairway down to SE Third Avenue. (Historic American Engineering Record 1990).

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Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

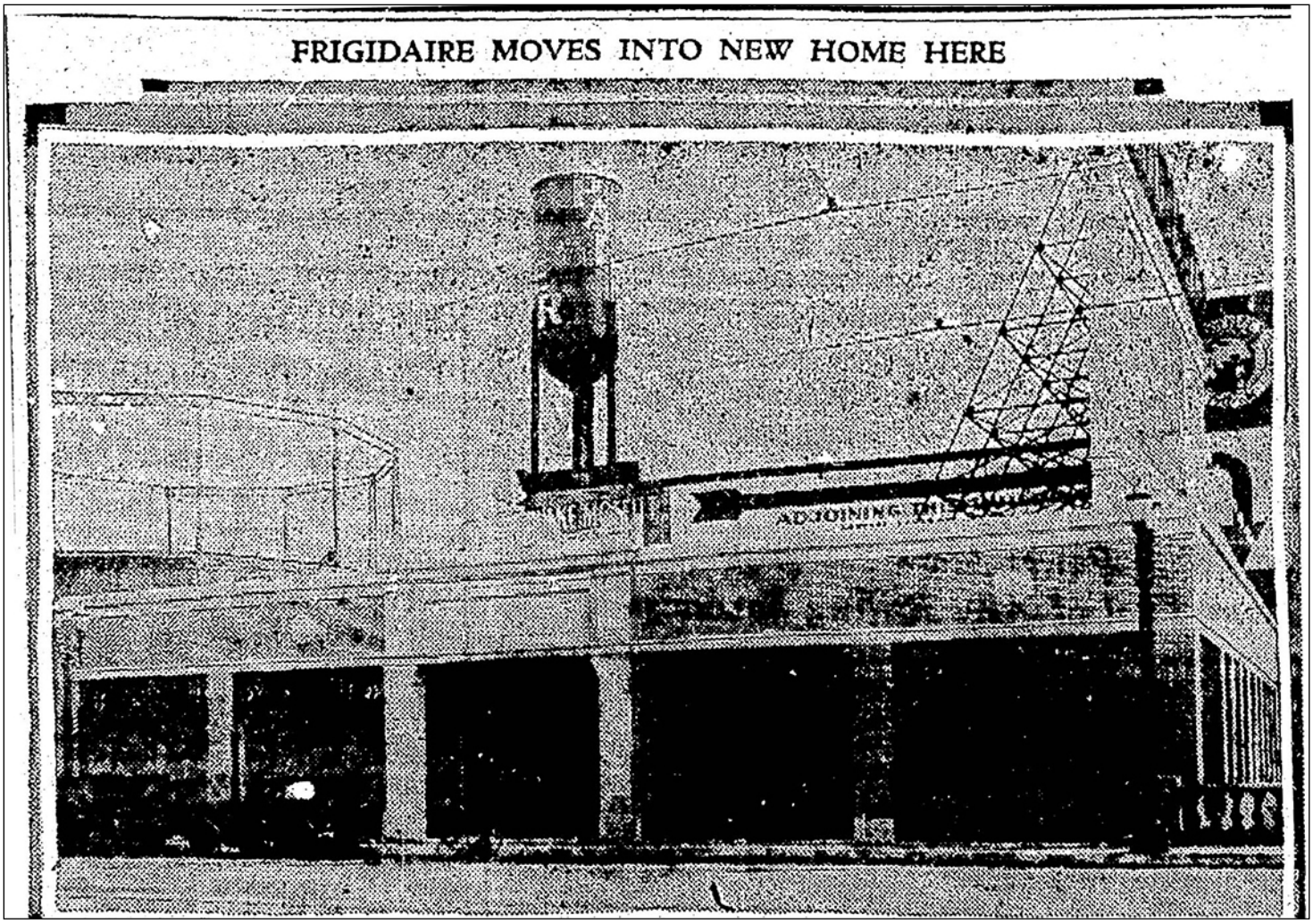

Figure 9: Photograph from the September 8, 1929, issue of the *Oregonian* newspaper showing the recently completed Frigidaire Building. Note the section of balustrade to the west of the building (*Oregonian* 1929g).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

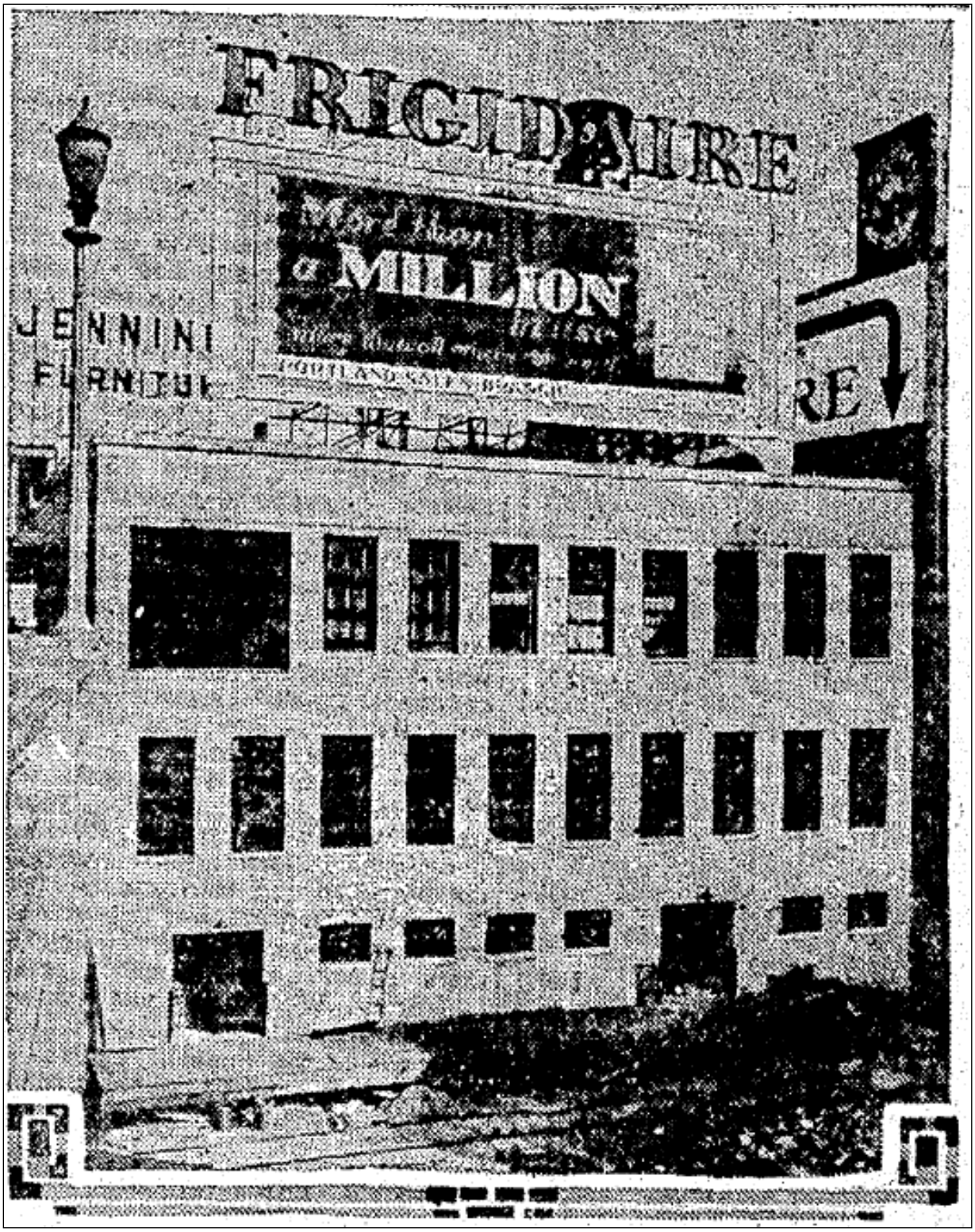

Figure 10: Photograph from the September 8, 1929, issue of the *Oregonian* newspaper showing the recently completed Frigidaire Building (*Oregonian* 1929g).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 11: East side of Burnside Bridge, January 4, 1932. Red arrow indicates the Frigidaire Building. Note the section of concrete balustrade immediately to the east of the Frigidaire Building and the different section of horizontal guardrail along the north side of the vacant lot on the east side of SE Third Avenue that can be seen in Figure 12 and 13 (Portland Archives A2004-001.622).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

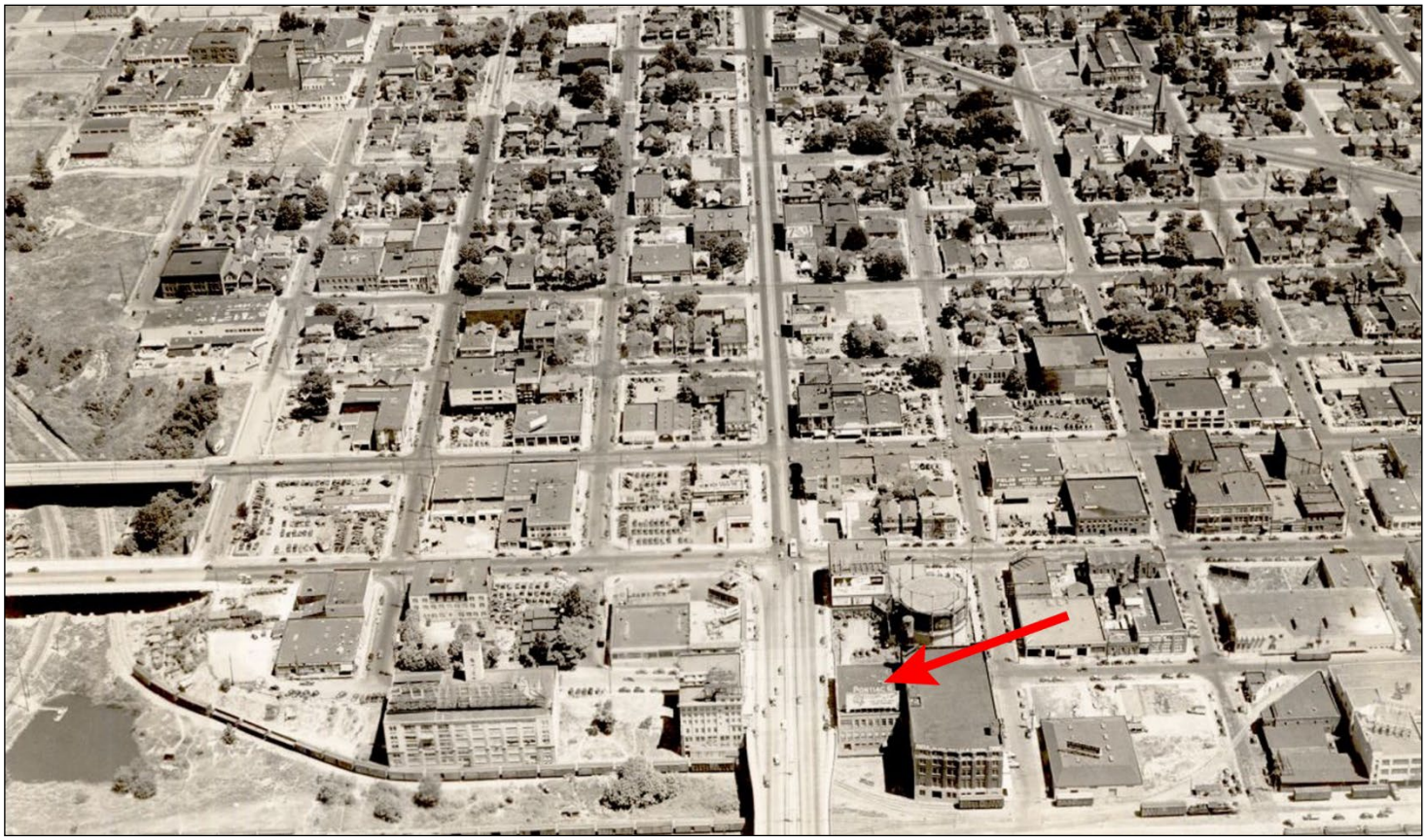

Figure 12: East end of the Burnside Bridge looking east, December 31, 1939. Red arrow indicates the Frigidaire Building (Portland Archives, A2005-001.130).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

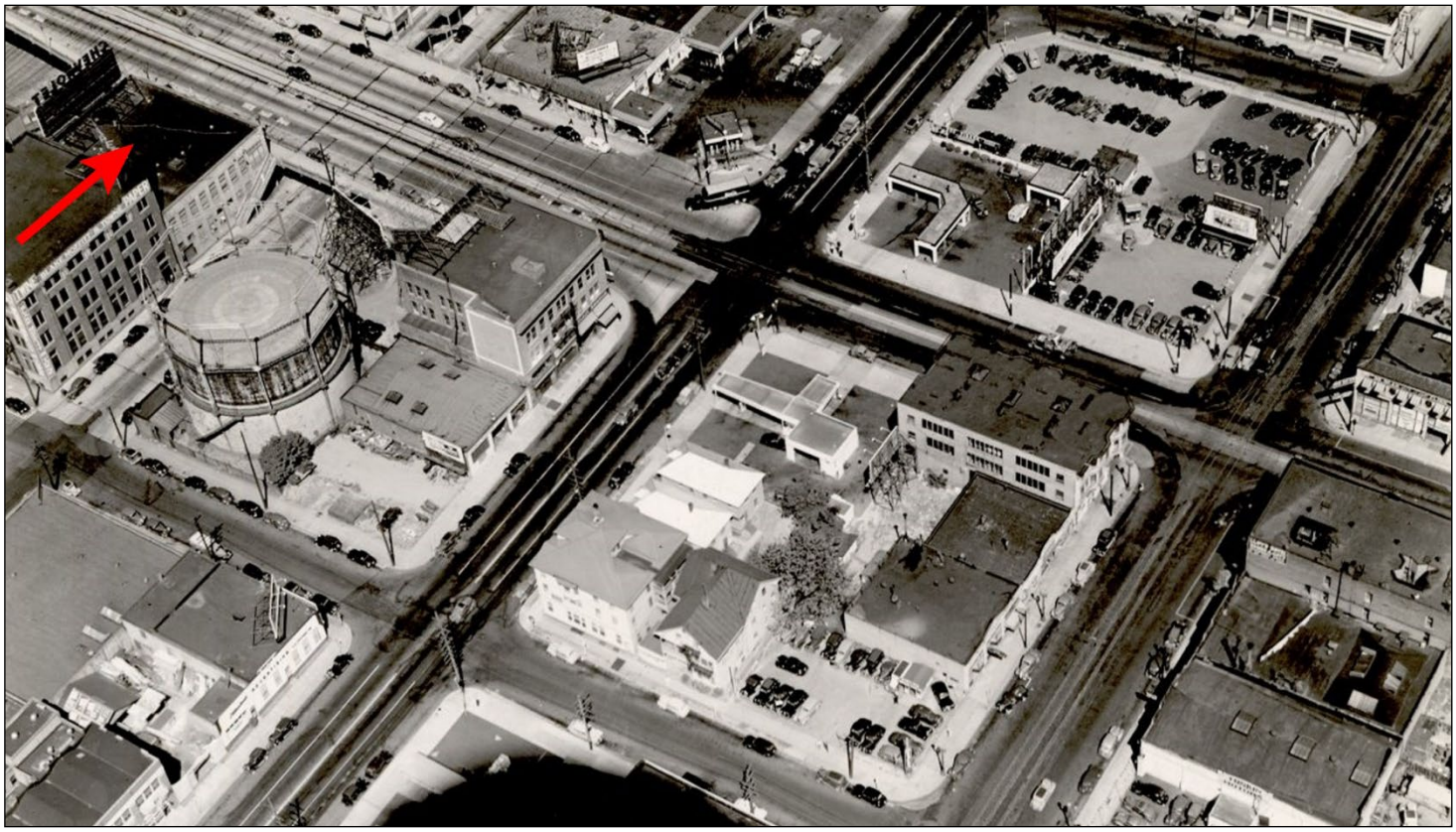

Figure 13: NE Union Avenue (Martin Luther King Jr Blvd) NE Grand Ave and E Burnside St looking northwest, December 31, 1939. Red arrow indicates the Frigidaire Building (Portland Archives, A2005-001.668).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 14: Burnside Bridge westbound, December 31, 1963. Red arrow indicates the Frigidaire Building (Portland Archives A2005-001.106).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 15: Frigidaire Building, north and west facades, oblique view looking southeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 16: Frigidaire Building, east and north facades, oblique view looking southwest (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 17: Frigidaire Building, detail of entrance, view looking southwest (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

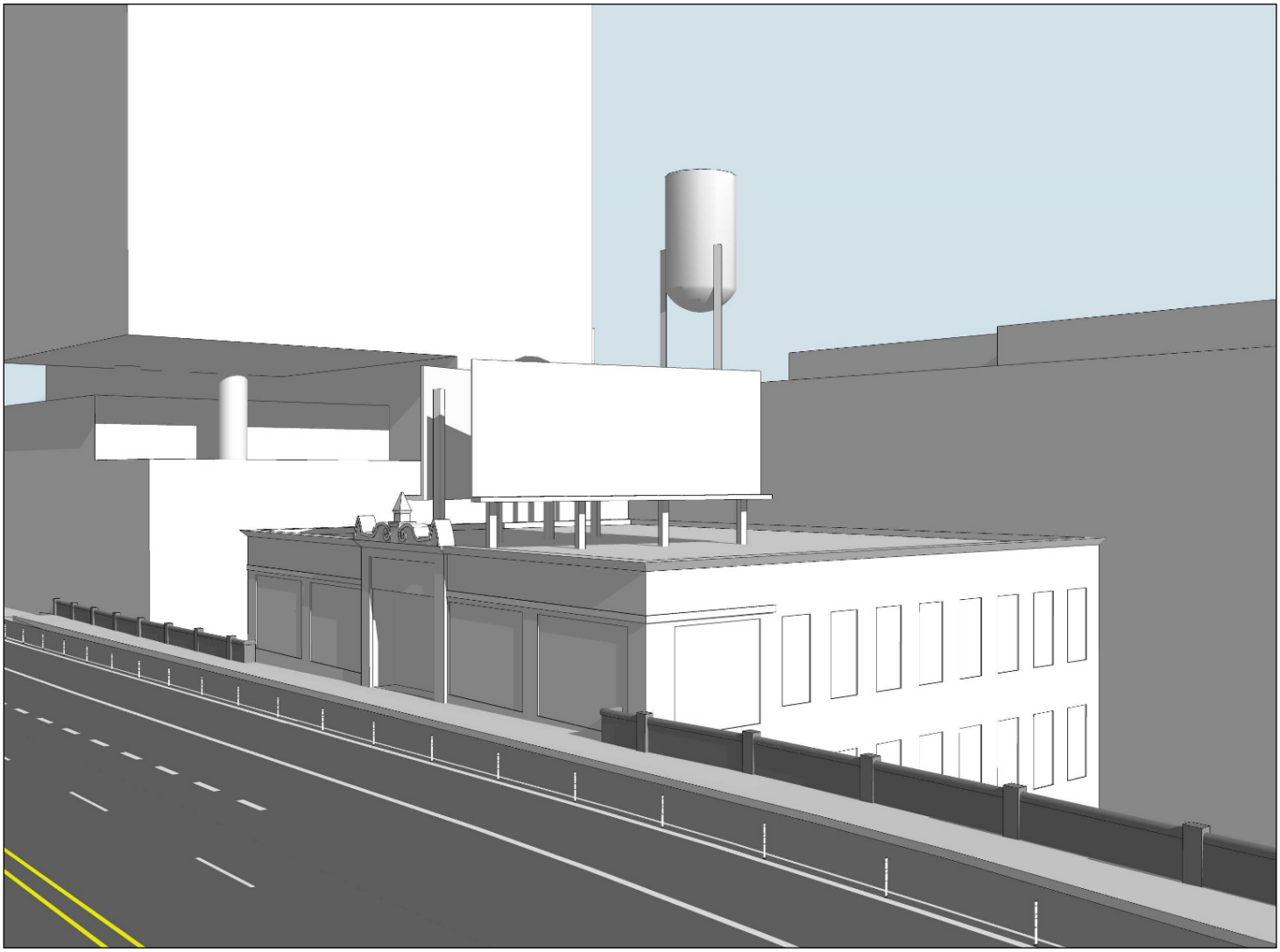

Figure 18: Frigidaire Building, artist's rendering of existing conditions (Fat Pencil Studio, 2021), oblique view looking southeast.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

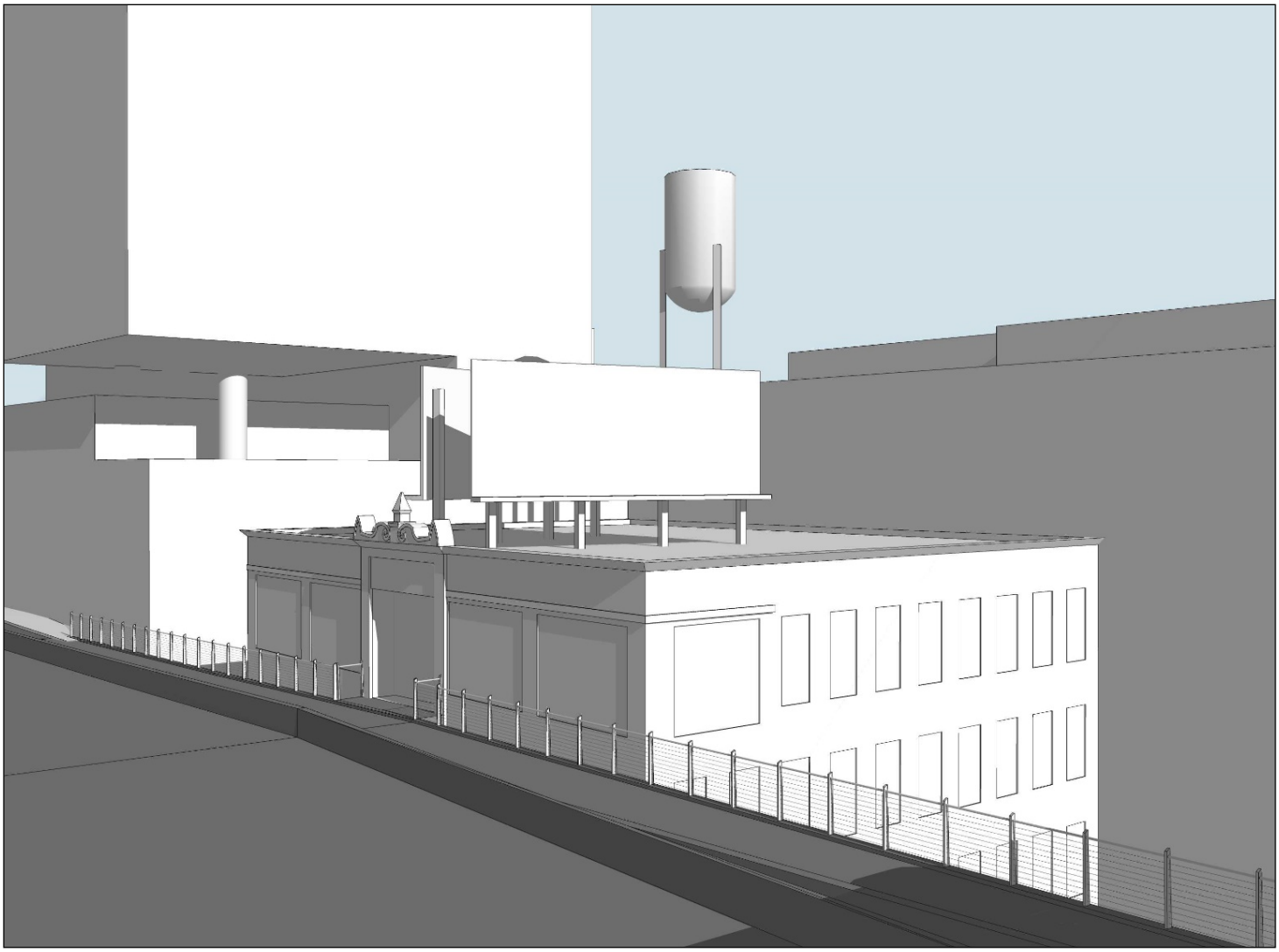

Figure 19: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), oblique view looking southeast. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (tied arch option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

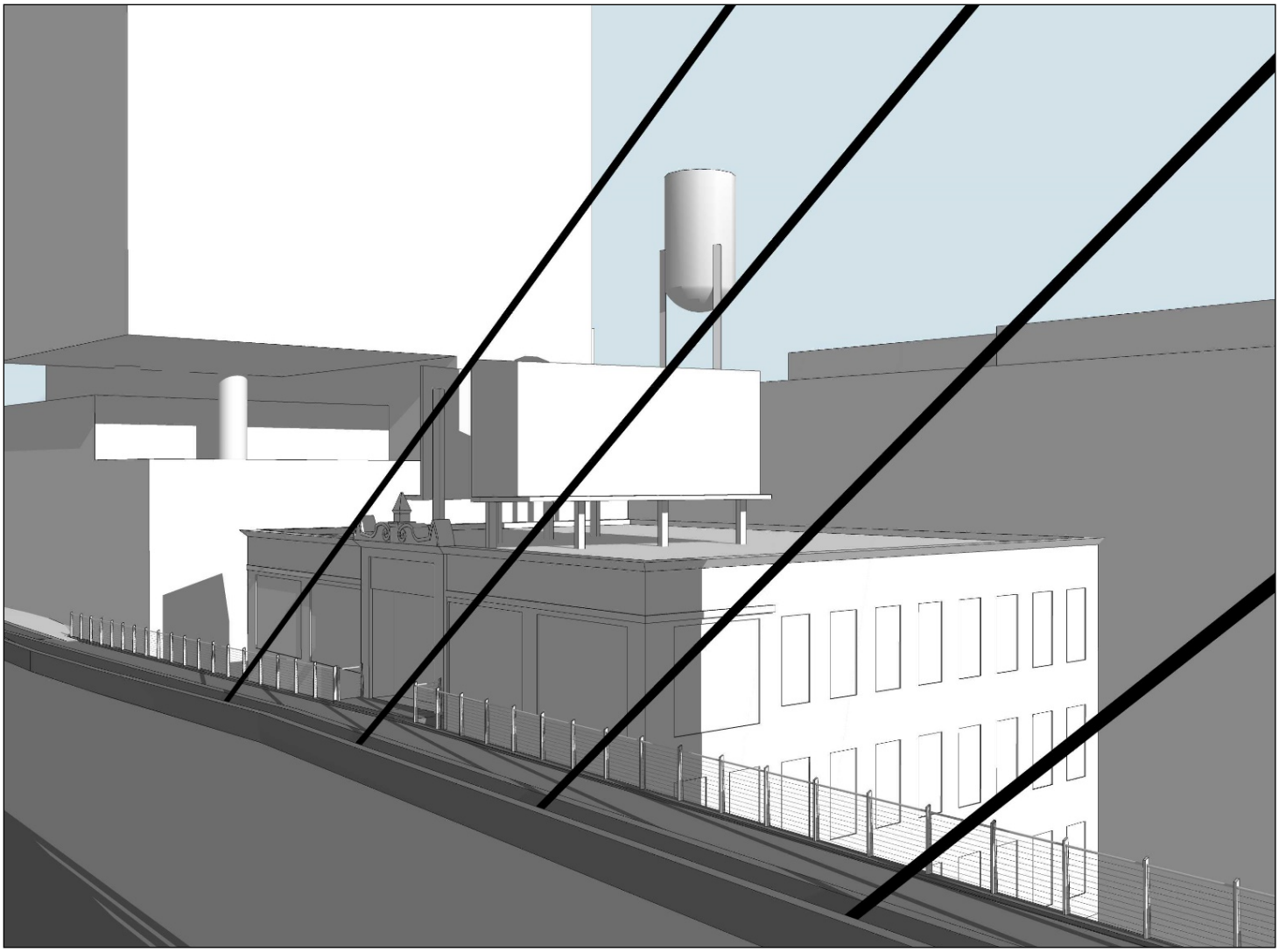

Figure 20: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), oblique view looking southeast. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (cable-stayed option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 21: Frigidaire Building, artist's rendering of existing conditions (Fat Pencil Studio, 2021), oblique view looking southwest.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 22: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), oblique view looking southwest. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (tied arch option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

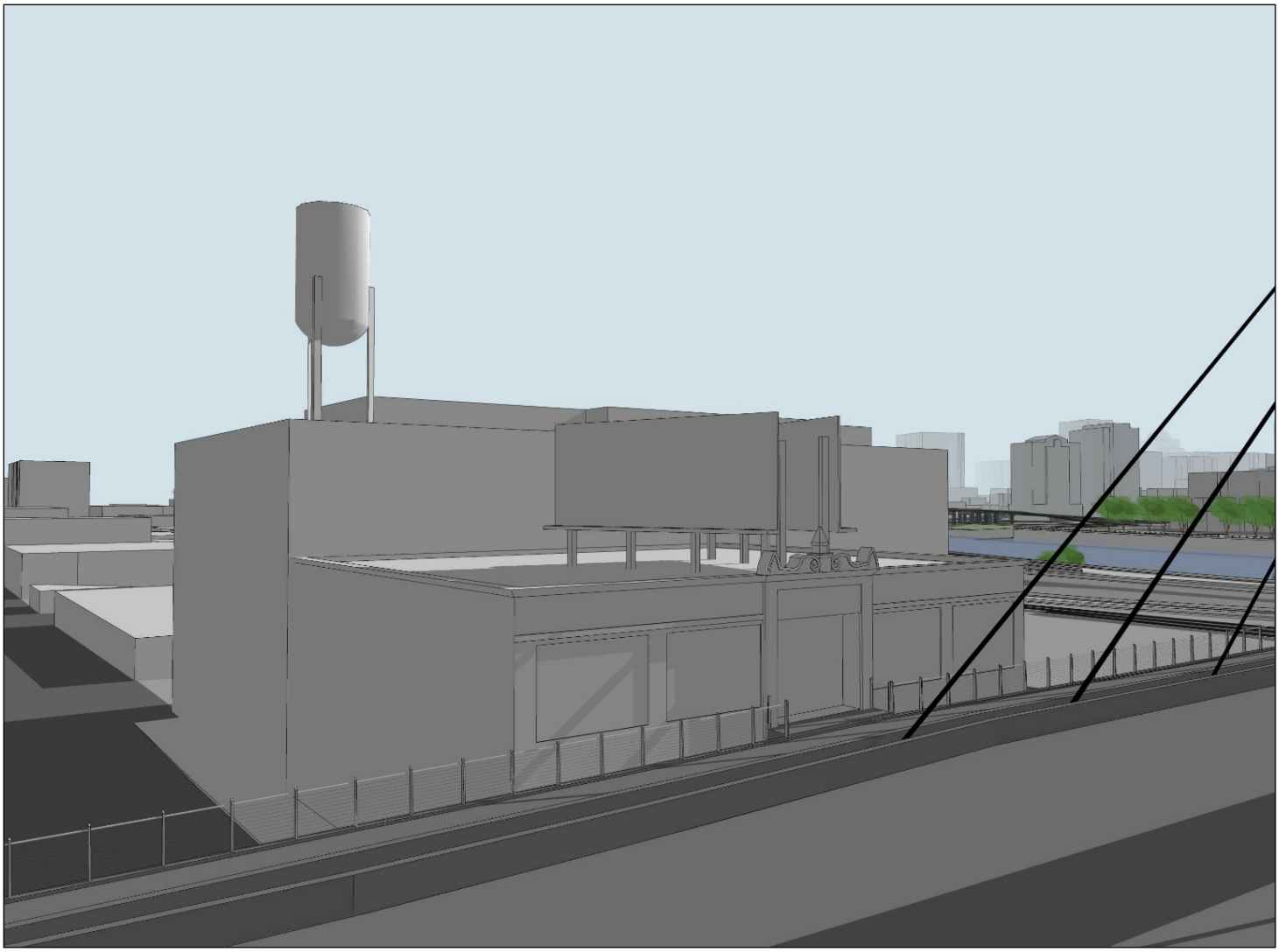

Figure 23: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), oblique view looking southwest. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (cable-stayed option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

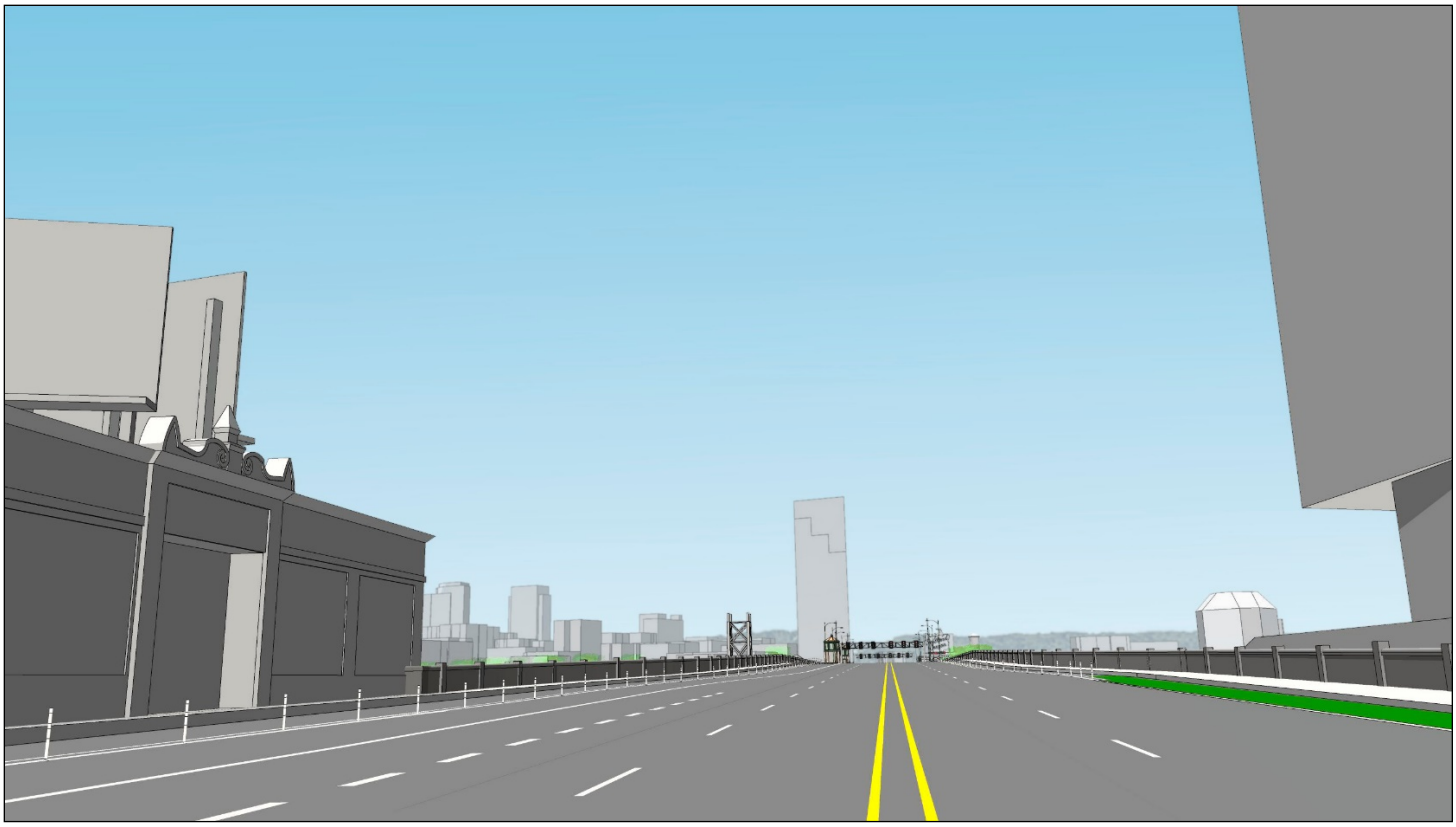

Figure 24: Frigidaire Building, artist's rendering of existing conditions (Fat Pencil Studio, 2021), view looking west.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 25: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), view looking west. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (tied arch option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

Figure 26: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), view looking west. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (cable-stayed option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

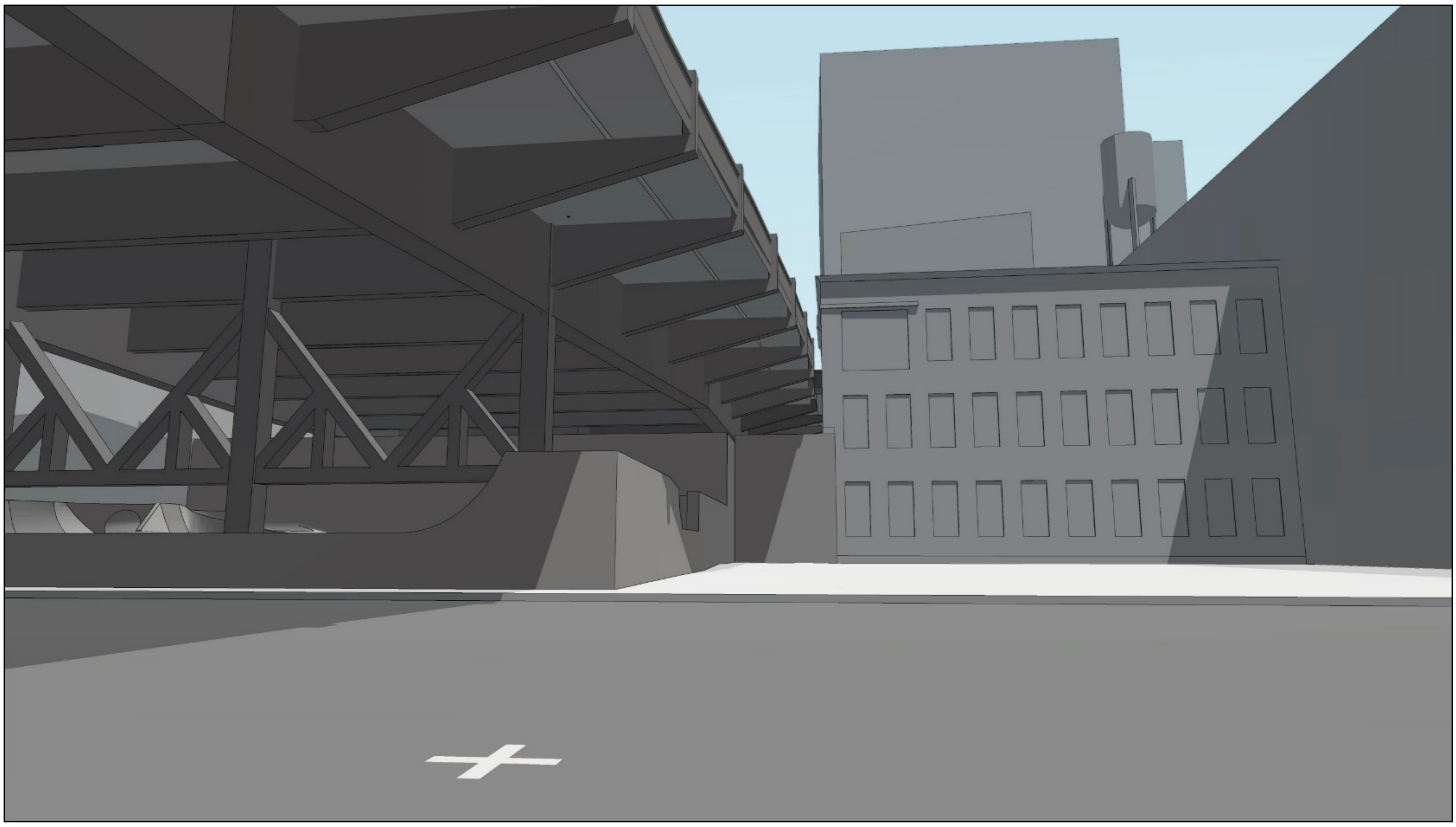

Figure 27: Frigidaire Building, artist's rendering of existing conditions (Fat Pencil Studio, 2021), view looking east.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

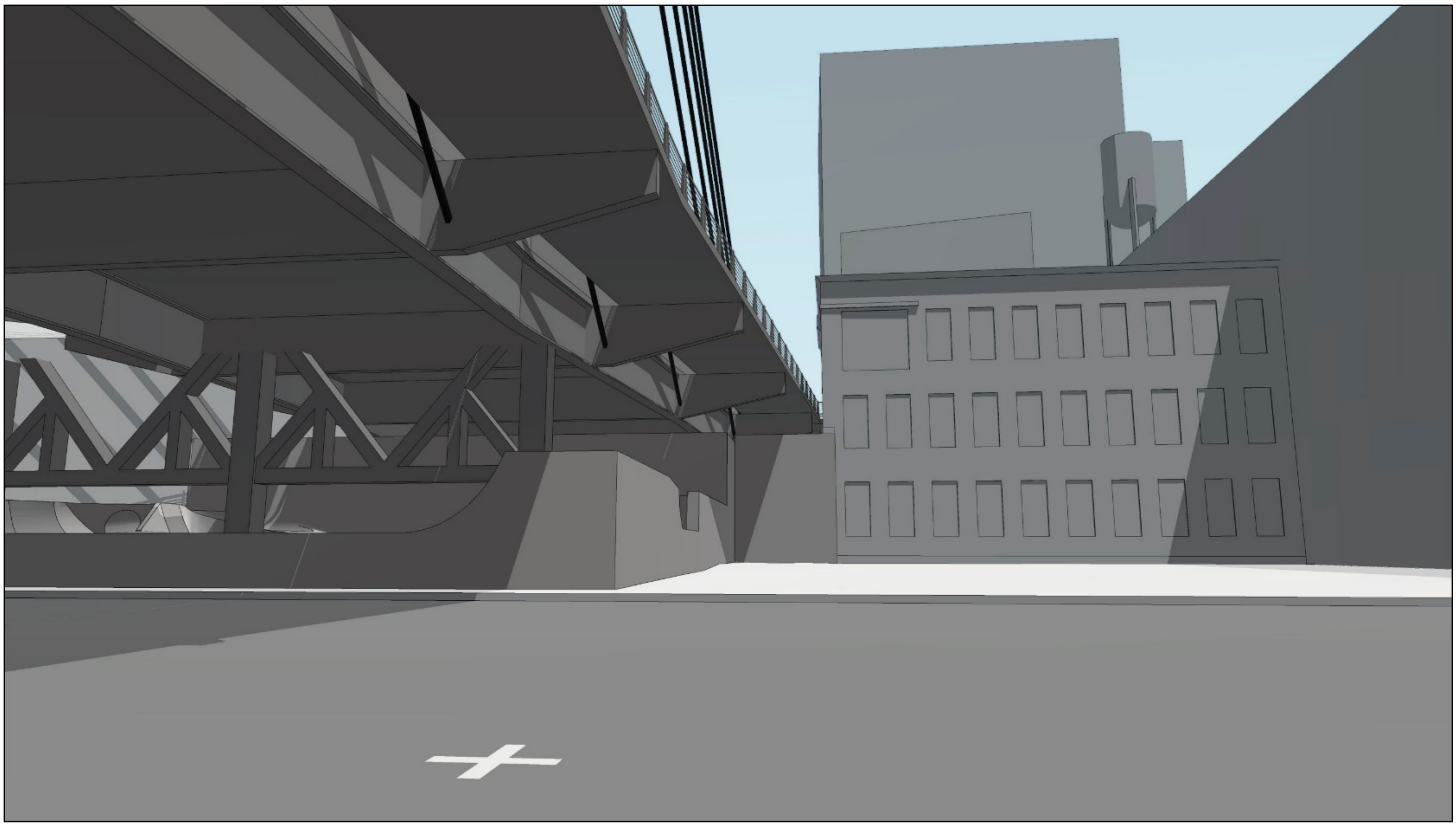

Figure 28: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), view looking east. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span (cable-stayed option).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

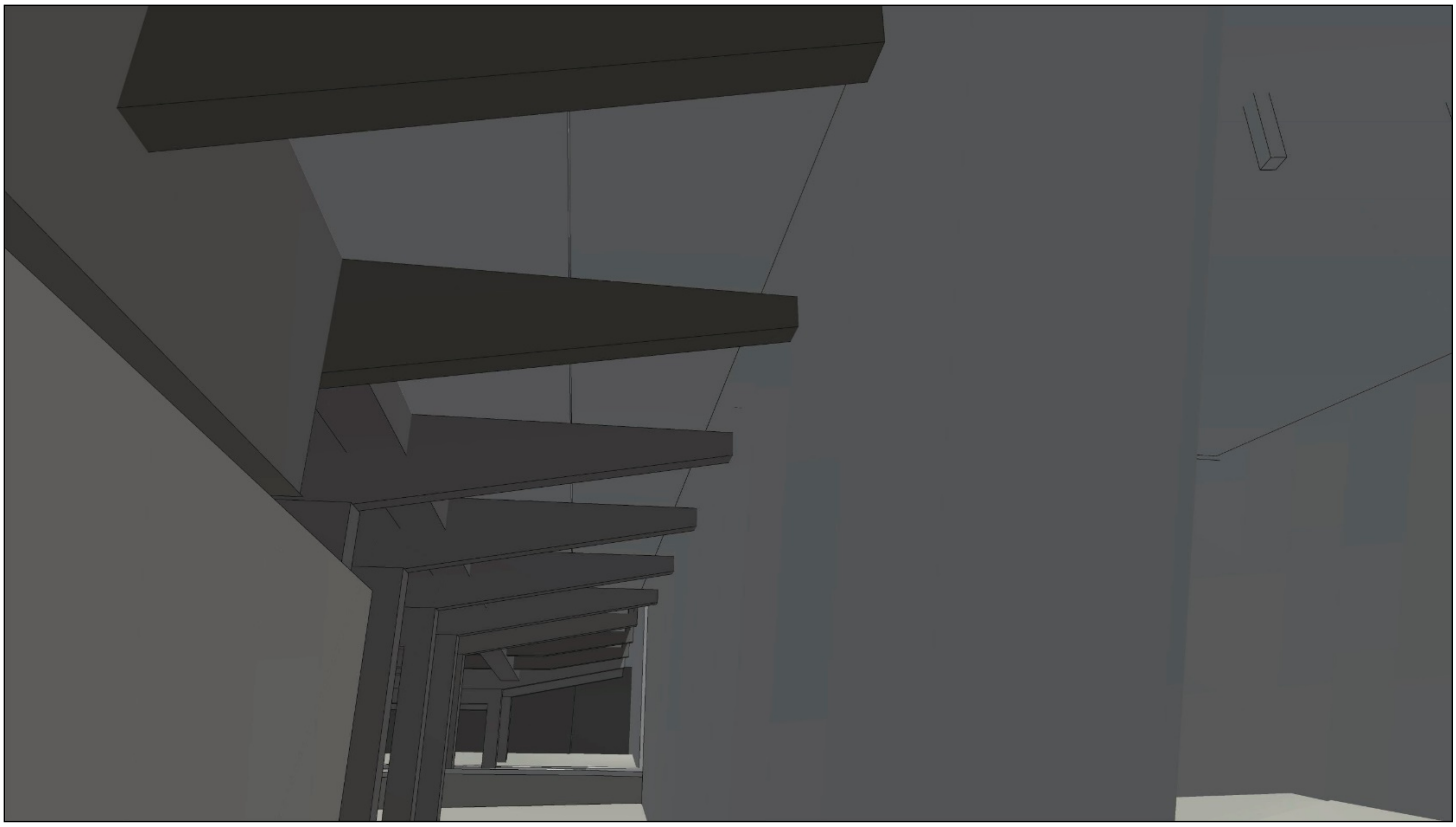

Figure 29: Frigidaire Building, artist's rendering of existing conditions (Fat Pencil Studio, 2021), view looking east.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Frigidaire Building	
Street Address: 230 East Burnside Street	City, County: Portland, Multnomah

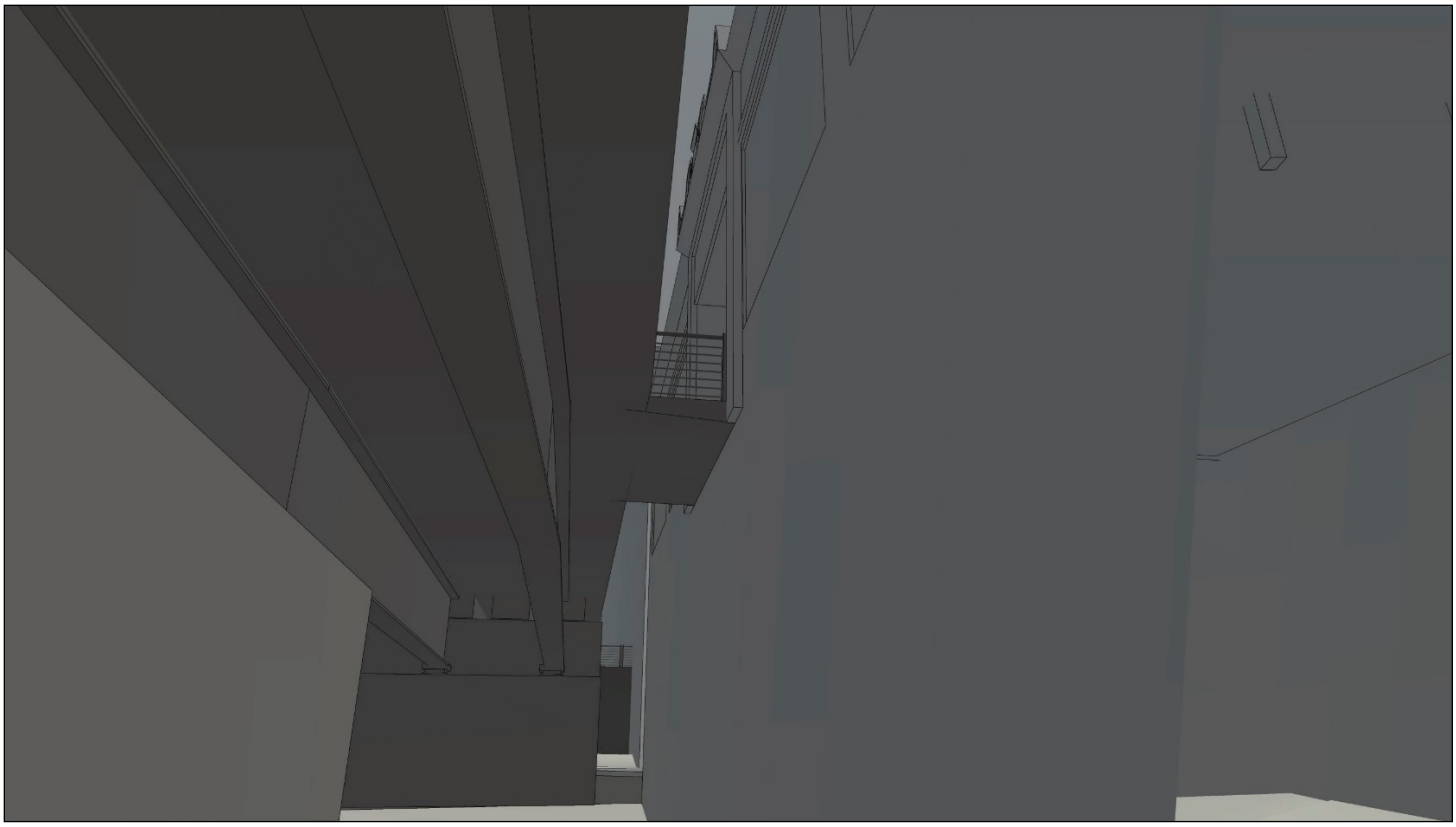

Figure 30: Frigidaire Building, artist's rendering (Fat Pencil Studio, 2021), view looking east. This figure illustrates the condition of the building after demolition of the existing Burnside Bridge and the construction of the replacement east approach span using either the tied arch or cable-stayed structure.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Portland Harbor Wall/Seawall	Street Address: Foot of SW Jefferson to Foot of NW Glisan	
City, County: Portland, Multnomah	Latitude: 45.522185 Longitude: (-)122.669294	
Surveyor: Elizabeth O'Brien	Affiliation: WillametteCRA	Date Recorded: 07/12/2019

Photo:

Photo Caption: Portland Harbor Wall, facing southwest from the Burnside Bridge, with the Ankeny Pump Station (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. Willamette Cultural Resources Associates (WillametteCRA) has recommended the Portland Harbor Wall as individually eligible for listing on the National Register of Historic Places. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Portland Harbor Wall. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would require replacing the existing bridge with a new bridge on the same alignment as the current bridge. The number of bents on the western approach in Waterfront Park would be reduced from four to two (existing bents would be removed only to ground level). The Portland Harbor Wall is immediately adjacent to the bridge's Pier 1. The Refined Long-span alternative would remove the uppermost portion of Pier 1. The opening left by that removal would be covered with a paved surface. This pavement would extend to the top of the riverbank, which would match the alignment of the rest of the Harbor Wall. The original Harbor Wall railing consisting of concrete panels around Pier 1 would also be removed. Other than demolition of the current approach span and construction of a new span (which includes removal of Pier 1), no other activities are proposed at this time in the vicinity of the Portland Harbor Wall.

3. Identification and Description of the Historic Resource

The Harbor Wall extends from NW Glisan Street, south to SW Jefferson Street, measuring approximately 5400-feet long. Constructed by the City of Portland in 1929, the Wall faces directly on the river except for where it was constructed around Burnside Bridge Pier 1 (constructed in 1924-1926). Regularly spaced concrete battered piers are spaced between steel railings. Wood 12" x 12" timber fenders protect the Harbor Wall from marine vessels anchored along the waterfront. Originally, concrete panels with vertical scoring and above diamond shaped impressions fit between the piers. Built by Works Progress Administration (WPA) workers in the 1930s, the concrete rails were replaced with a metal railing in the 1970s as a part of Portland's Waterfront Plan. Short stretches of the original concrete panels remain at the Ankeny Pumping Station and around Pier 1. The Harbor Wall's substructure is poured concrete and rests on a timber crib structure "filled with coarse river sand and gravel" and secured by piling (Laurgaard 1933:5). When the wall was constructed, it was built around the massive concrete pier of Burnside Bridge (Pier 1). At this location, the wall and rails retain most of their original appearance including the concrete panels, railing and a small concrete structure situated at the north corner of the wall where the wall begins to project around Pier 1. The concrete structure sits atop a massive pipe that descends into the water. The bulkhead wall was an integral part of constructing a

gravity-fed sewer and stormwater line along the waterfront, part of the interceptor plan allowing the gravity-fed line to flow in high flood stages rather than water backing up into the city business district (Hillegas-Elting 2018:39-40; Laurgaard 1933). Portland Harbor Wall is recommended eligible under Criterion A for its associations with events that have made a significant contribution to the broad patterns of our history as an important feature of the interceptor sewer system and the overall redevelopment of Portland's west waterfront during the 1920s. Completed in 1929, Portland's Harbor Wall continues to function as it was intended. The Harbor Wall is also recommended as eligible under Criterion C as an important engineering project and one of the most notable City projects associated with Portland City Engineer, Olaf Laurgaard ,and also associated with his proposal known as the Laurgaard Plan that was pivotal in the redevelopment of Portland's waterfront. Portland Harbor Wall embodies distinctive characteristics of a type, methods of construction and engineering as applied by Olaf Laurgaard.

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The

environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

The proposed Refined Long-span alternative would involve construction of a new bridge on the same alignment of the current bridge. The uppermost portion of the adjacent Pier 1 would be removed. The associated sunken area would be capped but would otherwise be left open under the cap. This would affect approximately 150 linear feet of the Harbor Wall, or approximately 3% of the entire Harbor Wall. Although this is the only portion of the Harbor Wall that deviates from the linear character of the rest of the wall, it is not an essential design element but was constructed only to address the "obstruction" of Pier 1. According to 36 CFR Part 800.5(a)(1), adverse effects occur when an undertaking directly or indirectly alters characteristics of a historic property that qualify it for inclusion in the NRHP; future and cumulative effects of the undertaking also need to be considered. An example listed in 800.5(a)(2) is "visual, atmospheric, or audible intrusions" (36 CFR 800.5). The undertaking will not affect the integrity of location, design, materials, feeling, workmanship, and association of the Portland Harbor Wall. Removal of Pier 1 would make the Harbor Wall constructed around the pier more visible. Replacing four bents with two would alter the setting, providing a more open view from Harbor Wall to the west. In sum, the project will have No Adverse Effect on the Portland Harbor Wall historic property.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge Project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed Refined Long-span alternative would not adversely affect the Portland Harbor Wall's eligibility for listing under Criteria A and C nor its integrity. WillametteCRA recommends a Finding of No Adverse Effect for this historic property.

8. Sources

Laurgaard, Olaf
1933 *Treatise on the Design, Test & Construction of the Front St. Intercepting Sewer and Drainage System in Portland, Oregon, Including Intercepting Sewer, Pumping Plant, & Concrete Bulkhead-Wall on Gravel filled Timber Cribs*. American Society of Civil Engineers, New York.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Maps and Figures

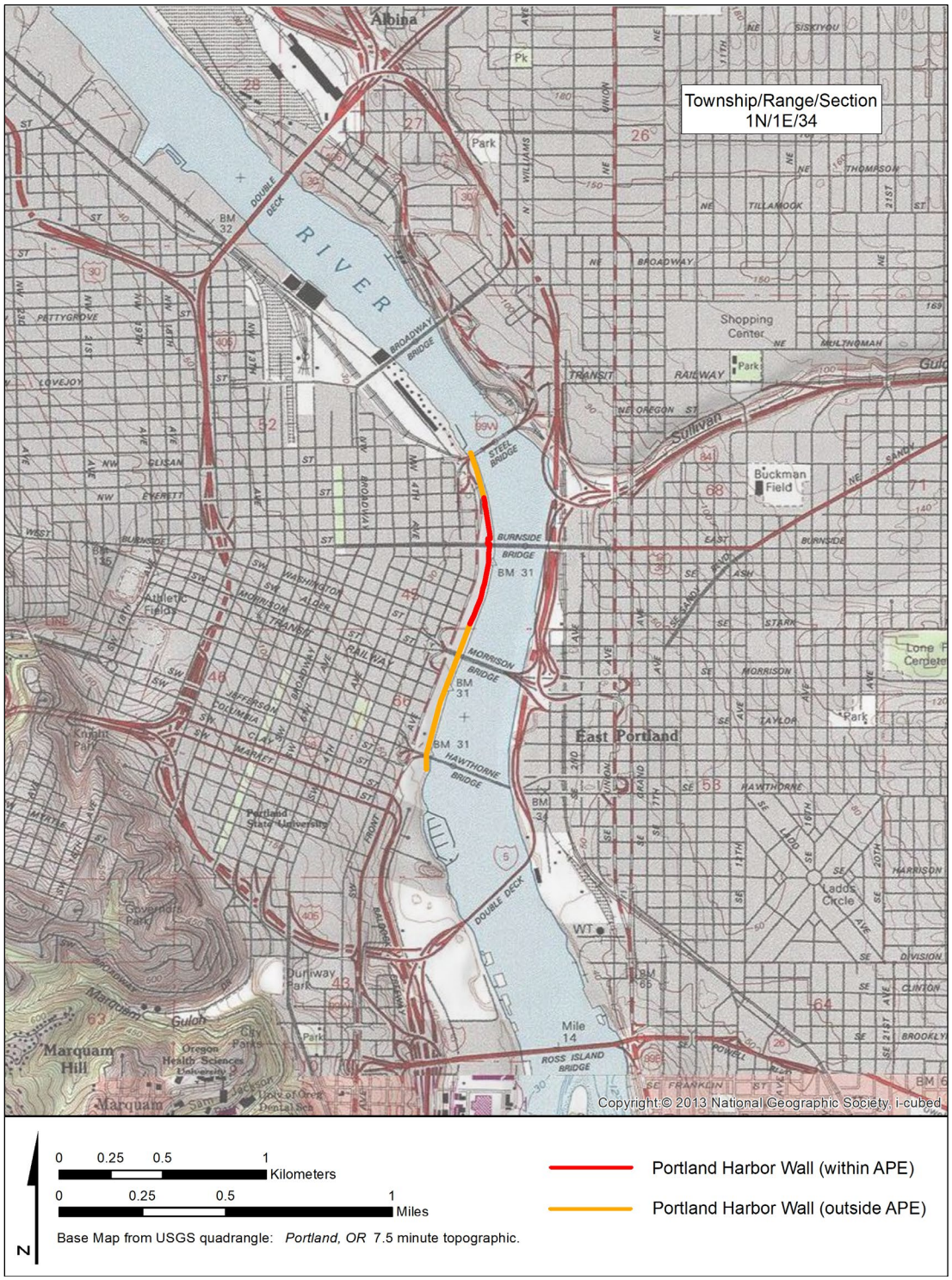

Figure 1. Location map.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

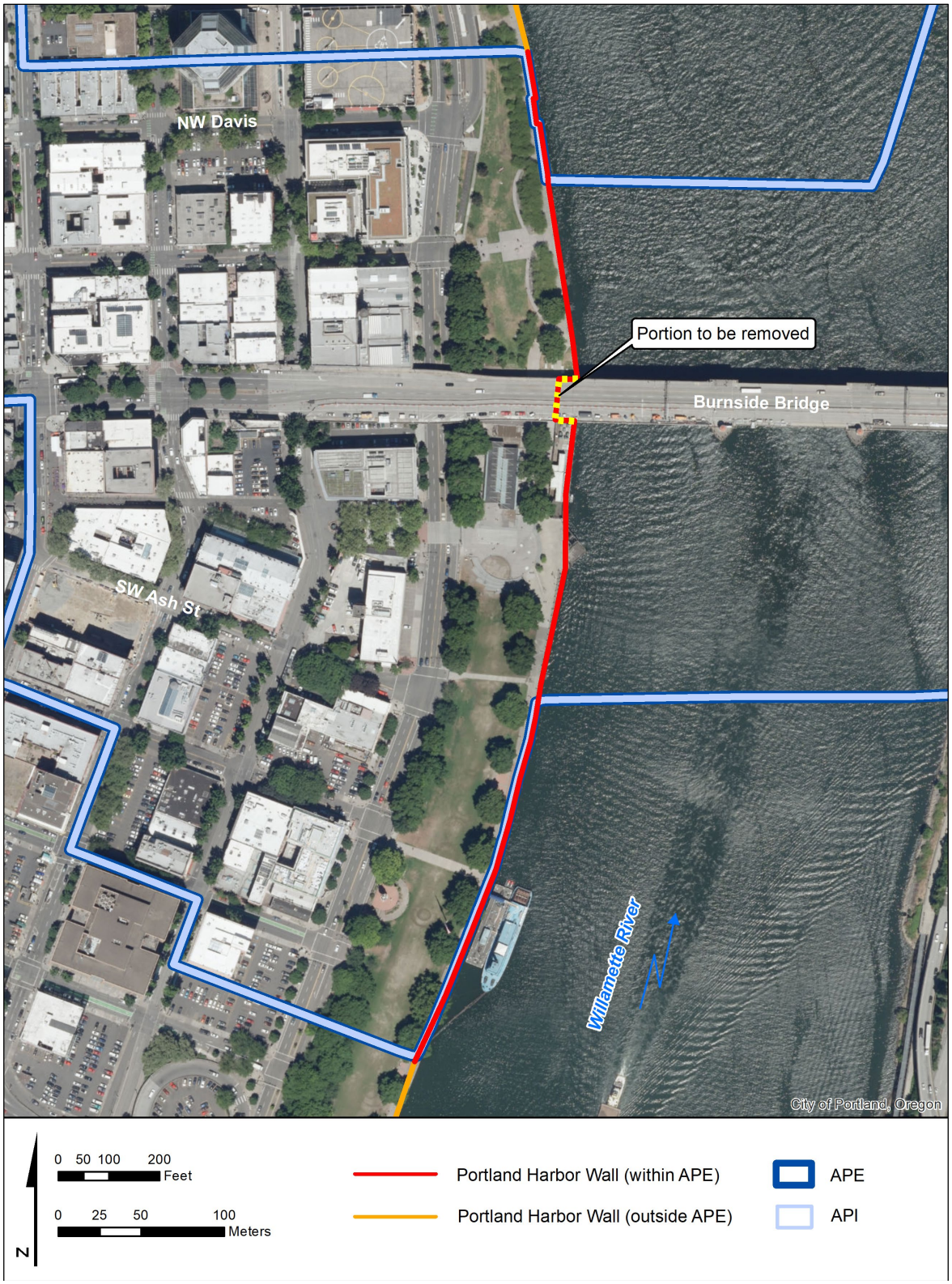

Figure 2. Portland Harbor Wall within the EQRB API & APE.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

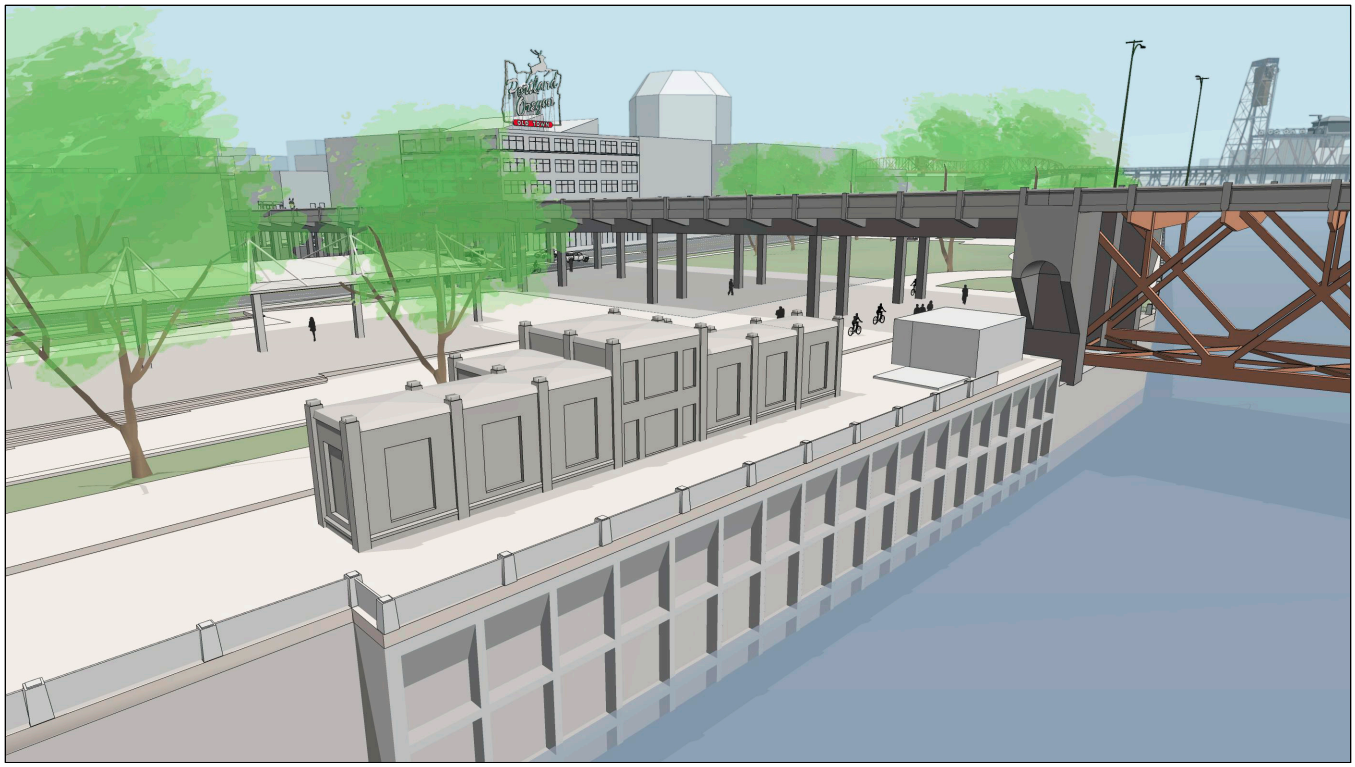

Figure 3. Portland Harbor Wall, artist's rendering of existing conditions (Fat Pencil Studio, 2021), oblique view looking northwest.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

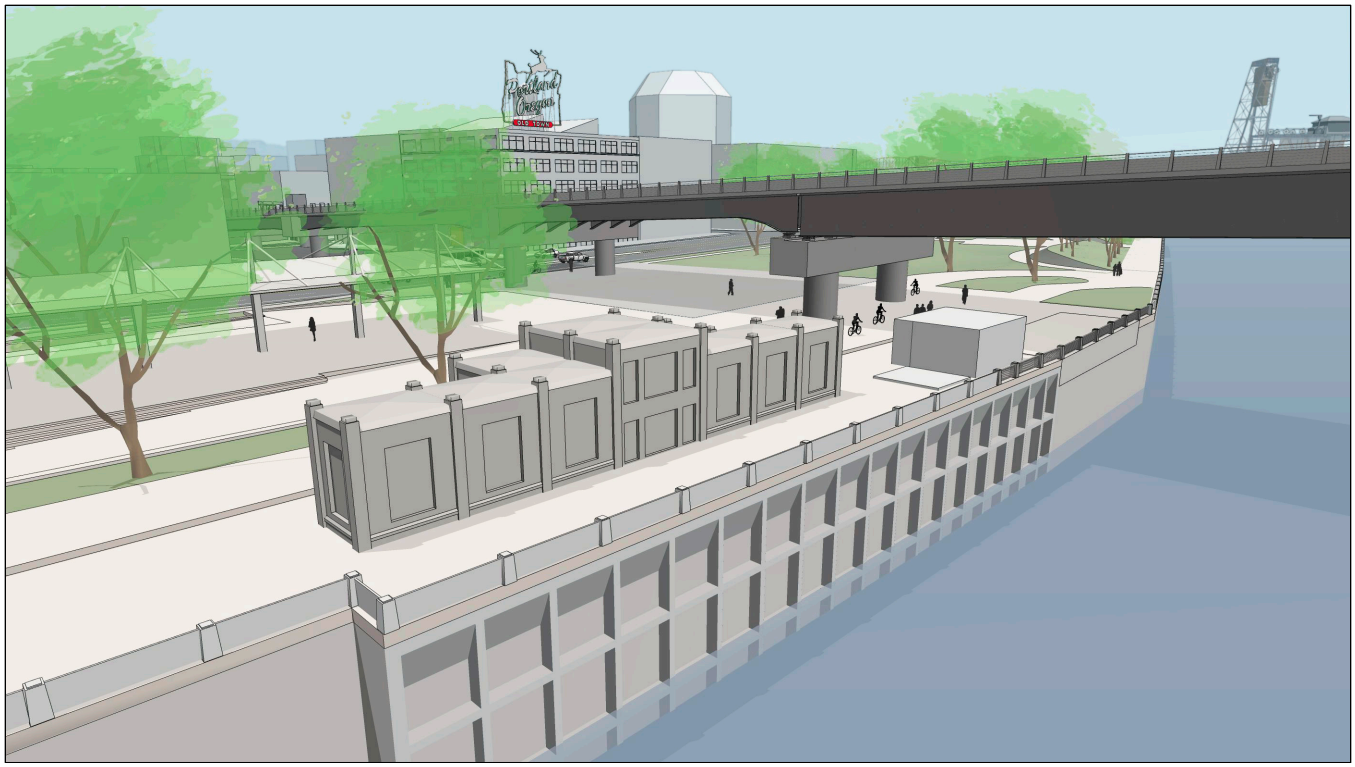

Figure 4. Portland Harbor Wall, artist's rendering (Fat Pencil Studio, 2021), oblique view looking northwest. This figure illustrates the condition of the Portland Harbor Wall after demolition of the existing Burnside Bridge, removal of Pier 1, and replacement of the west approach with a girder span.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Photographs

Figure 5. Portland Harbor Wall, facing north from the Burnside Bridge, with the current railings (David Ellis, 2021).

Figure 6. Portland Harbor Wall, facing south from the Burnside Bridge (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

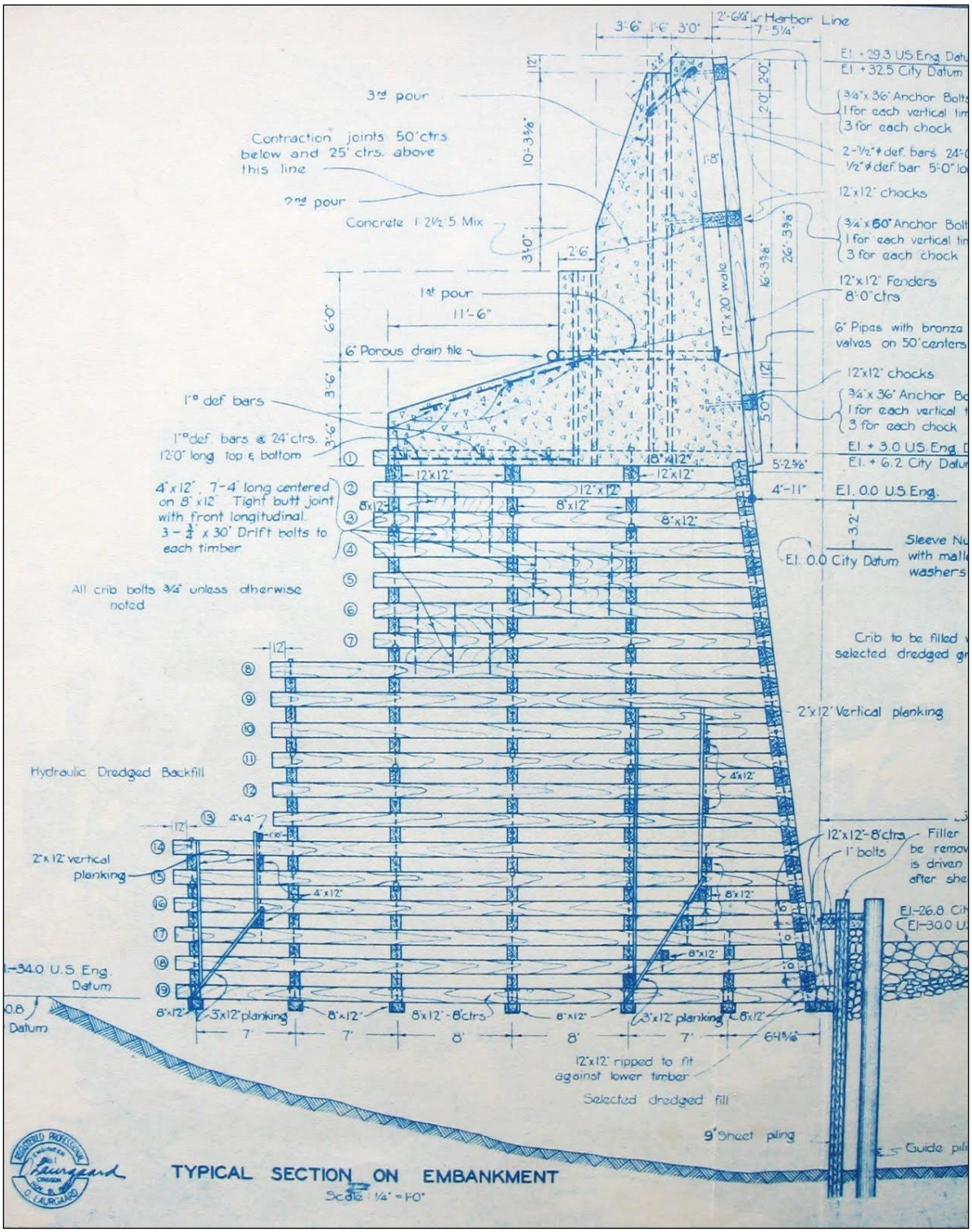

Figure 7. Laurgaard's 1925 design of the Harbor Wall.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Figure 8. Harbor Wall under construction in 1929, looking north to the Burnside Bridge (Portland City Archives).

Figure 9. The Harbor Wall looking north to the Burnside Bridge. Although undated, it is probably from early 1930s before railings were installed (Oregon Historical Society: Oregon Journal Negative Collection; Org. Lot 1368; Box 371; 0371N5334).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Harbor Wall/Seawall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Figure 10. Harbor Wall reinforced in response to the June 1948 flood, looking north to the Burnside Bridge (Portland City Archives).

Figure 11. Portland Harbor Wall constructed around Burnside Bridge Pier 1, facing southeast. The original concrete railing panels surround Pier 1 (Elizabeth O'Brien, 2019).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Reed Building	Street Address: 16-28 SW First Avenue/45 SW Ankeny Street	
City, County: Portland, Multnomah	Latitude: 45.522554 Longitude: (-) 122.671297	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/25/2021

Photo:

Photo Caption: Reed Building, view looking northeast (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The Reed Building (also known as the Packer-Scott Building) at 16-28 SW First Avenue/45 SW Ankeny Street is a contributing resource in the Skidmore/Old Town Historic District, which was listed in the National Register of Historic Places (NRHP) in 1975 and designated as a National Historic Landmark (NHL) in 1977. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Reed Building. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The Reed Building (also known as the Packer-Scott Building) at 16-28 SW First Avenue/45 SW Ankeny Street is located at the northeast corner of SW First Avenue and SW Ankeny Street (Portland Maps) (Figures 1 through 4). The four-story, brick and stone masonry building was designed by architects Whidden & Lewis in the Richardsonian Romanesque style and constructed in 1890. The building was constructed for use as a wholesale warehouse. Two other buildings were once located to the north of the Reed Building along the south side of the west approach span of the Burnside Bridge, however, these buildings were removed between 1960 and 1970. A surface parking lot is currently located on the site of these two buildings (Figures 5, 6, 10, 11, and 12). An addition was constructed on the east side of the Reed Building in 2008. The north facades of the original 1890 Reed Building and the 2008 Mercy Corps addition are located approximately 25 feet to the south of the existing west approach span of the Burnside Bridge. The southernmost edge of the replacement west approach span will be located approximately 10 to 15 feet to the north of the present south guardrail of the bridge, which will increase the existing separation between the buildings and the west approach span (Figures 13 through 22).

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

Location: The proposed replacement of the Burnside Bridge will not require the Reed Building to be relocated or removed, therefore, the undertaking will have no effect to the resource's integrity of location.

Setting: The proposed new approach span will be more distant from the north face of the Reed Building but will not otherwise alter the setting as that span will be on the same alignment and at the same elevation as the current span. Therefore, the setting of the Reed Building would not be adversely affected by the proposed undertaking.

Design: The proposed replacement of the Burnside Bridge will not alter the physical form, structure, and style of the Reed Building; therefore, the undertaking will have no effect to the resource's integrity of design.

Materials: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical elements of the Reed Building, therefore, the undertaking will have no effect to the resource's integrity of materials.

Workmanship: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical evidence of the historic construction techniques used to build the Reed Building, therefore, the undertaking will have no effect to the resource's integrity of workmanship.

Feeling: The proposed replacement of the Burnside Bridge will not alter the physical features which collectively convey the historic character of the Reed Building; therefore, the undertaking will have no effect to the resource's integrity of feeling.

Association: The proposed replacement of the Burnside Bridge will not diminish or eliminate the direct link that the Reed Building has to important historic events or persons significant to our past, therefore, the undertaking will have no effect to the resource's integrity of association.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span alternative would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The replacement of the existing west approach span of the Burnside Bridge would have no adverse effect to the Reed Building for either direct or indirect effects.

8. Sources

EarthExplorer
1951 Aerial Photograph, Entity ID 1QO0000020014, 25 October. United States Geological Survey. Electronic resource, https://earthexplorer.usgs.gov/, accessed August 2021.

Google Earth
2021 "Burnside Bridge." Electronic resource, https://earth.google.com/web/, accessed August 2021.

Historic Resource Inventory
1984 City of Portland Historic Resource Inventory Form for the Reed Building, 16-28 SW First Avenue, ID 0-001-00016. Oregon Historic Sites Database. Electronic resource, http://heritagedata.prd.state.or.us/historic/, accessed August 2021.

National Register of Historic Places (NRHP)
2008 National Historic Landmark Nomination (Revised Documentation), Skidmore/Old Town Historic District, Portland, Multnomah County, Oregon. Oregon Historic Sites Database. Electronic resource, https://heritagedata.prd.state.or.us/historic/, accessed August 2021.

Portland Archives
1935a "Aerial of Downtown Portland including Burnside, Steel and Broadway Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number A2005-005.1449.10, Record Number AP/476. Electronic resource, https://efiles.portlandoregon.gov/Record/2043501/, accessed August 2021.
1935b "Aerial view of the downtown waterfront near the Burnside and Steel Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number 2000-03, Record Number AP/666. Electronic resource, https://efiles.portlandoregon.gov/Record/2298287/, accessed August 2021.

Portland Maps
2021 "101-117 W Burnside St." Electronic resource, https://www.portlandmaps.com/detail/property/101-117-W-BURNSIDE-ST/R140343_did/, accessed August 2021.

Sanborn Map Company (Sanborn)
1908a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1908b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1950a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.
1950b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.

United States Geological Survey (USGS)
1990 "Portland, OR Quadrangle, 7.5 Minute." TopoView. Electronic resource, https://ngmdb.usgs.gov/topoview/, accessed August 2021.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Maps and Figures

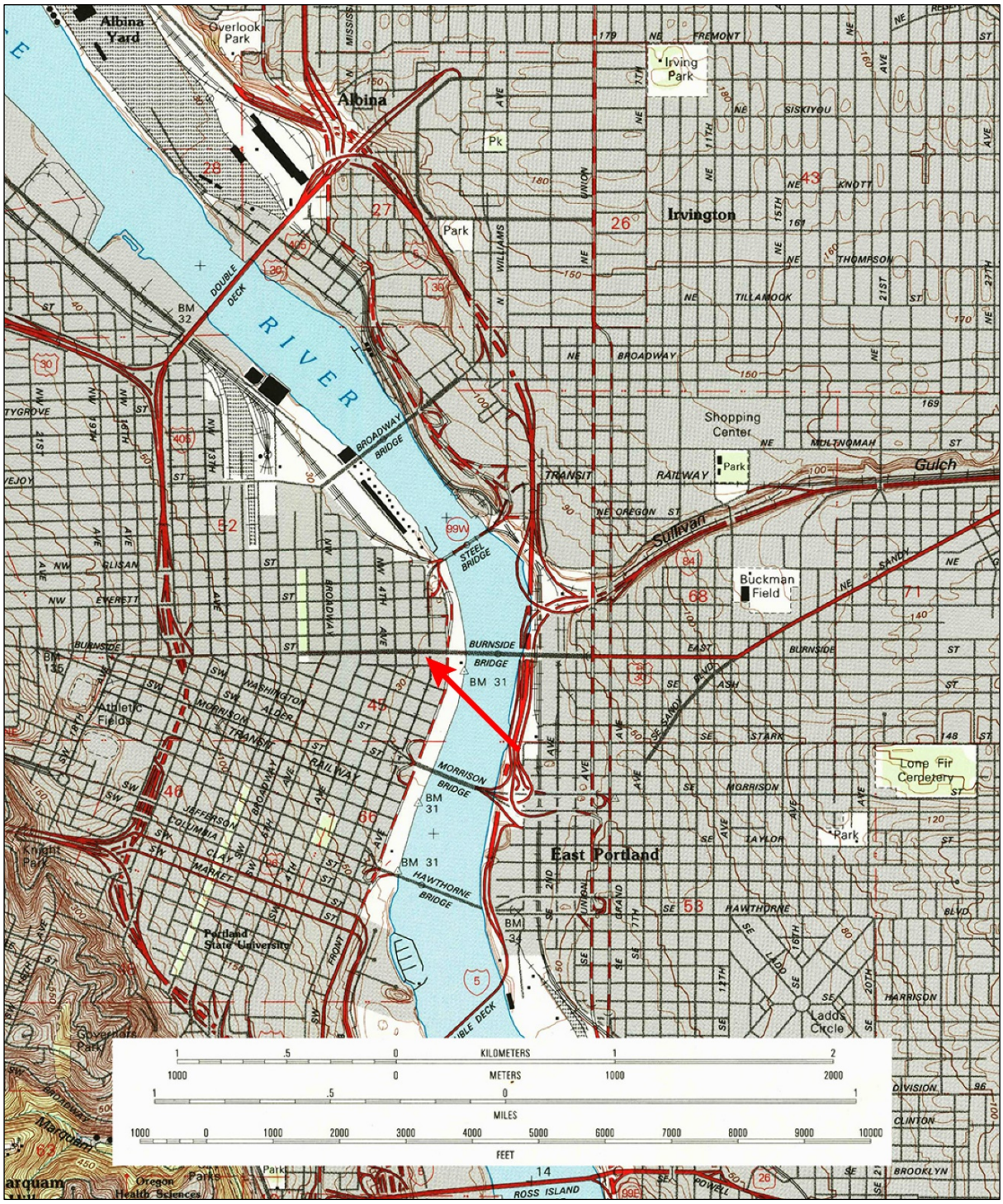

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of the Reed Building (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

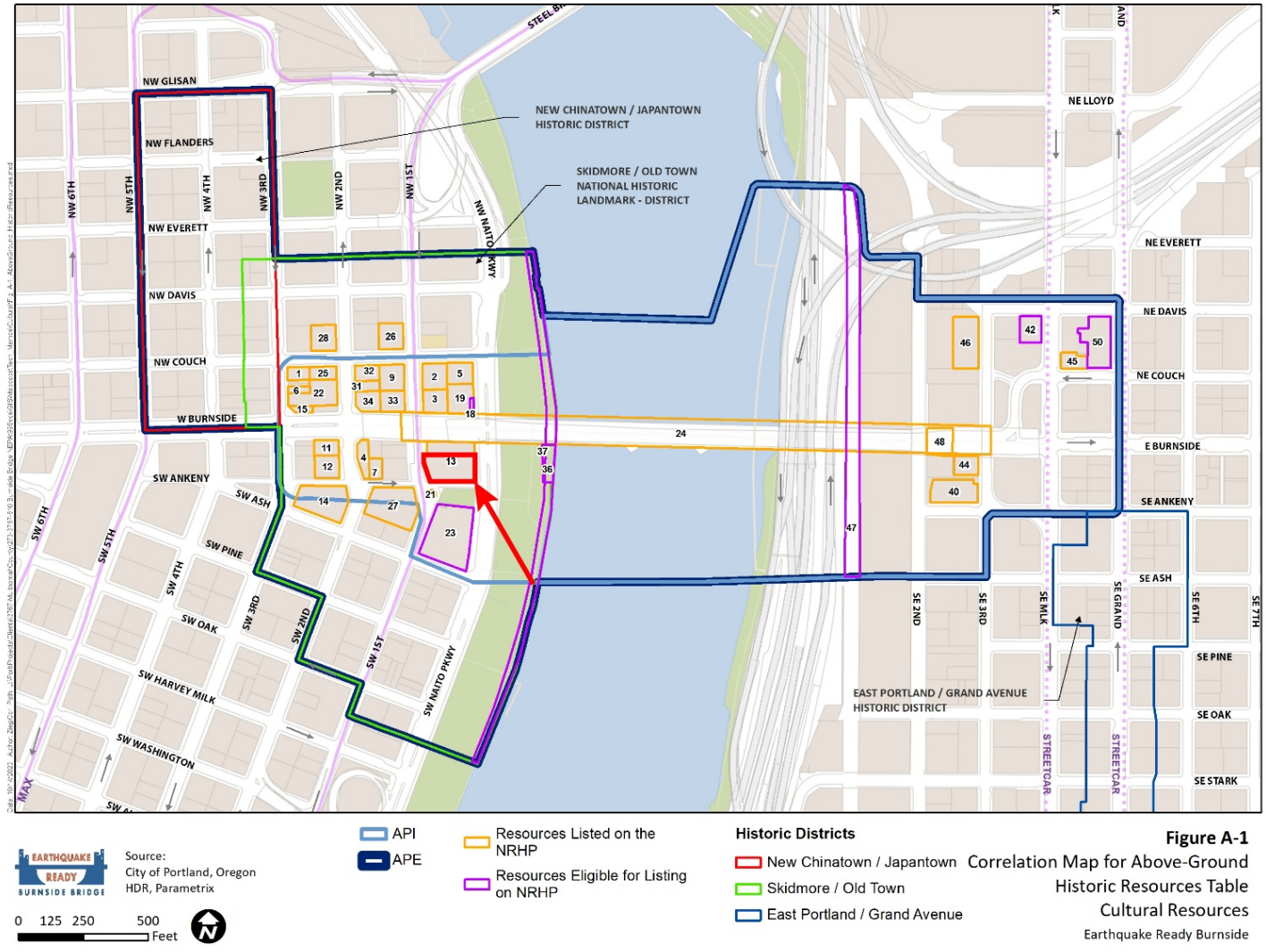

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the Reed Building, which is outlined in red.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Figure 3: Aerial photograph with location of the Reed Building indicated by red line (Google Earth).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
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Figure 4: 1951 aerial photograph with location of the Reed Building indicated by red line (USGS EarthExplorer).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

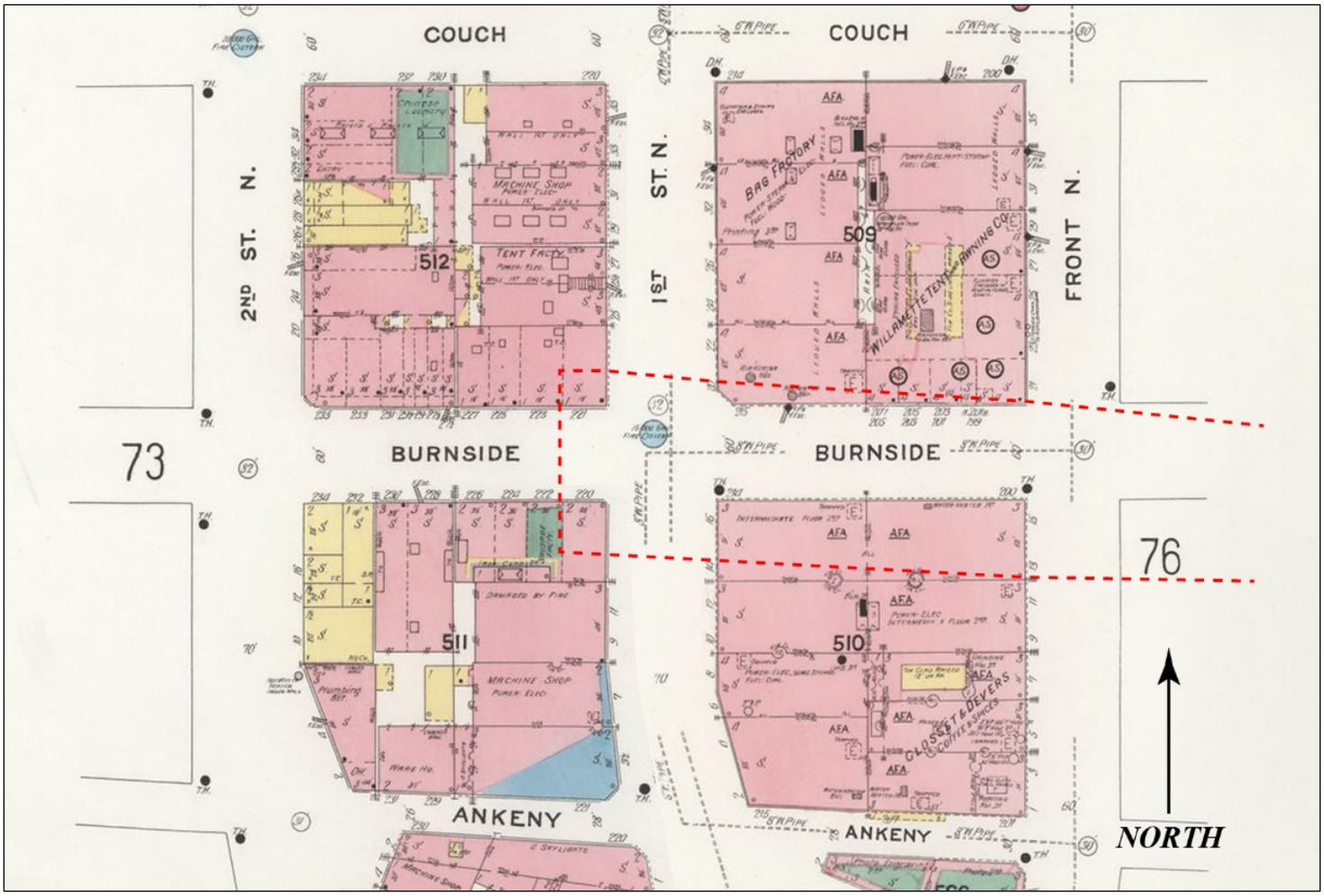

Figure 5: Sanborn maps, Volume 1, 1908. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

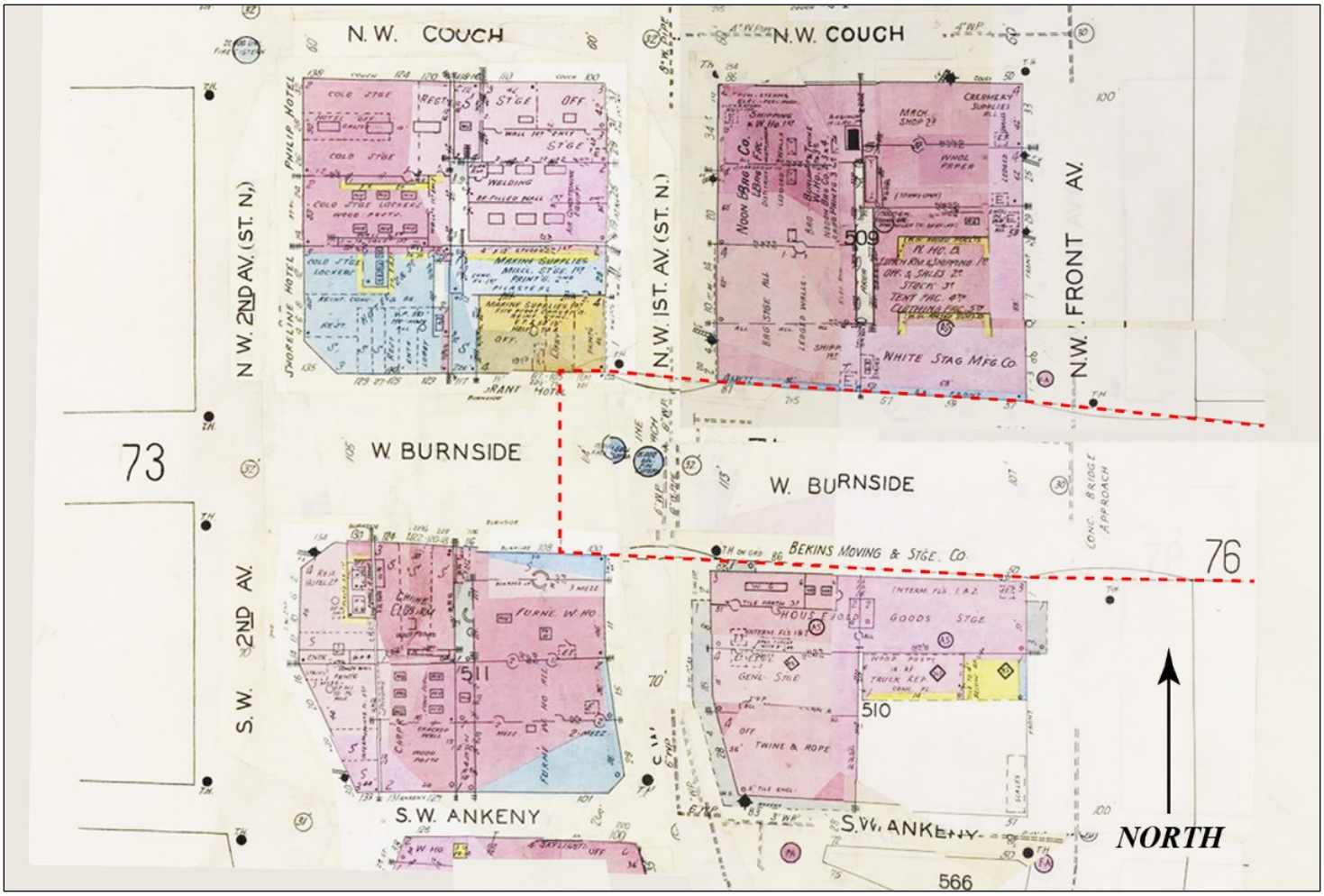

Figure 6: Sanborn maps, Volume 1, 1950. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

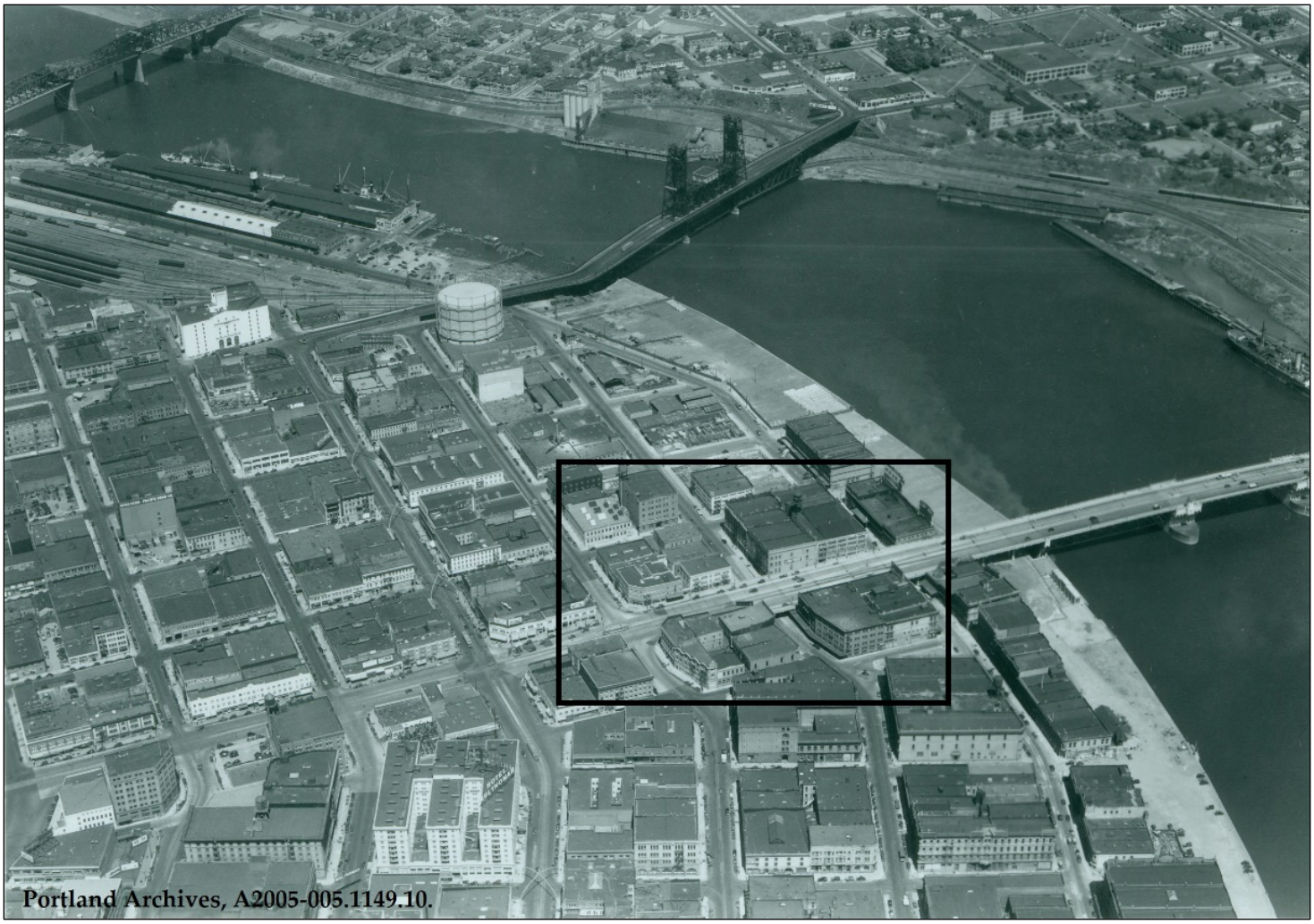

Figure 7: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Black box indicates excerpt in Figure 8 below (Portland Archives, A2005-005.1149.10).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

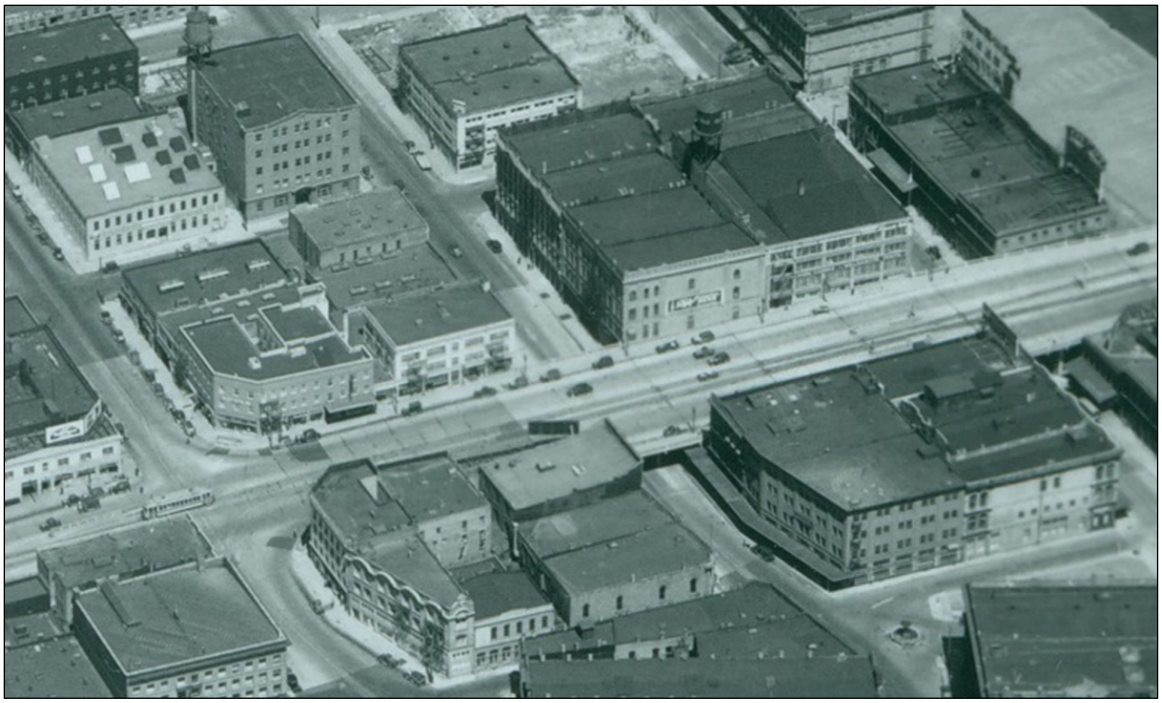

Figure 8: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Excerpt of Figure 7 above (Portland Archives, A2005-005.1149.10).

Figure 9: Aerial view of the downtown waterfront near the Burnside and Steel Bridges, December 31, 1935 (Portland Archives, 2000-03).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Figure 10: Photo of the Reed Building from the City of Portland, Oregon Historic Resource Inventory, 1984 (OR SHPO).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Figure 11: Footprint of the Reed Building superimposed on property line map (Portland Maps/WillametteCRA, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

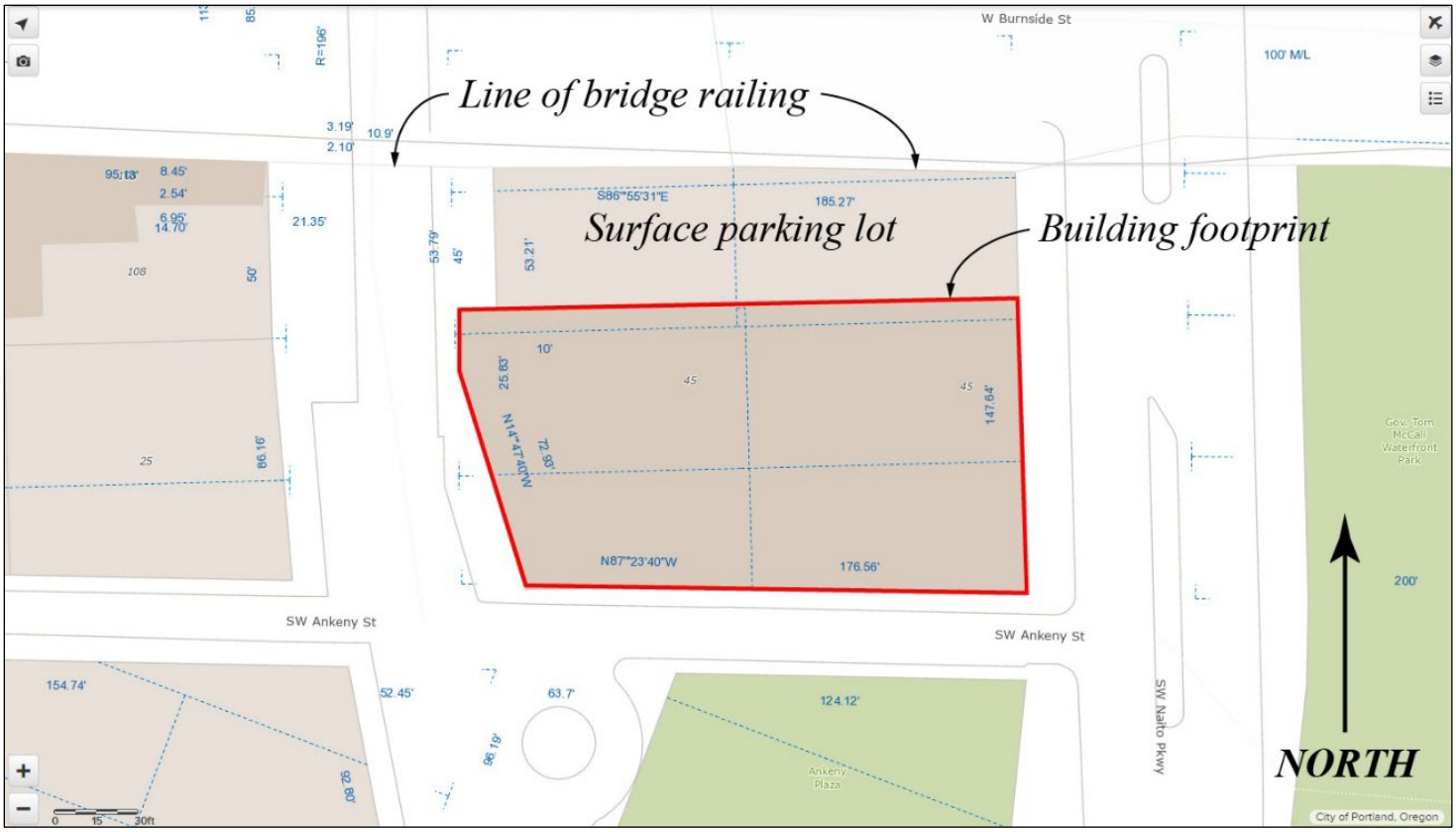

Figure 12: Footprint of the Reed Building superimposed on property line map, with elements of existing Burnside Bridge indicated (Portland Maps/WillametteCRA, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Photographs

Figure 13: Reed Building, view looking northeast (Elizabeth O'Brien, 2019).

Figure 14: Mercy Corps (modern addition to the east end of Reed Building), view looking northwest (Elizabeth O'Brien, 2019).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

Figure 15: Reed Building and surface parking lot to the north, view looking southwest (Elizabeth O'Brien, 2019).

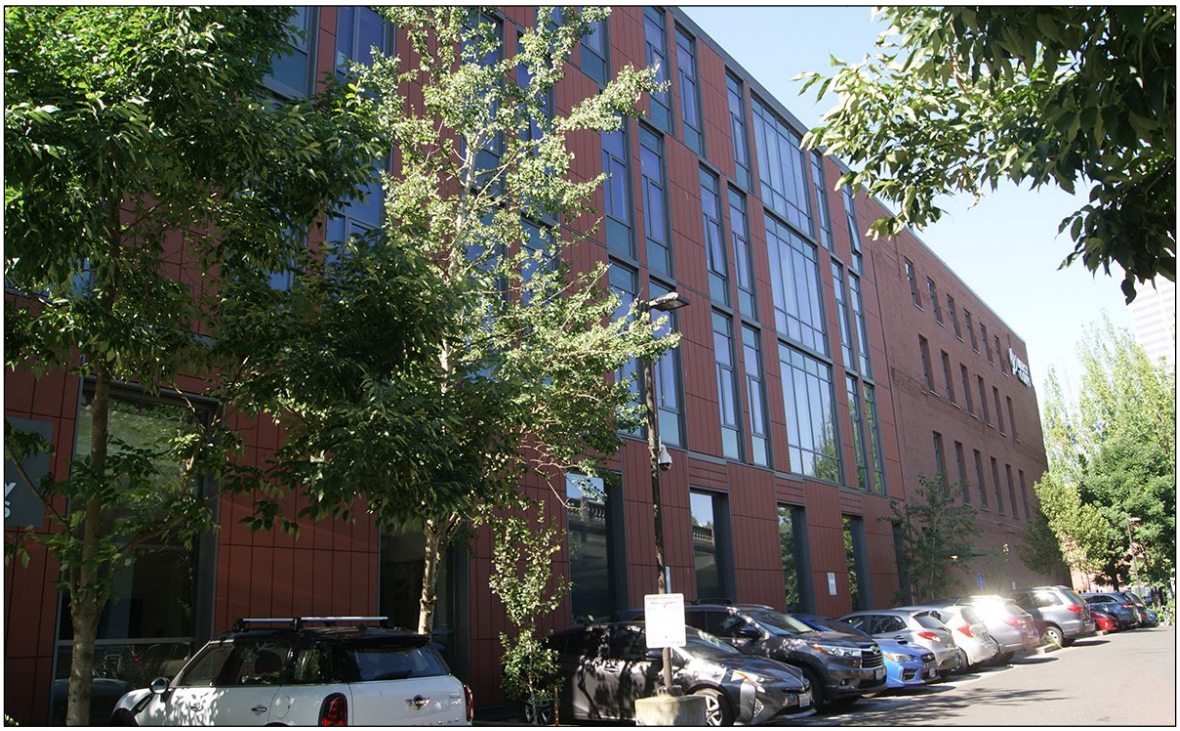

Figure 16: Mercy Corps (modern addition to the east end of Reed Building) and surface parking lot to the north, view looking southwest (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

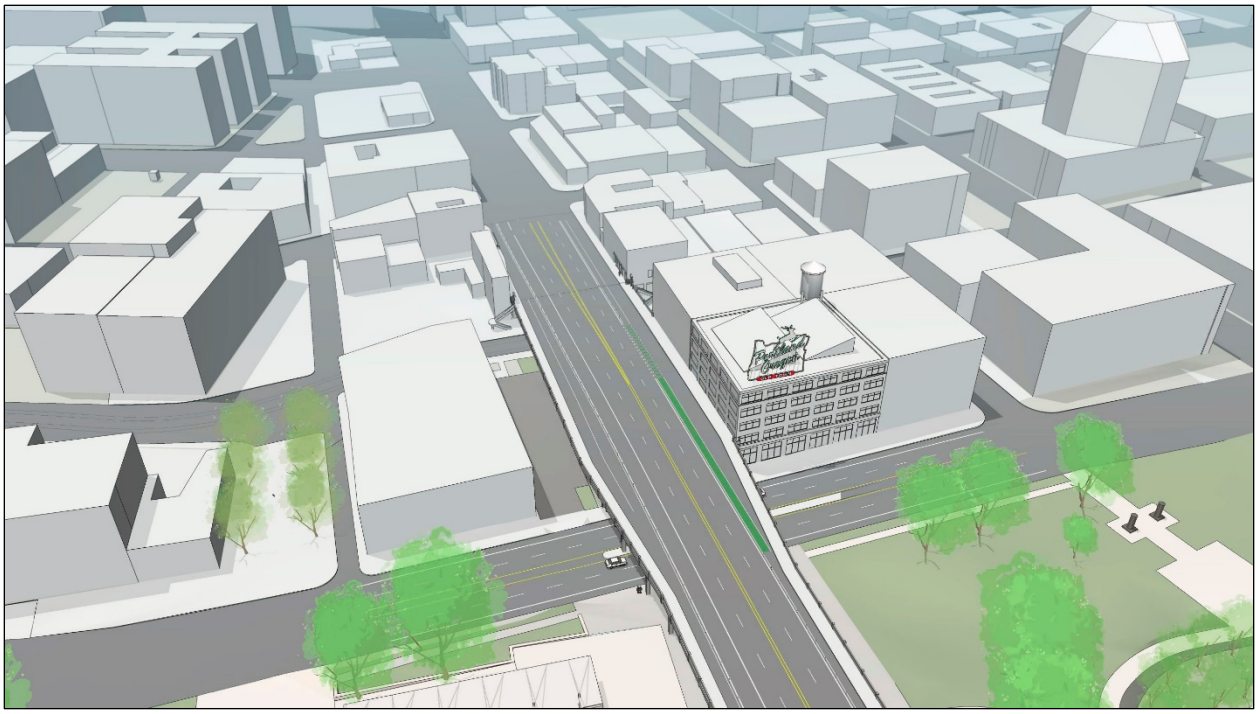

Figure 17: Reed Building, artist's rendering of existing condition of west approach, aerial view looking northwest (Fat Pencil Studio, 2021).

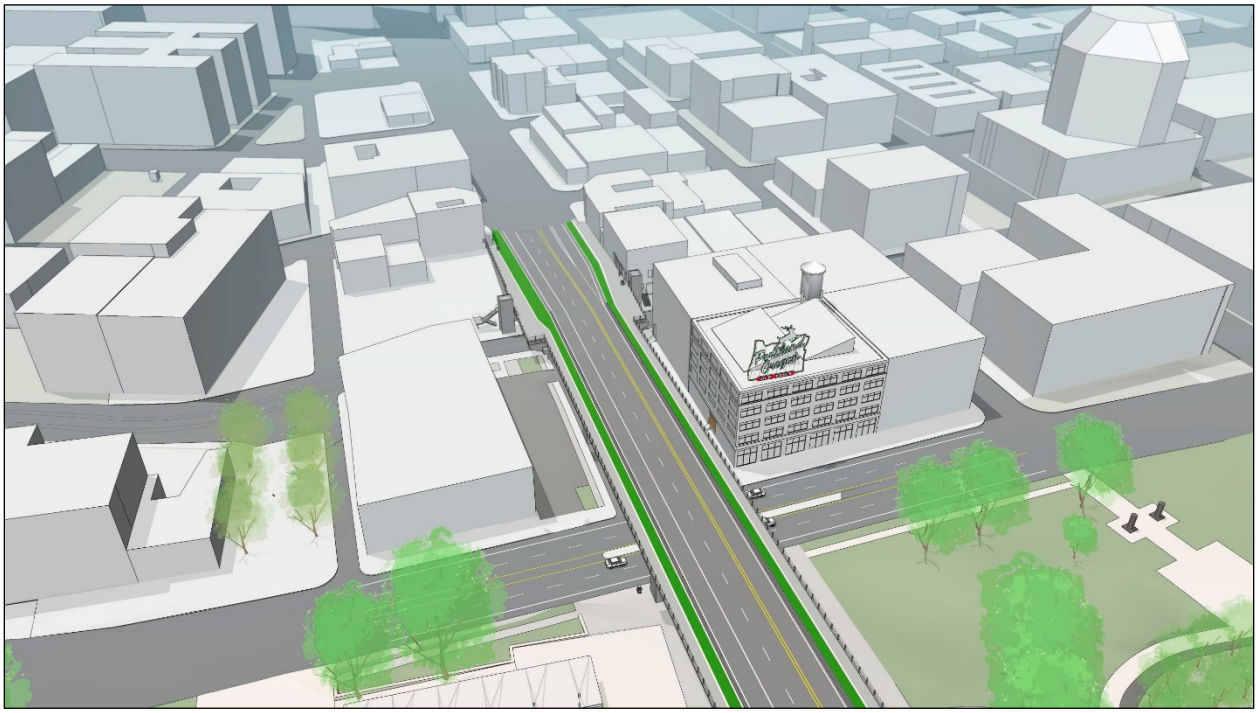

Figure 18: Reed Building, artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

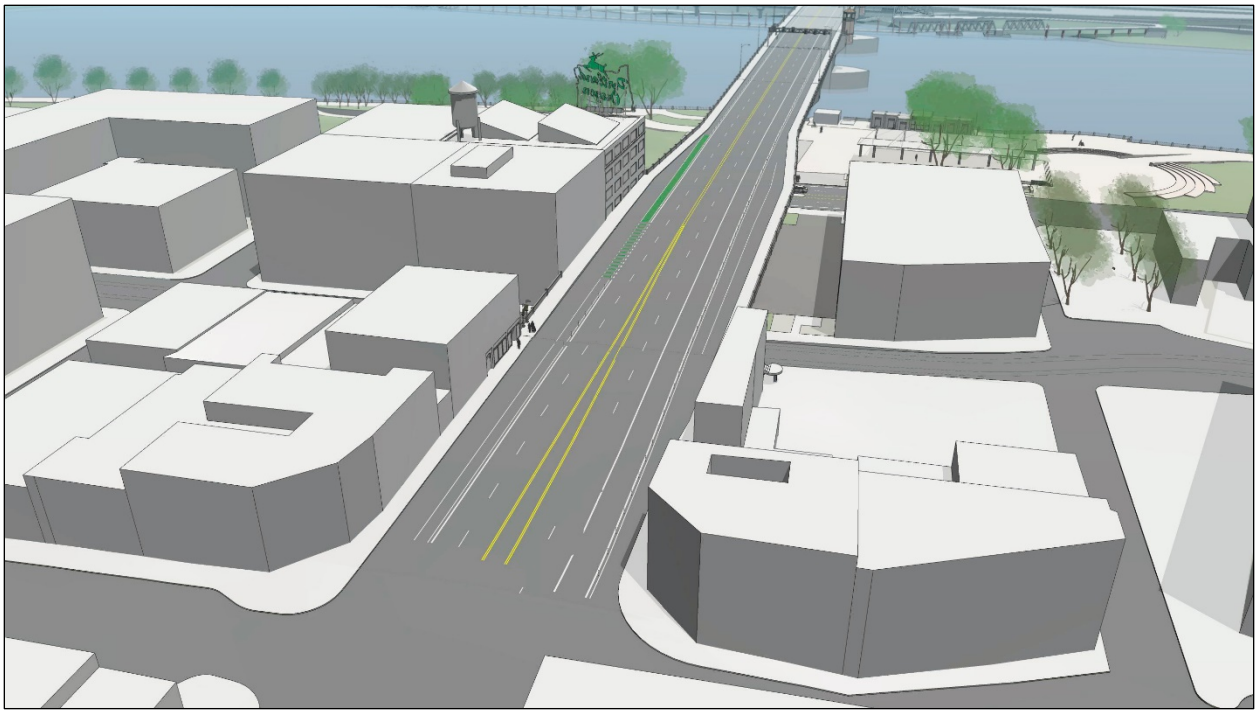

Figure 19: Reed Building, artist's rendering of existing condition of west approach, aerial view looking northeast (Fat Pencil Studio, 2021).

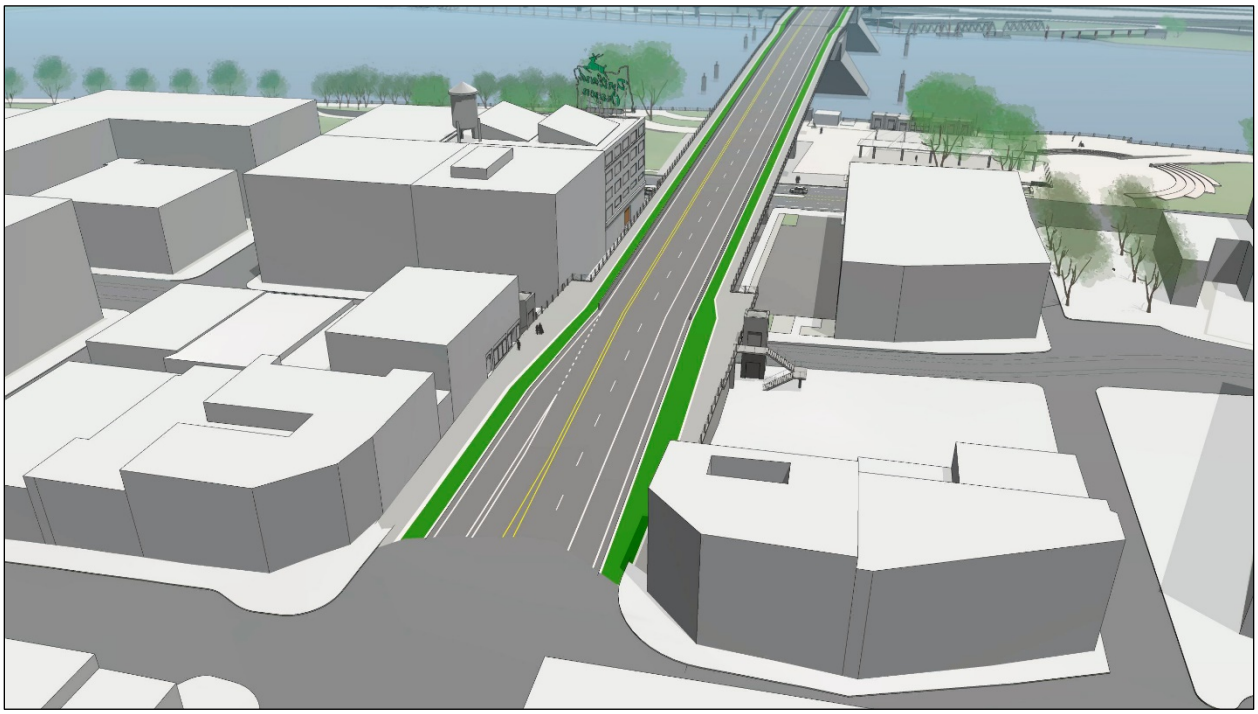

Figure 20: Reed Building, artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Reed Building	
Street Address: 45 SW Ankeny Street	City, County: Portland, Multnomah

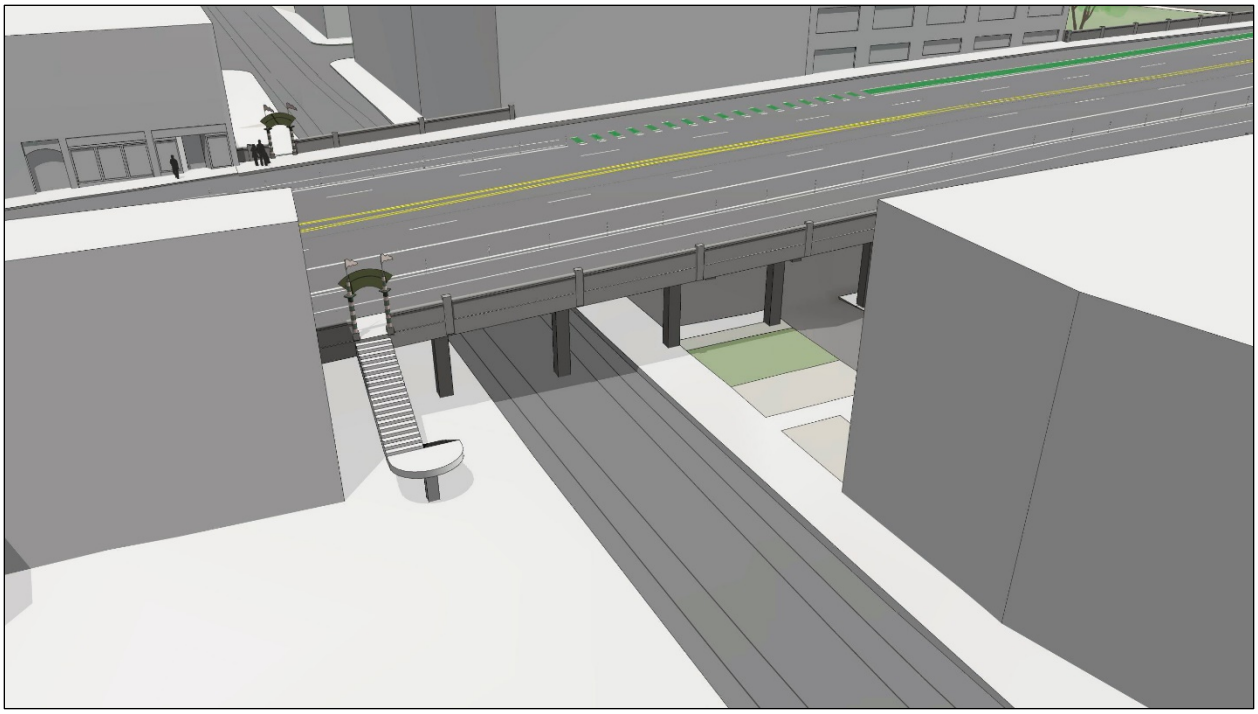

Figure 21: Reed Building, artist's rendering of existing condition of west approach, aerial view looking northeast (Fat Pencil Studio, 2021).

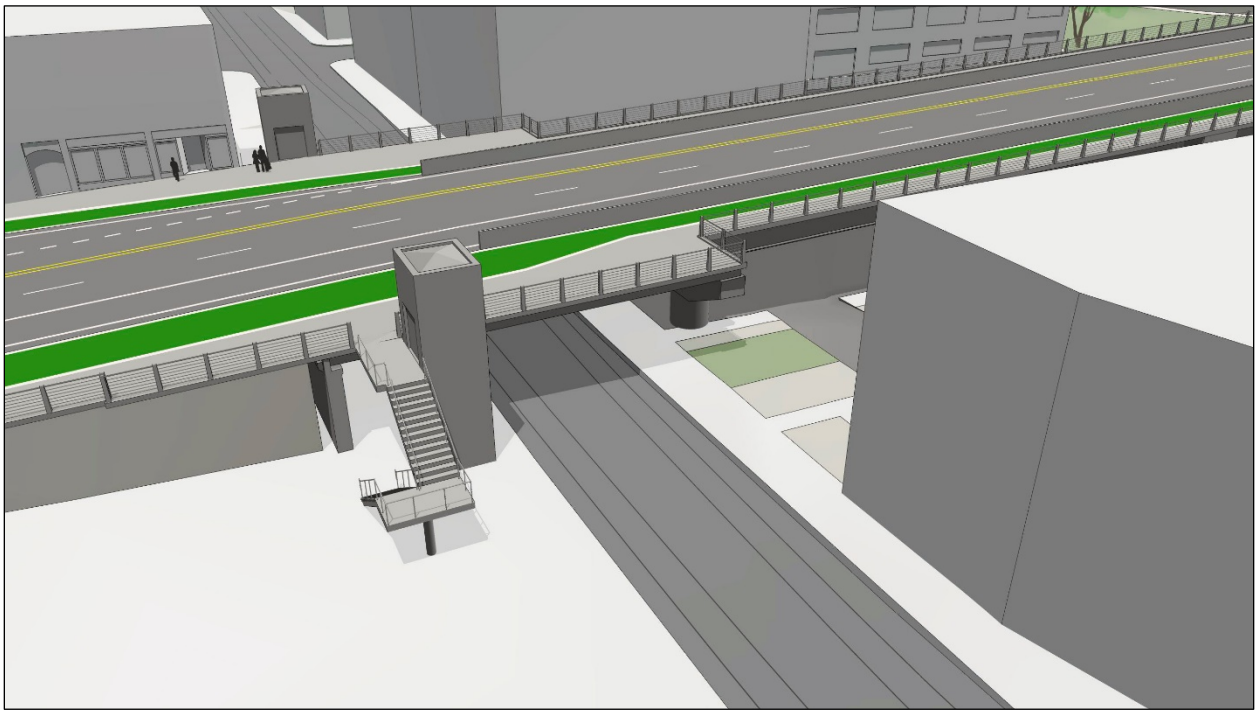

Figure 22: Reed Building, artist's rendering of replacement west approach span, aerial view looking northeast (Fat Pencil Studio, 2021).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]		
Property Name: Salvation Army	Street Address: 134 West Burnside Street	
City, County: Portland, Multnomah	Latitude: 45.522969 Longitude: (-) 122.672437	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/25/2021

Photo:

Photo Caption: Salvation Army Building, view looking southeast (Elizabeth O'Brien, 2019)

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The Salvation Army Building at 134 West Burnside Street is a contributing resource in the Skidmore/Old Town Historic District, which was listed in the National Register of Historic Places (NRHP) in 1975 and designated as a National Historic Landmark (NHL) in 1977. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Salvation Army Building. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The Salvation Army Building is addressed as 134 West Burnside Street and is located at the southeast corner of NW 2nd Avenue and West Burnside Street (Portland Maps) (Figures 1 through 4). The Salvation Army Building is a four-story, irregularly shaped, brick masonry building constructed in an early 20th century classical style. The building was extensively altered in 1925 to make way for the construction of the west approach of the Burnside Bridge. These 1925 alterations included a new façade. The Salvation Army Building was not included in the City of Portland Historic Resource Inventory of 1984 and was originally classified as not contributing to the significance of the Skidmore/Old Town Historic District. However, this classification has been changed to contributing. (NRHP 2008:24).

There are storefront openings along the north, northwest, and west facades of the building which have been altered from their original condition (NRHP 2008:24). The existing west approach of the Burnside Bridge will be removed and replaced with a new west approach span as part of the proposed undertaking. The overall configuration, width, and slope of the road prism in the section of West Burnside Street adjacent to the Salvation Army Building will not change as part of the proposed undertaking (Figures 5 through 10). The existing concrete sidewalk will be replaced with a concrete sidewalk with the same elevation and slope along the north and northwest facades of the Salvation Army Building (Figures 11 through 16).

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the

Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

Location: The proposed replacement of the Burnside Bridge will not require the Salvation Army Building to be relocated or removed, therefore, the undertaking will have no effect to the resource's integrity of location.

Setting: The proposed replacement of the Burnside Bridge will not alter the current relationship of the Salvation Army Building to the sidewalk level along West Burnside Street and NW 2nd Avenue. Concrete

sidewalks will be replaced in kind with concrete sidewalks with a slightly different cross-section that the current cross-section but otherwise unchanged. Therefore, the setting of the Salvation Army Building would not be adversely affected by the proposed undertaking.

Design: The proposed replacement of the Burnside Bridge will not alter the physical form, structure, and style of the Salvation Army Building; therefore, the undertaking will have no effect to the resource's integrity of design.

Materials: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical elements of the Salvation Army Building, therefore, the undertaking will have no effect to the resource's integrity of materials.

Workmanship: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical evidence of the historic construction techniques used to build the Salvation Army Building, therefore, the undertaking will have no effect to the resource's integrity of workmanship.

Feeling: The proposed replacement of the Burnside Bridge will not alter the physical features which collectively convey the historic character of the Salvation Army Building; therefore, the undertaking will have no effect to the resource's integrity of feeling.

Association: The proposed replacement of the Burnside Bridge will not diminish or eliminate the direct link that the Salvation Army Building has to important historic events or persons significant to our past, therefore, the undertaking will have no effect to the resource's integrity of association.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span alternative, which would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The replacement of the existing west approach span of the Burnside Bridge would have no adverse effect to the Salvation Army Building for either direct or indirect effects.

8. Sources

EarthExplorer
1951 Aerial Photograph, Entity ID 1QO0000020014, 25 October. United States Geological Survey. Electronic resource, https://earthexplorer.usgs.gov/, accessed August 2021.

Google Earth
2021 "Burnside Bridge." Electronic resource, https://earth.google.com/web/, accessed August 2021.

National Register of Historic Places (NRHP)
2008 National Historic Landmark Nomination (Revised Documentation), Skidmore/Old Town Historic District, Portland, Multnomah County, Oregon. Oregon Historic Sites Database. Electronic resource, https://heritagedata.prd.state.or.us/historic/, accessed August 2021.

Portland Archives
1935a "Aerial of Downtown Portland including Burnside, Steel and Broadway Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number A2005-005.1449.10, Record Number AP/476. Electronic resource, https://efiles.portlandoregon.gov/Record/2043501/, accessed August 2021.
1935b "Aerial view of the downtown waterfront near the Burnside and Steel Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number 2000-03, Record Number AP/666. Electronic resource, https://efiles.portlandoregon.gov/Record/2298287/, accessed August 2021.

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2021 "101-117 W Burnside St." Electronic resource, https://www.portlandmaps.com/detail/property/101-117-W-BURNSIDE-ST/R140343_did/, accessed August 2021.

Sanborn Map Company (Sanborn)
1908a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1908b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1950a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.
1950b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.

United States Geological Survey (USGS)
1990 "Portland, OR Quadrangle, 7.5 Minute." TopoView. Electronic resource, https://ngmdb.usgs.gov/topoview/, accessed August 2021.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

Maps and Figures

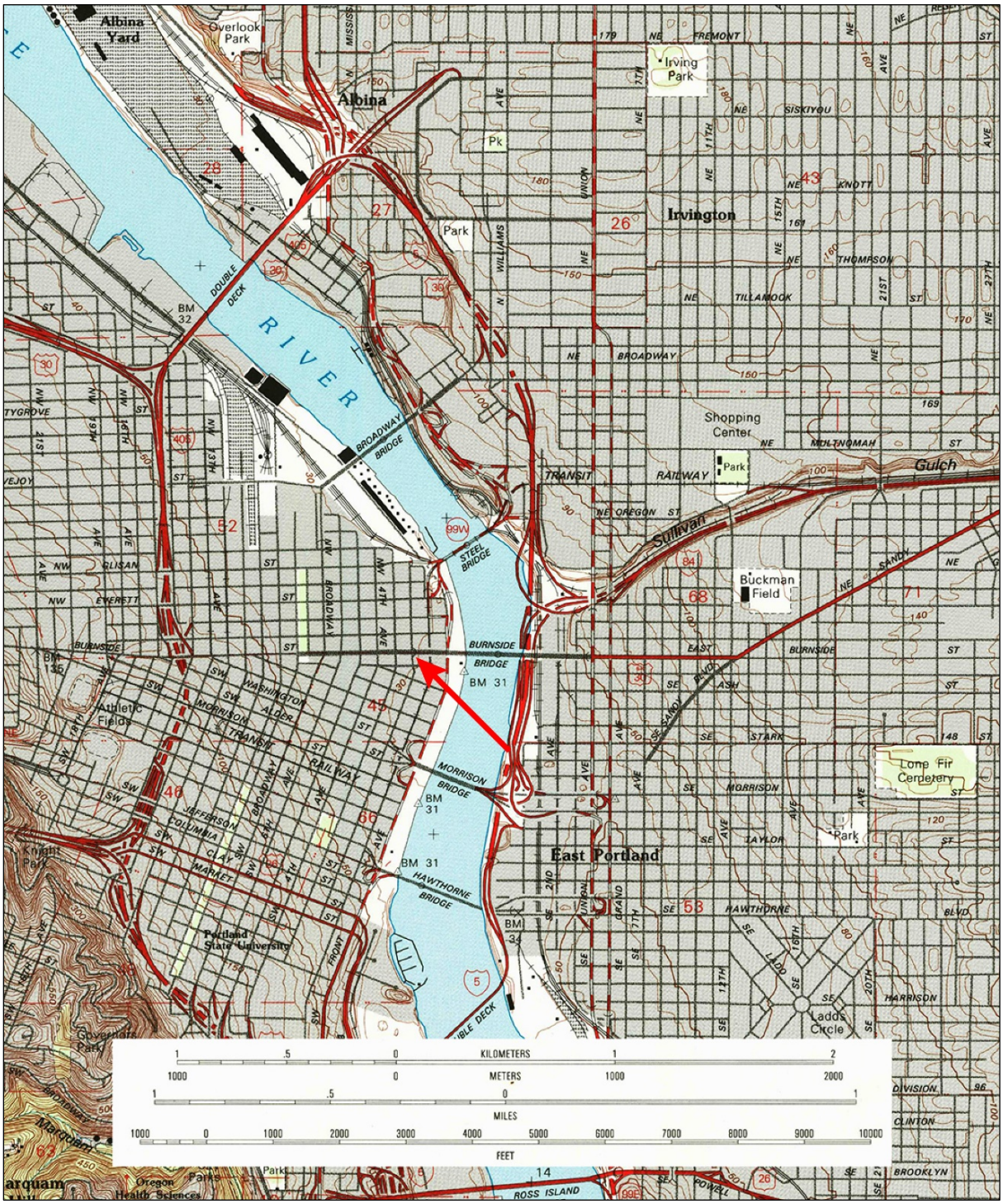

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of the Salvation Army Building (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

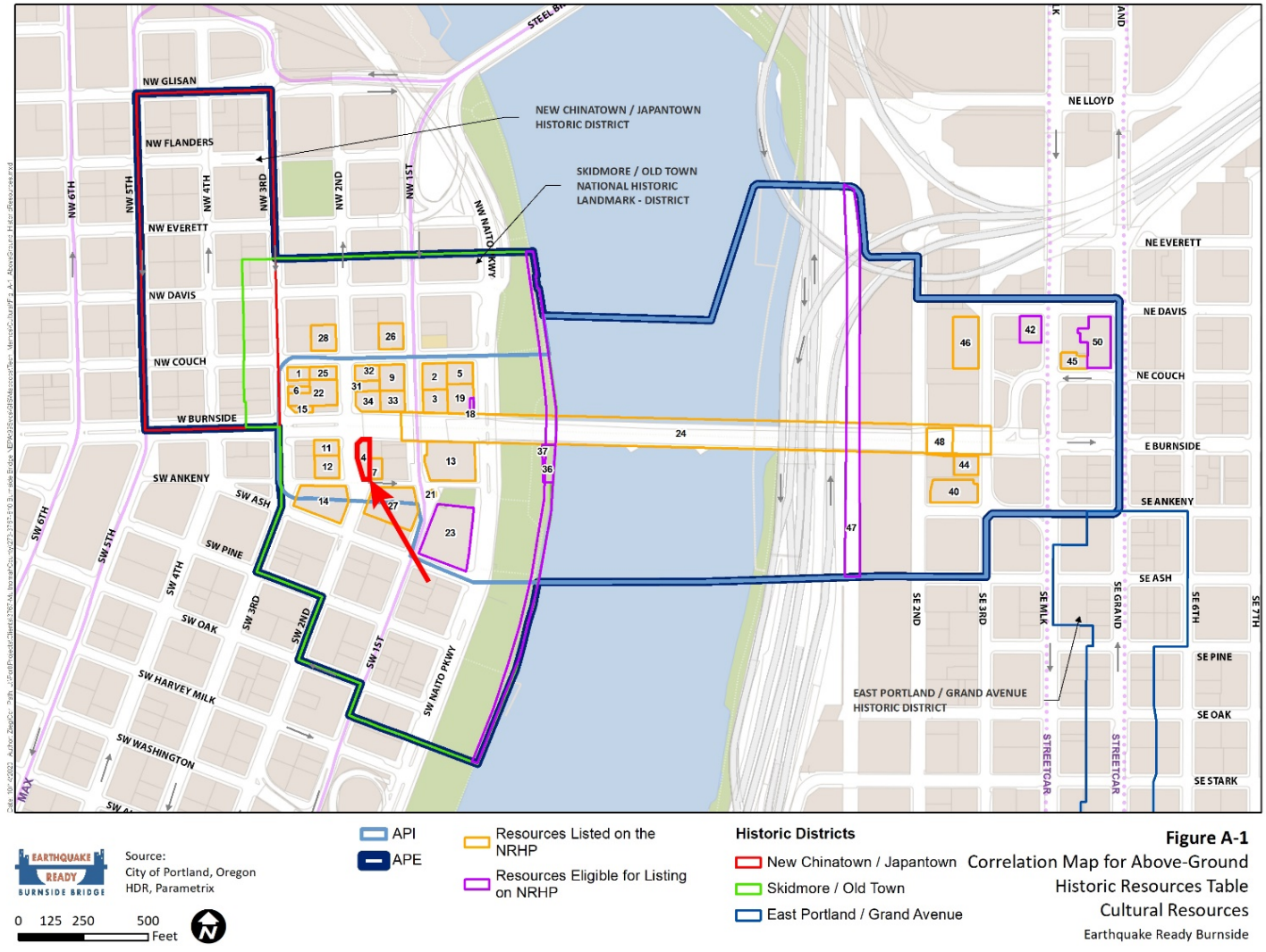

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the Salvation Army Building, which is outlined in red.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
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Figure 3: Aerial photograph with location of the Salvation Army Building indicated by red line (Google Earth).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

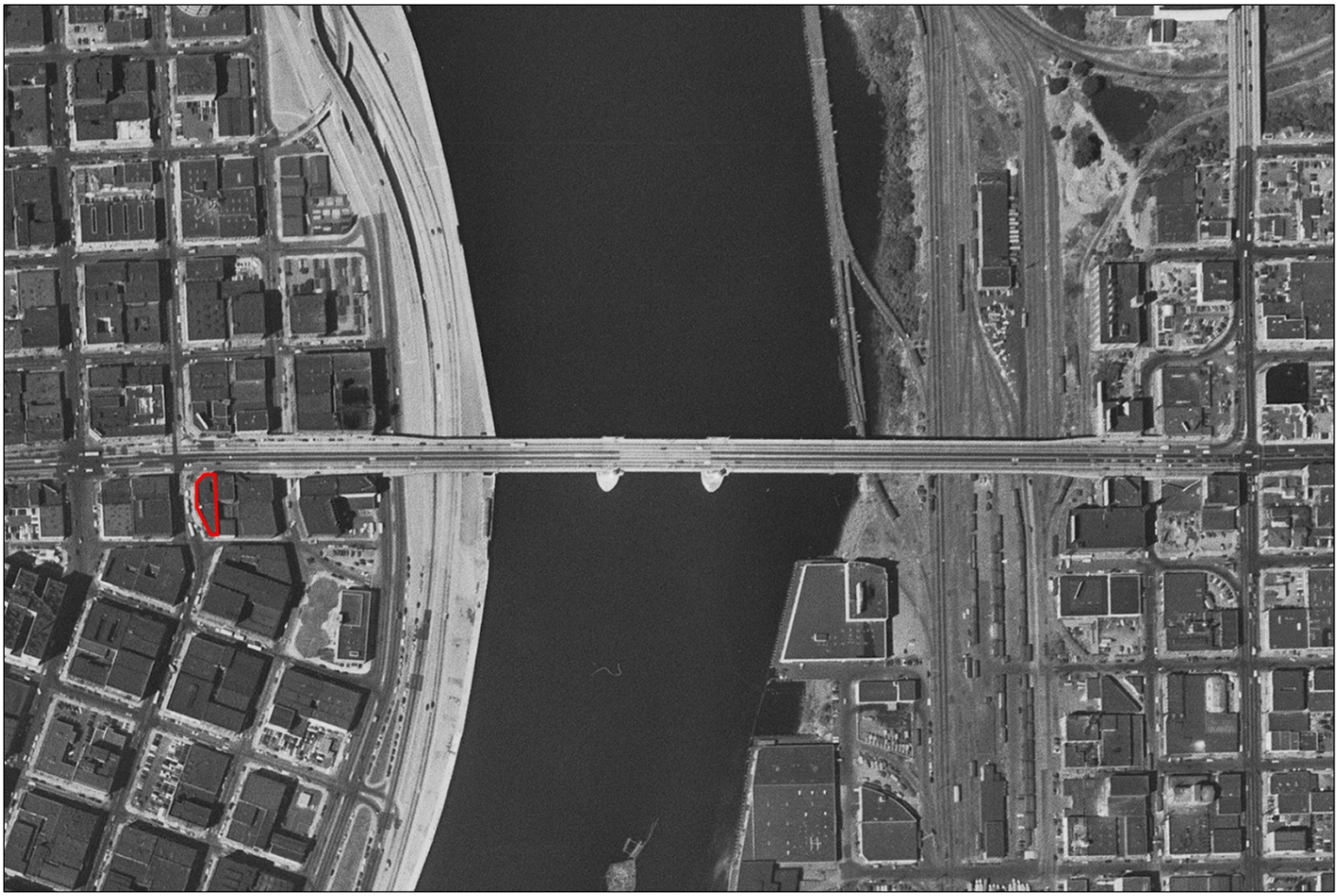

Figure 4: 1951 aerial photograph with location of the Salvation Army Building indicated by red line (USGS EarthExplorer).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

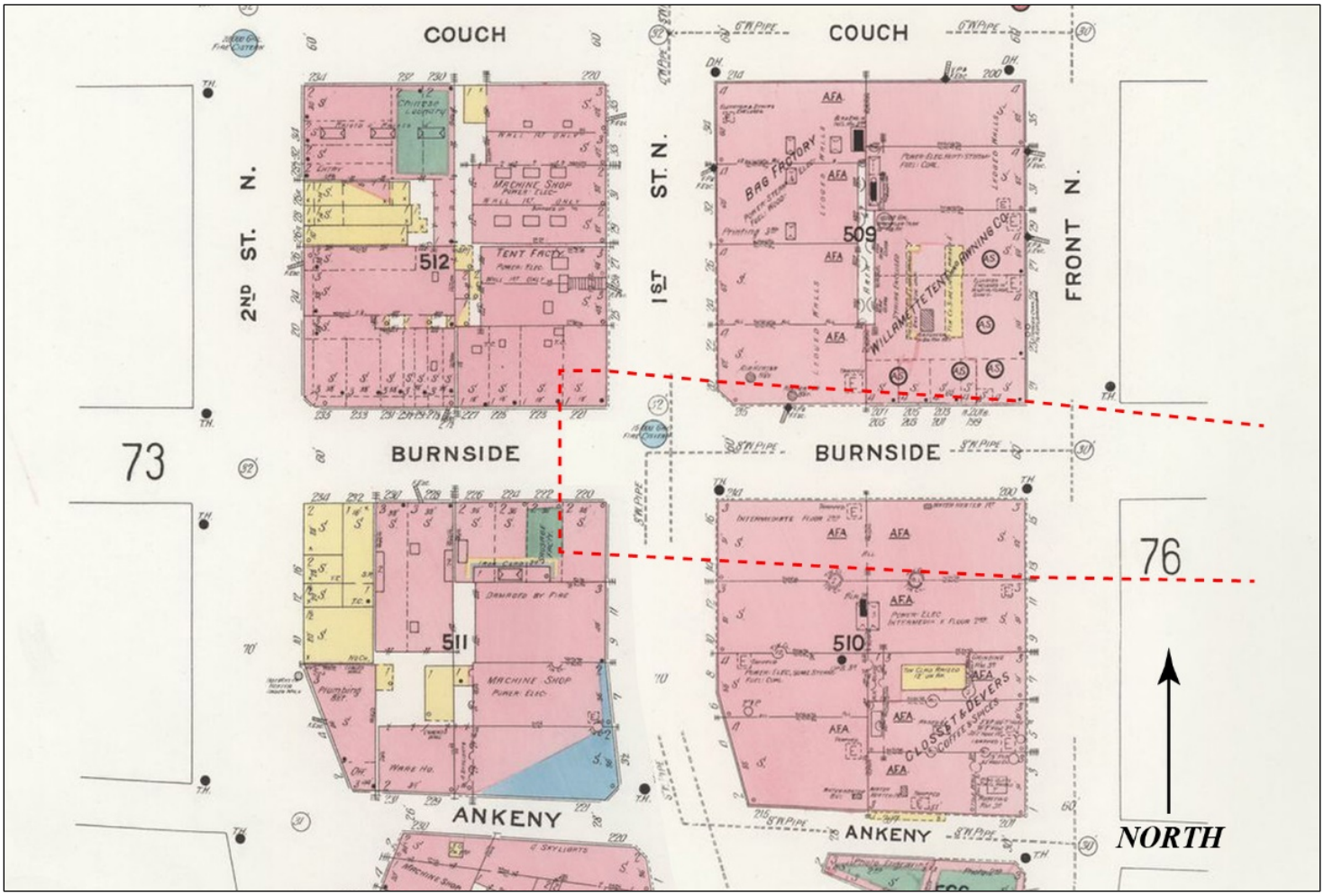

Figure 5: Sanborn maps, Volume 1, 1908. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

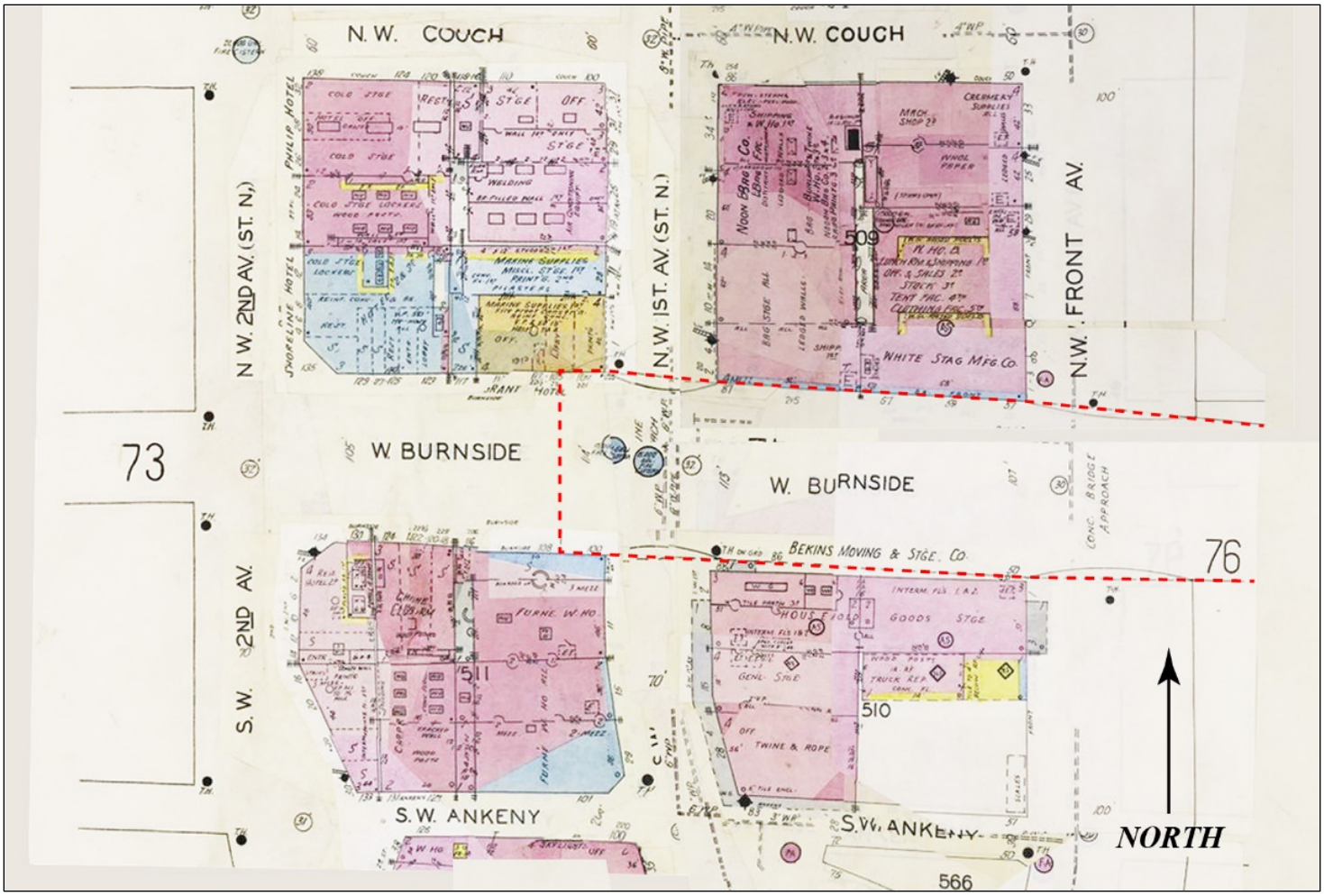

Figure 6: Sanborn maps, Volume 1, 1950. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

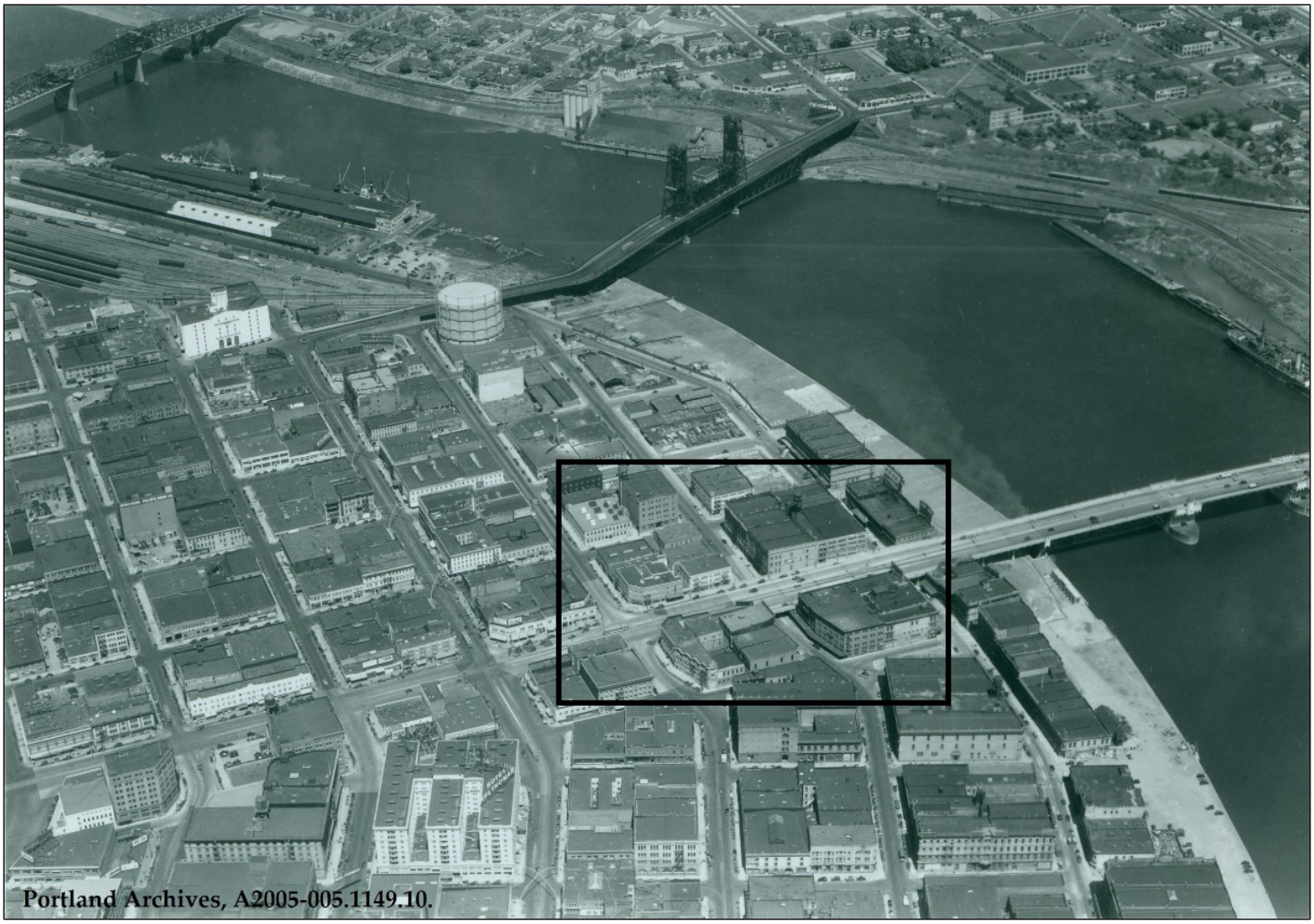

Figure 7: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Black box indicates excerpt in Figure 8 below (Portland Archives, A2005-005.1149.10).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

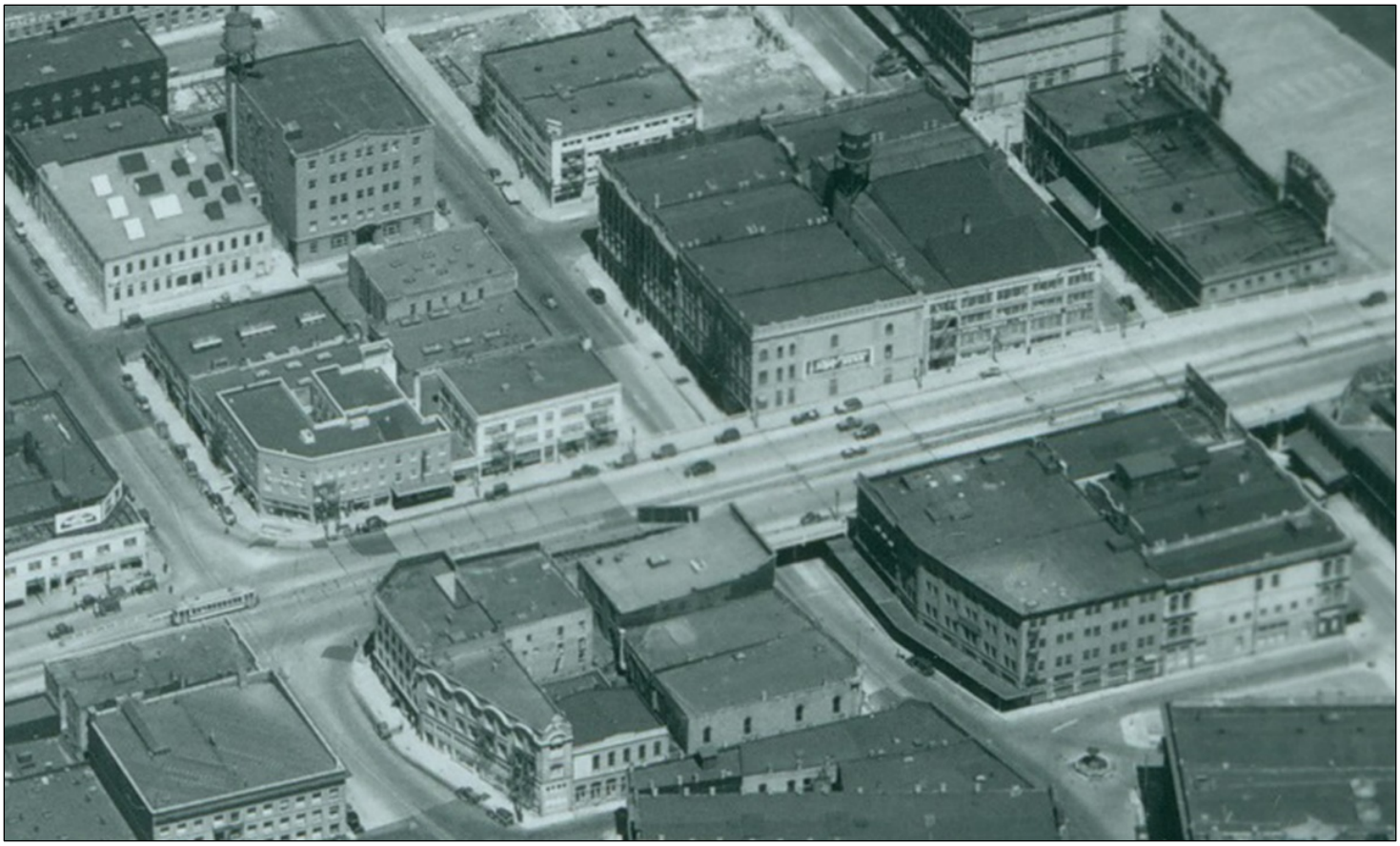

Figure 8: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Excerpt of Figure 7 above (Portland Archives, A2005-005.1149.10).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

Figure 9: Footprint of the Salvation Army Building superimposed on property line map (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

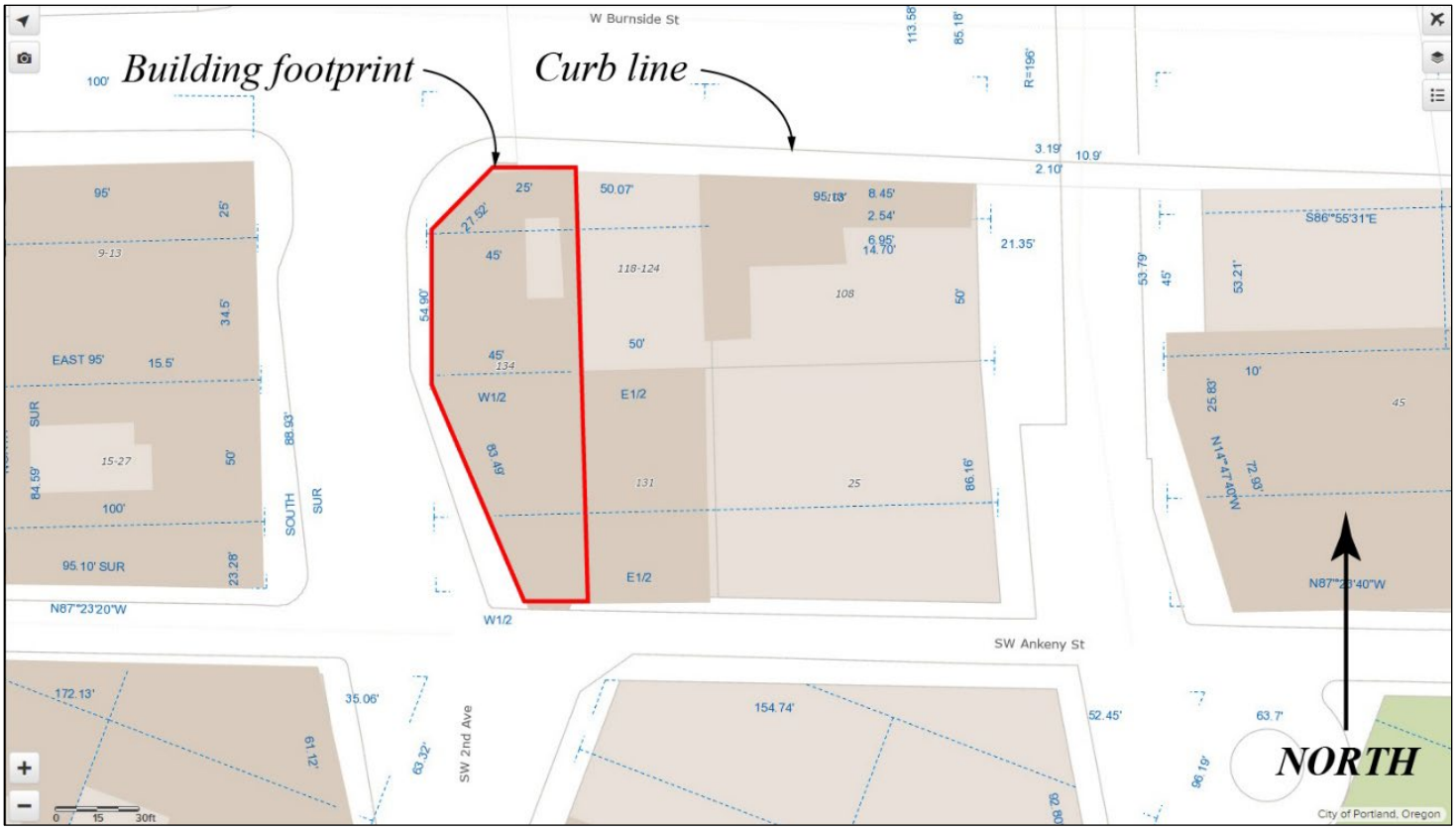

Figure 10: Footprint of the Salvation Army Building superimposed on property line map, with elements of existing Burnside Bridge indicated (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

Photographs

Figure 11: Salvation Army Building, view looking southeast (Elizabeth O'Brien, 2019).

Figure 12: Salvation Army Building, view looking southeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

Figure 13: Salvation Army Building, view looking southwest (Elizabeth O'Brien, 2019).

Figure 14: Salvation Army Building, view looking west (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: Salvation Army	
Street Address: 134 West Burnside Street	City, County: Portland, Multnomah

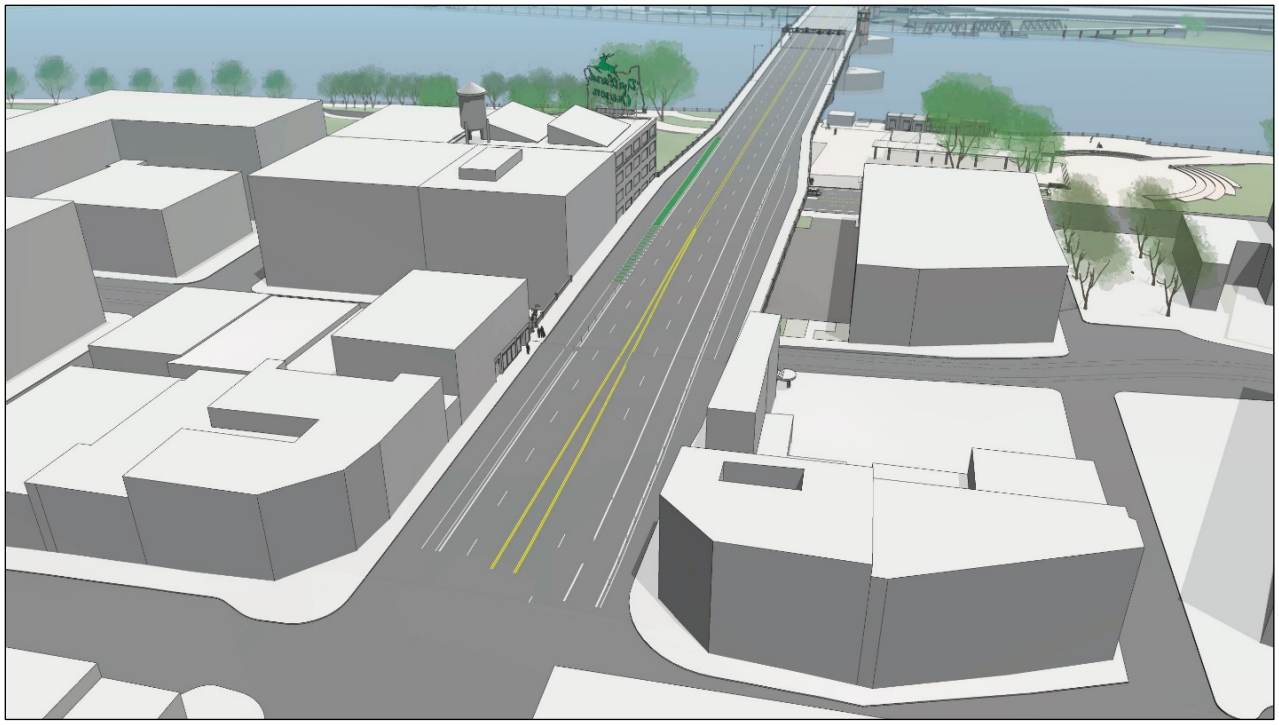

Figure 15: Salvation Army Building, artist's rendering of existing condition of west approach, aerial view looking northeast (Fat Pencil Studio, 2021).

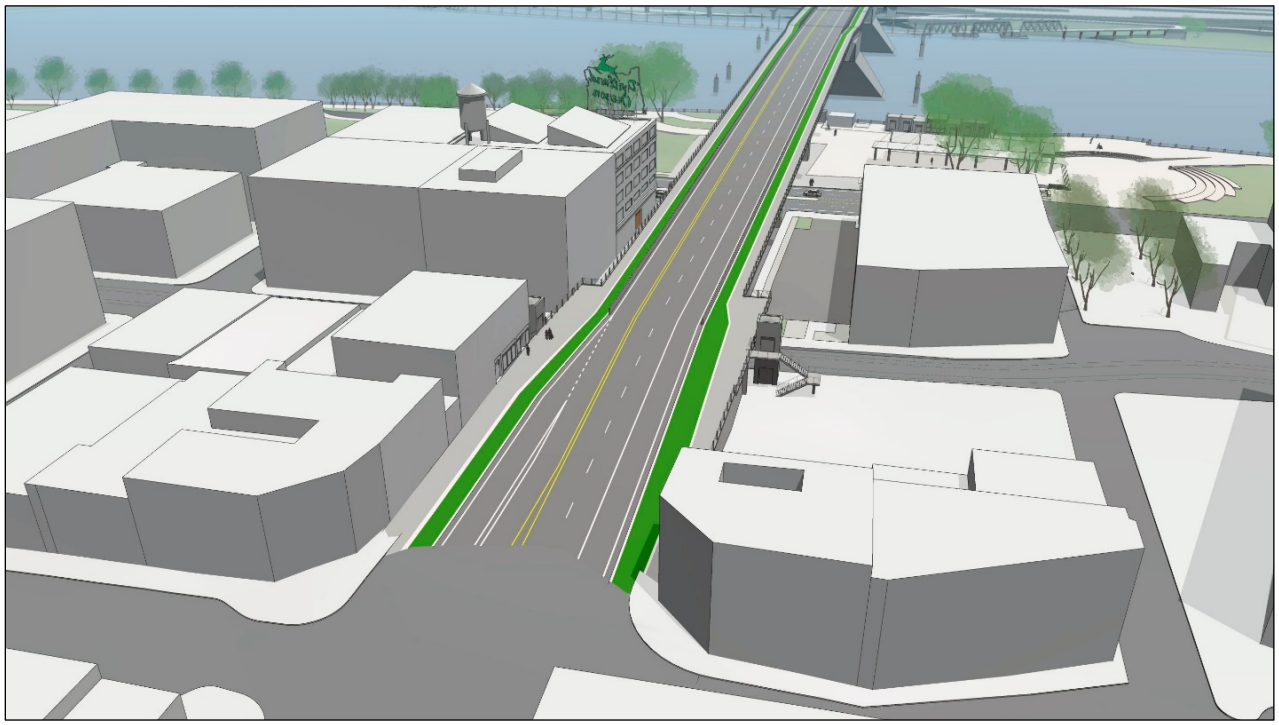

Figure 16: Salvation Army Building, artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM
Continuation Sheet

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Skidmore/Old Town Historic District (NHL)	Street Address:	
City, County: Portland, Multnomah	Latitude: Longitude:	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/27/2021

Photo:

Photo Caption: Burnside Bridge with Skidmore/Old Town Historic District in background, aerial photograph looking southwest (Multnomah County, 2021).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☒ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project on the Portland Skidmore/Old Town Historic District. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT).

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The Portland Skidmore/Old Town Historic District is located on the west bank of the Willamette River in the Central City area of Portland, Multnomah County, Oregon. The district is where the streets of the original 1845 Portland townsite, oriented to magnetic north and the flow of the Willamette River, meet the streets of Couch's Addition plat of 1850, which are oriented to true north, creating an offset of about 20 degrees. West Burnside Street bisects the district and divides the west side of Portland into northwest and southwest quadrants (Figures 1 through 4).

The Portland Skidmore/Old Town Historic District was listed in the National Register of Historic Places (NRHP) on December 6, 1975. The Skidmore/Old Town Historic District was designated as a National Historic Landmark (NHL) on May 5, 1977. The original 1975 NRHP nomination for the district and the subsequent 1977 NHL nomination were revised with supplemental documentation in 2008. The Portland Skidmore/Old Town Historic District is nationally significant for its historical associations with the early development and economic growth of Portland, which was the Pacific Northwest's most important urban center during the latter half of the nineteenth century. The district is equally significant for its exceptional inventory of mid- and late-nineteenth-century cast-iron commercial buildings, which is considered one of the finest collections of such buildings in the nation and one of the most outstanding in the Far Western United States.

The boundaries of the Portland Skidmore/Old Town Historic District were drawn to include the significant concentration of historic buildings from the late nineteenth and early twentieth centuries, many of which possess a high level of integrity. The period of significance for the district begins in 1857, which was when the oldest extant resource in the district was constructed, and ends in 1929, when the Willamette River seawall system was completed. There are 101 recorded resources in the district, including 57 contributing and 44 non-contributing resources. The 57 contributing properties located within the NHL boundaries include 55 buildings, 1 structure, and 1 object.

The west approach span of the Burnside Bridge is located within the boundaries of Portland Skidmore/Old Town Historic District. The Burnside Bridge was completed in May 1926, which is within the period of significance for the NHL district, but the bridge was not included as a contributing structure in the district since it was a "physical disruption" to the "regularity and connectivity provided by the street grid [that] has been altered by major public interventions." The nomination documentation also refers to the Burnside Bridge as "just the first of a wave of large-scale public works projects and accompanying building demolitions that significantly altered the physical and economic fabric of the district." Despite this exclusion from the historic district nomination, the Burnside Bridge was listed in the NRHP on November 14, 2012 (Figures 5 through 11).

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria

of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

The proposed Refined Long-span alternative would involve construction of a new bridge on the same alignment of the existing Burnside Bridge. According to 36 CFR Part 800.5(a)(1), adverse effects to NRHP-eligible or NRHP-listed properties occur when an undertaking directly or indirectly alters the characteristics of a historic property that qualify it for inclusion in the NRHP. In addition to direct effects, both future and cumulative effects of the undertaking also need to be considered. An example listed in 800.5(a)(2) is "visual, atmospheric, or audible intrusions" (36 CFR 800.5).

Direct Effects to the Skidmore/Old Town Historic District

The following NRHP-listed resources are located within the Area of Potential Effect (APE) for direct effects of the proposed undertaking:
Bates Building, 101-117 West Burnside Street (Figure 13)
Burnside Hotel, 2-12 NW Second Avenue (Figure 14)
Reed Building, 16-28 SW First Avenue (Figure 16)
Salvation Army Building, 134 West Burnside Street (Figure 15)
White Stag Block, 5 NW Naito Parkway (Figure 12)

The assessments of potential direct effects to these resources are contained in the ODOT Section 106 Level of Effect Forms which have been prepared for each of these resources (Figures 29 through 32). In summary, it is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed replacement of the Burnside Bridge would have *no adverse direct effect* to the Bates Building, the Burnside Hotel, the Reed Building, the Salvation Army Building, and the White Stag Block.

Direct and Indirect Effects to the Skidmore/Old Town Historic District

Furthermore, two new pedestrian access structures will be constructed at the west approach of the replacement Burnside Bridge. Each of these structures will have an accessible elevator and stair to connect the sidewalks of the west approach with the street level of NW First Avenue below. One of these structures will be located on the north side of the west approach on the west side of NW First Avenue, and the other structure will be located on the south side of the west approach on the west side of NW First Avenue. The design and construction of these new structures are subject to review by the City of Portland Historic Landmarks Commission. The assessment of effects for this select portion of the undertaking is based on the assumption that both structures would meet the Skidmore/Old Town Historic District Design Guidelines and would be approved by the Historic Landmarks Commission (Figures 17 through 28). In summary, it is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed construction of the two pedestrian access structures would have *no adverse direct or indirect effect* to the Skidmore/Old Town Historic District.

Indirect Effects to the Portland Skidmore/Old Town Historic District: The exact configuration of approach spans and central operable span has not yet been finalized for the Refined Long-span alternative. The new east approach span may be either tied arch or cable supported structures and the central operable span may be either a bascule or vertical lift. The following is an evaluation of potential indirect adverse effects of the various Refined Long-span bridge span combinations currently being considered, pursuant to 36 CFR 800.5(a)(2):

Span Combination 1
Girder West Approach Span, Bascule Central Span, Tied Arch East Approach Span:
The girder west approach span of this option would be located within the Portland Skidmore/Old Town Historic District, and the new bascule central span would be located in the approximate location of the existing bascule span in middle of the Willamette River. The girder west approach span and bascule central span most closely approximates the current visual signature, or "eyeprint" of the existing Burnside Bridge and would not introduce additional visual intrusions within the NHL district (Figures 33, 34, 38, 39, 43, 44, 48, 49, 53, 54, 58, 59, 63, 64, and 69). It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed construction of this particular combination of bridge structures would have *no adverse indirect effect* to the Skidmore/Old Town Historic District.

Span Combination 2
Girder West Approach Span, Vertical Lift Central Span, Tied Arch East Approach Span:
The girder west approach span of this option would be located within the Portland Skidmore/Old Town Historic District, and the new vertical lift central span would be located in the approximate location of the existing bascule span in middle of the Willamette River. The girder west approach span most closely approximates the current visual signature, or "eyeprint" of the existing Burnside Bridge and would not introduce additional visual intrusions within the NHL district. However, the new vertical lift central span would introduce a visual intrusion to the NHL district, particularly in the bridge viewshed from the NRHP-listed buildings on the west side of the Tom McCall Waterfront Park (Figures 33, 35, 38, 40, 43, 45, 48, 50, 53, 55, 58, 60, 63, 65, 68, and 70). It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed construction of this particular combination of bridge structures would constitute an *adverse indirect visual effect* to the Skidmore/Old Town Historic District.

Span Combination 3
Girder West Approach Span, Bascule Central Span, Cable Supported East Approach Span:
The girder west approach span of this option would be located within the Portland Skidmore/Old Town Historic District, and the new bascule central span would be located in the approximate location of the existing bascule span in middle of the Willamette River. The girder west approach span and bascule central span most closely approximates the current visual signature, or "eyeprint" of the existing Burnside Bridge and would not introduce additional visual intrusions within the NHL district (Figures 33, 36, 38, 41, 43, 46, 48, 51, 53, 56, 58, 61, 63, 66, 68, and 69). It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed construction of this particular combination of bridge structures would have *no adverse indirect effect* to the Skidmore/Old Town Historic District.

Span Combination 4

Girder West Approach Span, Vertical Lift Central Span, Cable Supported East Approach Span:
The girder west approach span of this option would be located within the Portland Skidmore/Old Town Historic District, and the new vertical lift central span would be located in the approximate location of the existing bascule span in middle of the Willamette River. The girder west approach span most closely approximates the current visual signature, or "eyeprint" of the existing Burnside Bridge and would not introduce additional visual intrusions within the NHL district. However, the new vertical lift central span would introduce a visual intrusion to the NHL district, particularly in the bridge viewshed from the NRHP-listed buildings on the west side of the Tom McCall Waterfront Park (Figures 33, 37, 38, 42, 43, 47, 48, 52, 53, 57, 58, 62, 63, 67, 68, and 70). It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed construction of this particular combination of bridge structures would constitute an *adverse indirect visual effect* to the Skidmore/Old Town Historic District.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed replacement of the Burnside Bridge would constitute *no direct or indirect adverse effects* to the Skidmore/Old Town Historic District. Furthermore, Long Span combination 2 and 4 would diminish the integrity of setting and feeling of the district and constitute *adverse indirect visual effects* to the Skidmore/Old Town Historic District. Finally, Long Span combination 1 and 3 would constitute *no adverse indirect visual effects* to the Skidmore/Old Town Historic District.

8. Sources

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1950b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.

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ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Maps and Figures

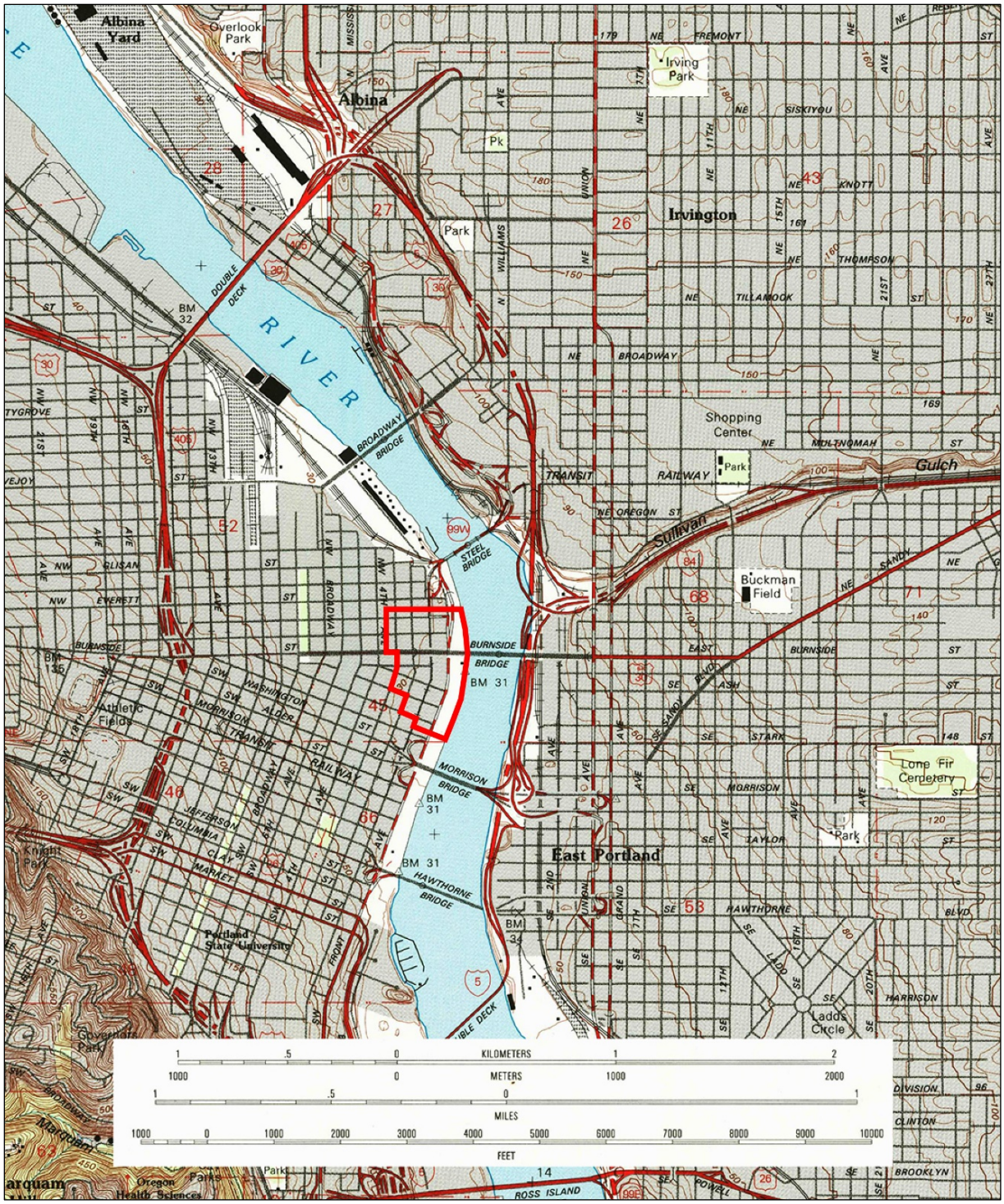

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. The Skidmore/Old Town Historic District is outlined in red (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

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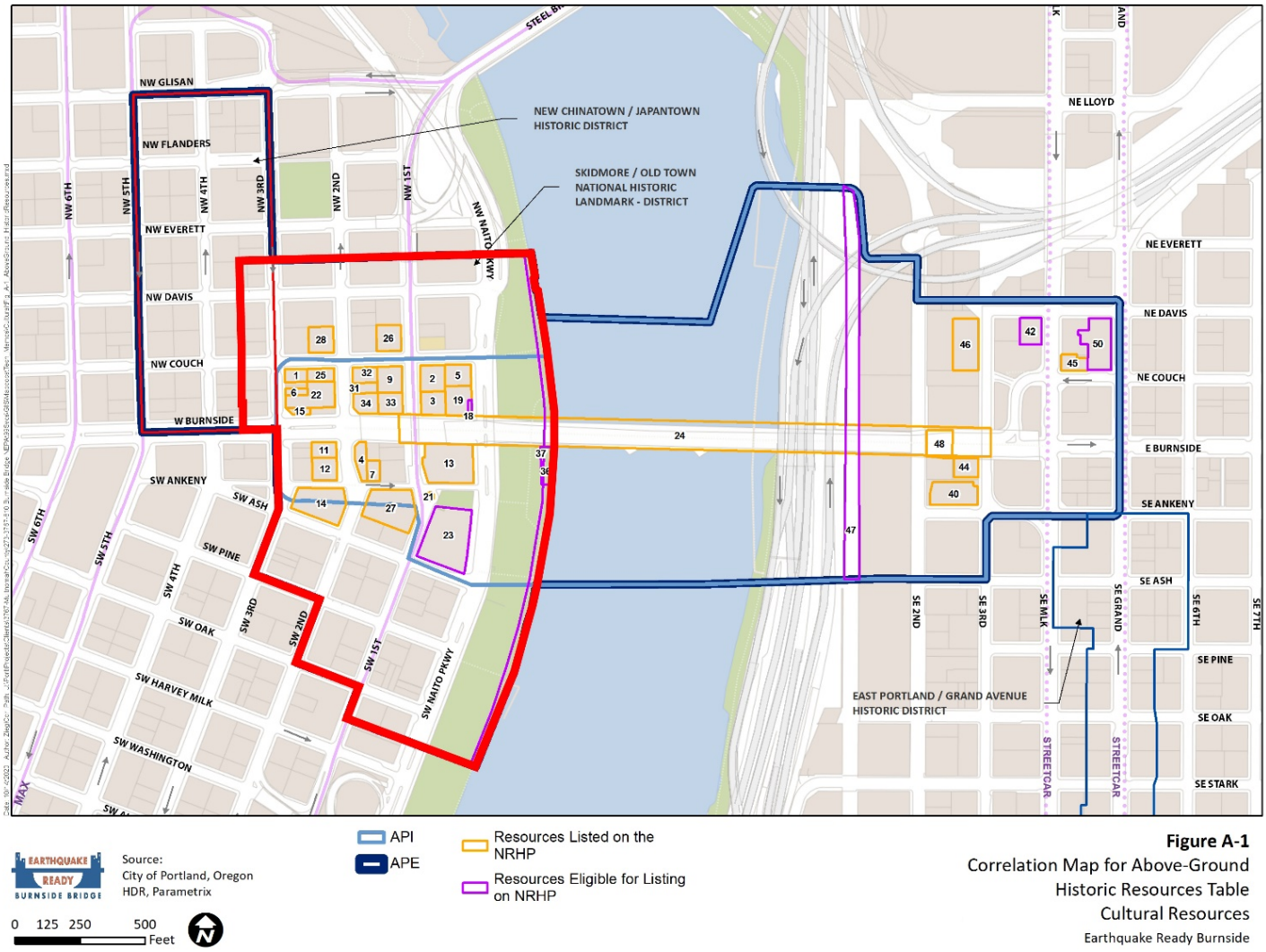
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah



Source: City of Portland, Oregon HDR, Parametrix

0 125 250 500 Feet

API
APE
Resources Listed on the NRHP
Resources Eligible for Listing on NRHP

Figure A-1
Correlation Map for Above-Ground Historic Resources Table
Cultural Resources
Earthquake Ready Burnside

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. The Skidmore/Old Town Historic District is outlined in red.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

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Figure 3: Aerial photograph with the Skidmore/Old Town Historic District outlined in red (Google Earth).

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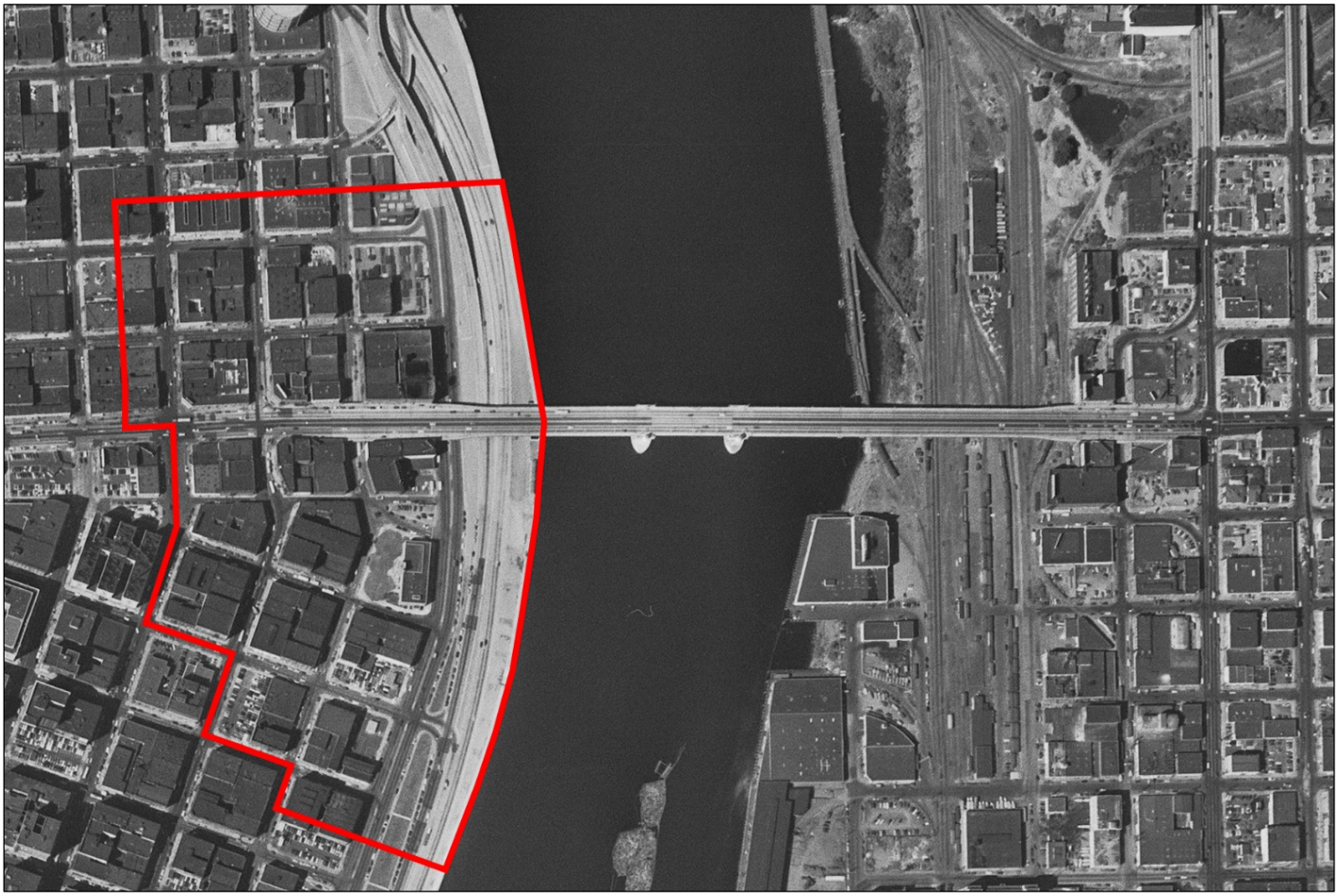

Figure 4: 1951 aerial photograph with the Skidmore/Old Town Historic District outlined in red (USGS EarthExplorer).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
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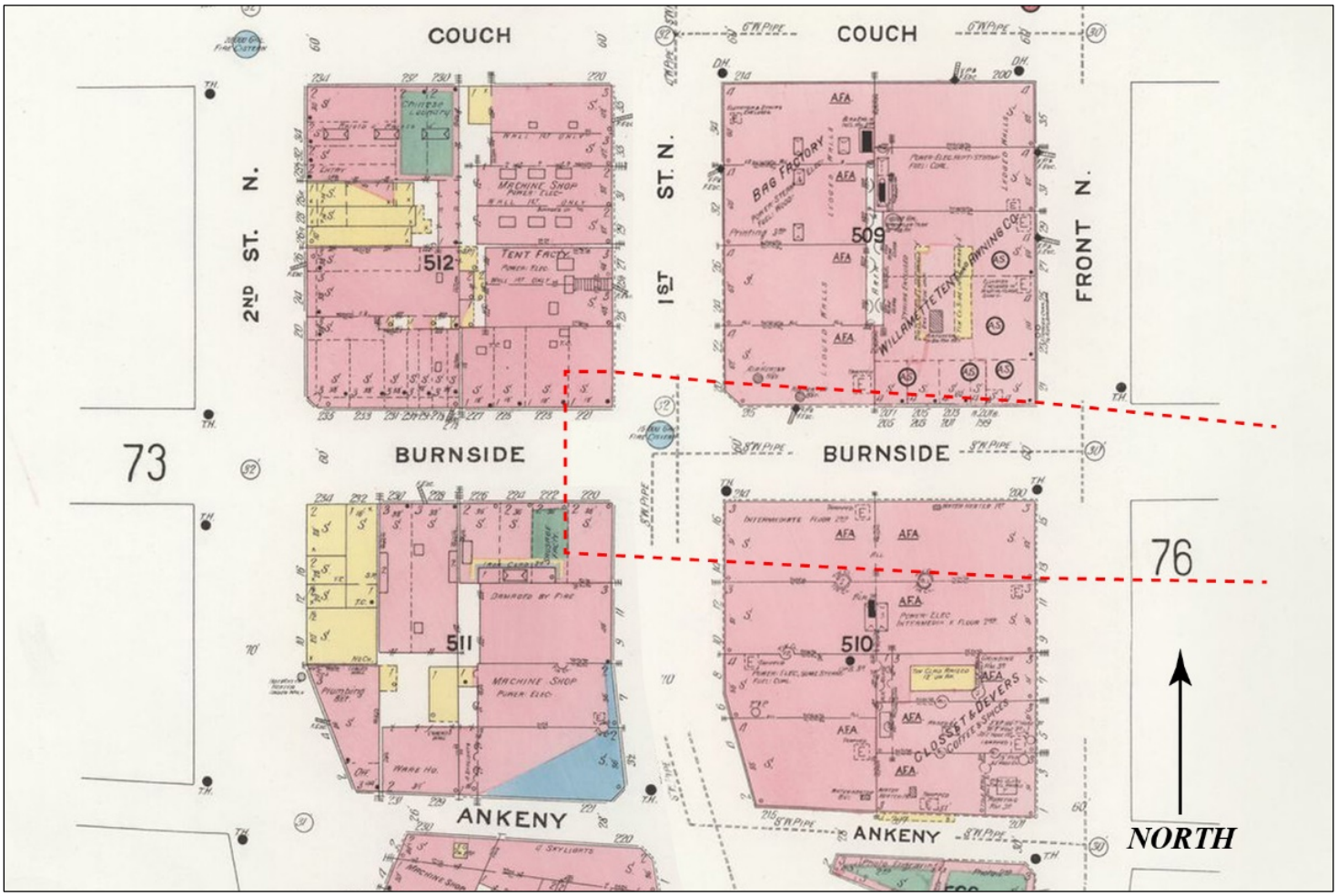

Figure 5: Sanborn maps, Volume 1, 1908. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

ODOT INVENTORY OF HISTORIC PROPERTIES
SECTION 106 LEVEL OF EFFECT FORM

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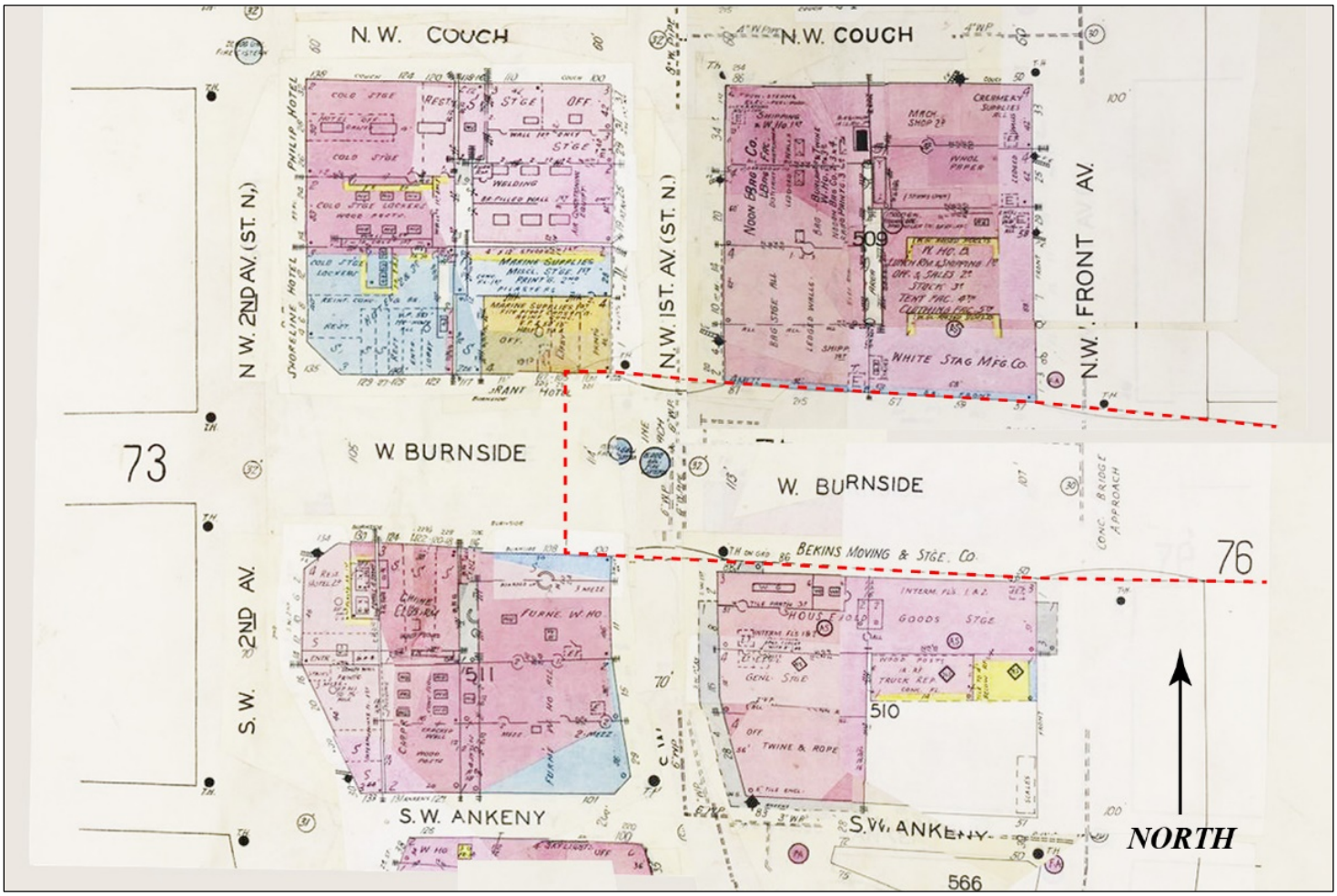

Figure 6: Sanborn maps, Volume 1, 1950. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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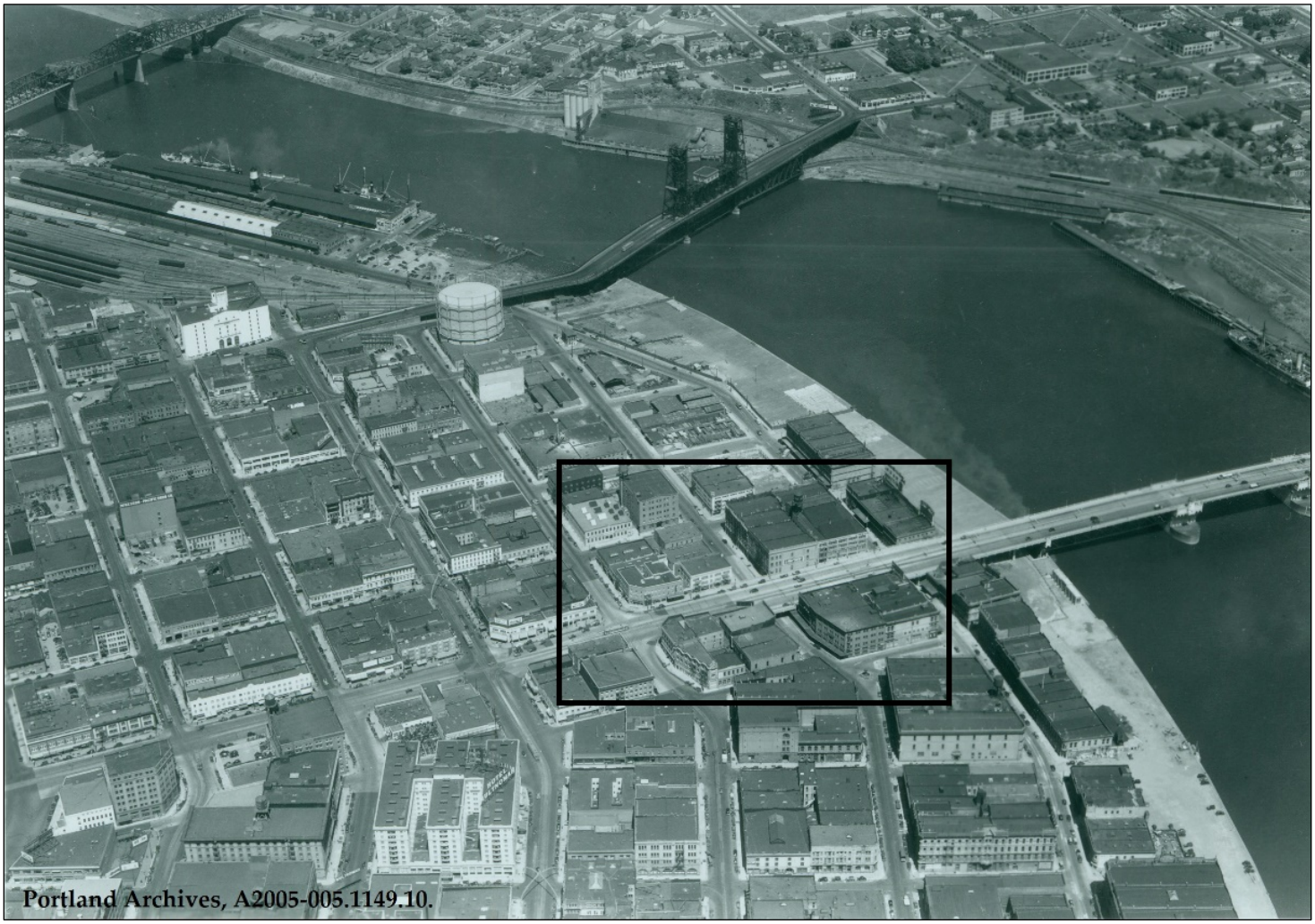

Figure 7: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Black box indicates excerpt in Figure 8 below (Portland Archives, A2005-005.1149.10).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Street Address: Multiple	City, County: Portland, Multnomah

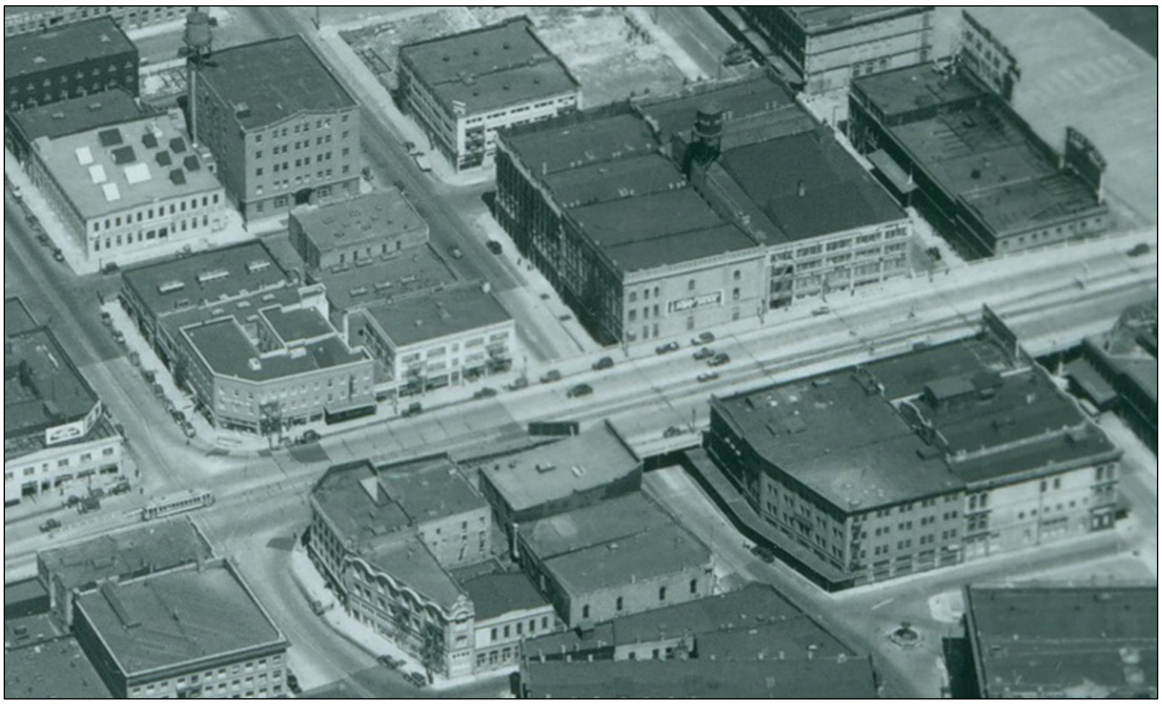

Figure 8: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Excerpt of Figure 7 above (Portland Archives, A2005-005.1149.10).

Figure 9: Aerial view of the downtown waterfront near the Burnside and Steel Bridges, December 31, 1935 (Portland Archives, 2000-03).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Figure 10: Aerial view of completed Harbor Wall take from above the Burnside Bridge looking west, January 31, 1929 (Portland Archives, A1999-004.54).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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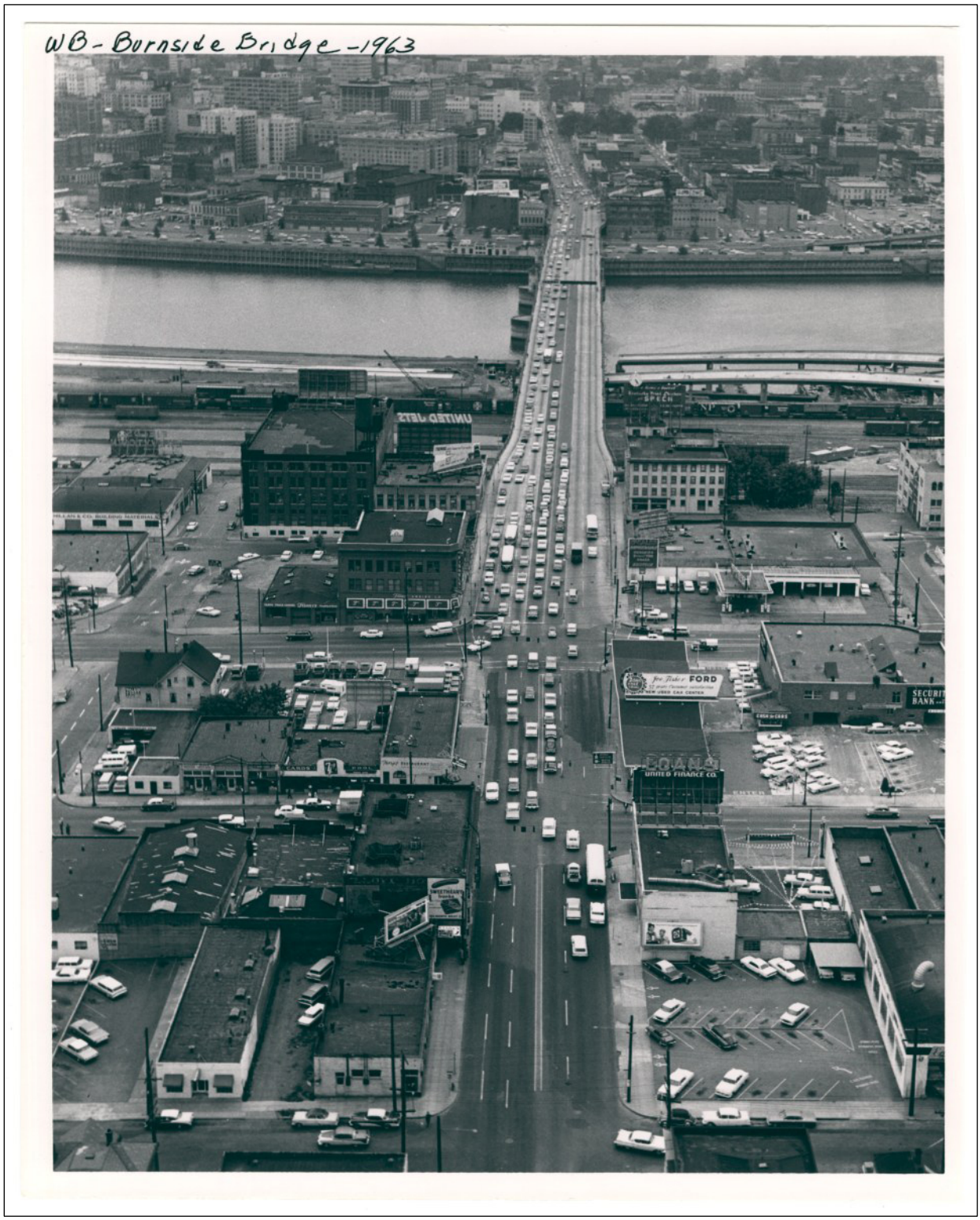

Figure 11: Burnside Bridge westbound, 1963 (Portland Archives A2005-001.106).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Photographs

Figure 12: White Stag Block, looking northeast (Elizabeth O'Brien, 2019; photo mosaic Adam S. Alsobrook, 2021).

Figure 13: Bates Building, view looking northwest (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Figure 14: Burnside Hotel, view looking northeast (Elizabeth O'Brien, 2019).

Figure 15: Salvation Army Building, view looking southeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Figure 16: Reed Building, looking southwest (Elizabeth O'Brien, 2019).

Figure 17: Existing pedestrian access at north side of west approach, view looking north (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Figure 18: Existing pedestrian access at north side of west approach, view looking south (David Ellis, 2021).

Figure 19: Existing pedestrian access at south side of west approach, view looking south (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Figure 20: Existing pedestrian access at south side of west approach, view looking north (David Ellis, 2021).

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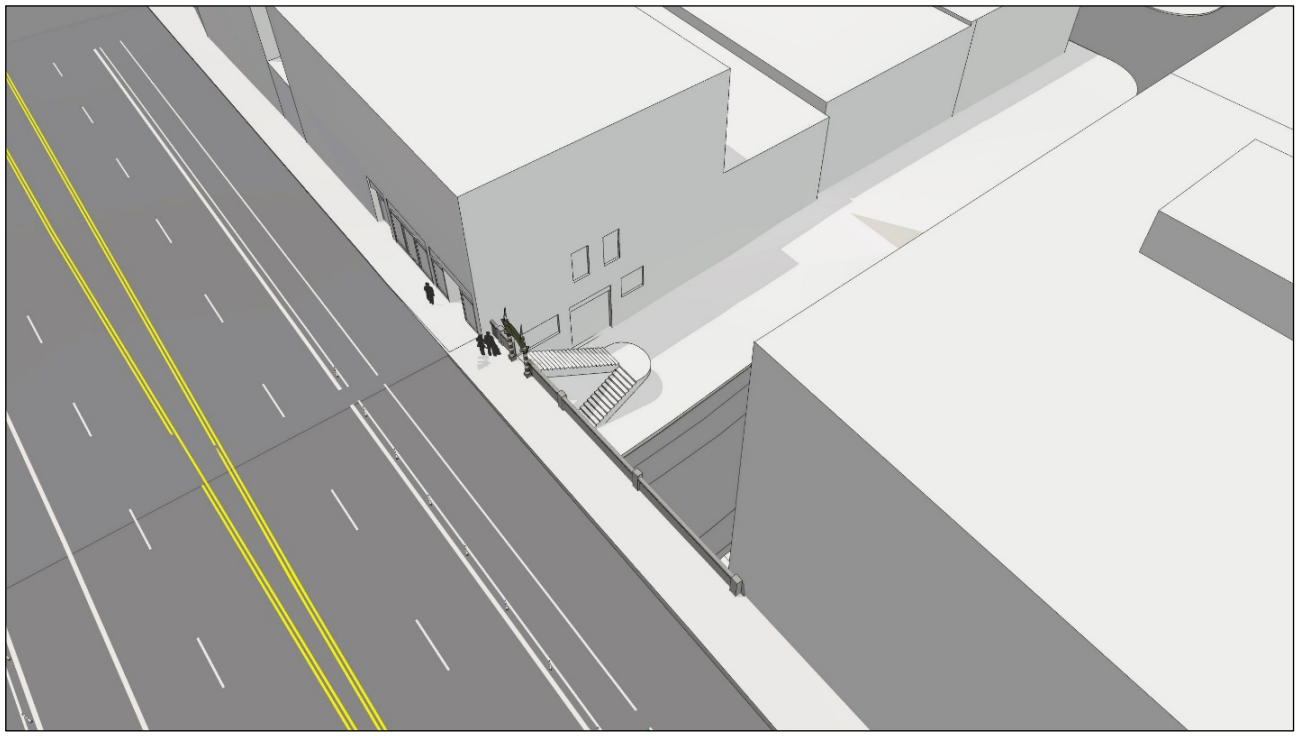

Figure 21: Existing pedestrian access at north side of west approach, artist's rendering, aerial view looking northwest (Fat Pencil Studio, 2021).

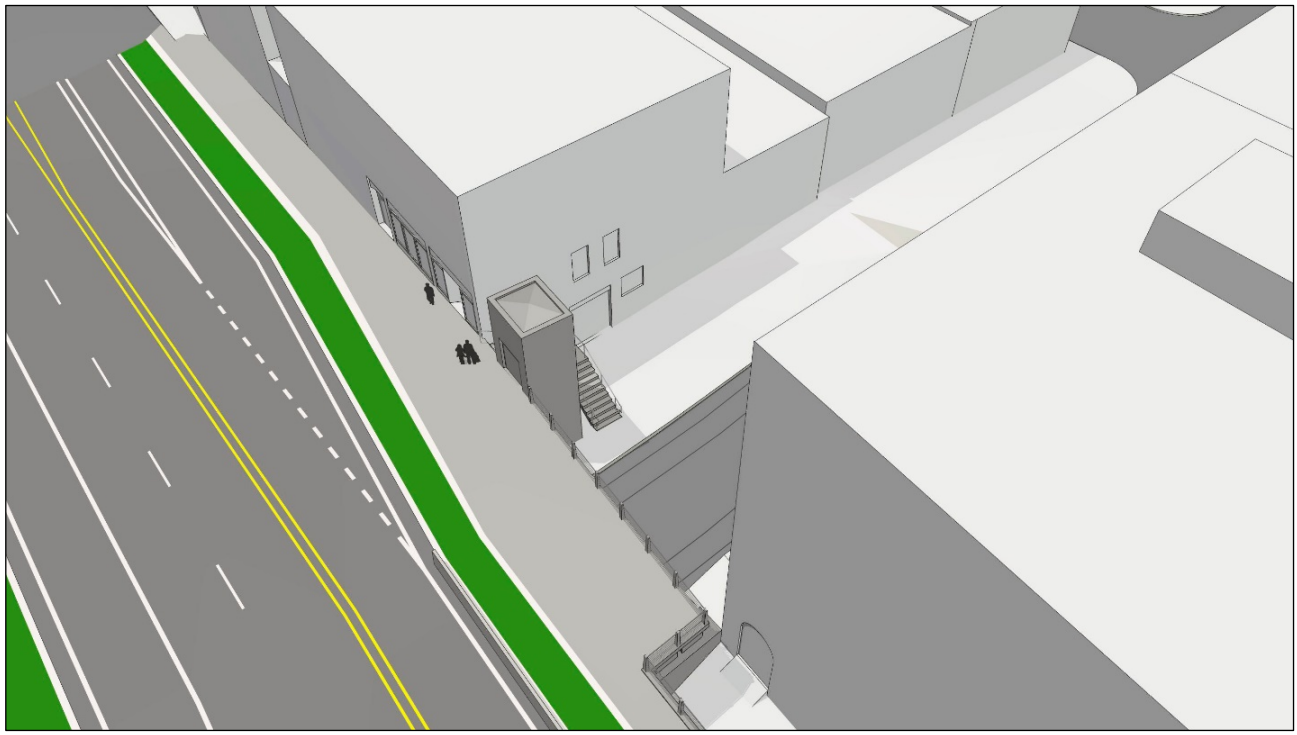

Figure 22: Proposed new pedestrian access at north side of west approach, artist's rendering, aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

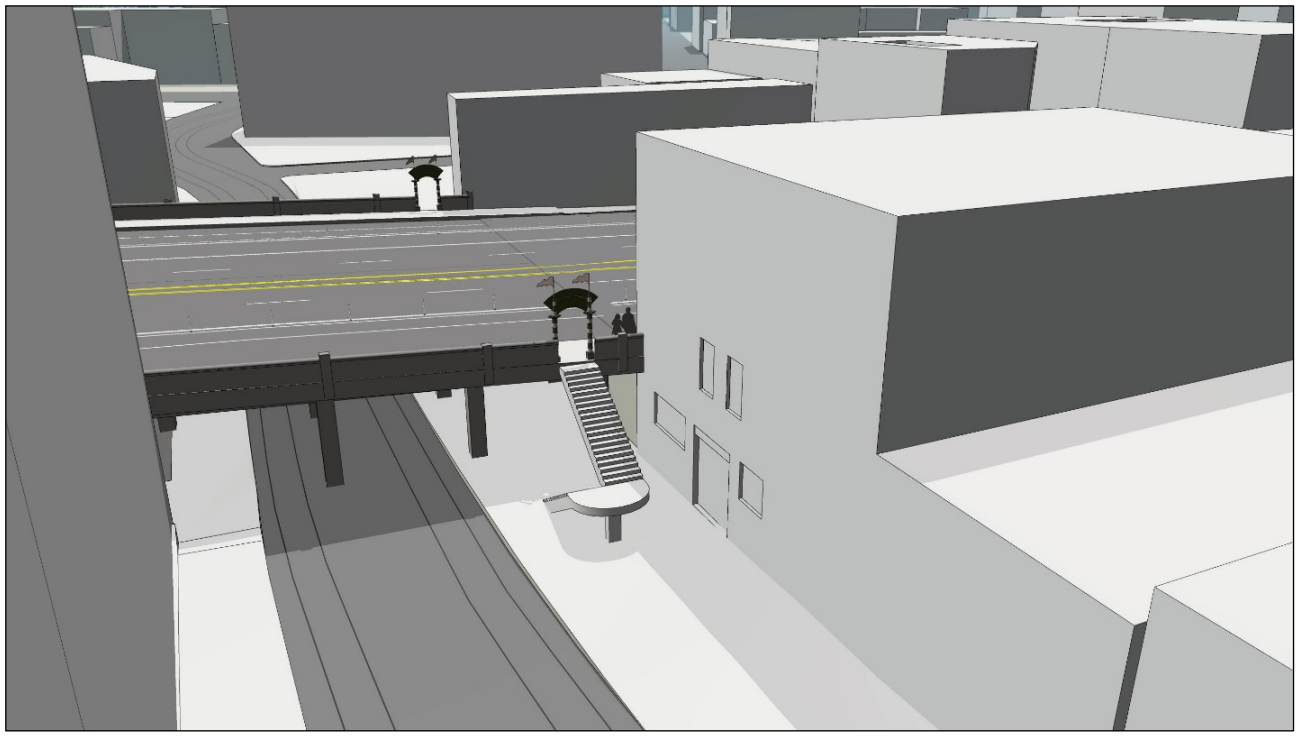

Figure 23: Existing pedestrian access at north side of west approach, artist's rendering, aerial view looking southwest (Fat Pencil Studio, 2021).

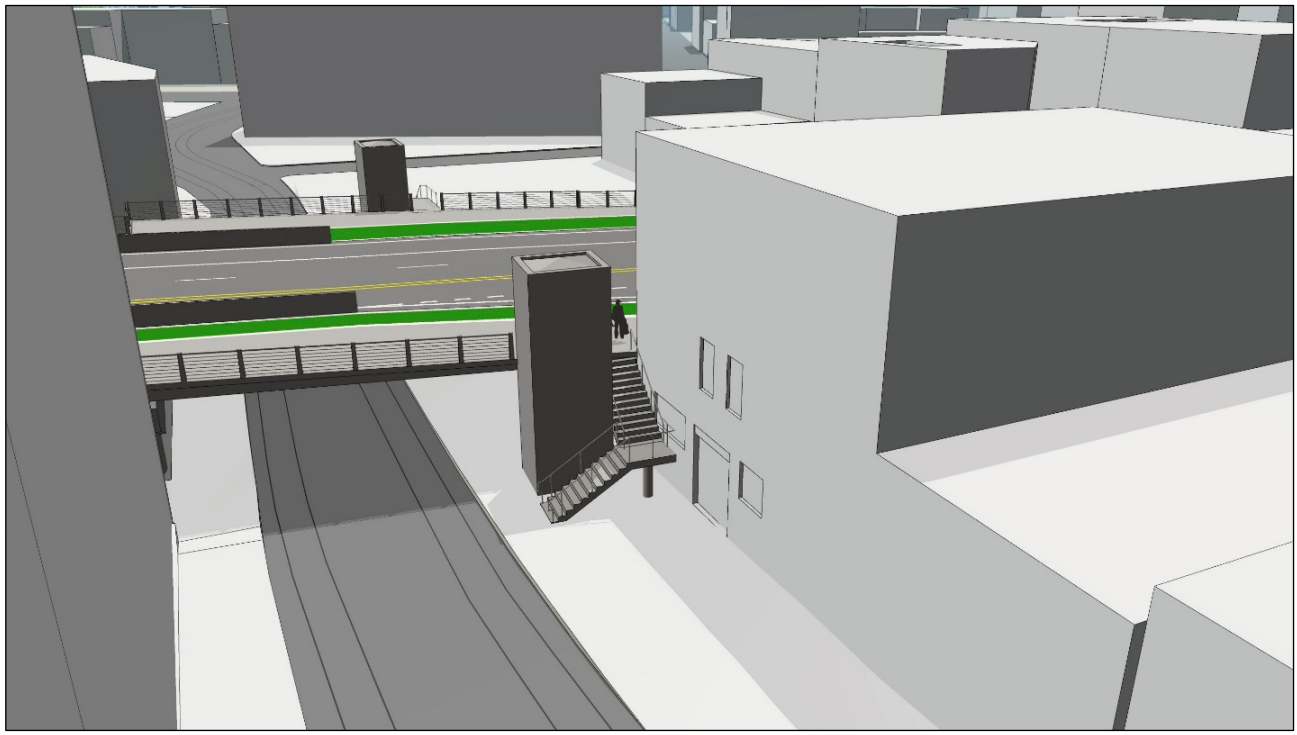

Figure 24: Proposed new pedestrian access at north side of west approach, artist's rendering, aerial view looking southwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Figure 25: Existing pedestrian access at north side of west approach, artist's rendering, aerial view looking northwest (Fat Pencil Studio, 2021).

Figure 26: Proposed new pedestrian access at north side of west approach, artist's rendering, aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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Street Address: Multiple	City, County: Portland, Multnomah

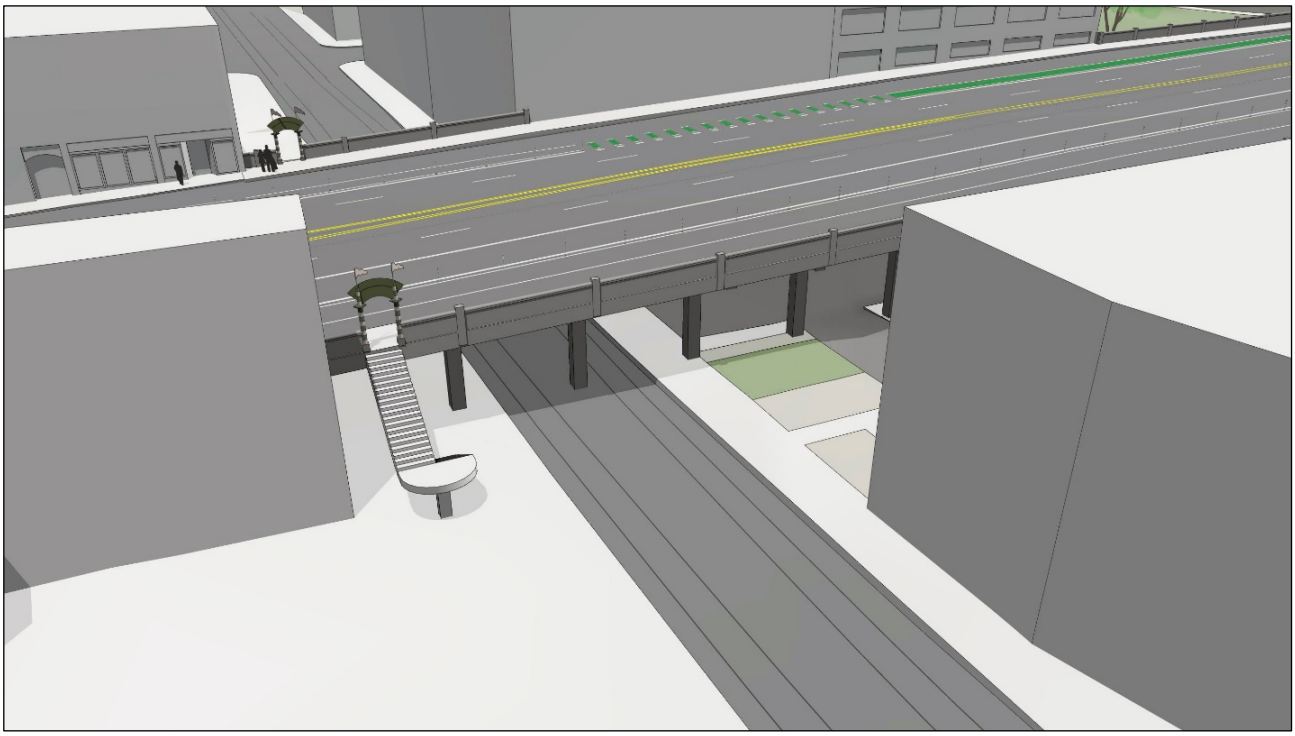

Figure 27: Existing pedestrian access at south side of west approach, artist's rendering, aerial view looking northeast (Fat Pencil Studio, 2021).

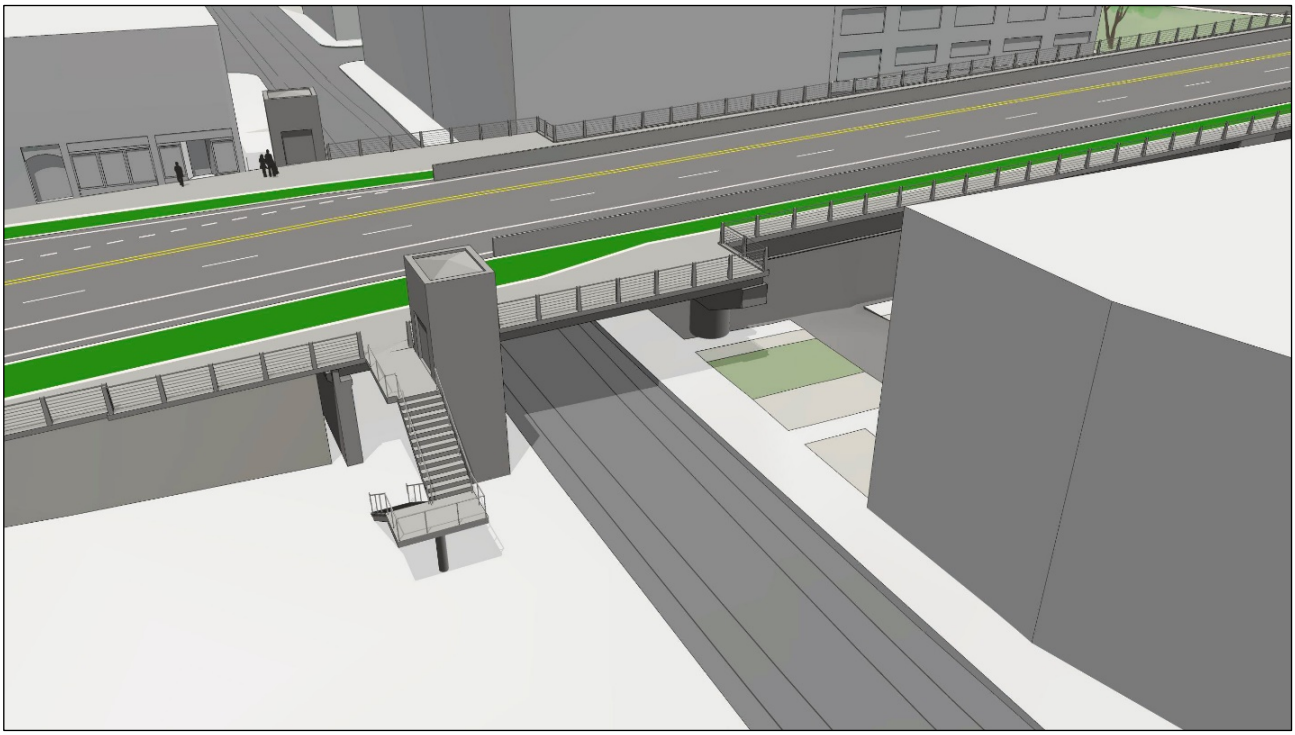

Figure 28: Proposed new pedestrian access at south side of west approach, artist's rendering, aerial view looking northeast (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

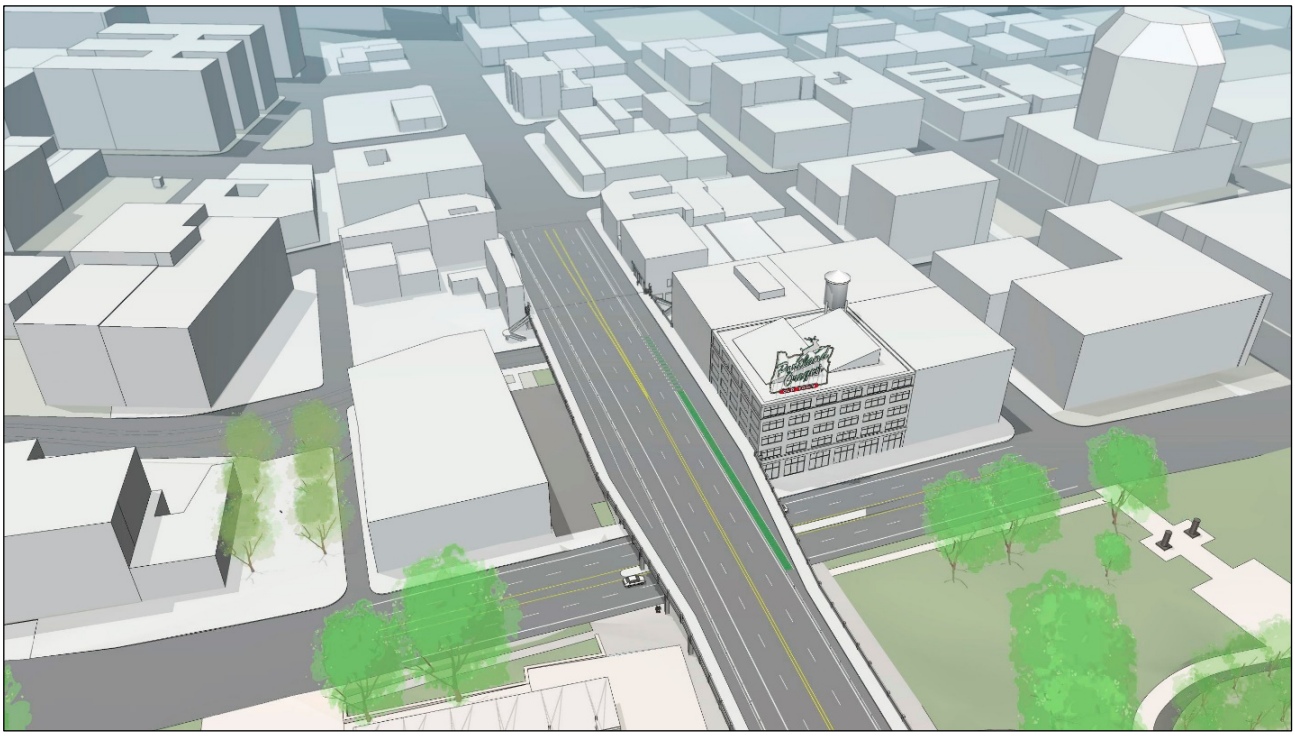

Figure 29: Artist's rendering of existing condition of west approach, aerial view looking northwest (Fat Pencil Studio, 2021).

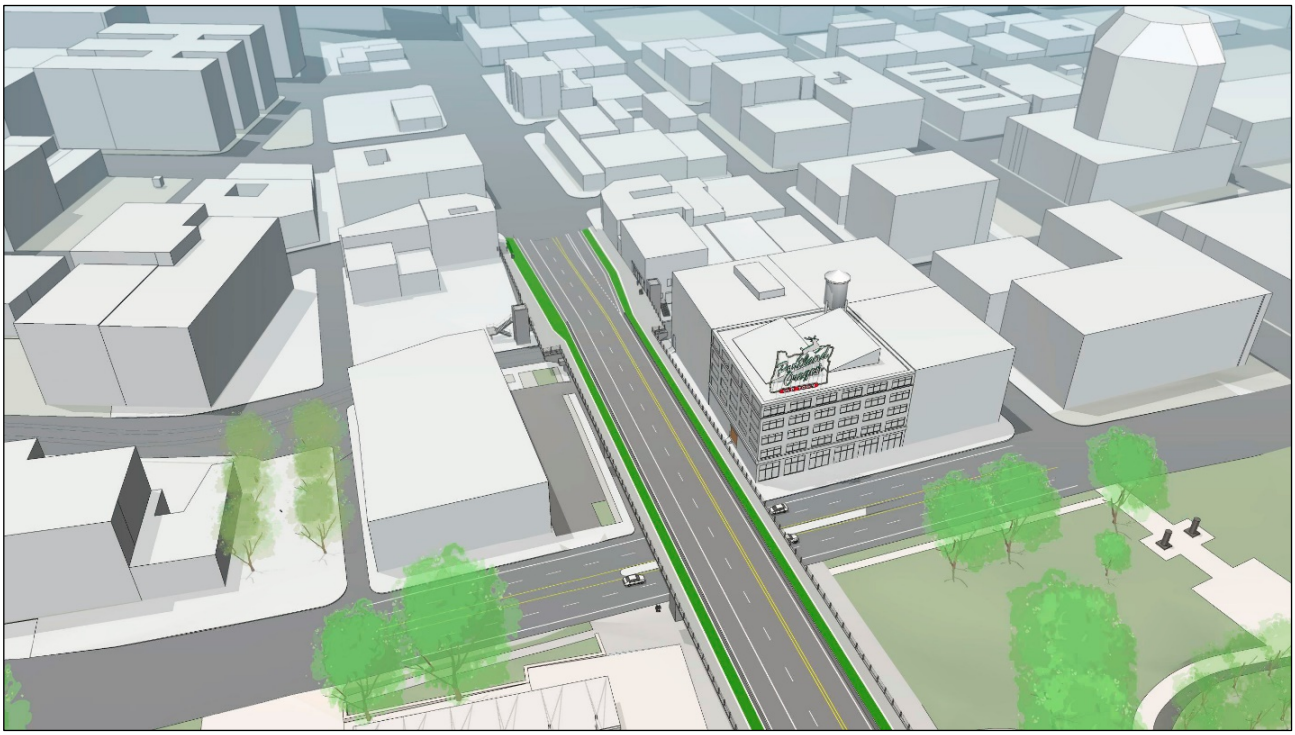

Figure 30: Artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 31: Artist's rendering of existing condition of west approach, aerial view looking northeast (Fat Pencil Studio, 2021).

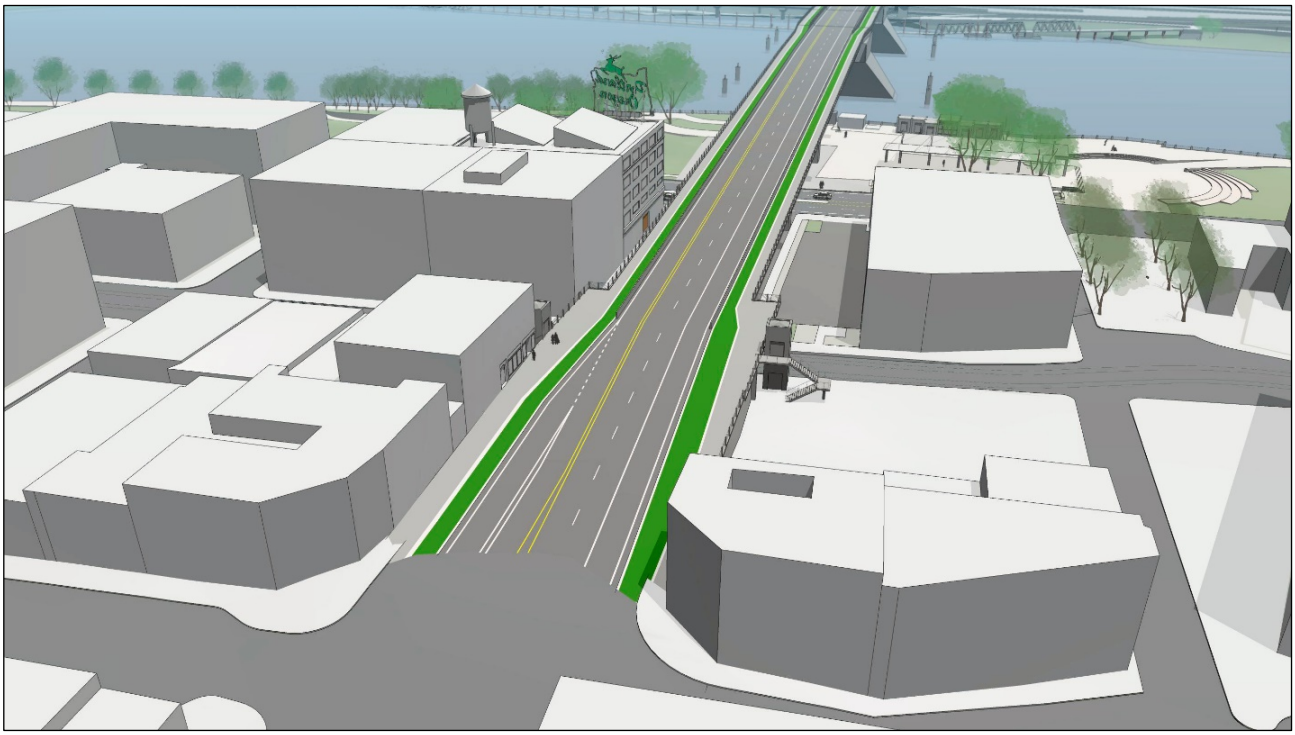

Figure 32: Artist's rendering of replacement west approach span, aerial view looking northwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 33: Artist's rendering of existing condition of the Burnside Bridge, aerial view looking southwest (Fat Pencil Studio, 2021).

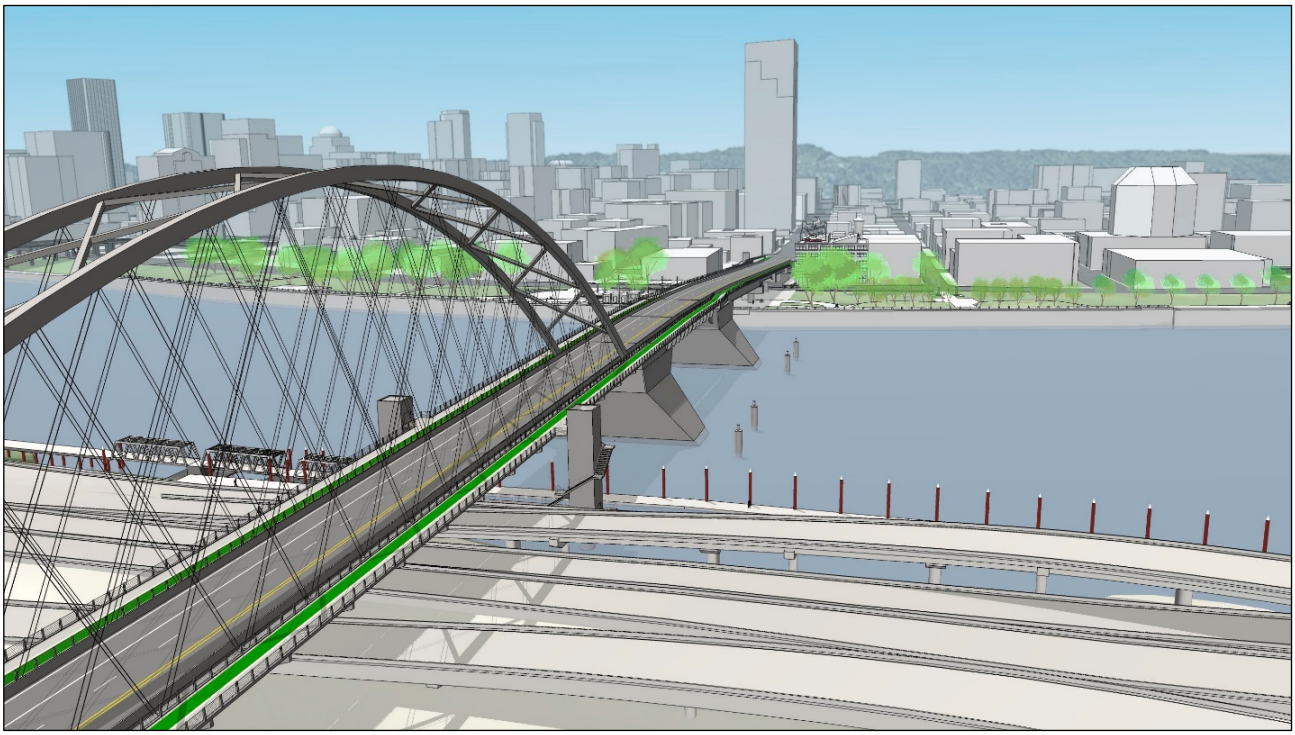

Figure 34: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking southwest (Fat Pencil Studio, 2021).

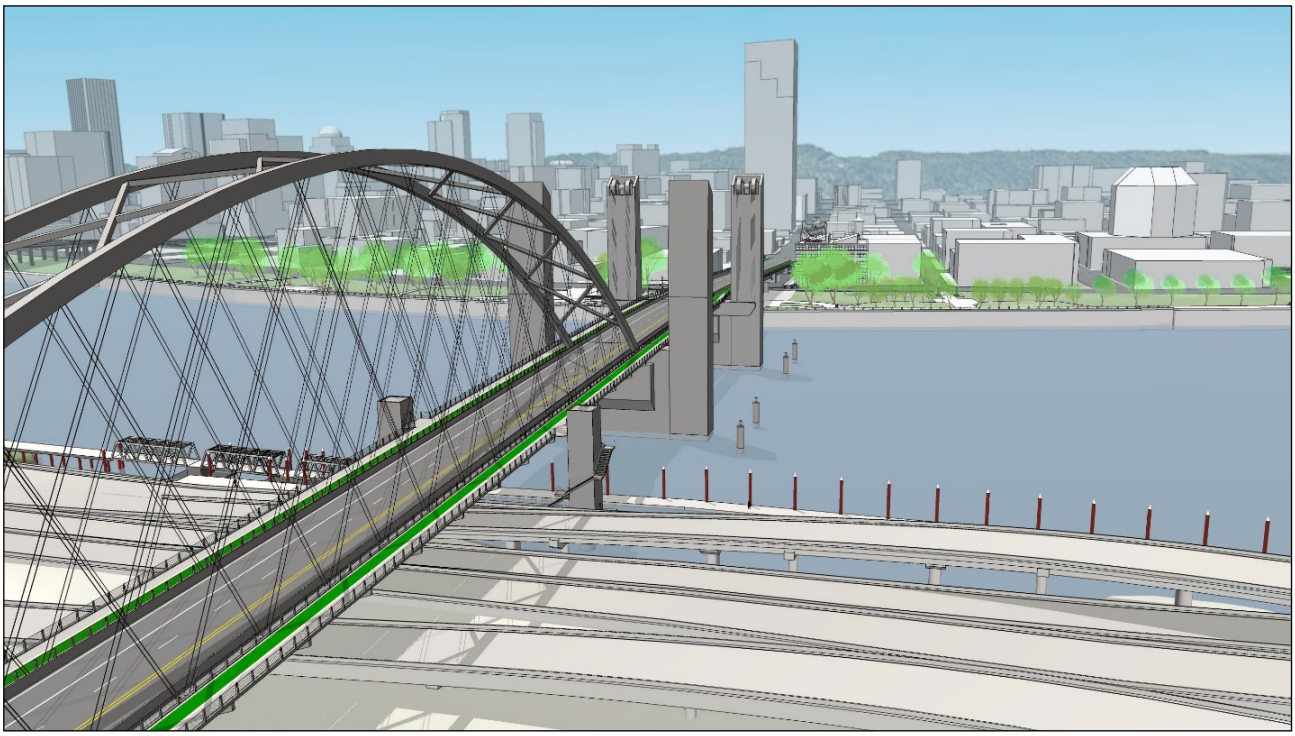

Figure 35: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking southwest (Fat Pencil Studio, 2021).

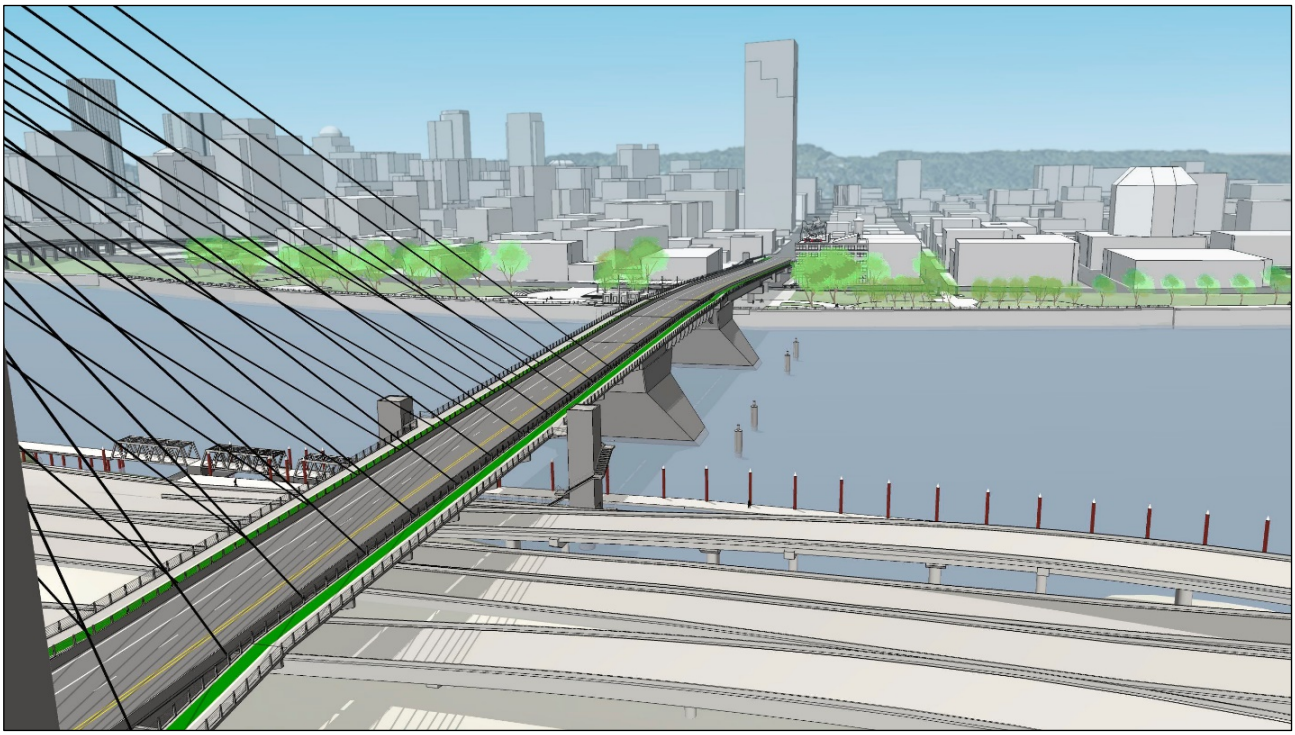

Figure 36: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking southwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

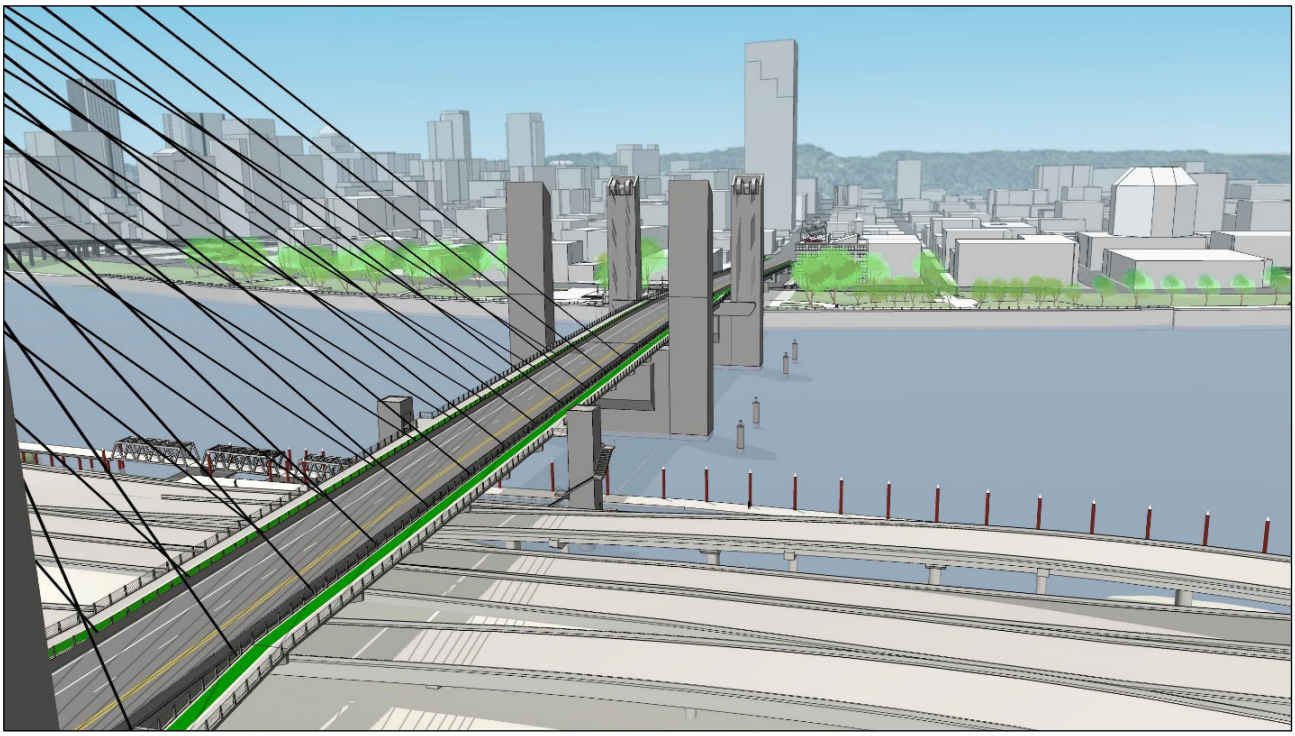

Figure 37: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking southwest (Fat Pencil Studio, 2021).

Figure 38: Artist's rendering of existing condition of the Burnside Bridge, view looking south (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 39: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking south (Fat Pencil Studio, 2021).

Figure 40: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking south (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 41: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking south (Fat Pencil Studio, 2021).

Figure 42: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking southwest (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 43: Artist's rendering of existing condition of the Burnside Bridge, view looking north (Fat Pencil Studio, 2021).

Figure 44: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking north (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 45: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking north (Fat Pencil Studio, 2021).

Figure 46: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking north (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 47: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking southwest (Fat Pencil Studio, 2021).

Figure 48: Artist's rendering of existing condition of the Burnside Bridge, view looking southeast (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

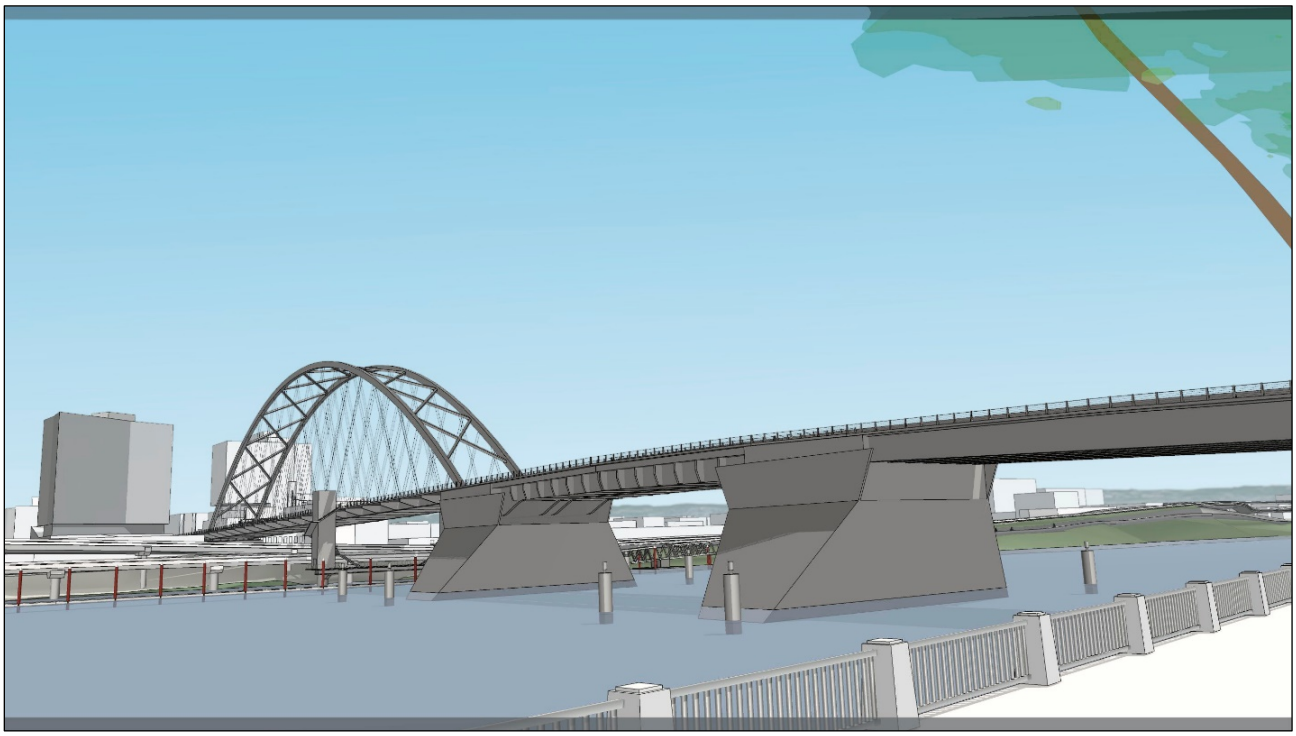

Figure 49: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking southeast (Fat Pencil Studio, 2021).

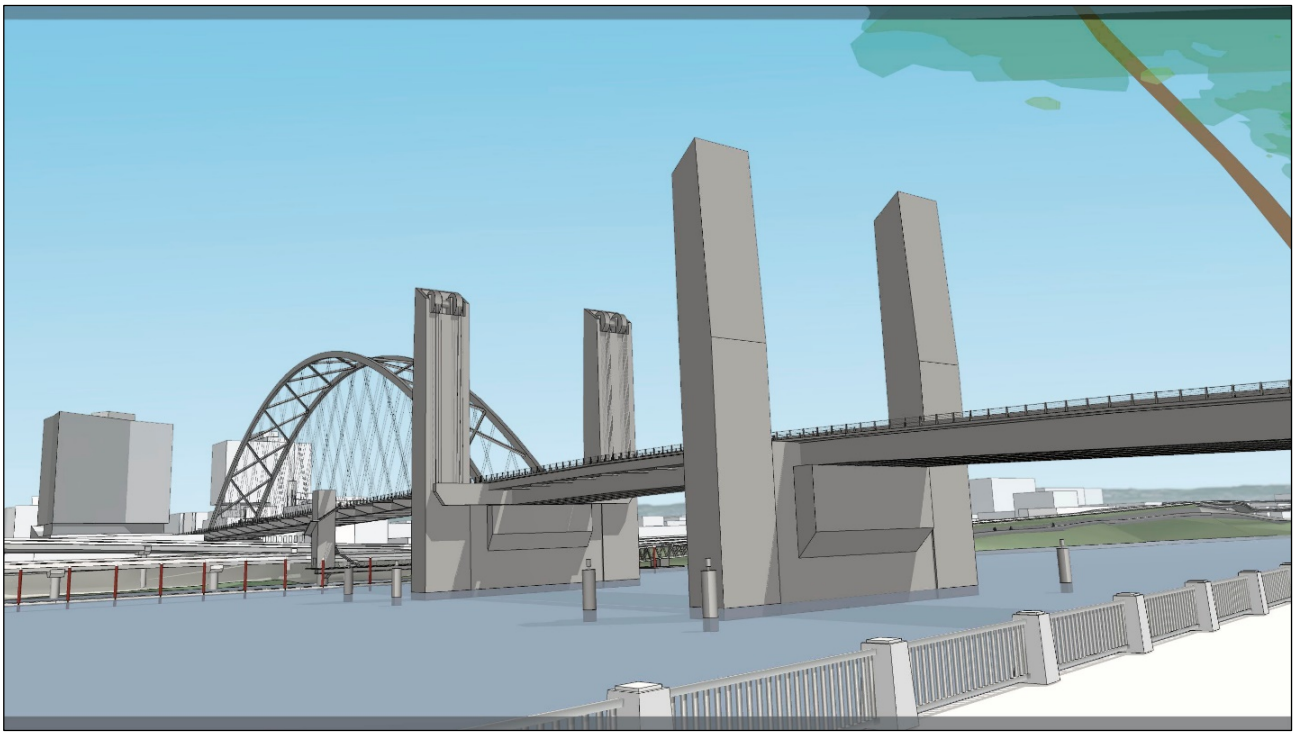

Figure 50: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking southeast (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

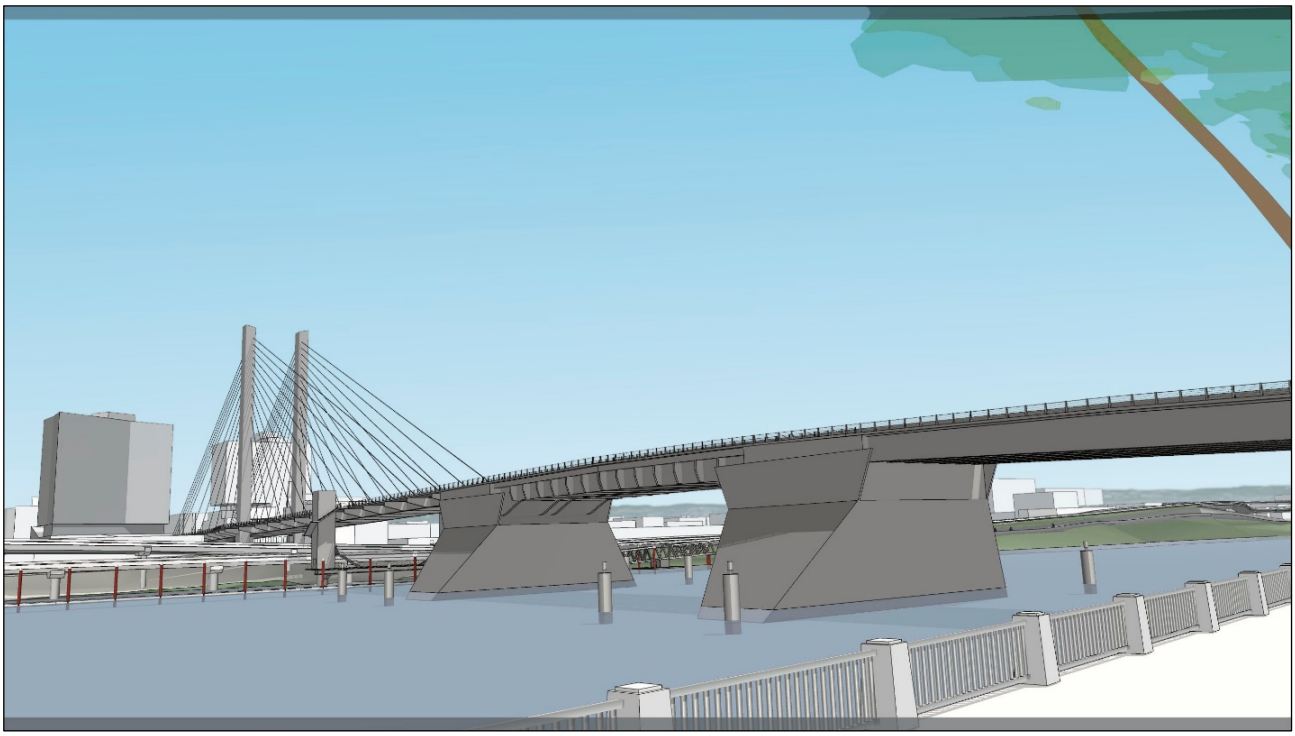

Figure 51: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking southeast (Fat Pencil Studio, 2021).

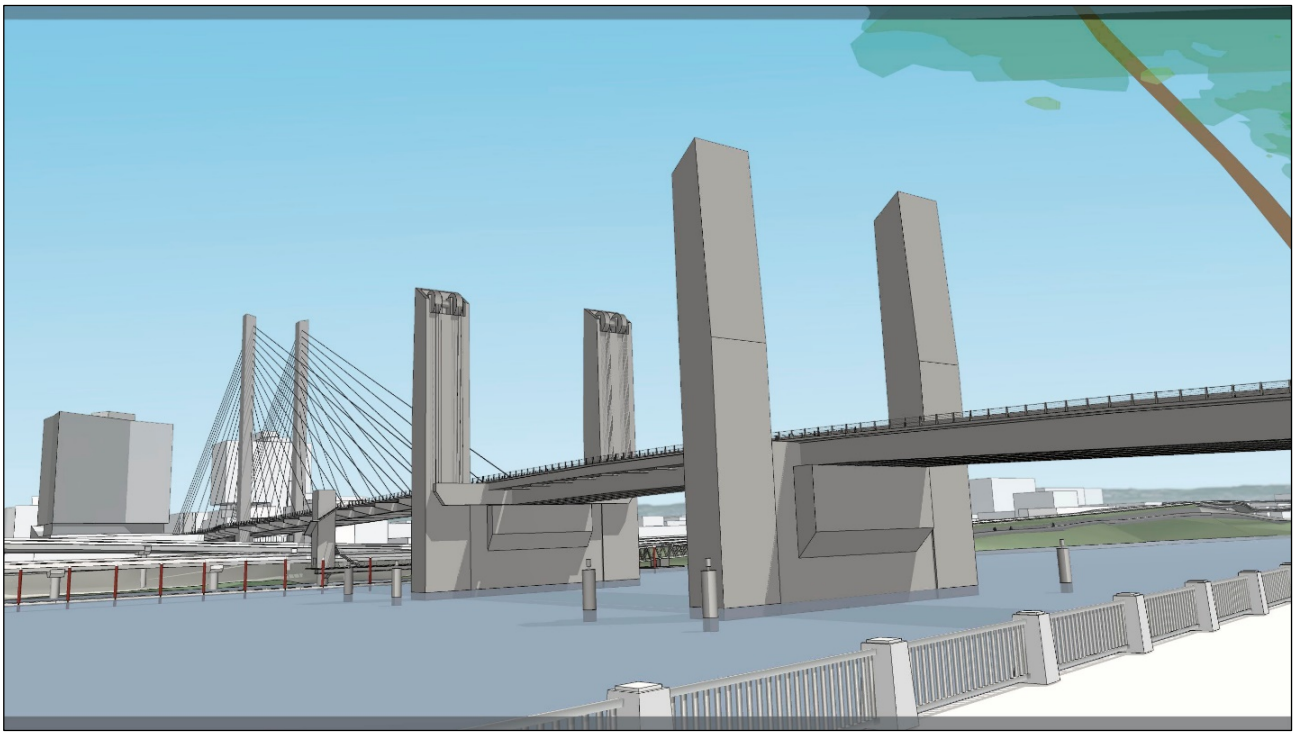

Figure 52: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking southeast (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

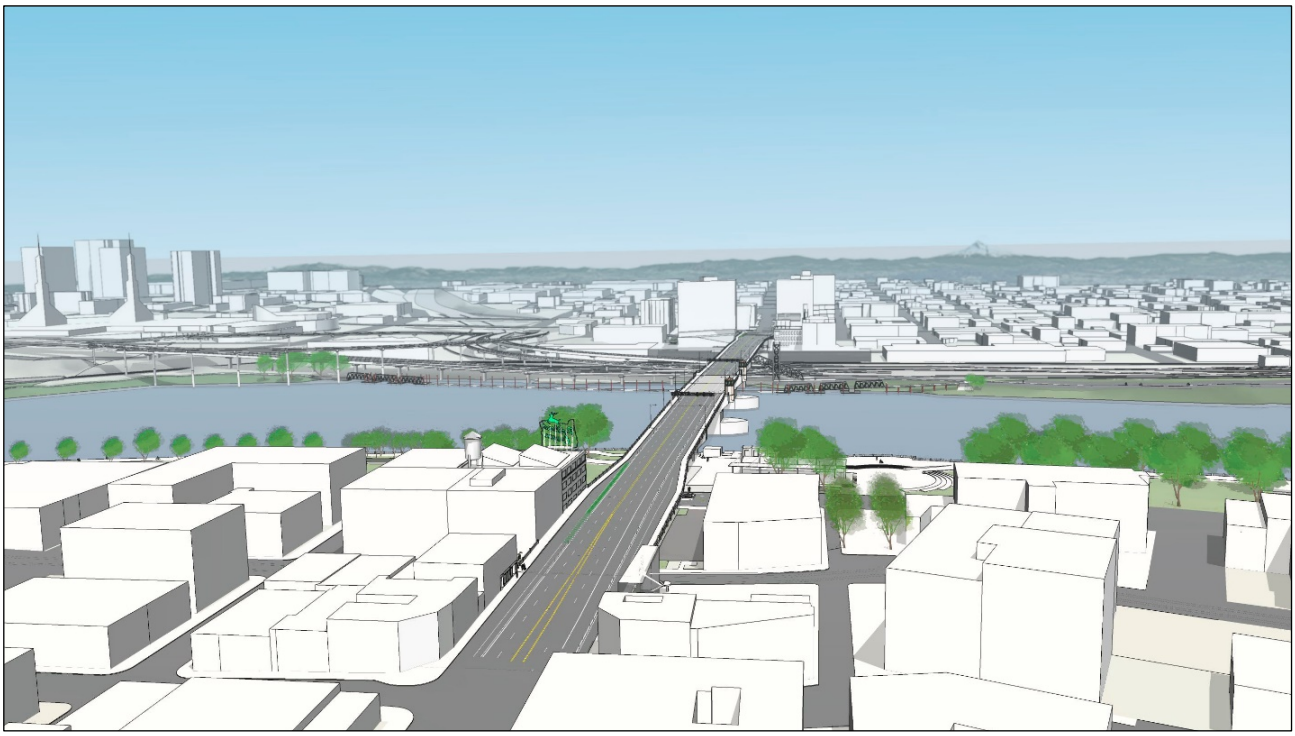

Figure 53: Artist's rendering of existing condition of the Burnside Bridge, aerial view looking east (Fat Pencil Studio, 2021).

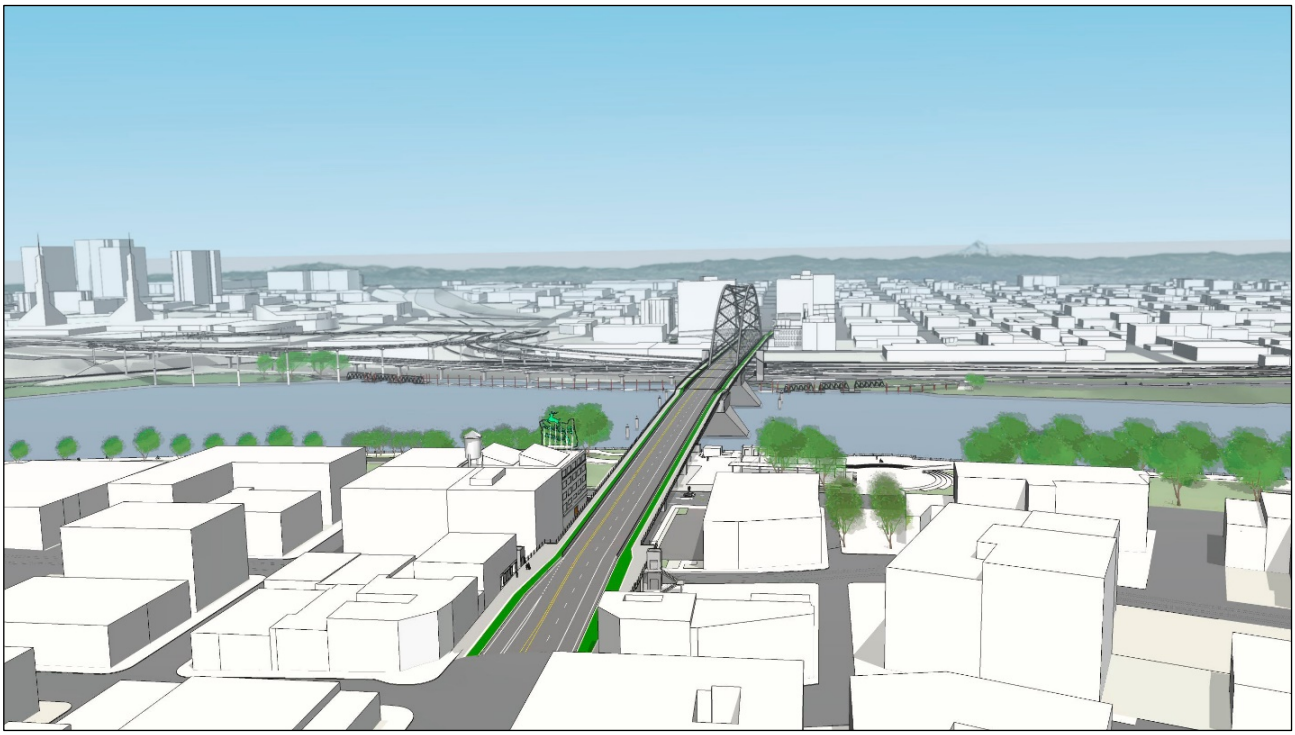

Figure 54: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

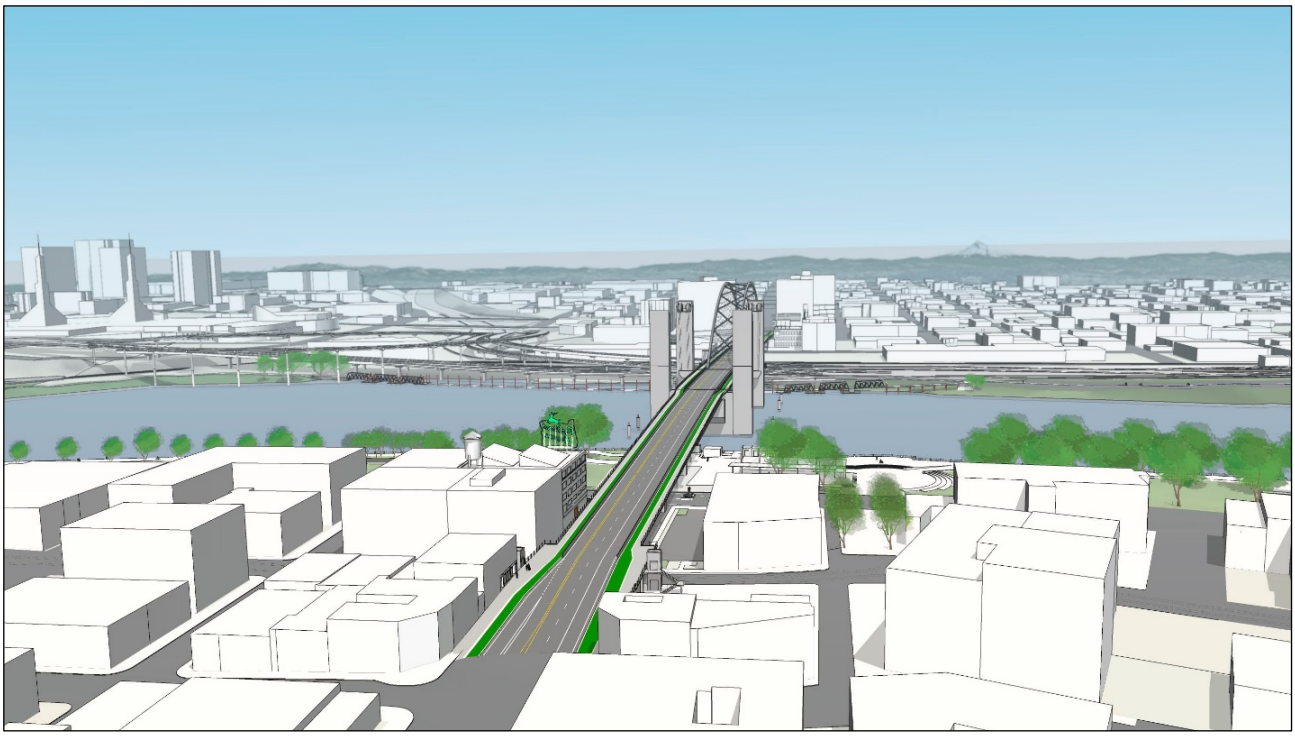

Figure 55: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

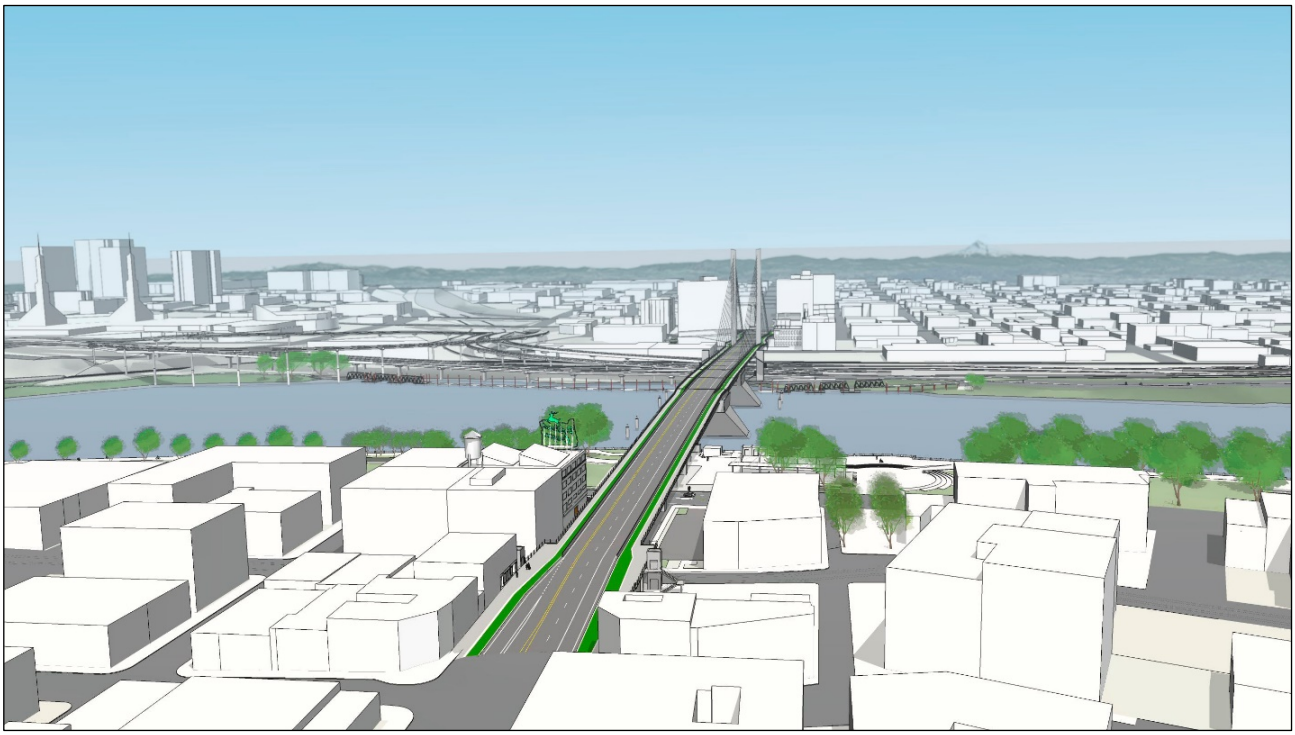

Figure 56: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

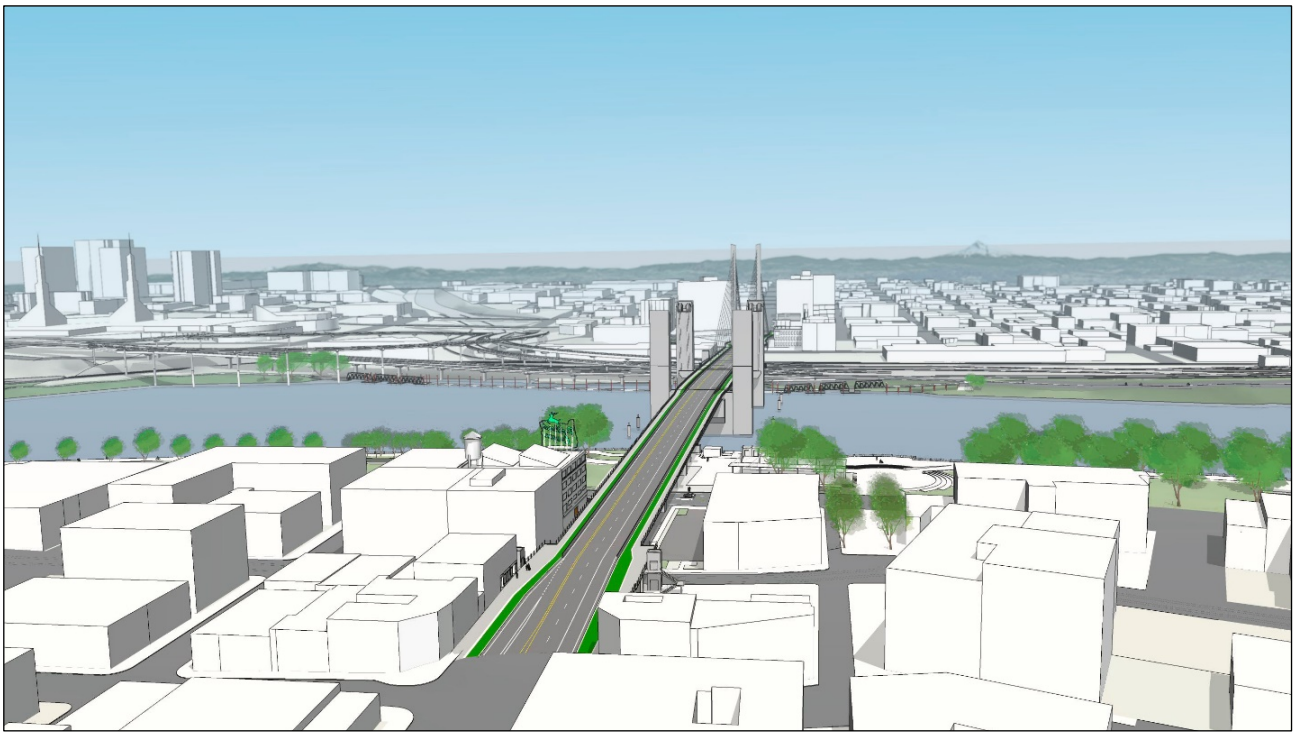

Figure 57: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

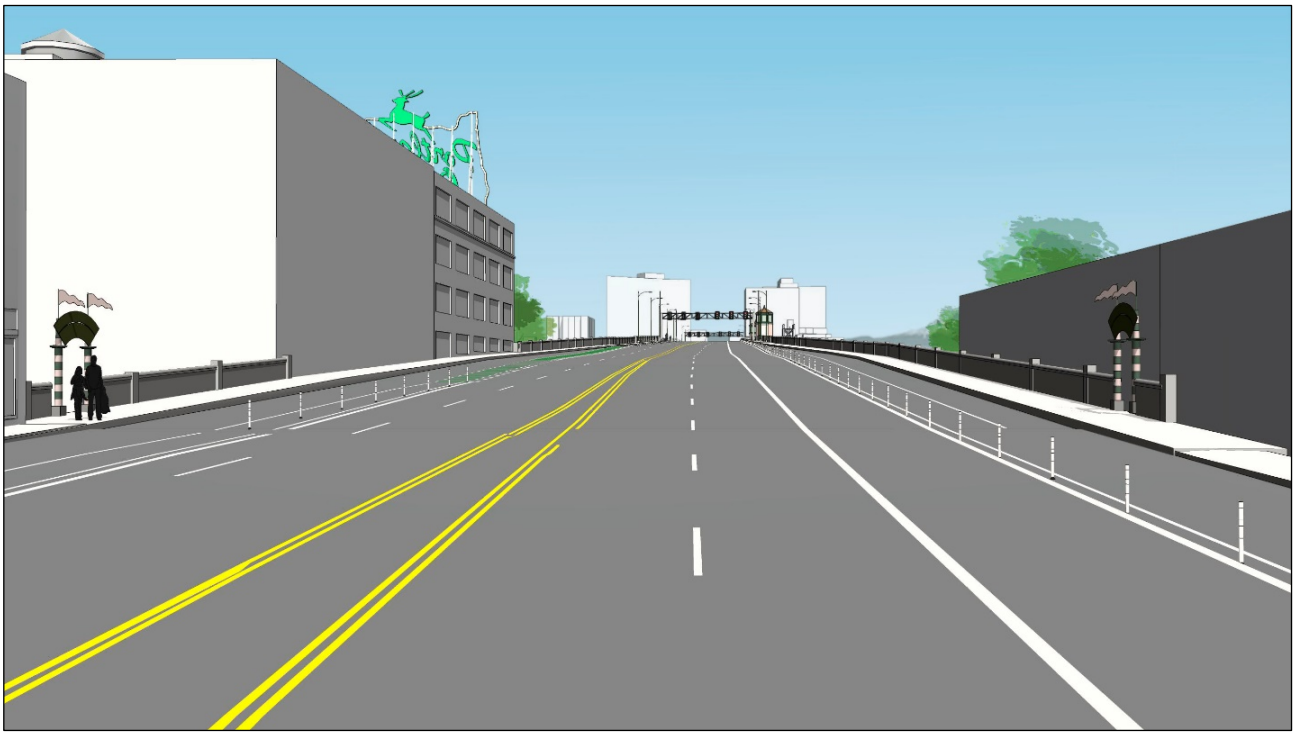

Figure 58: Artist's rendering of existing condition of the Burnside Bridge, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

Figure 59: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Figure 60: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

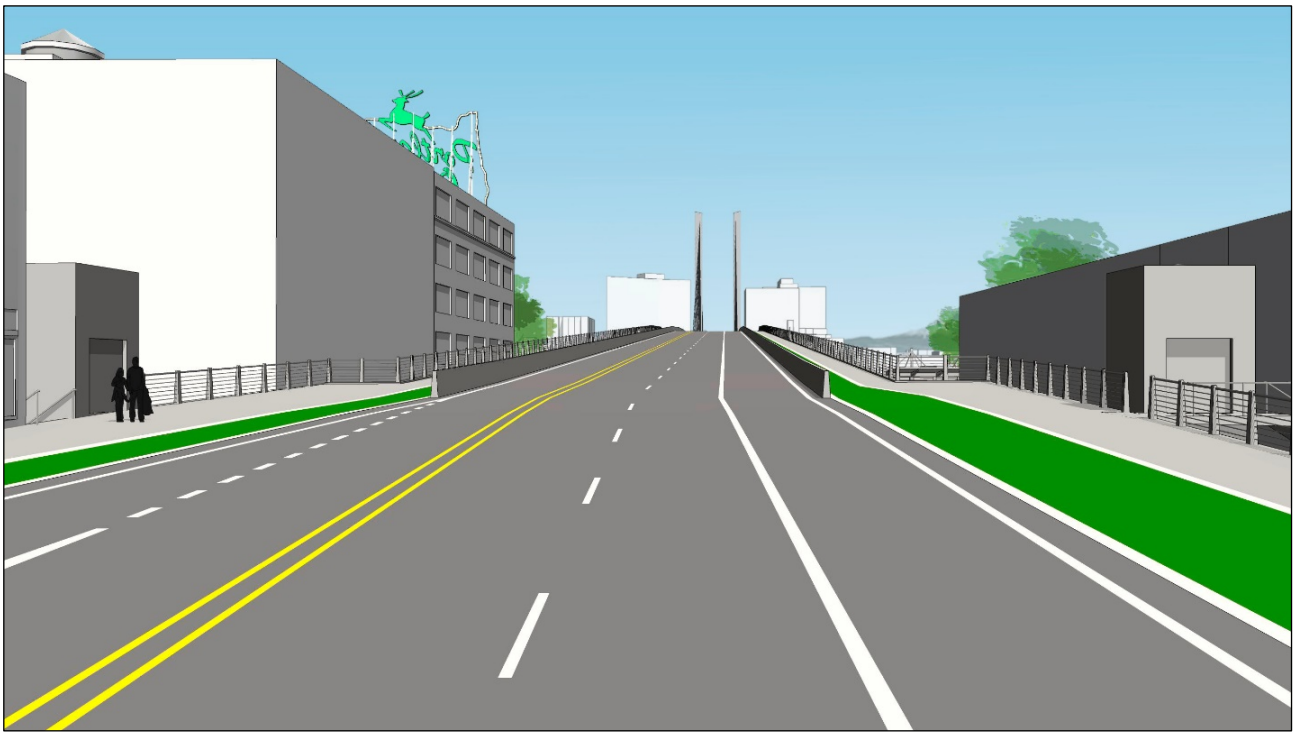

Figure 61: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

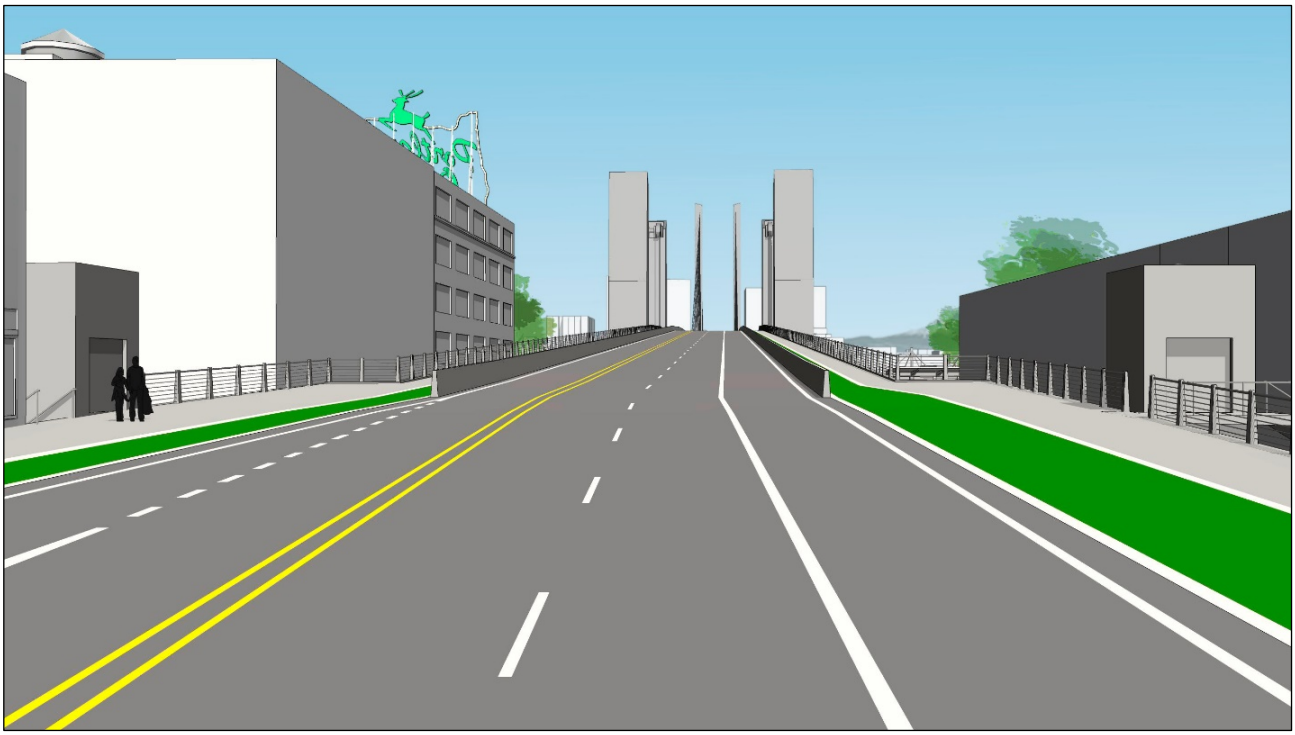

Figure 62: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

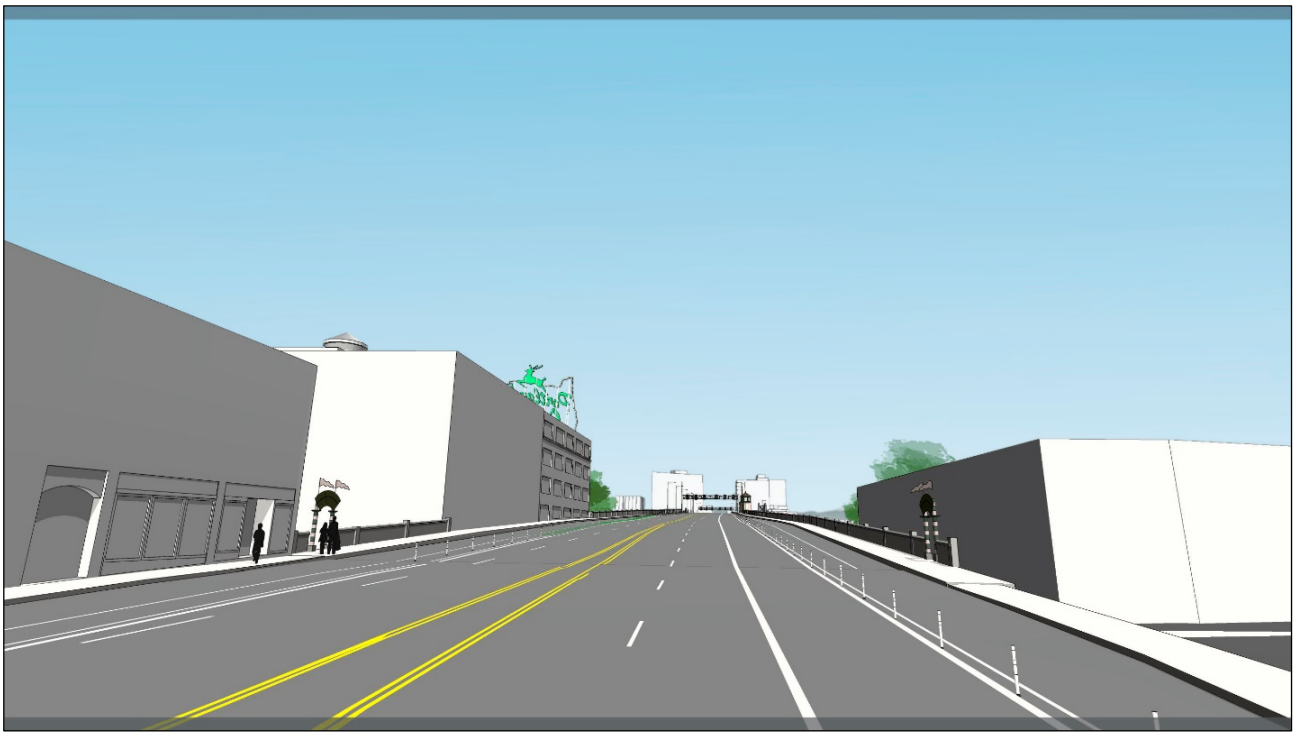

Figure 63: Artist's rendering of existing condition of the Burnside Bridge, view looking east (Fat Pencil Studio, 2021).

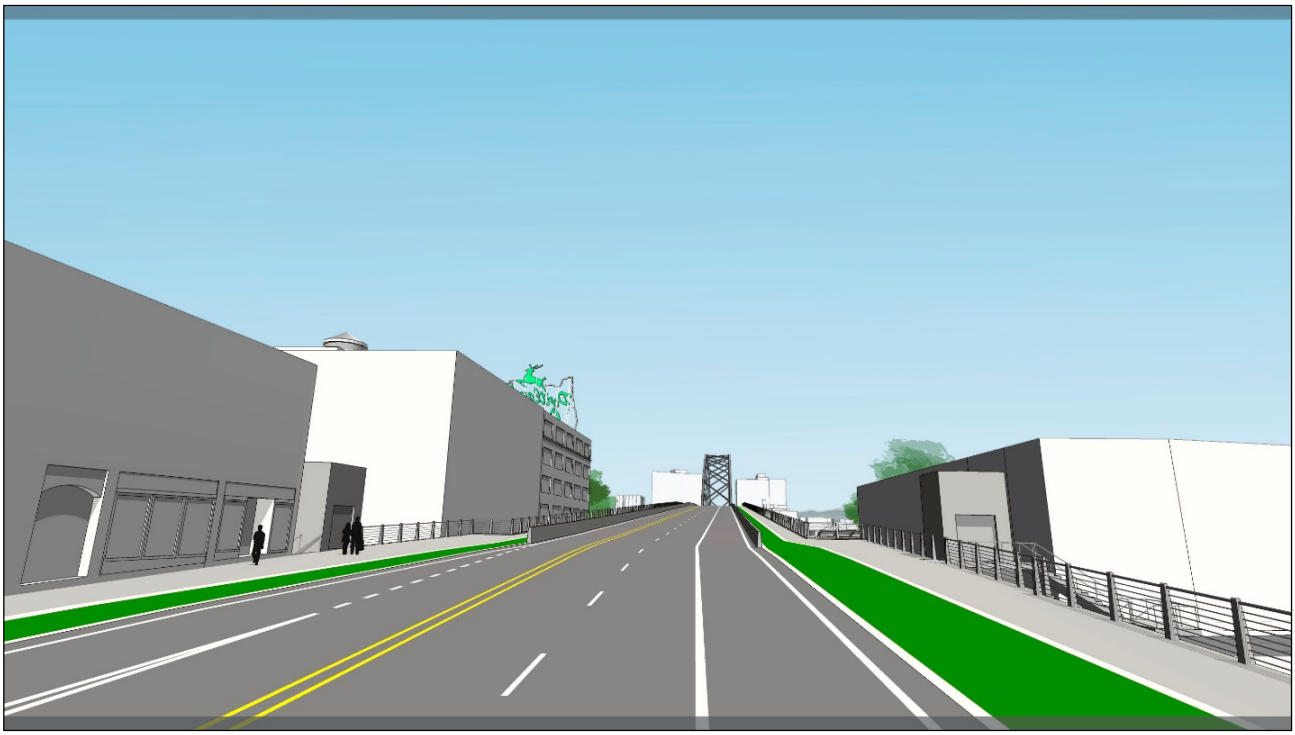

Figure 64: Span Combination 1 (girder west approach, bascule central span, tied arch east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

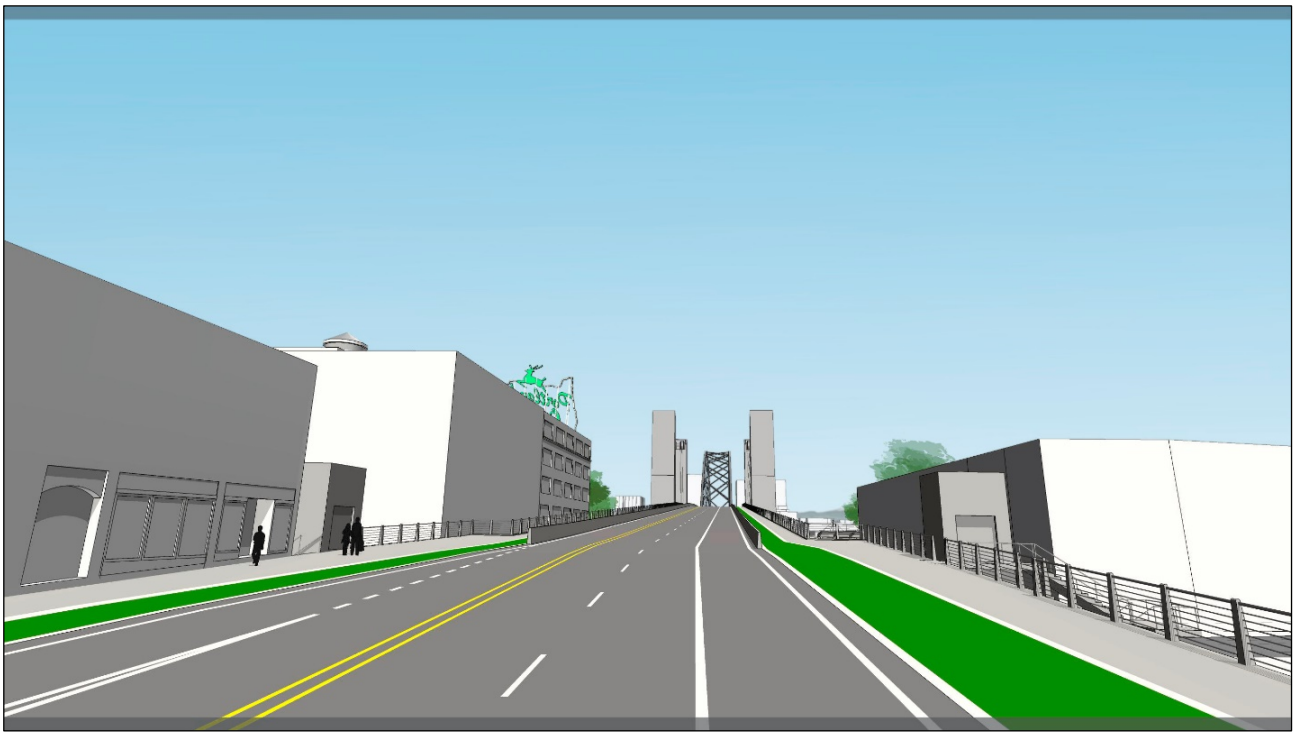

Figure 65: Span Combination 2 (girder west approach, vertical lift central span, tied arch east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Figure 66: Span Combination 3 (girder west approach, bascule central span, cable supported east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

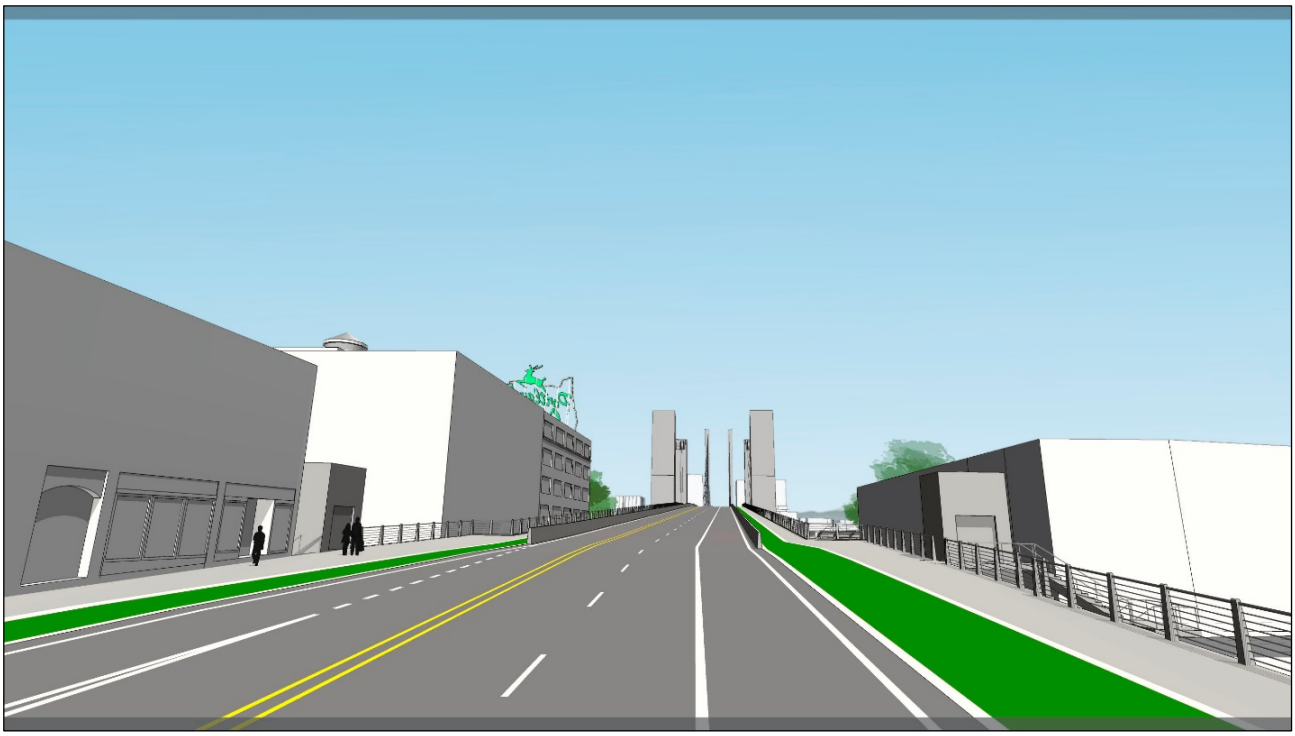

Figure 67: Span Combination 4 (girder west approach, vertical lift central span, cable supported east approach), artist's rendering, view looking east (Fat Pencil Studio, 2021).

Figure 68: Artist's rendering of existing condition of the Burnside Bridge, view looking west (Fat Pencil Studio, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Skidmore/Old Town Historic District (NHL)	
Street Address: Multiple	City, County: Portland, Multnomah

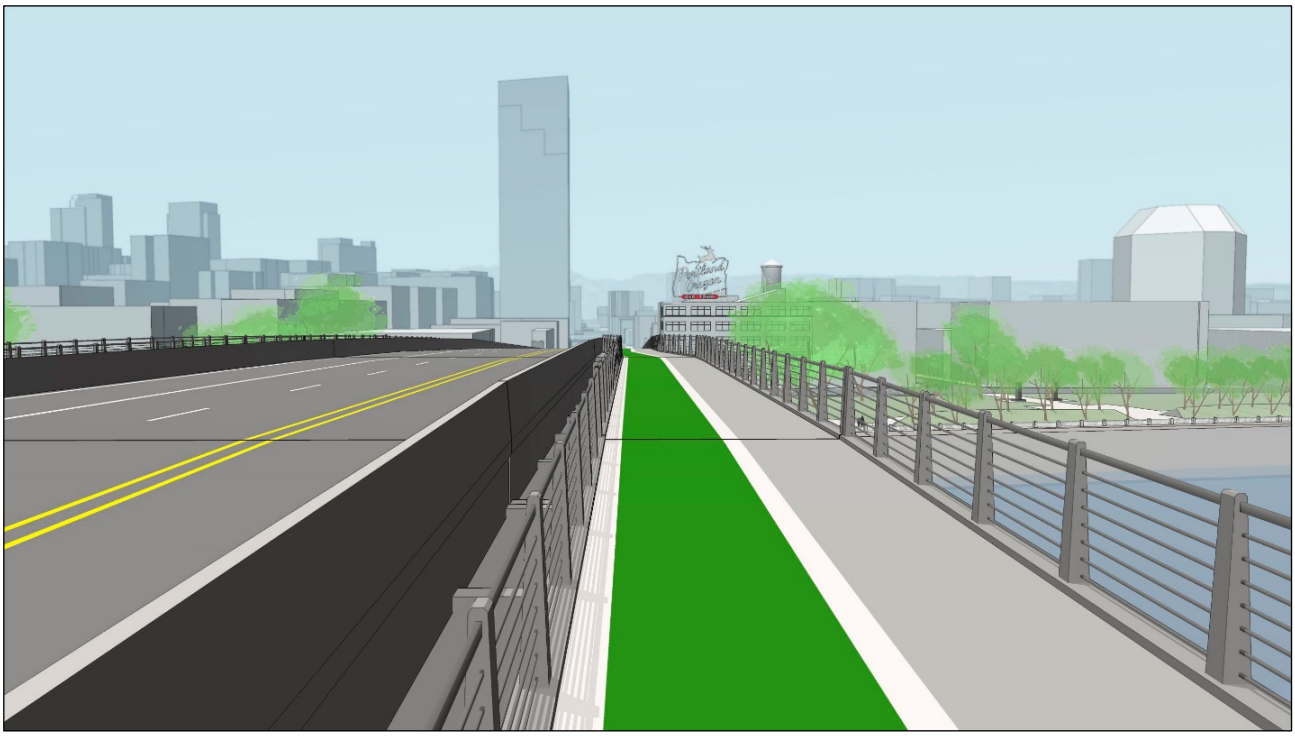

Figure 69: Artist's rendering of replacement center span (bascule option), view looking west (Fat Pencil Studio, 2021).

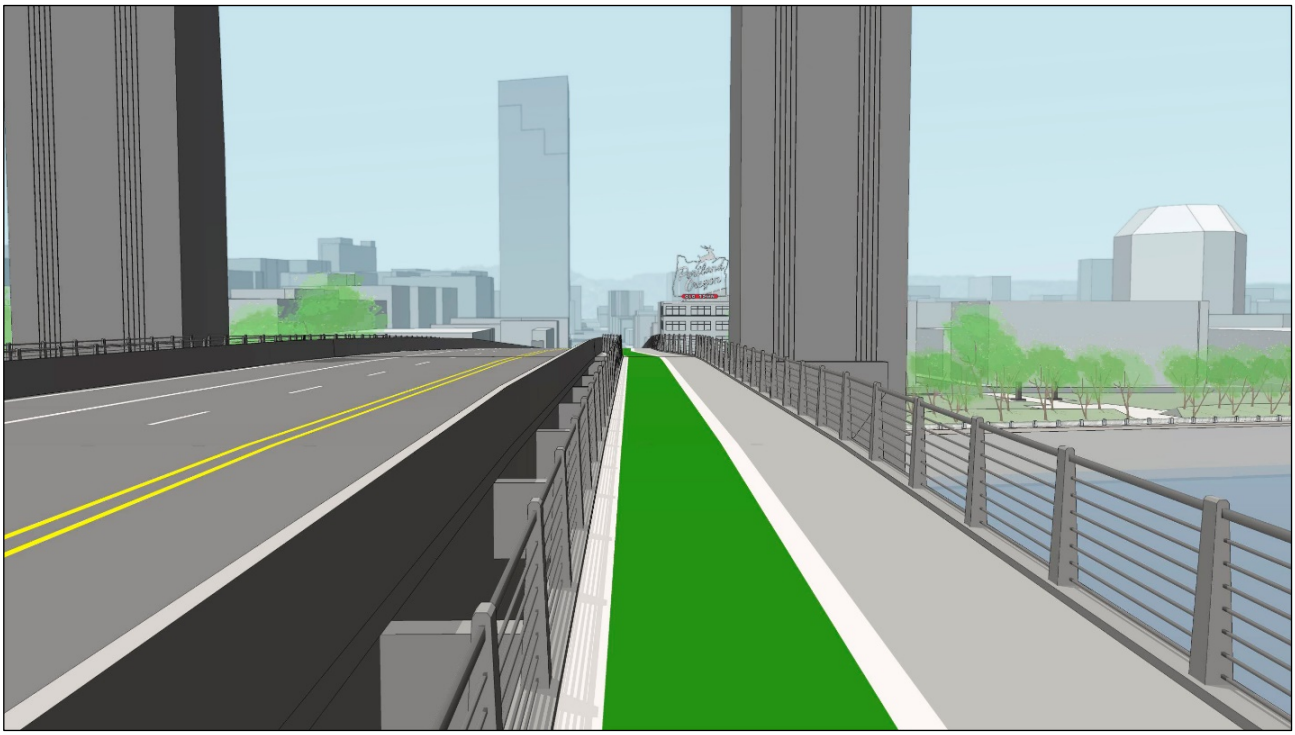

Figure 70: Artist's rendering of replacement center span (vertical lift option), view looking west (Fat Pencil Studio, 2021).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))		
Property Name: Oregon & California Railroad/Union Pacific Railroad (UPRR)	Street Address:	
City, County: Portland, Multnomah	Latitude: 45.522185 Longitude: (-)122.669294	
Surveyor: Elizabeth O'Brien	Affiliation: WillametteCRA	Date Recorded: 07/12/2019

Photo:

Photo Caption: Oregon & California Railroad (UPRR), facing south from Burnside Bridge (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Oregon & California Railroad/Union Pacific Railroad (UPRR)	
Street Address:	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. Willamette Cultural Resources Associates (WillametteCRA) has recommended the Oregon & California Railroad (UPRR) as individually eligible for listing on the National Register of Historic Places. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the Oregon & California Railroad (UPRR). This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would require replacing the existing bridge with a new bridge on the same alignment as the current bridge. The number of bents on the eastern approach would be reduced from five to one in the viewshed of the UPRR (existing bents would be removed only to ground level). Other than demolition of the current approach span and construction of a new span, no other activities are proposed at this time in the vicinity of the Oregon & California Railroad (UPRR).

3. Identification and Description of the Historic Resource

The UPRR within the APE/API extends from the intersection of I-5 and I-84 south to the hypothetical extension of SE Ash Street west of SE 1st Avenue (a distance of approximately 1,200 feet). Constructed in 1868 as the Oregon & California Railroad, it was the first major north-south railroad in Oregon. It was incorporated into the Southern Pacific Railroad system in the 1880s; the Southern Pacific system was acquired by the Union Pacific RR in 1996.

Initiated as the Oregon & California Railroad (O&C) or East Side Company, the rail line was planned for construction on the east bank of the Willamette River in competition with its rival, the West Side Company. The two companies fought to obtain land rights approval and a grant from the Oregon State Legislature. After considerable political maneuvering and legal battles, the East Side Company with its leader Ben Holladay built the east side railroad (Cain 2003; Ganoe 1924). Construction began in 1868 and continued in several phases. It reached Roseburg in 1872 and connected to the Southern Pacific rail line in Ashland in 1887 and eventually absorbed into the Southern Pacific Railroad (Corning 1989).

An 1879 panoramic view of Portland, Oregon depicts the railroad not more than a decade after it was built. The railroad was then situated on the west boundary of the East Portland plat on First Avenue near the water's edge. At that time, the rail line was built up on what appears to be a raised berm and in other places a timber trestle. The line was noted as the "Oregon & California R.R." at that time (Glover 1879). The 1889 Sanborn Map shows the railroad running along First Avenue, the immediate area not yet built up and the waterline not more than a block away (Sanborn Map 1889). In the 1920s, a number of tracks, including

spurs and sidelines, paralleled the early alignment from First to Second Avenues serving local businesses and industry (Sanborn Maps Sanborn Map 1924-1928).

Benjamin Holiday was influential in the initial stages of building the Oregon & California Railroad. Before coming to Portland, he built successful businesses supplying and freighting goods. He took on the East Side Railroad to see it built (Oregon Historical Society 2019). Known for questionable business practices and reckless spending, he eventually lost his interest in the railroad, but was unquestionably influential in the early railroad development of Oregon.

The Oregon & California RR/UPRR is recommended eligible for listing in the NRHP under Criteria A and B.

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the “No-Build Pre-Earthquake” alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the “No-Build Post-Earthquake,” which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge

due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

The proposed Refined Long-span alternative would involve construction of a new bridge on the same alignment of the current bridge. The railroad is presently framed by two bents supporting the eastern approach of the Burnside Bridge (Figure 3). The Refined Long-span alternative would eliminate the bents on both sides of the UPRR. The tied-arch span would construct a bent along NE/SE 2nd Avenue, some distance to the east. The cable-stayed span would construct massive support towers to the east (Figures 4 and 5). According to 36 CFR Part 800.5(a)(1), adverse effects occur when an undertaking directly or indirectly alters characteristics of a historic property that qualify it for inclusion in the NRHP; future and cumulative effects of the undertaking also need to be considered. An example listed in 800.5(a)(2) is "visual, atmospheric, or audible intrusions" (36 CFR 800.5). The undertaking will not affect the integrity of location, design, materials, feeling, workmanship, and association of the Oregon & California Railroad (UPRR). Elimination of the existing bents would alter the setting, providing a more open view. The current setting is entirely dominated by transportation features and structures. Reduction of the number of bents would not alter this setting. In sum, the project will have a No Adverse Effect on the Oregon & California RR (UPRR) historic property.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge Project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG..

7. Conclusion

It is the recommendation of WillametteCRA, on behalf of ODOT, that the proposed Refined Long-span alternative would not adversely affect the Oregon & California Railroad (UPRR)'s eligibility for listing under Criteria A and B nor its integrity. WillametteCRA recommends a Finding of No Adverse Effect for this historic property.

8. Sources

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1924-1928 *Insurance Maps of Portland, Oregon*. Sanborn Map & Publishing Company, New York, Portland, Oregon.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Oregon & California Railroad/Union Pacific Railroad (UPRR)	
Street Address:	City, County: Portland, Multnomah

Maps and Figures

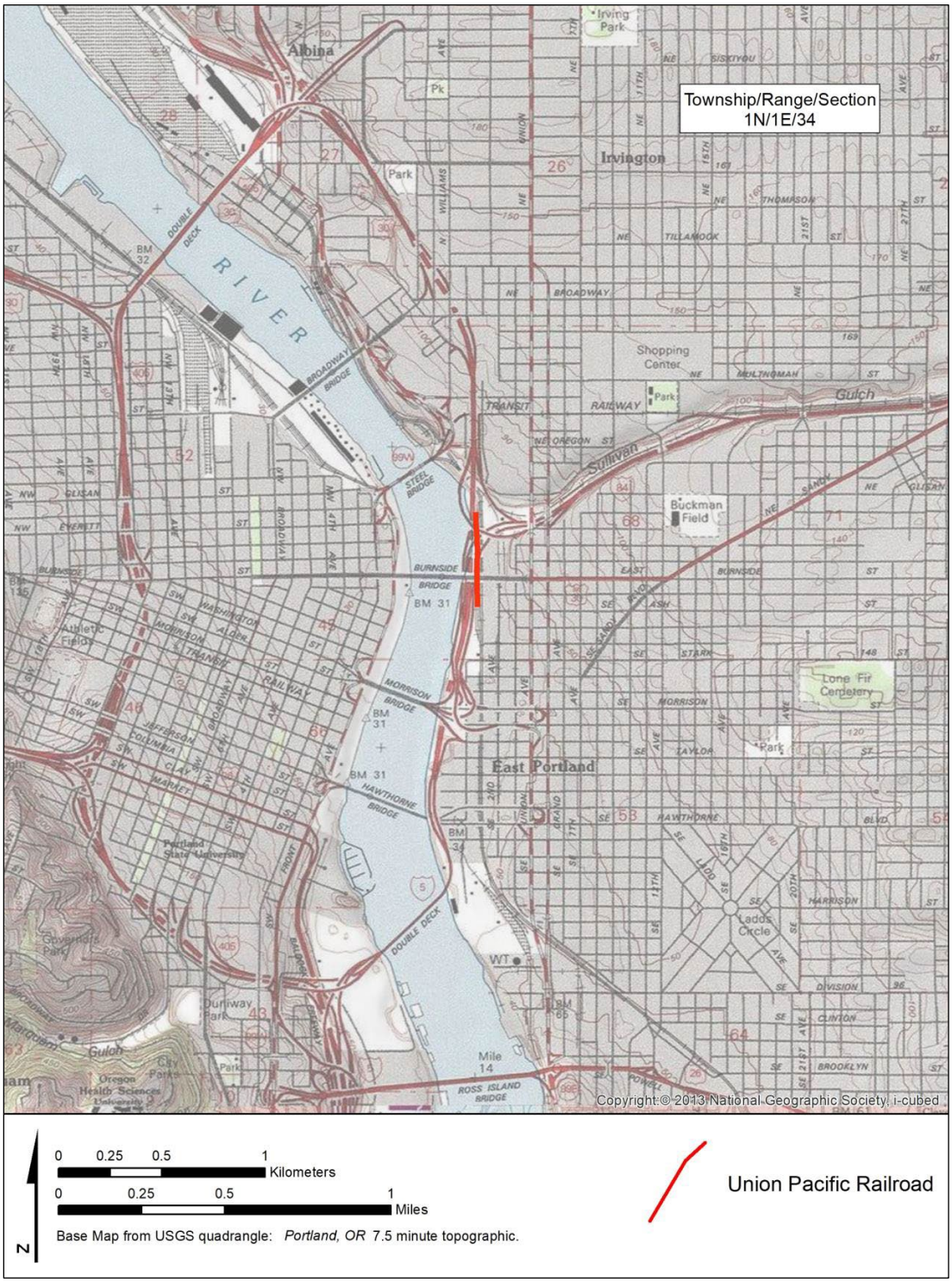

Figure 1. Location map.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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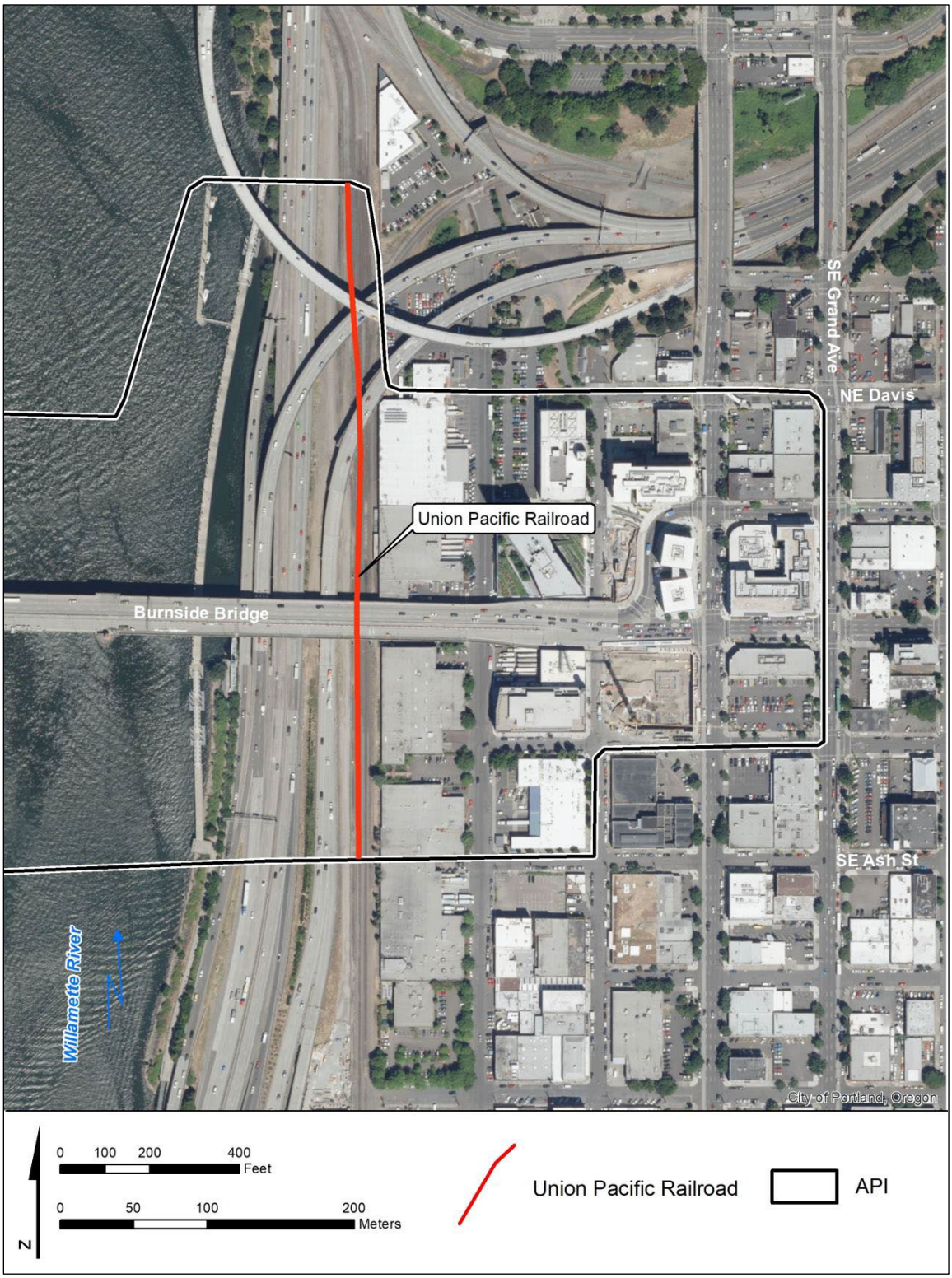

Figure 2. Oregon & California RR (UPRR) within the EQRB API & APE.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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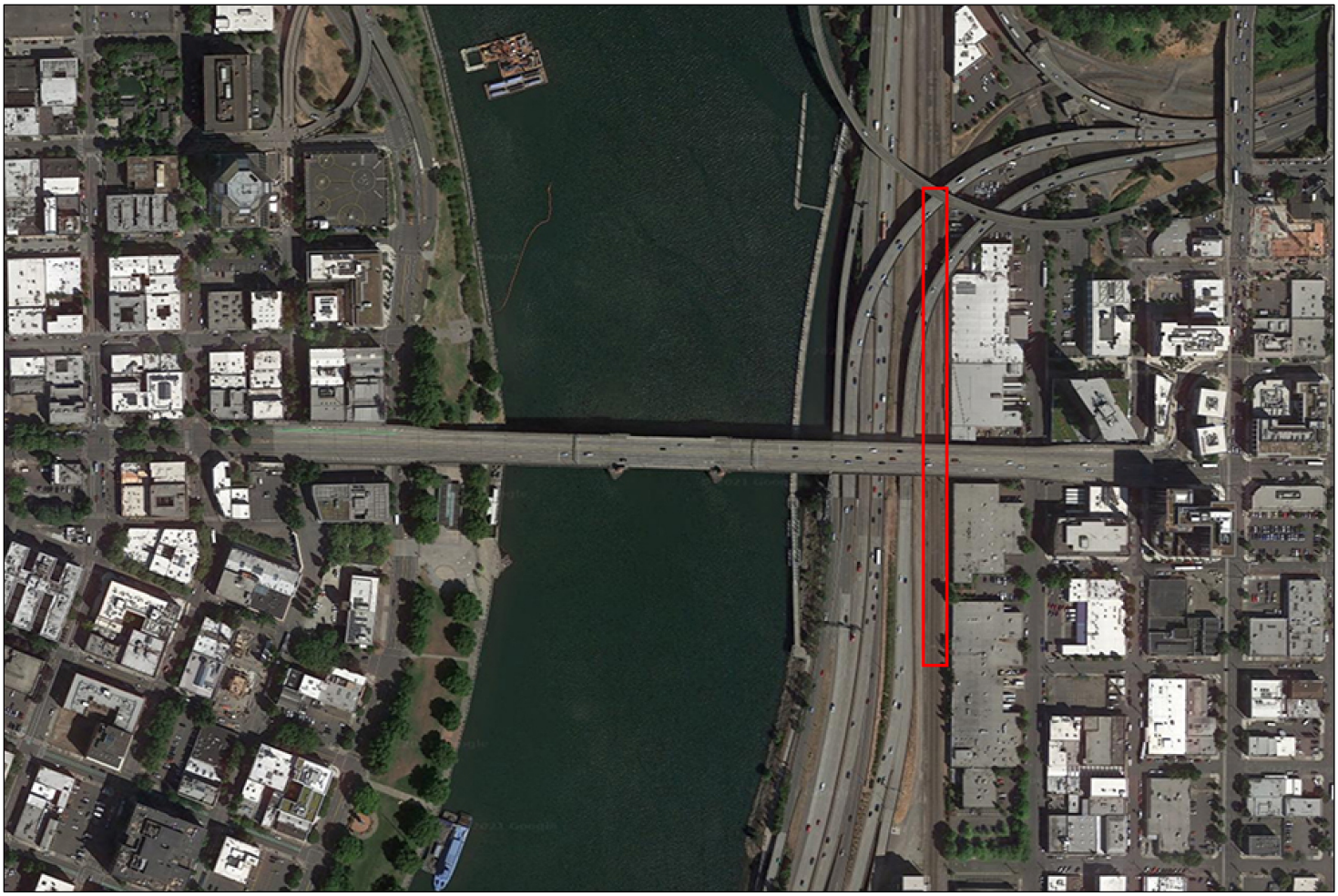

Figure 3. Aerial photograph with location of Oregon & California Railroad (UPRR) right-of-way indicated by red outline (Google Earth).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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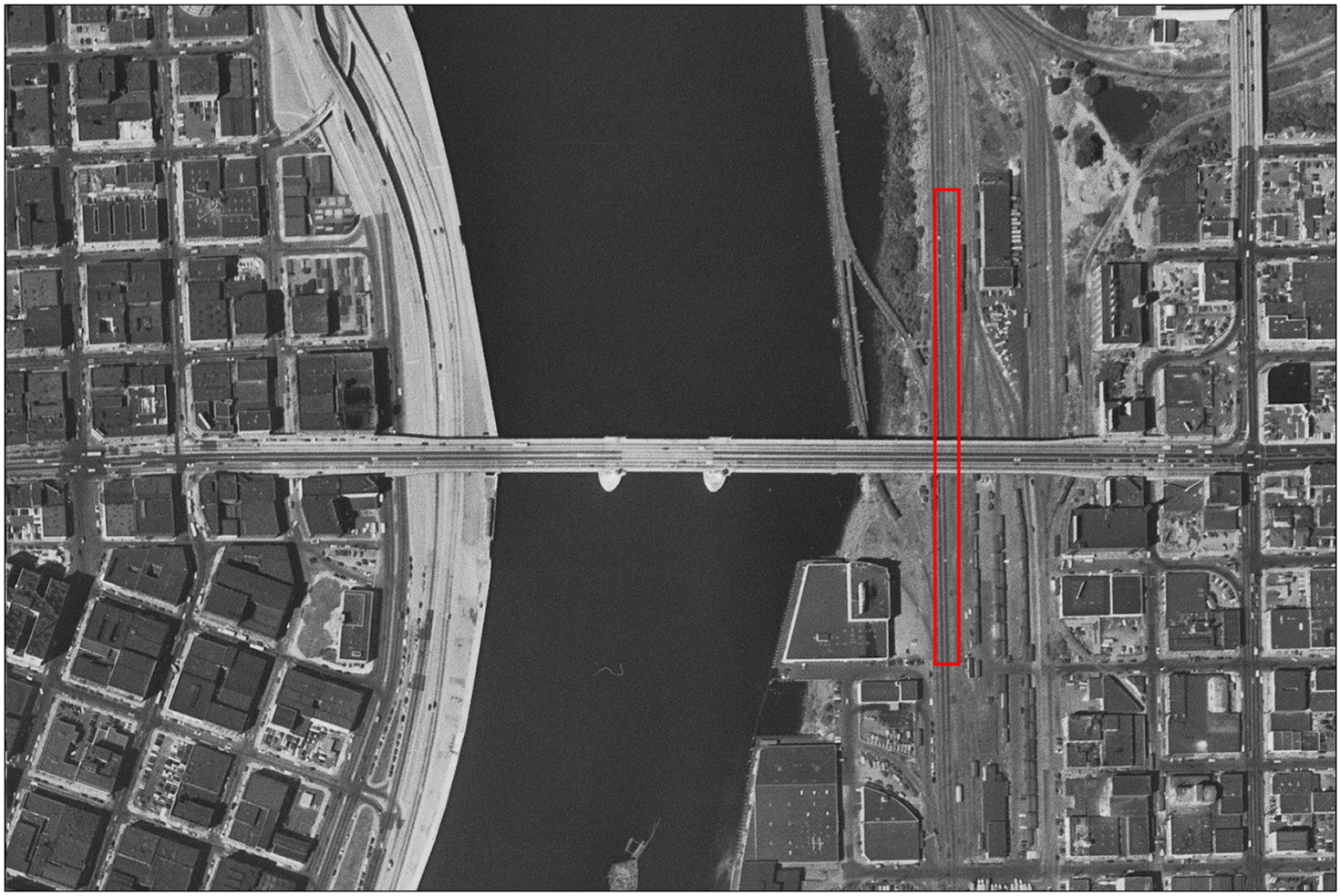

Figure 4. 1951 aerial photograph with location of Oregon & California Railroad (UPRR) right-of-way indicated by red outline (USGS EarthExplorer).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
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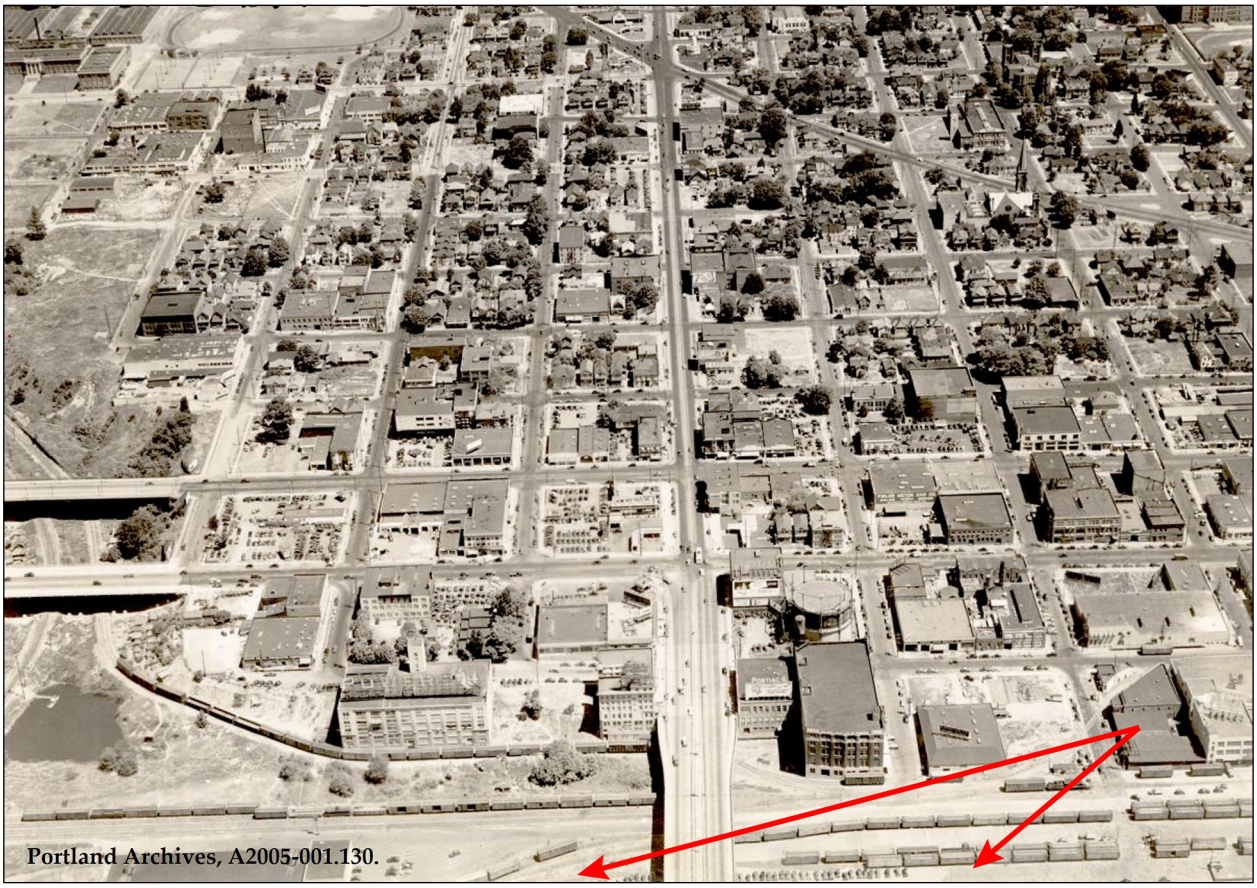

Figure 5. East end of the Burnside Bridge looking east, December 31, 1939. Red arrows indicate the Oregon & California Railroad (UPRR) right-of-way at the extreme bottom edge of the image (Portland Archives, A2005-001.130).

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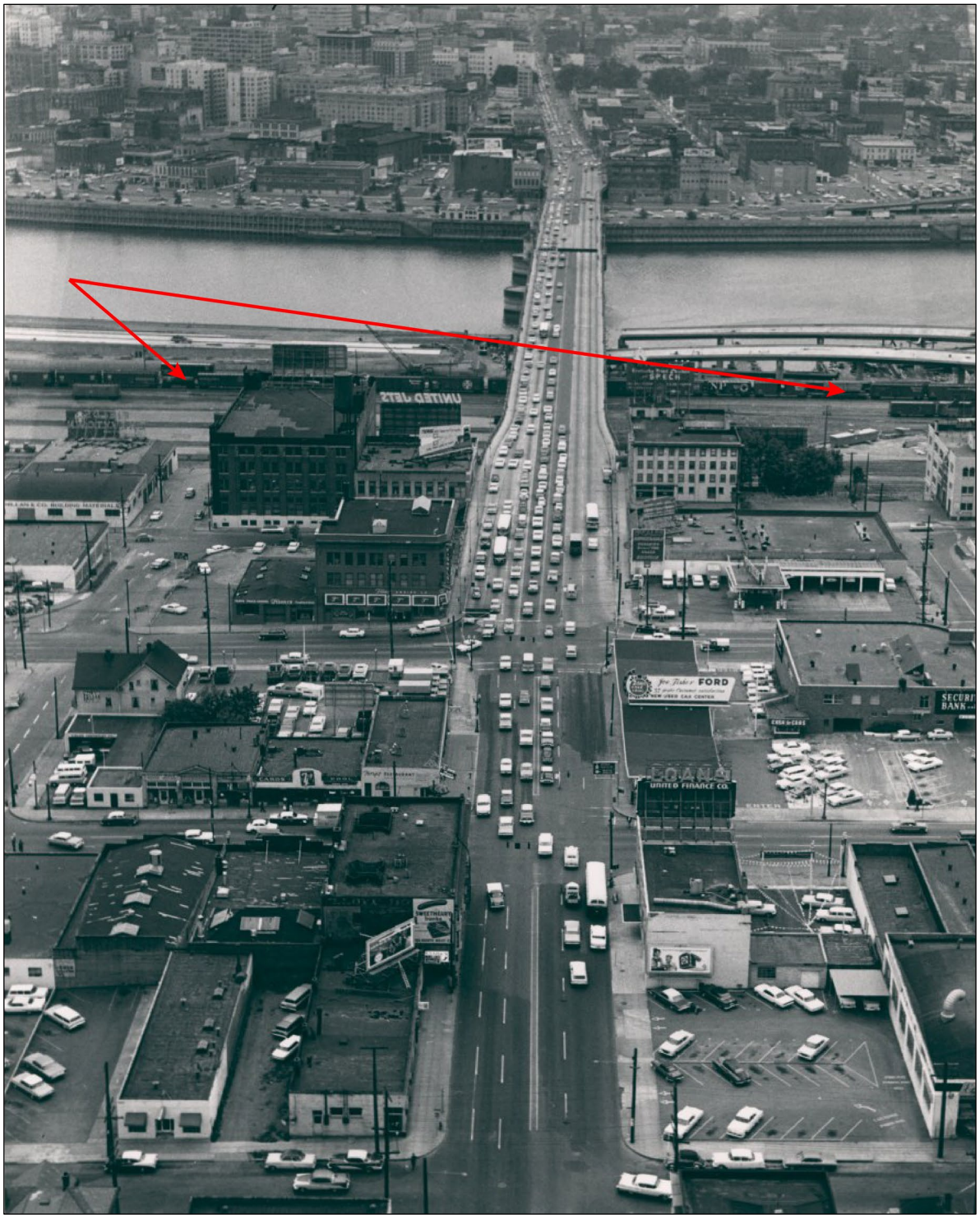

Figure 6. Burnside Bridge westbound, December 31, 1963. Red arrows indicate the Oregon & California Railroad (UPRR) right-of-way (Portland Archives A2005-001.106).

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Street Address:	City, County: Portland, Multnomah

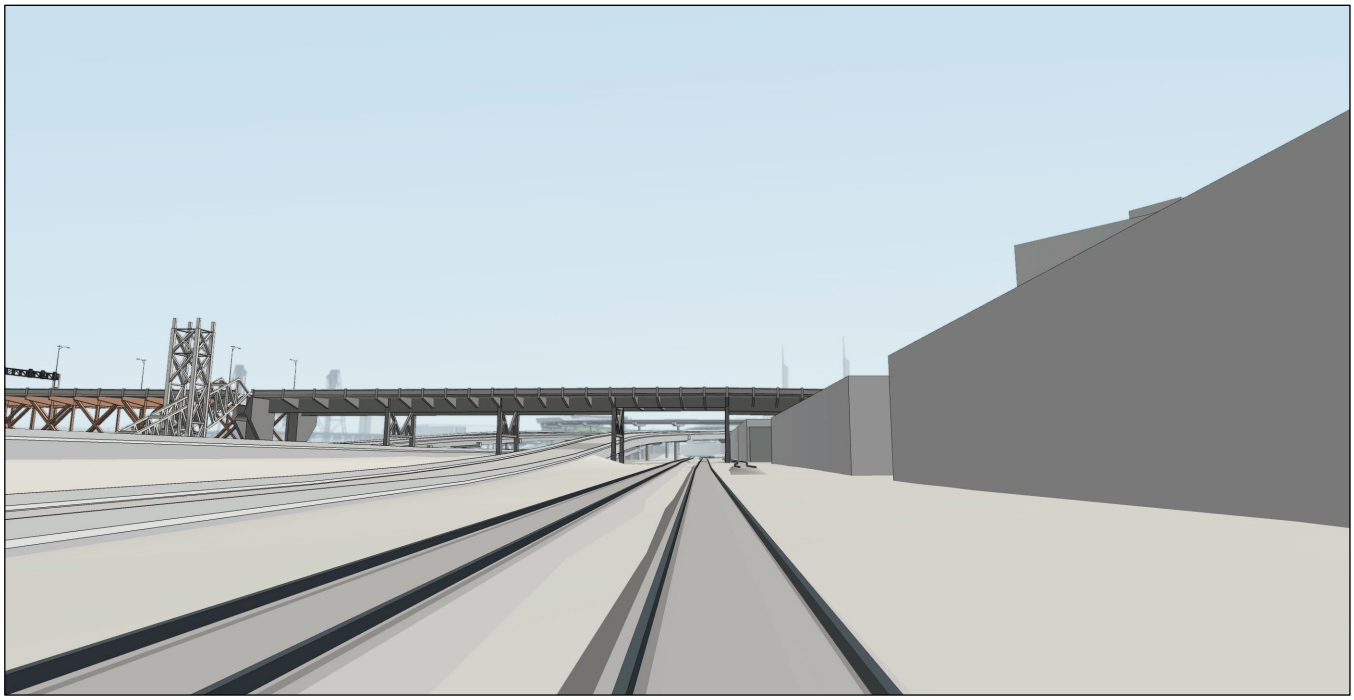

Figure 7. Oregon & California RR (UPRR) alignment looking north toward the Burnside Bridge undercrossing, artist's rendering of existing conditions (Fat Pencil Studio, 2021).

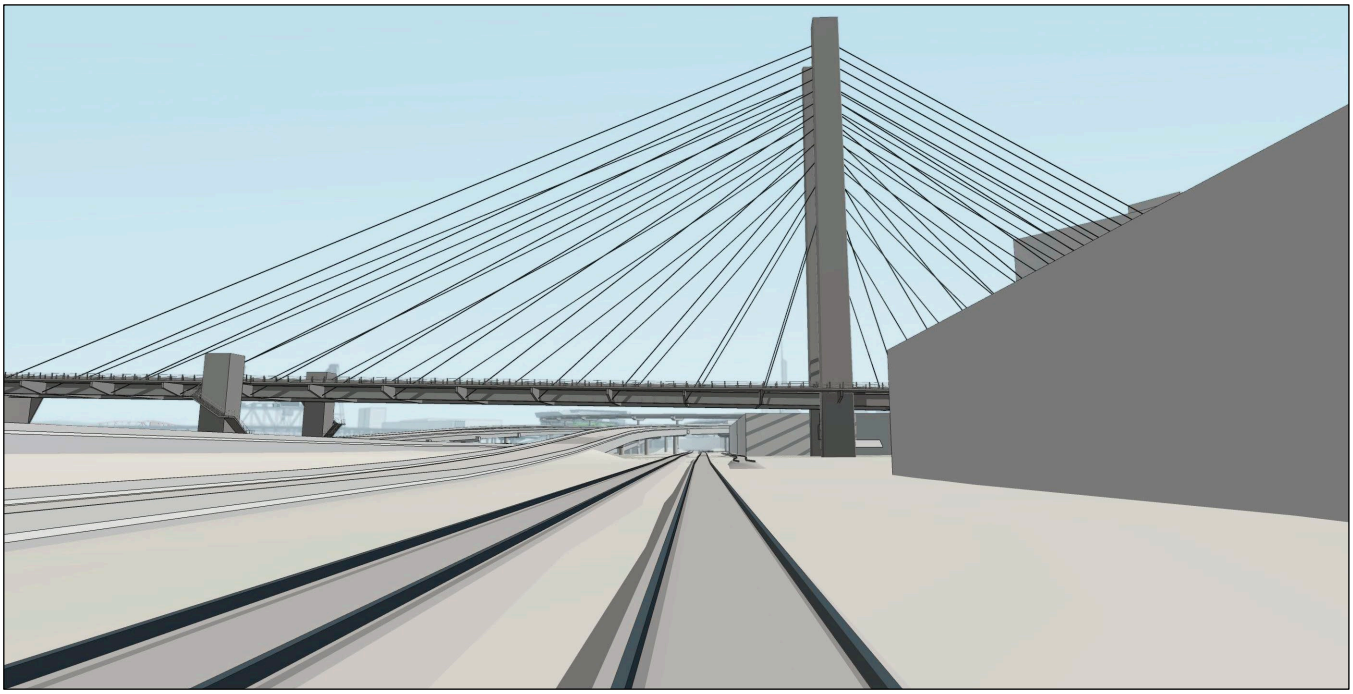

Figure 8. Oregon & California RR (UPRR) alignment looking north toward the Burnside Bridge undercrossing, artist's rendering of proposed new eastern approach with cable-stayed structure (Fat Pencil Studio, 2021).

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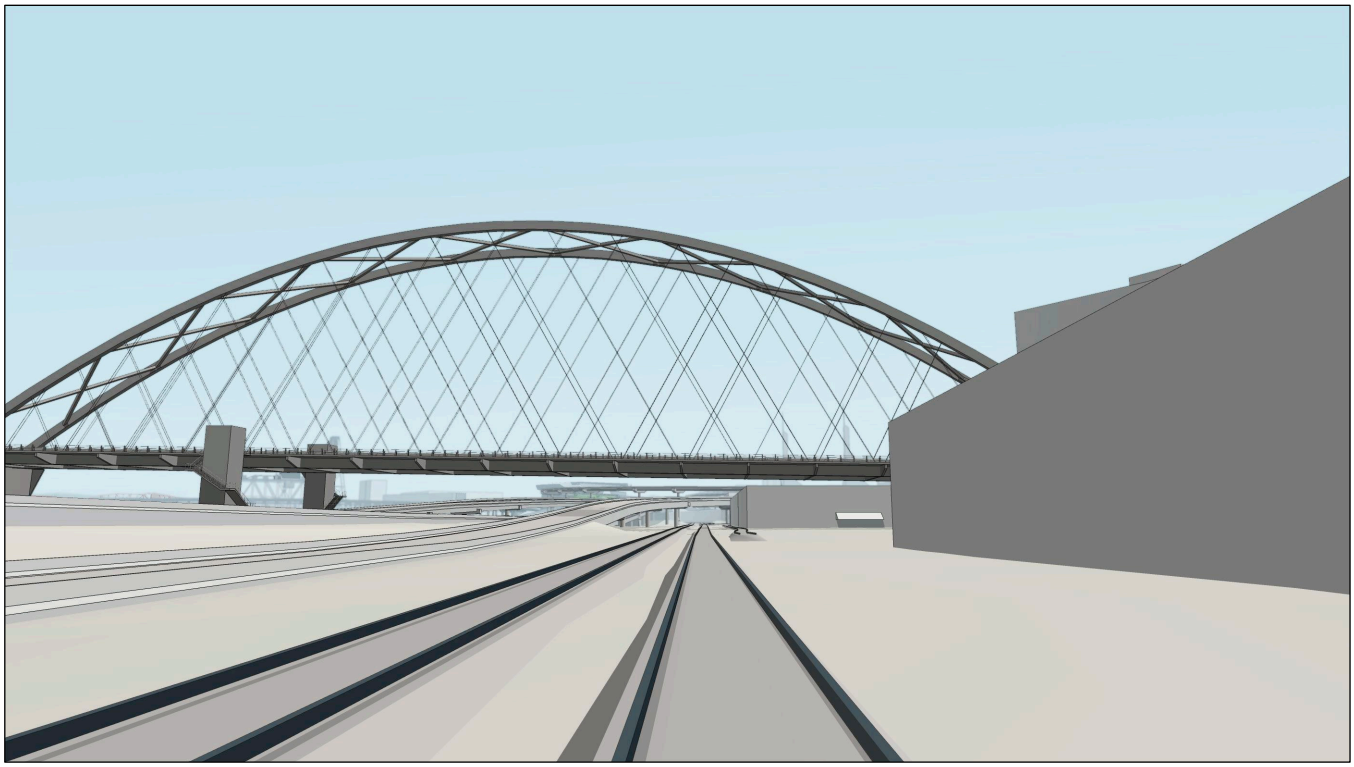

Figure 9. Oregon & California RR (UPRR) alignment looking north toward the Burnside Bridge undercrossing, artist's rendering of proposed new eastern approach with tied-arch structure (Fat Pencil Studio, 2021).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]		
Property Name: White Stag Block	Street Address: 5 NW Naito Parkway	
City, County: Portland, Multnomah	Latitude: 45.523486 Longitude: (-) 122.672966	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/23/2021

Photo:

Photo Caption: Photomosaic of White Stag Block (by Adam S. Alsobrook, 2021), looking northeast (photos taken by Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The White Stag Block at 5 NW Naito Parkway is the common name for a collection of three buildings, all of which are contributing resources in the Skidmore/Old Town Historic District, which was listed in the National Register of Historic Places (NRHP) in 1975 and designated as a National Historic Landmark (NHL) in 1977. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the White Stag Block. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The White Stag Block is the common name for a collection of three buildings located in the Skidmore/Old Town NHL in Portland, Multnomah County, Oregon. The White Stag Block is addressed as 5 NW Naito Parkway and is located at the north side of the existing west approach of the Burnside Bridge between NW First Avenue and NW Naito Parkway (Portland Maps 2021) (Figures 1 through 4). The Bickel Block at 25-33 NW Naito Parkway was designed by noted Portland architect Justus Krumbein and constructed in 1883 (NRHP 2008:22) (Figure 19). The Skidmore Block at 10-32 NW First Avenue was designed by an unknown architect and constructed in 1889 (NRHP 2008:16) (Figures 14, 16, 20, and 21). The Willamette Tent and Awning/Hirsch-Weis Building at 5 NW Naito Parkway/67 West Burnside Street was designed by an unknown architect and constructed in 1907 (NRHP 2008:23) (Figures 15 and 18). These three buildings were consolidated onto one tax lot in 2008 (NRHP 2008:16) (Figures 11 and 12).

The south facades of the Skidmore Block and the Willamette Tent and Awning/Hirsch-Weis Building face the west approach of the Burnside Bridge (Figures 13 through 17). Both of these building facades were extensively modified in 1925 to make way for the construction of the Burnside Bridge, which was completed in 1926 (*Oregonian* 1925) (Figures 5 through 10). The reinforced concrete structure of the west approach was built right up against both building facades, leaving a gap of just a few inches (Figures 22 through 28). This existing condition is undesirable from a structural engineering standpoint, since seismic forces could be transferred from the bridge structure to the White Stag Block during an earthquake.

The existing west approach of the Burnside Bridge will be removed and replaced with a new west approach span as part of the proposed undertaking. The new west approach span will be narrower than the existing

span, and there will be a separation of approximately 20 to 25 feet between the northernmost edge of the new west approach span and the south facades of the White Stag Block (Figures 29 through 36). This is a positive change from the existing condition of the bridge structure and south facades of the White Stag Block, since the new configuration of the west approach span will provide sufficient room for the buildings and bridge structure to respond separately to seismic forces.

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Draft Environmental Impact Statement (DEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the “No-Build Pre-Earthquake” alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the “No-Build Post-Earthquake,” which analyzed no-build conditions after a CSZ seismic event. The authors of the DEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

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c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

Note: For clarity, the common name "White Stag Block" is used in this section to refer collectively to the three historic buildings of which it is comprised: the Bickel Block (1883), the Skidmore Block (1889), and the Willamette Tent and Awning/Hirsch-Weis Building (1907). The Skidmore Block and the Willamette Tent and Awning/Hirsch-Weis Buildings both currently abut the west approach of the 1926 Burnside Bridge.

Location: The proposed replacement of the Burnside Bridge will not require the White Stag Block to be relocated or removed, therefore, the undertaking will have no effect to the resource's integrity of location.

Setting: The proposed replacement of the Burnside Bridge will alter the current relationship of the second level of the White Stag Block to the sidewalk level of the west approach of the bridge. However, the nomination for the Skidmore/Old Town Historic District notes that the 1926 Burnside Bridge was an intrusion into the historic fabric of the neighborhood (NRHP 2008:40:41:70:71). The construction of the west approach span of the Burnside Bridge created an artificial relationship between the White Stag Block and the surrounding streetscape. The removal of the bridge structure abutting the building will restore the original historic relationship of the ground level of the White Stag Block to the surrounding streetscape. The new approach span would be at the same elevation as the existing span and would therefore maintain the vertical relationship between the White Stag Block and the bridge. The northernmost edge of the new west approach span will be approximately 20 to 25 feet south of the south facades of the White Stag Block. This will allow for the buildings and bridge structure to independently react to ground motion during a seismic event and also allow visibility of the ground level of the White Stag Block for the first time since it was modified in 1925 to make way for the Burnside Bridge. The new separation between the bridge structure and the south facades will also allow for light and air through the window openings on the south façade of the White Stag Block. Therefore, the setting of the White Stag Block would not be adversely affected by the proposed undertaking.

Design: The proposed replacement of the Burnside Bridge will not alter the physical form, structure, and style of the White Stag Block; therefore, the undertaking will have no effect to the resource's integrity of design.

Materials: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical elements of the White Stag Block, therefore, the undertaking will have no effect to the resource's integrity of materials.

Workmanship: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical evidence of the historic construction techniques used to build the White Stag Block, therefore, the undertaking will have no effect to the resource's integrity of workmanship.

Feeling: The proposed replacement of the Burnside Bridge will not alter the physical features which collectively convey the historic character of the White Stag Block; therefore, the undertaking will have no effect to the resource's integrity of feeling.

Association: The proposed replacement of the Burnside Bridge will not diminish or eliminate the direct link that the White Stag Block has to important historic events or persons significant to our past, therefore, the undertaking will have no effect to the resource's integrity of association.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span alternative would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The replacement of the existing east and west approach spans and center span of the Burnside Bridge would have no adverse effect to the White Stag Block for either direct or indirect effects.

8. Sources

EarthExplorer
1951 Aerial Photograph, Entity ID 1QO0000020014, 25 October. United States Geological Survey. Electronic resource, https://earthexplorer.usgs.gov/, accessed August 2021.

Google Earth
2021 "Burnside Bridge." Electronic resource, https://earth.google.com/web/, accessed August 2021.

National Register of Historic Places (NRHP)
2008 National Historic Landmark Nomination (Revised Documentation), Skidmore/Old Town Historic District, Portland, Multnomah County, Oregon. Oregon Historic Sites Database. Electronic resource, https://heritagedata.prd.state.or.us/historic/, accessed August 2021.

Oregonian (Portland, Oregon). Electronic resource, https://multcolib.org/resource/historical-oregonian-1861-1987, accessed August 2021.
1925 "Old Picturesque Burnside Street Yields Place to New Thoroughfare Where Workmen in Dust and Confusion Clear Way for Bridge Approach." *Oregonian*, 2 November:6.
1934a "Safety Islands Decried." *Oregonian*, 14 September:6.
1934b "Week's Worst Accident Stresses 'Let's Quit Killing" – Safety Island Crash on Burnside Bridge Claims Two Lives." *Oregonian*, 16 September:43.

Portland Archives
1935a "Aerial of Downtown Portland including Burnside, Steel and Broadway Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number A2005-005.1449.10, Record Number AP/476. Electronic resource, https://efiles.portlandoregon.gov/Record/2043501/, accessed August 2021.

1935b "Aerial view of the downtown waterfront near the Burnside and Steel Bridges." City of Portland Auditor's Office, Archives and Records Management, PARC Accession Number 2000-03, Record Number AP/666. Electronic resource, https://efiles.portlandoregon.gov/Record/2298287/, accessed August 2021.

Portland Maps
2021 "5 NW Naito Pkwy." Electronic resource, https://www.portlandmaps.com/detail/property/5-NW-NAITO-PKWY/R140324_did/, accessed August 2021.

Sanborn Map Company (Sanborn)
1908a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1908b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-1909 (1908), Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_006/, accessed August 2021.
1950a Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 74. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.
1950b Sanborn Fire Insurance Map from Portland, Multnomah County, Oregon. Volume 1, 1908-April 1950, Sheet 75. Electronic resource, https://www.loc.gov/item/sanborn07439_021/, accessed August 2021.

United States Geological Survey (USGS)
1990 "Portland, OR Quadrangle, 7.5 Minute." TopoView. Electronic resource, https://ngmdb.usgs.gov/topoview/, accessed August 2021.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
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Maps and Figures

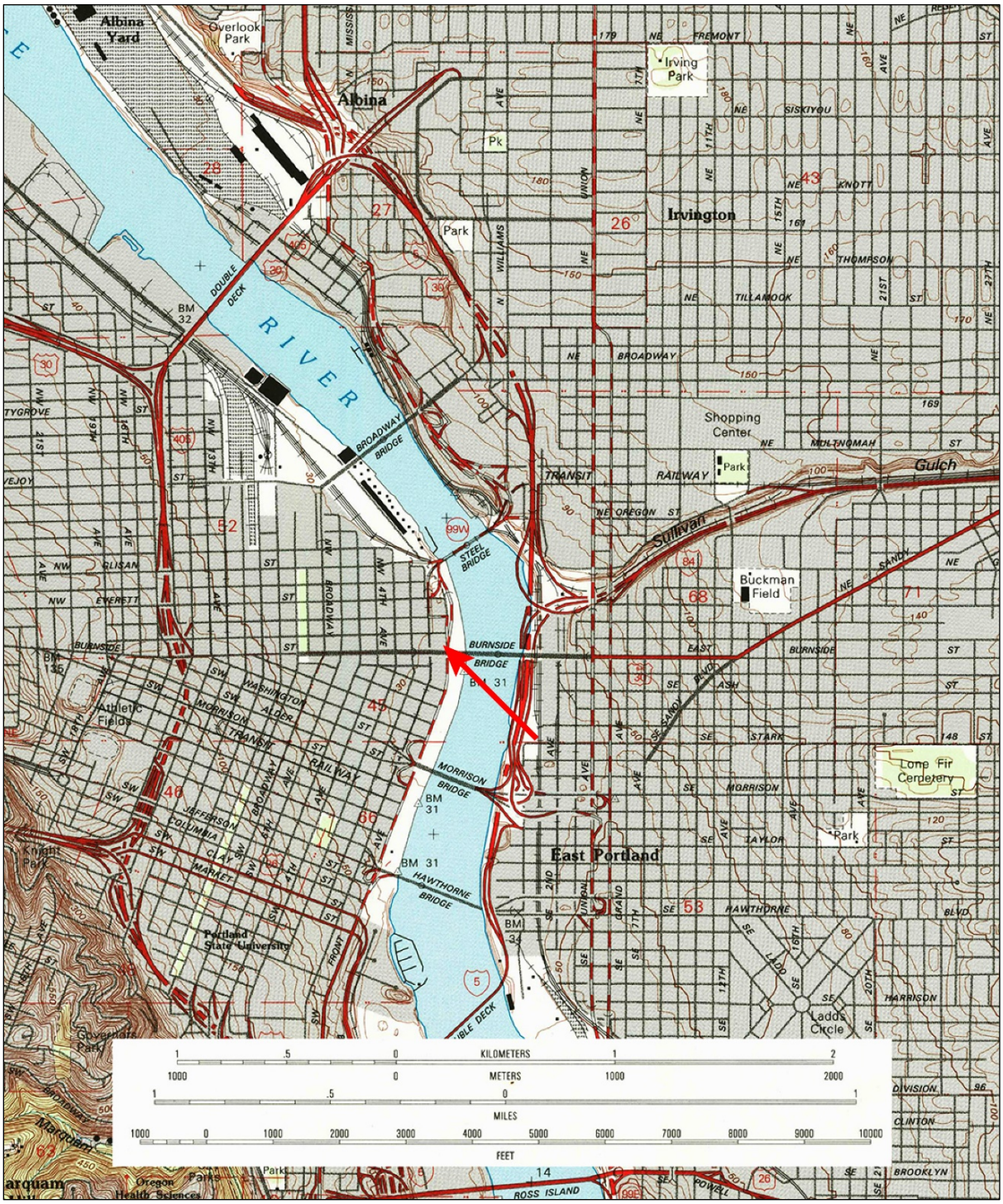

Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of the White Stag Block (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

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Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

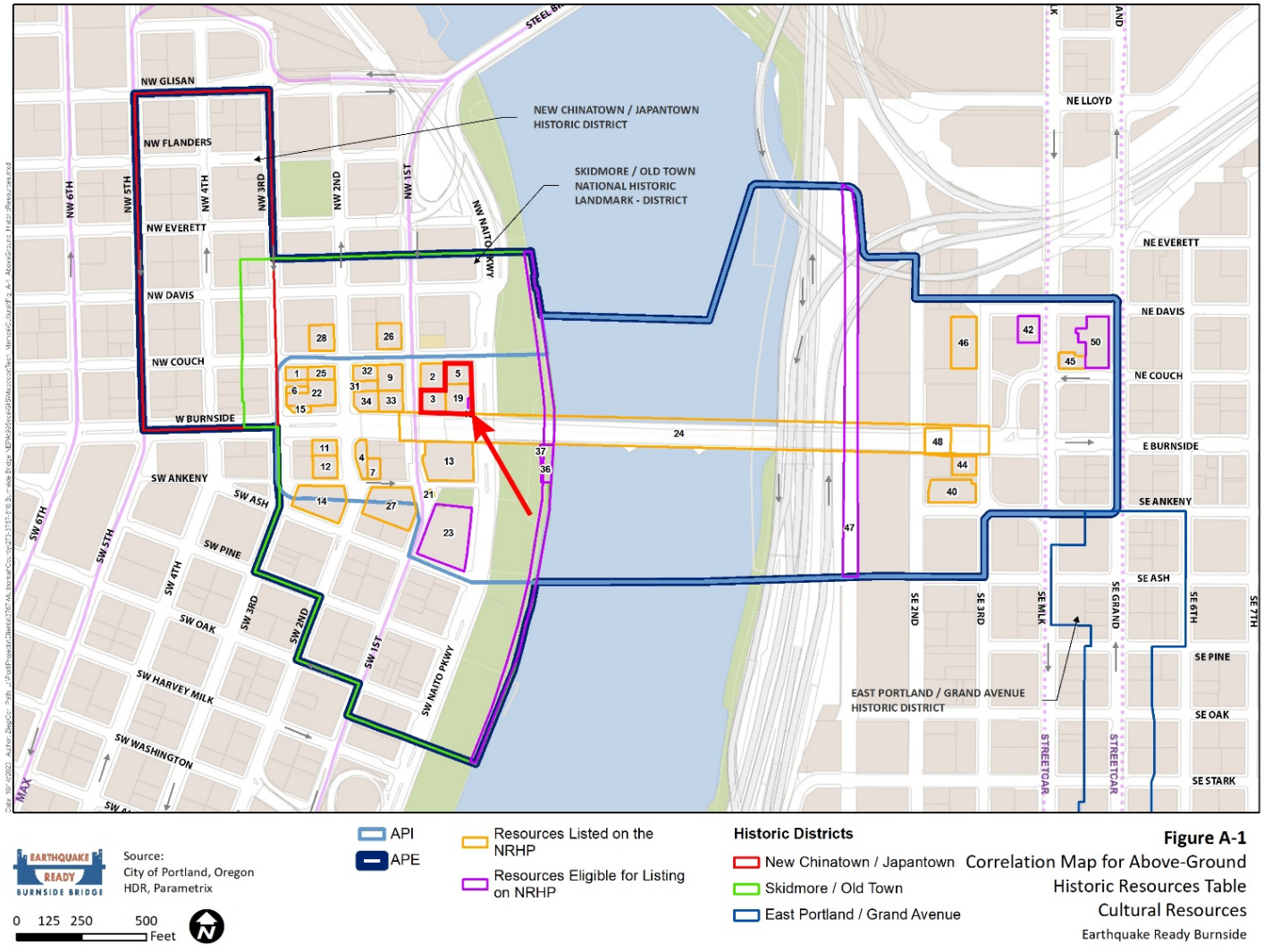

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the White Stag Block, which is outlined in red.

ODOT INVENTORY OF HISTORIC PROPERTIES

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Figure 3: Aerial photograph with location of the White Stag Block indicated by red line (Google Earth).

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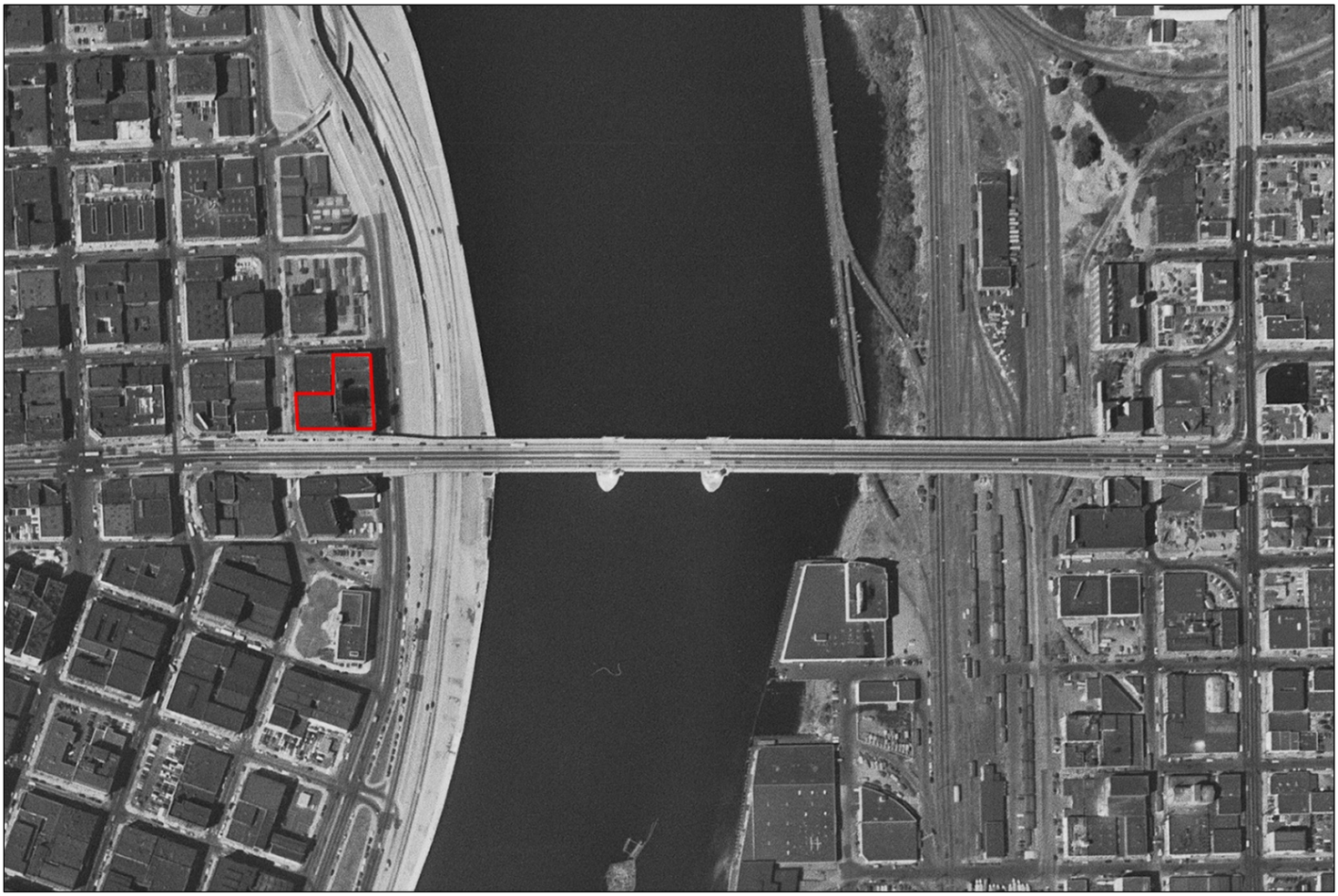

Figure 4: 1951 aerial photograph with location of the White Stag Block indicated by red line (USGS EarthExplorer).

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SECTION 106 LEVEL OF EFFECT FORM

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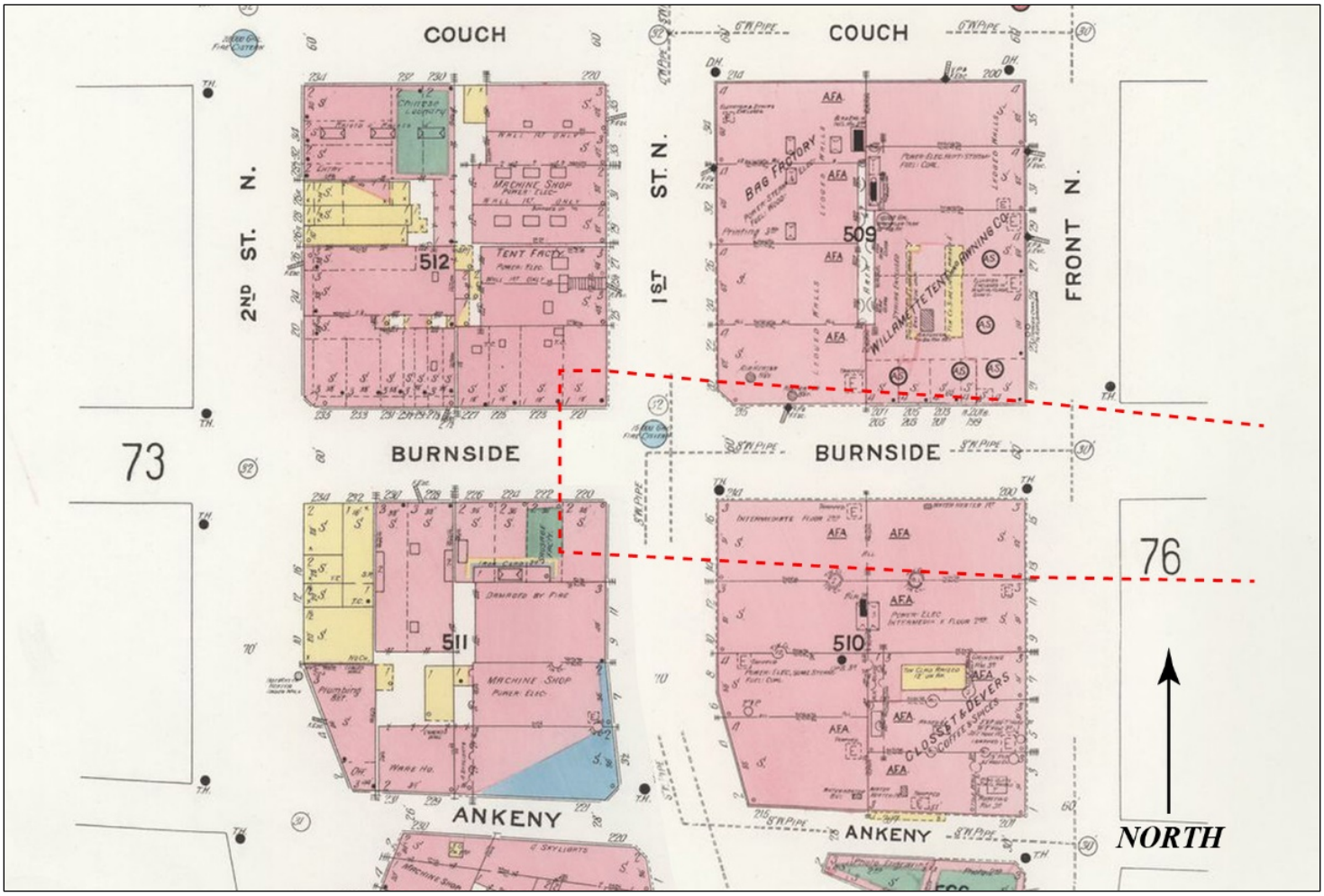

Figure 5: Sanborn maps, Volume 1, 1908. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

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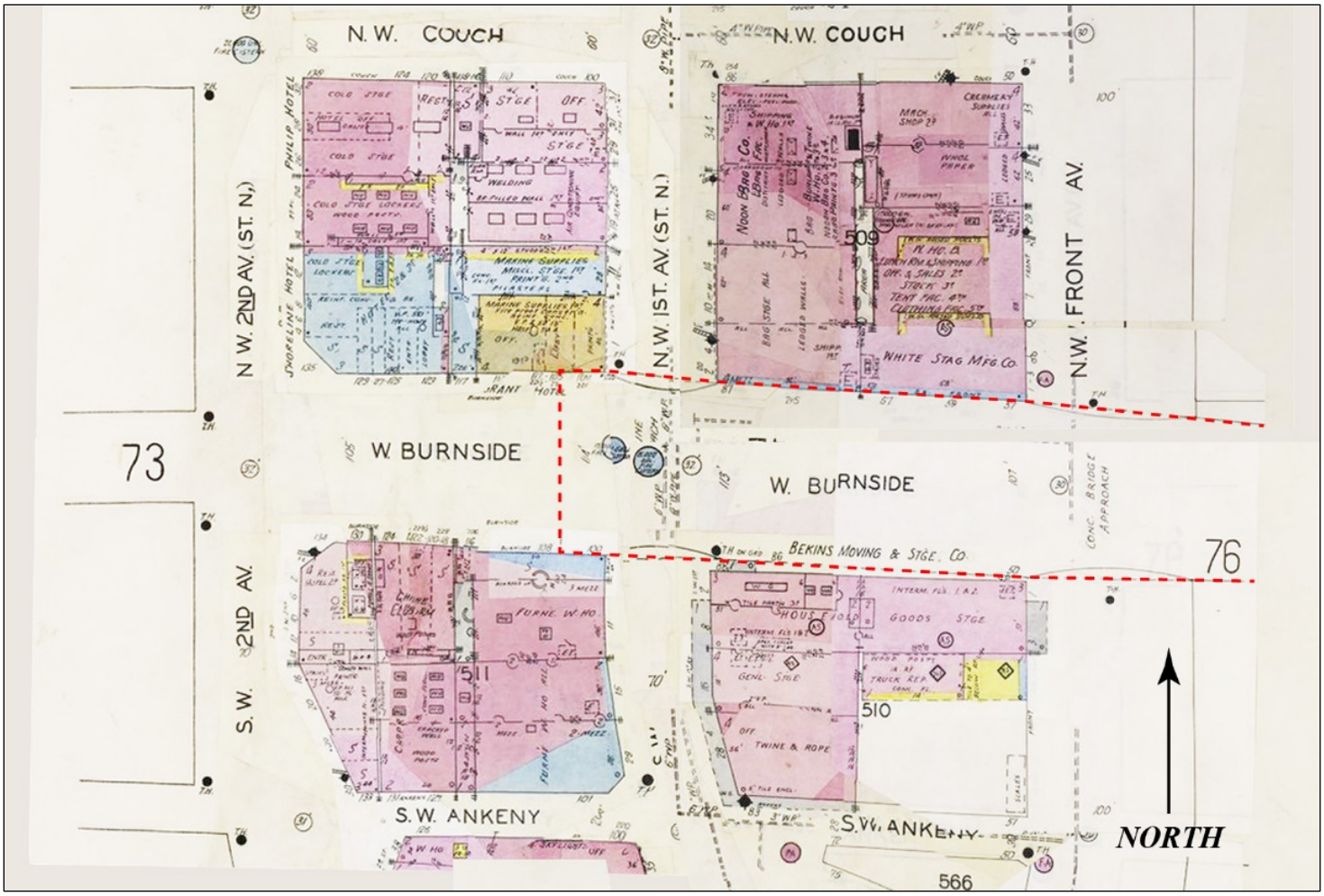

Figure 6: Sanborn maps, Volume 1, 1950. Mosaic of Sheet 74 (left two blocks) and Sheet 75 (right two blocks). Dashed red line indicates footprint of existing Burnside Bridge (Library of Congress).

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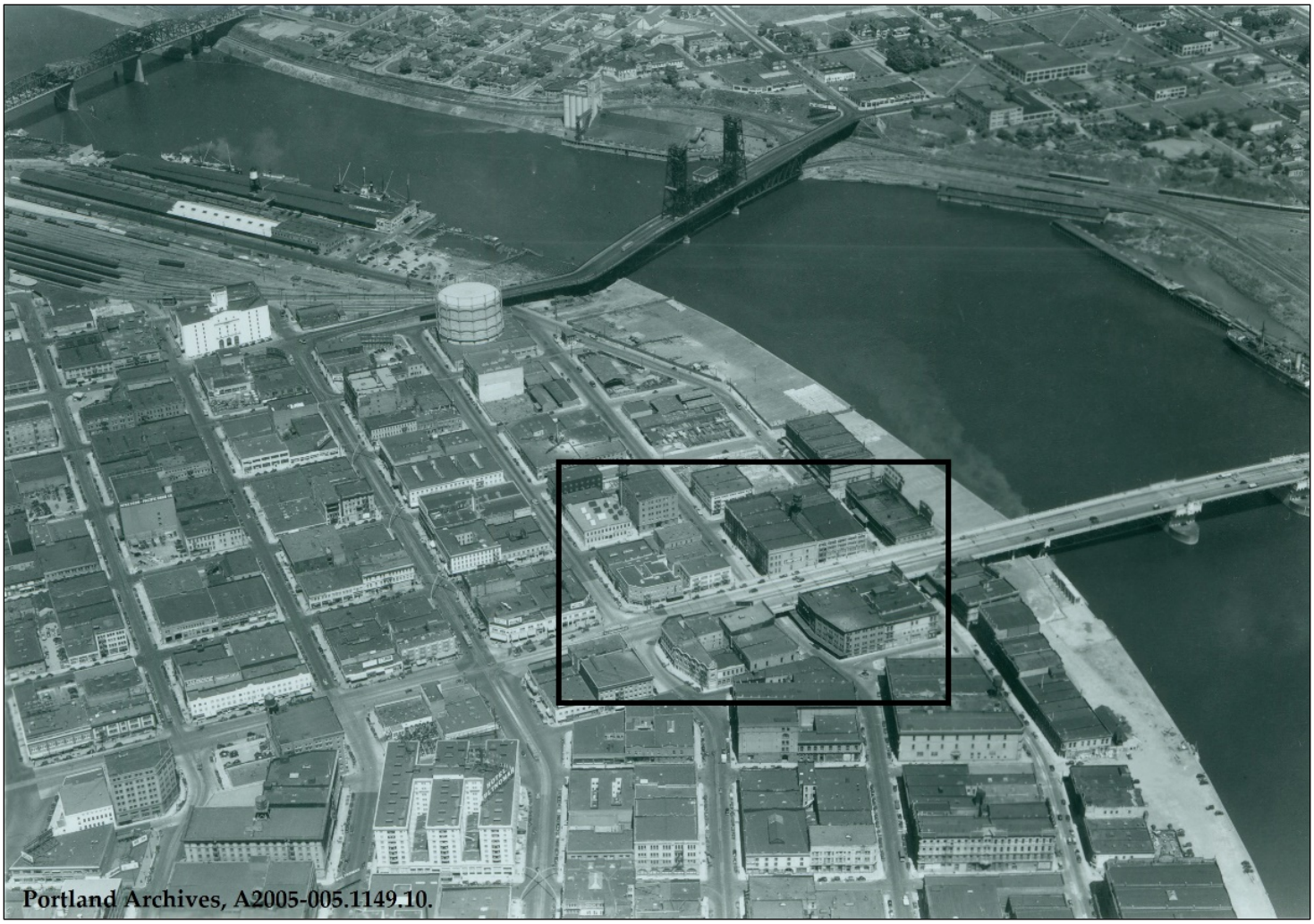

Figure 7: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Black box indicates excerpt in Figure 8 below (Portland Archives, A2005-005.1149.10).

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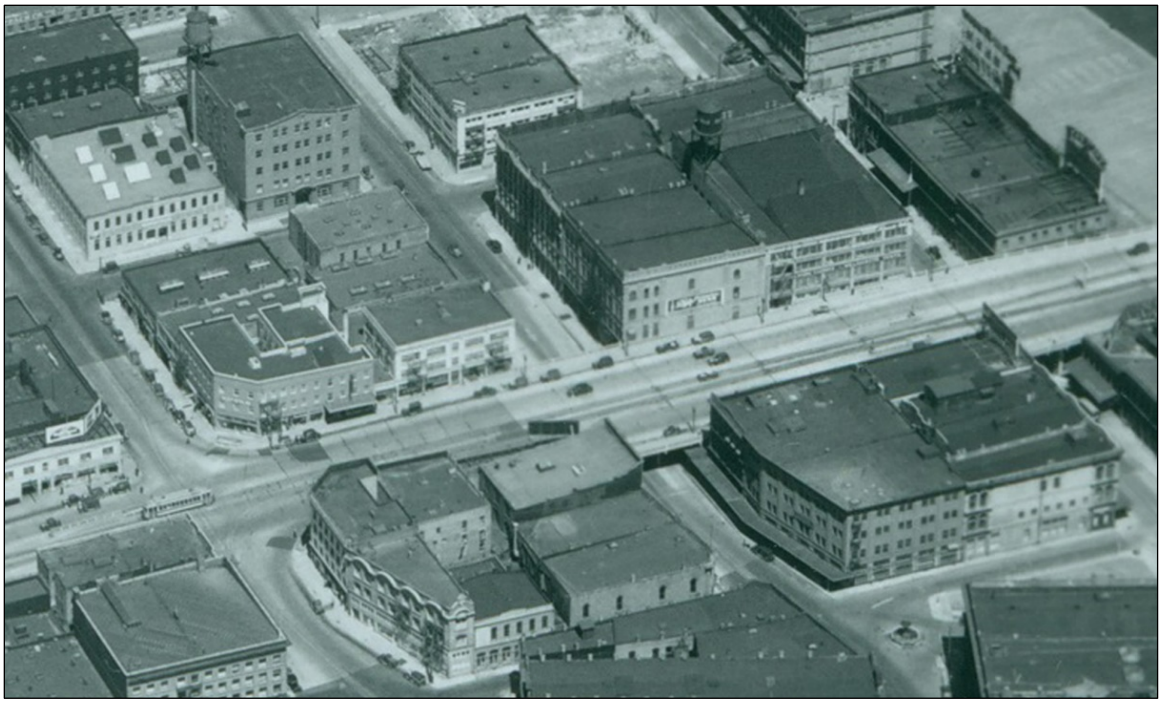

Figure 8: Aerial of downtown Portland including Burnside, Steel, and Broadway Bridges, December 31, 1935. Excerpt of Figure 7 above (Portland Archives, A2005-005.1149.10).

Figure 9: Aerial view of the downtown waterfront near the Burnside and Steel Bridges, December 31, 1935 (Portland Archives, 2000-03).

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Figure 10: West approach of Burnside Bridge with White Stag Block in background, looking northwest (*Oregonian*, September 14, 1934).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 11: Footprint of White Stag Block superimposed on property line map (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

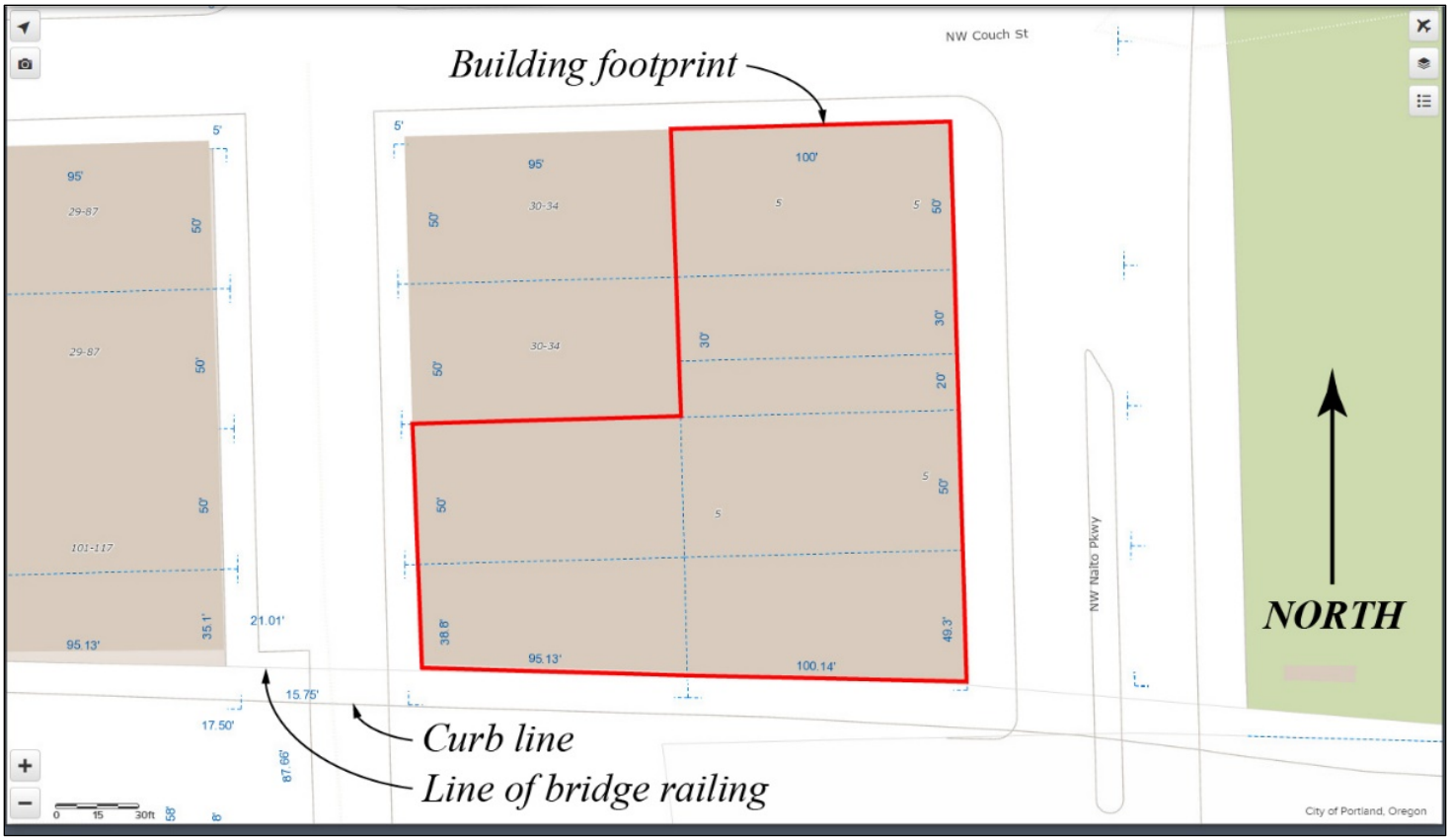


Figure 12: Footprint of White Stag Block superimposed on property line map, with elements of existing Burnside Bridge indicated (Portland Maps/WillametteCRA).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Photographs

Figure 13: White Stag Block, Skidmore Building at left and Willamette Tent & Awning Building at right, view looking northeast (Elizabeth O'Brien, 2019).

Figure 14: White Stag Block (Skidmore Building), view looking northeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 15: White Stag Block (Willamette Tent & Awning Building), view looking northeast (Elizabeth O'Brien, 2019).

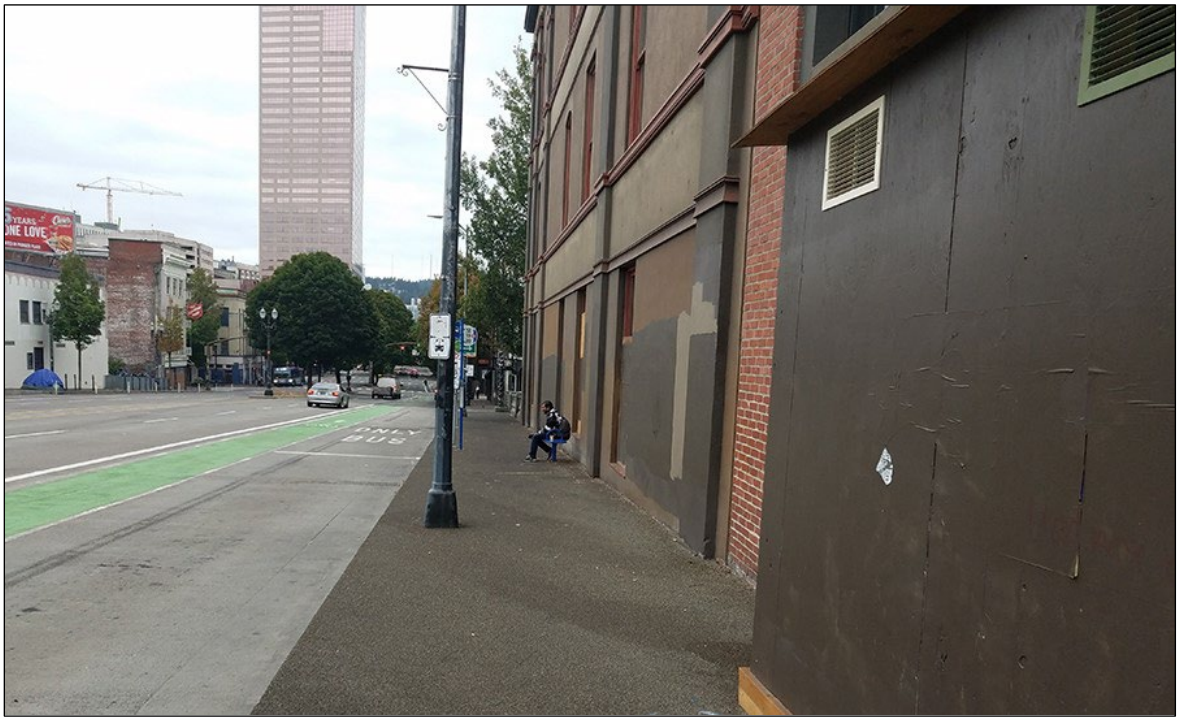


Figure 16: White Stag Block (Skidmore Building), south façade, looking west (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 17: White Stag Block (Willamette Tent & Awning Building), south façade, view looking west (David Ellis, 2021)

Figure 18: White Stag Block (Willamette Tent & Awning Building), east façade, view looking southwest (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 19: White Stag Block (Bickel Block), east façade, view looking southwest (Elizabeth O'Brien, 2019).

Figure 20: White Stag Block (Skidmore Building), west façade, view looking southeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 21: White Stag Block (Skidmore Building), detail of west façade, view looking southeast (Elizabeth O'Brien, 2019).

Figure 22: White Stag Block (Skidmore Building), detail of west façade, view looking southeast (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 23: White Stag Block (Skidmore Building), southwest corner of building at Burnside Bridge, view looking northeast (Elizabeth O'Brien, 2019).

Figure 24: White Stag Block (Skidmore Building), south façade of building under west approach of Burnside Bridge, view looking north (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 25: White Stag Block (Skidmore Building), detail of south façade of building under west approach of Burnside Bridge, view looking east (David Ellis, 2021).

Figure 26: White Stag Block (Skidmore Building), detail of south façade of building under west approach of Burnside Bridge, view looking up (David Ellis, 2021).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 27: White Stag Block (Skidmore Building), detail of south façade of building under west approach of Burnside Bridge, view looking up (David Ellis, 2021).

Figure 28: White Stag Block (Willamette Tent & Awning Building), detail of south façade of building under west approach of Burnside Bridge, view looking north (Elizabeth O'Brien, 2019).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

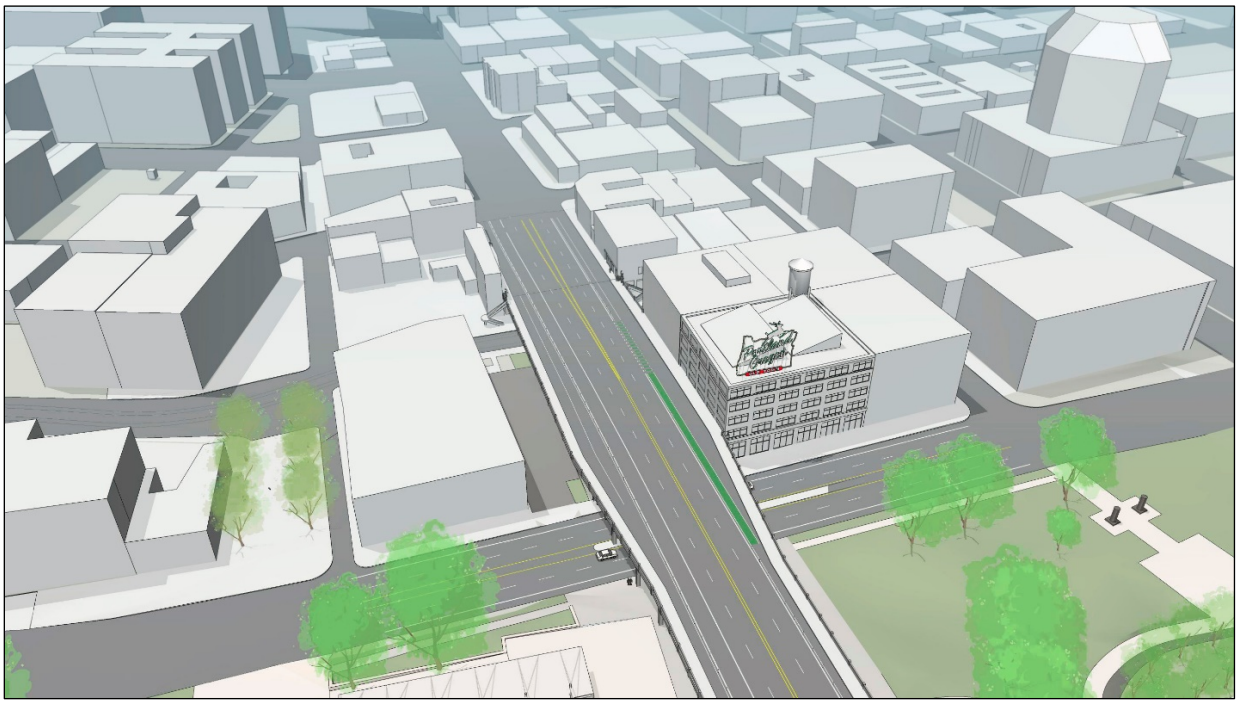


Figure 29: White Stag Block, artist's rendering of existing condition of west approach (Fat Pencil Studio, 2021), aerial view looking northwest.

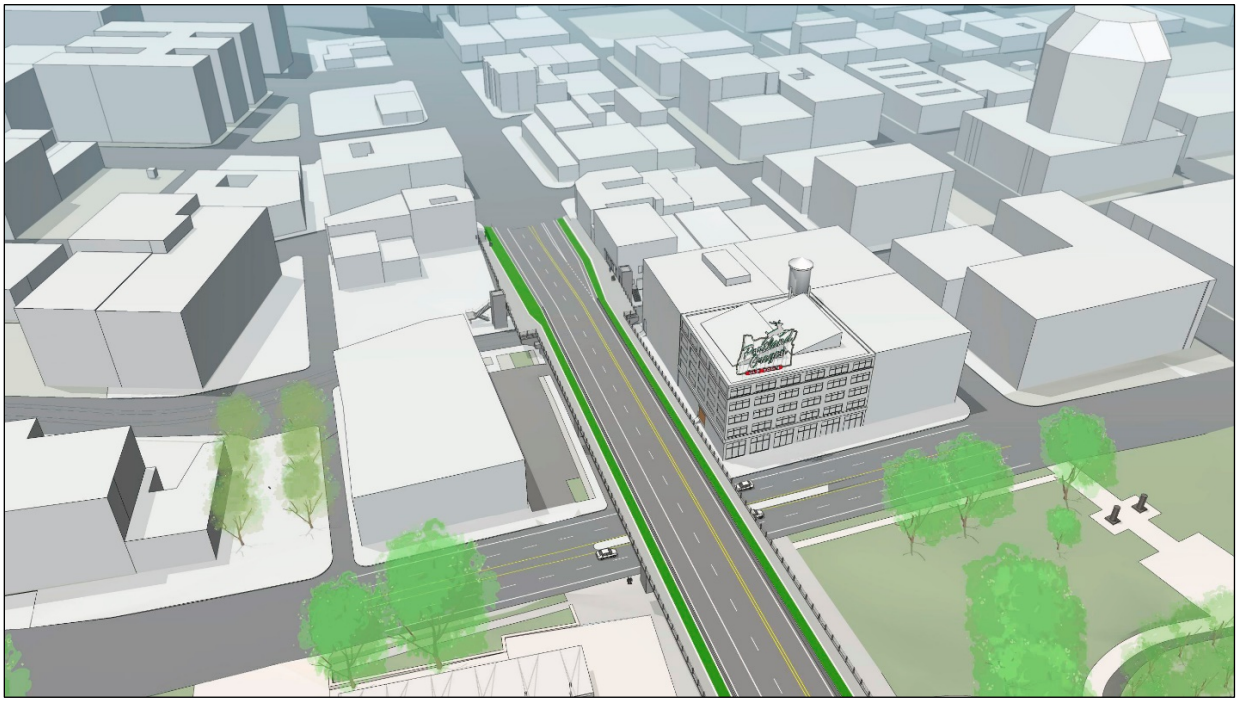


Figure 30: White Stag Block, artist's rendering of replacement west approach span (Fat Pencil Studio, 2021), aerial view looking northwest.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 31: White Stag Block, artist's rendering of existing condition of west approach (Fat Pencil Studio, 2021), aerial view looking northeast.

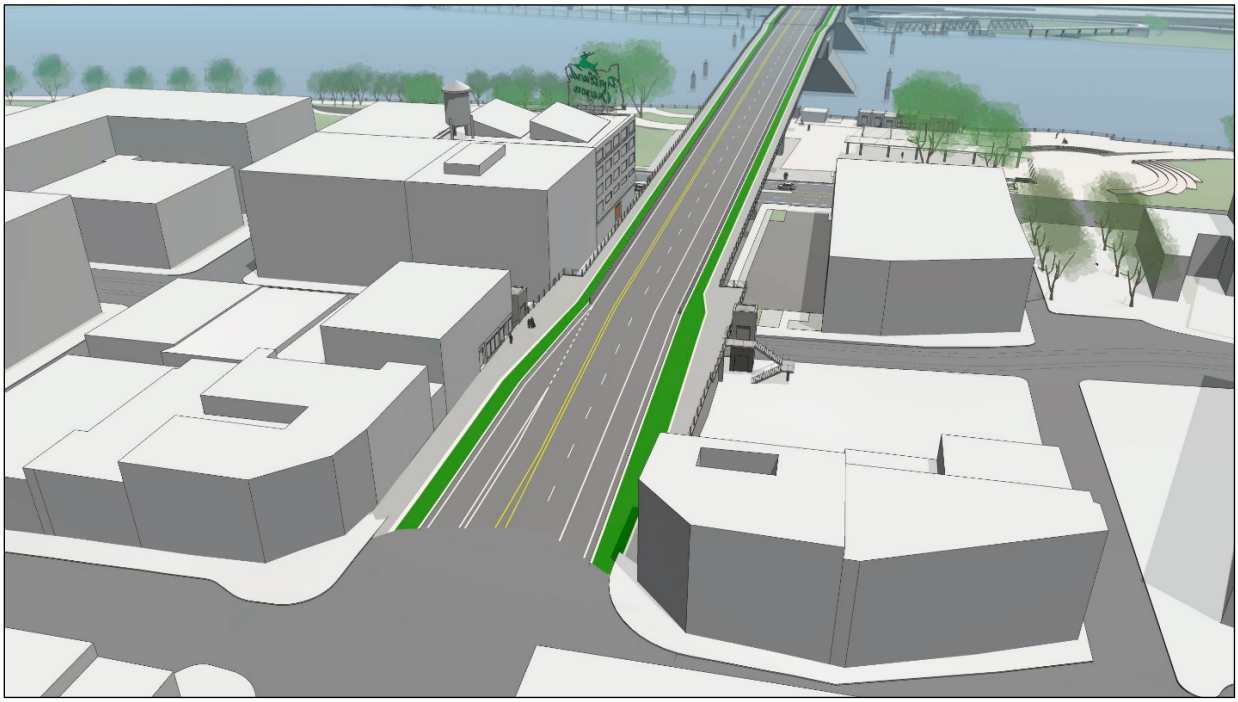


Figure 32: White Stag Block, artist's rendering of replacement west approach span (Fat Pencil Studio, 2021), aerial view looking northwest.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

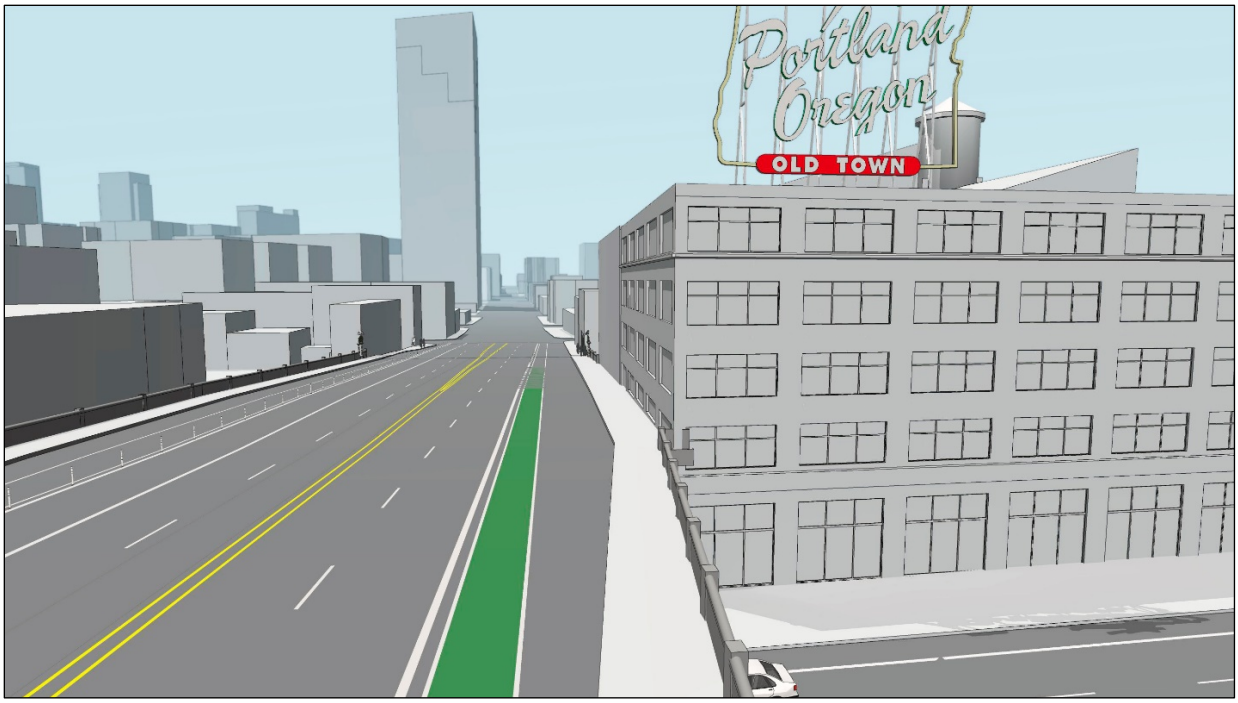


Figure 33: White Stag Block, artist's rendering of existing condition of west approach (Fat Pencil Studio, 2021), view looking west.

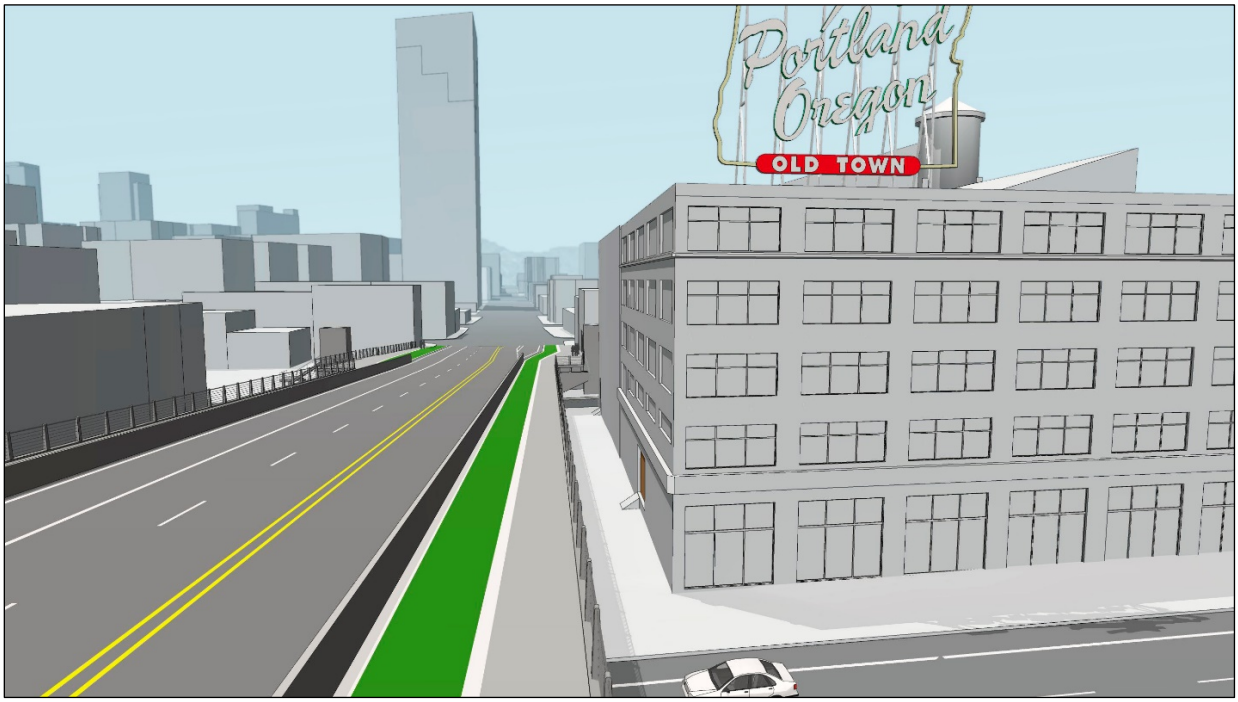


Figure 34: White Stag Block, artist's rendering of replacement west approach span (Fat Pencil Studio, 2021), view looking west.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Block	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

Figure 35: White Stag Block, artist's rendering of existing condition of west approach (Fat Pencil Studio, 2021), view looking west.

Figure 36: White Stag Block, artist's rendering of replacement west approach span (Fat Pencil Studio, 2021), view looking west.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Oregon Department of Transportation/Earthquake Ready Burnside Bridge ODOT Key Number: :XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]		
Property Name: White Stag Sign	Street Address: 67 West Burnside Street	
City, County: Portland, Multnomah	Latitude: 45.523043 Longitude: (-) 122.671620	
Surveyor: Adam S. Alsobrook	Affiliation: WillametteCRA	Date Recorded: 08/18/2021

Photo:

Photo Caption: White Stag Sign, looking southwest (Elizabeth O'Brien, 2019).

Preliminary Finding of Effect:

☐ No Historic Properties Affected ☒ No Historic Properties Adversely Affected ☐ Historic Properties Adversely Affected

State Historic Preservation Office Comments:

☐ **Concur** ☐ **Do Not Concur:** ☐ No Historic Properties Affected ☐ No Historic Properties Adversely Affected

☐ Historic Properties Adversely Affected

Signed: _____ Date: _____

Comments:

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Sign	
Street Address: 67 West Burnside Street	City, County: Portland, Multnomah

Provide written description of the project, and its potential effects on the subject property per 36 CFR 800. The project and findings, as per instructions, should include:

1. Introduction

This statement of finding of effect discusses the effect of the proposed Earthquake Ready Burnside Bridge (EQRB) Project in Portland, Oregon. The White Stag Sign at 5 NW Naito Parkway was determined as individually eligible for listing in the National Register of Historic Places (NRHP) by the Oregon State Historic Preservation Office (OR SHPO) on December 21, 2020. Multnomah County is the project proponent with support from the Oregon Department of Transportation (ODOT) on behalf of the Federal Highway Administration (FHWA). Historical Research Associates, Inc. (HRA) prepared the original findings that have since been updated by WillametteCRA with the current Alignment Alternatives information on behalf of the Oregon Department of Transportation (ODOT). It is the finding of WillametteCRA, on behalf of ODOT, that the proposed project will have no adverse effect on the White Stag Sign. This statement of finding of effect is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36 CFR 800), Executive Order 11593, and the National Environmental Policy Act of 1969.

2. Project Description

The proposed project is to establish a Burnside Bridge that would survive a major Cascadia Subduction Zone (CSZ) earthquake. The existing bridge would fail in such an earthquake. The preferred alternative would replace the existing bridge with a new bridge, known as the Long Span option. The Long Span alternative would construct a new bridge on the same alignment as the current bridge.

3. Identification and Description of the Historic Resource

The White Stag Sign is located on the roof of the Willamette Tent and Awning building at 67 West Burnside Street, Portland, Multnomah County, Oregon. This metal-framed roof sign measures approximately 50 feet long by 50 feet high. The White Stag Sign is situated at southeast corner of the building's roof, with the primary face of the sign facing east. The sign graphics are created with a combination of neon tubes and electric lamps.

When it was completed in November 1940, the present-day White Stag Sign advertised the "White Satin"-brand sugar produced by the Amalgamated Sugar Company (*Oregonian* 1940c). In the fall of 1938, Amalgamated Sugar opened a new $2.5 million (about $48.4 million in 2021 dollars) beet sugar processing plant at Nyssa, Oregon, which processed over 70 million pounds of refined sugar during the plant's first seasonal production run of about 115 days (*Nyssa Gate City Journal* 1939). Due to the record success of the new plant, Amalgamated Sugar hired the food brokers Mailliard and Schmiedell as sales representatives to market their "White Satin" sugar to consumers in Oregon and Washington (*Oregonian* 1939). "White Satin" sugar was dubbed "Oregon's Own and Only Sugar" in newspaper advertisements, and this slogan was also used on the original version of the White Stag Sign (*Oregonian* 1940b, 1940c).

The White Satin Sugar rooftop sign was constructed by A. Young & Son for the Ramsay Sign Company at a cost of $4,000 (about $78,000 in 2021 dollars) (*Oregonian* 1940a, 1940c). The Hirsch-Weis Manufacturing Company, makers of "White Stag"-brand ski clothing, owned the building when the sign was constructed (*Oregonian* 1937, 1940c). As originally constructed, the sign measured 50 feet long and 40 feet high. Eleven tons of steel were used to build the structure for the electric sign, which used 1100 feet of neon tubing and 550

incandescent lamps to spell out the message: "White Satin Sugar, Oregon's Own and Only." This message was gradually revealed in a five-step illumination process and animated with a pouring sack of sugar (*Oregonian* 1940c). A neon-illuminated outline of the State of Oregon surrounded the advertising message (O'Brien 2020).

By 1947, the original 1940 advertising message had been replaced with a circular "White Satin Sugar" corporate logo, which was centered within the Oregon-shaped neon-illuminated border. In 1951, the sign was remodeled again, and the main sign message within the Oregon-shaped border was changed to read: "It's White Satin Sugar," and the slogan "Oregon's Own and Only" was added to a panel mounted above the top of the border. The Hirsch-Weis Manufacturing Company acquired the sign in 1957, and it was once again remodeled. The "White Satin Sugar" lettering was removed and the neon-illuminated Oregon-shaped outline remained. "White Stag" was spelled out in bold letters within the border, with the leaping white stag corporate logo mounted above the primary lettering and the word "Sportswear" added below. A neon red nose was added to the white stag in 1959 at the suggestion of Elizabeth Blair Hirsch, Harold Hirsch's wife. The red nose on the white stag "Rudolph" reappeared during subsequent holiday seasons and this feature of the sign is much beloved by the residents of Portland (O'Brien 2020).

The Hirsch-Weis Manufacturing Company moved out of the building in 1973, though the company agreed to maintain both the sign and seasonal red nose feature. In October 1977, the Portland Historic Landmarks Commission voted unanimously to designate the White Stag sign as a city landmark. Disagreements over the maintenance of the sign arose during the mid-1990s.However, in 1996 a maintenance agreement was reached between sign owner Ramsay Sign Company and the H. Naito Corporation, the building owner. H. Naito removed the "White Stag" sign lettering within the Oregon-shaped neon border and replaced it with the words "Made in Oregon." The company also replaced the "Sportswear" lettering at the base of the sign with the words "Old Town," in reference to the Skidmore/Old Town National Historic Landmark district in which the Willamette Tent and Awning building is located. Despite these changes, the seasonal red nose for "Rudolph" was retained. In 2010, the Ramsay Sign Company donated the White Stag sign to the City of Portland. Art DeMuro, then the owner of the Willamette Tent and Awning building, contributed $200,000 toward the replacement of the "Made in Oregon" lettering with a new "Portland, Oregon" message (O'Brien 2020).

The White Stag sign was originally constructed in 1940 and is therefore outside of the historical period of significance of the Skidmore/Old Town National Historic Landmark district, which spans the years between 1857 and 1929 (NRHP 2008). However, the Oregon SHPO determined that the White Stag sign was individually eligible for listing on the NRHP on December 21, 2020.

4. Undertaking Options Considered

A total of six (6) alternatives have been considered for this undertaking: two (2) no-build alternatives and four (4) build alternatives. The four (4) build alternatives included an Enhanced Seismic Retrofit Alternative and three (3) replacement alternatives. Extensive discussion and analysis of these alternatives is contained in the Supplemental Draft Environmental Impact Statement (SDEIS) of 2021. The following is a synopsis of the alternatives considered for this undertaking.

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Sign	
Street Address: 67 West Burnside Street	City, County: Portland, Multnomah

a. No-Build Alternative

Two (2) no-build alternatives were considered for this undertaking. These no-build alternatives assume that all other programmed and planned projects move forward and that the Burnside Bridge would remain seismically at risk. The first no-build scenario considered was the "No-Build Pre-Earthquake" alterative, which analyzed no-build conditions prior to a CSZ seismic event. The second no-build scenario considered was the "No-Build Post-Earthquake," which analyzed no-build conditions after a CSZ seismic event. The authors of the SDEIS concluded that the no-build alternatives would not address the acute seismic vulnerability of the existing Burnside Bridge, which is expected to be heavily damaged or completely collapse during a CSZ seismic event. The collapse of the Burnside Bridge would very likely result in a significant loss of life to people on or under the bridge during a CSZ seismic event. The loss of the Burnside Bridge would sever downtown Portland from the rest of the city on the east side of the Willamette River and would prevent emergency responders from being able to cross the river. Additionally, debris from the collapse of the Burnside Bridge would block all travel by land and water under the bridge. The loss of the Burnside Bridge due to a CSZ seismic event would hamper the long-term recovery of the city and surrounding region during the months following a major earthquake, and the potential adverse economic effects would likely persist for years.

b. Avoidance Alternative

The environmental team considered one (1) avoidance alternative. An Enhanced Seismic Retrofit Alternative was considered in lieu of the wholesale replacement of the Burnside Bridge. This alternative would partially retrofit the existing bridge and replace major structural components of the bridge to meet seismic design criteria. In this scenario, the retrofitted structural elements would be visually similar to the existing structure of the bridge, but the replacement approaches would be substantially different in appearance compared with the existing bridge. Under this scenario, the width of the bridge would be unchanged, and the modal connections at each end of the bridge would also not change. The environmental team made a preliminary analysis of potential effects to the NRHP-listed Burnside Bridge due to the Enhanced Seismic Retrofit Alternative scope of work. The team applied the Section 106 criteria of adverse effect and found that this potential scope of work would result in adverse effects to the NRHP-listed Burnside Bridge.

c. Proposed Undertaking

Three (3) build alternatives were considered for the proposed undertaking. Of these three alternatives, the Refined Long-span alternative would replace the existing bridge with a new bridge on the same alignment as the current bridge. This would necessitate the demolition of the existing Burnside Bridge.

5. Evaluation of Effects

Note: The structure of the operable center span of the new replacement bridge has not yet been finalized. The center span will be either a bascule or vertical lift structure. A bascule lift center span would not have any direct effects to the White Stag Sign, and this option would also not have any indirect visual effects to the viewshed of the sign (Figures 15 and 16). The four towers of a vertical lift center span would not have any direct effects to the White Stag Sign, and while there would be the potential for slight visual effects to the viewshed of the sign, these appear to be slight enough to not rise to the level of an adverse effect (Figures 15 and 17).

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Sign	
Street Address: 67 West Burnside Street	City, County: Portland, Multnomah

Location: The proposed replacement of the Burnside Bridge will not require the White Stag Sign to be relocated or removed, therefore, the undertaking will have no effect to the sign's integrity of location (Figures 6, 7, and 9).

Setting:
Discussion of Direct Effects:
The immediate physical environment of the White Stag Sign is the rooftop of the Willamette Tent and Awning building (Figures 6 and 7). The sign location is bounded by an adjacent building to the north, NW Naito Parkway and Tom McCall Waterfront Park to the east, the west approach span of the Burnside Bridge to the south, and an adjacent building to the west. The proposed replacement of the Burnside Bridge will not alter or destroy the immediate setting of the White Stag Sign and therefore the undertaking will have no adverse effect to the sign's integrity of setting.

Discussion of Indirect Effects:
The principal viewshed of the White Stag Sign is along the east west axis of the existing alignment of the Burnside Bridge (Figures 8, 9, 10, 11, and 12). Many, if not most, contemporary photographic views of the White Stag Sign are taken from locations to the east of the sign either along the Burnside Bridge or slightly to the north of the bridge span. The relatively flat, wide, and visually open character of the existing road deck of the Burnside Bridge is conducive to unimpeded views of the sign and thus a popular vantage point for both amateur and professional photographers.

The girder option for the replacement west approach span would not have an effect on the primary viewshed of the White Stag Sign, since it closely approximates the character of the existing Burnside Bridge (Figures 13 and 14). Also, the bascule option for the operable center span would not have an effect on the viewshed of the sign for reasons similar to the girder structure (Figures 15 and 16). However, the vertical lift option for the operable center span would have a slight effect on the White Stag Sign viewshed, since the four vertical towers would partially or completely block views of the sign from certain points along the sidewalks and road deck of the new Burnside Bridge (Figures 15 and 17). However, other views of the White Stag Sign would remain unaffected by the proposed placement of the vertical lift towers. Since the potential for indirect effects to the setting of the sign by the vertical lift towers is slight, the vertical lift center span option would constitute no adverse effect to the White Stag Sign for indirect effects.

Design: The proposed replacement of the Burnside Bridge will not alter the physical form, structure, and style of the White Stag Sign, therefore, the undertaking will have no effect to the sign's integrity of design.

Materials: The proposed replacement of the Burnside Bridge will not damage, remove, or destroy physical elements of the White Stag Sign, therefore, the undertaking will have no effect to the sign's integrity of materials.

Workmanship: The proposed replacement of the Burnside Bridge would not damage, remove, or destroy physical evidence of the historic construction techniques used to build the White Stag Sign, therefore, the undertaking will have no effect to the sign's integrity of workmanship.

Feeling: The proposed replacement of the Burnside Bridge would not alter the physical features which collectively convey the historic character of the White Stag Sign, therefore the undertaking will have no effect to the sign's integrity of feeling.

Association: The proposed replacement of the Burnside Bridge would not diminish or eliminate the direct link that the sign has to important historic events or persons significant to our past, therefore, the undertaking will have no effect to the sign's integrity of association.

6. Coordination and Public Output

The Earthquake Ready Burnside Bridge project has been the subject of public meetings since 2016. Multnomah County has established a Community Task Force in October 2018, which continues to meet regularly. Meetings of the Section 106 Consulting Parties have been meeting regularly since December 2020. Draft technical reports to address NHPA and NEPA requirements have been circulated for review by representatives of the SHPO, City of Portland, and ODOT. There has also been coordination with the Portland Historic Landmarks Commission, which is a CLG.

7. Conclusion

In summary, the Refined Long-span alternative would necessitate the complete replacement of the existing Burnside Bridge with new approach and main spans. The replacement of the existing east and west approach spans and center span of the Burnside Bridge would have no adverse effect to the White Stag Sign for either direct or indirect effects.

8. Sources

O'Brien, Elizabeth
2020 Oregon Inventory of Historic Properties, Section 106 Determination of Eligibility Form, White Satin Sugar/White Stag Sign, 5 NW Naito Parkway, Portland, Multnomah County, Oregon. Earthquake Ready Burnside Bridge, Draft Environmental Impact Statement, Attachment F: Agency Letters. Electronic resource, https://www.multco.us/earthquake-ready-burnside-bridge/draft-environmental-impact-statement, accessed August 2021.

Historic Resource Inventory
1984 City of Portland Historic Resource Inventory Form for the White Stag Sign, 67 West Burnside Street, ID 0-125-00067. Oregon Historic Sites Database. Electronic resource, http://heritagedata.prd.state.or.us/historic/, accessed August 2021.

National Register of Historic Places
2008 Revised Documentation, National Register of Historic Places Registration Form for the Skidmore/Old Town Historic District, 6 October. Oregon Historic Sites Database. Electronic resource, http://heritagedata.prd.state.or.us/historic/, accessed August 2021.

The Nyssa Gate City Journal [Nyssa, Oregon]
1939 "Oregon's New Sugar Refinery Establishes Production Record and Exceed [sic] Estimated Season Output." *The Nyssa Gate City Journal* [Nyssa, Oregon], 26 January:1. Electronic resource, https://oregonnews.uoregon.edu/newspapers/, accessed August 2021.

Oregonian newspaper. Electronic resource, https://multcolib.org/resource/historical-oregonian-1861-1987, accessed August 2021.
1937 "Hirsch-Weis Adds 48 New Machines; Goods in Demand." *Oregonian*, 3 October:12.
1939 "Group Off to View Nyssa Sugar Plant." *Oregonian*, 14 December:8.
1940a "Building Permits." *Oregonian*, 21 September:10.
1940b "Oregon's Own and Only Sugar Salutes Portland." *Oregonian*, 1 November:28.
1940c "Huge Sign Sugar Ad." *Oregonian*, 3 November:59.

Oregon State Historic Preservation Office (OR SHPO)
2020 Letter from Sarah Jalving to John Raasch, SHPO Case No. 18-1479, 21 December. Earthquake Ready Burnside Bridge, Draft Environmental Impact Statement, Attachment F: Agency Letters. Electronic resource, https://www.multco.us/earthquake-ready-burnside-bridge/draft-environmental-impact-statement, accessed August 2021.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Sign	
Street Address: 67 West Burnside Street	City, County: Portland, Multnomah

Maps and Figures

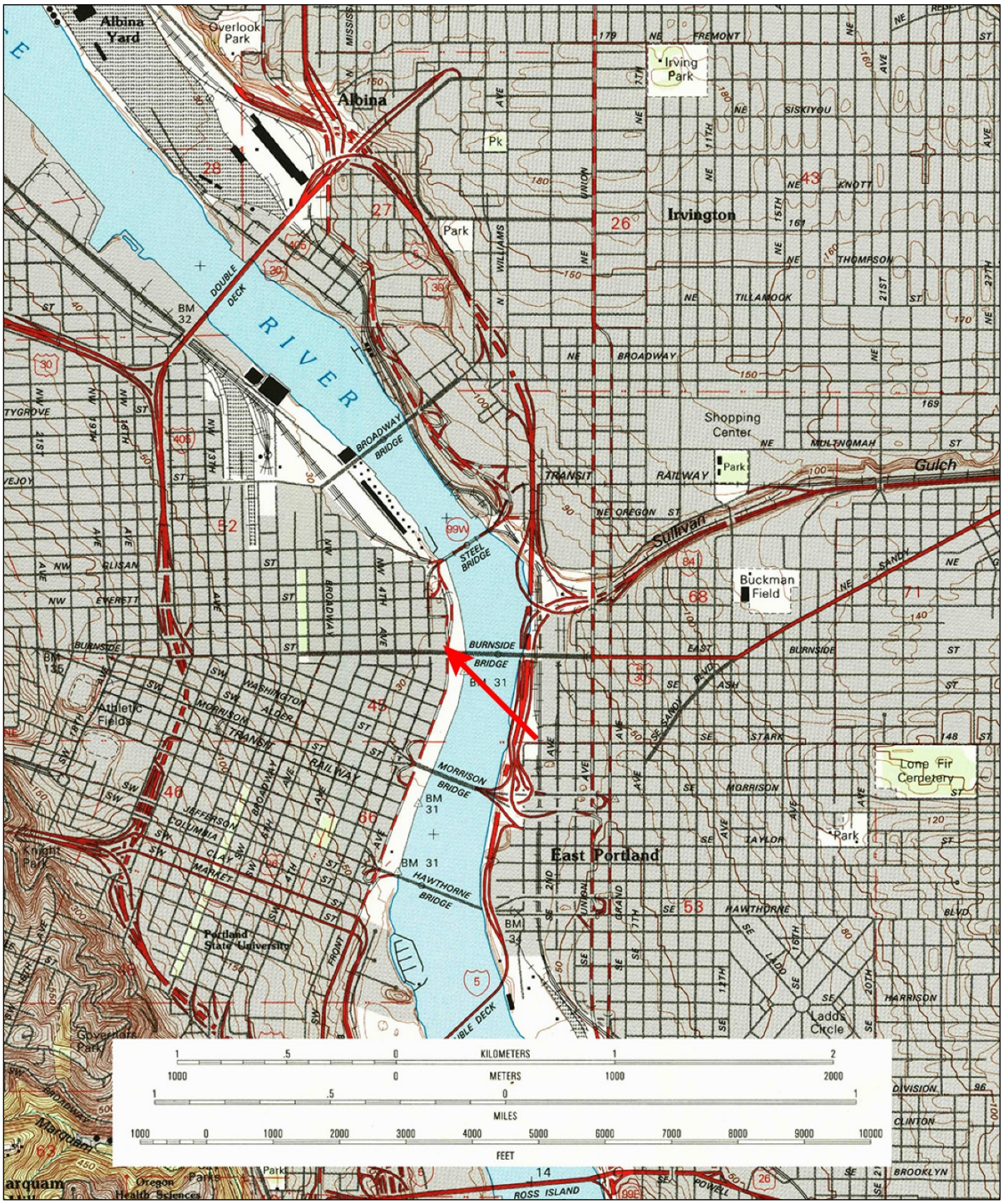


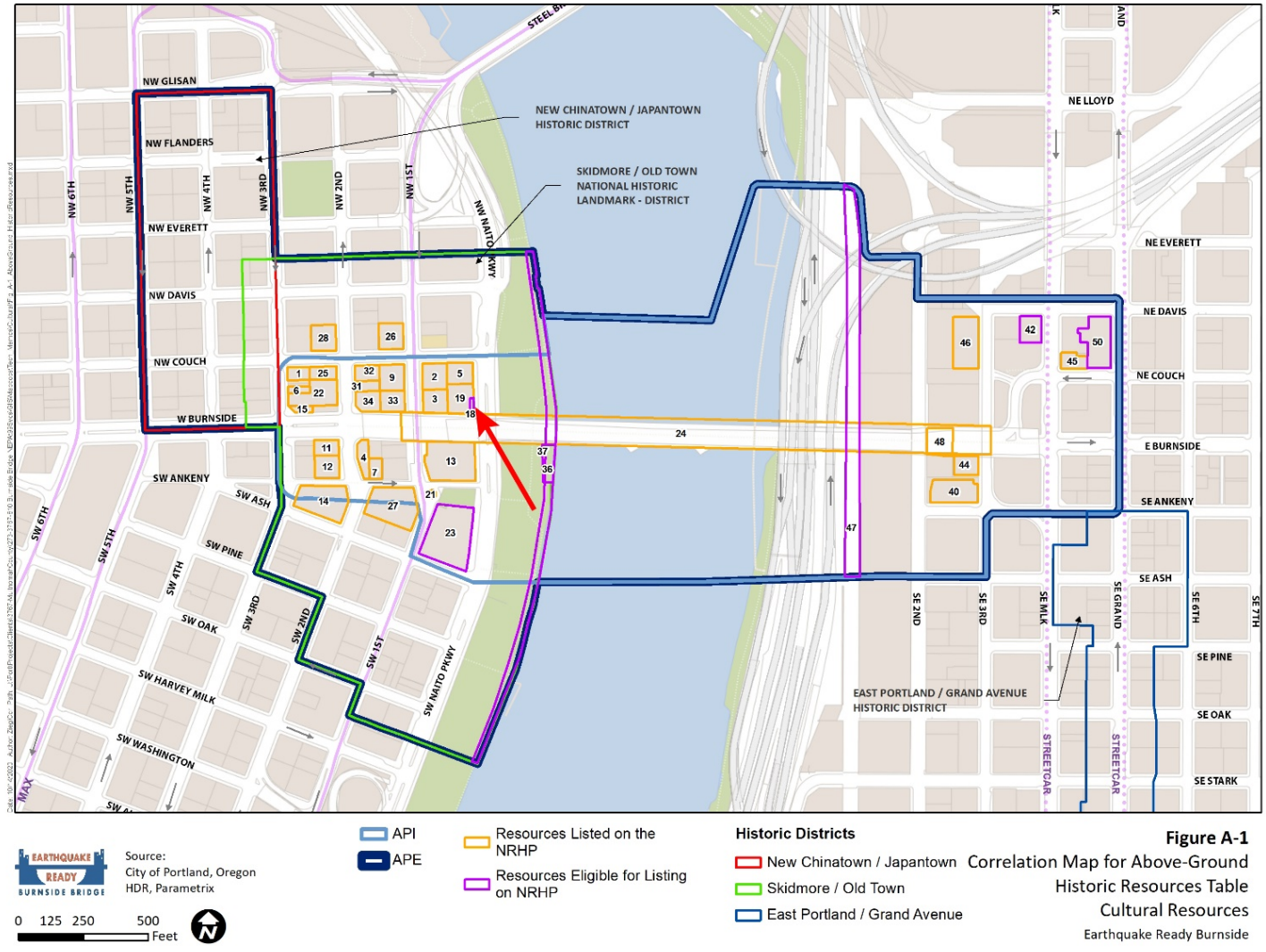
Figure 1: USGS, Portland, OR Quadrangle, 7.5 Minute, 1990. Red arrow indicates location of the White Stag Sign (USGS).

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Sign	
Street Address: 67 West Burnside Street	City, County: Portland, Multnomah



Source: City of Portland, Oregon HDR, Parametrix

0 125 250 500 Feet

API
APE

Resources Listed on the NRHP
Resources Eligible for Listing on NRHP

Historic Districts
New Chinatown / Japantown
Skidmore / Old Town
East Portland / Grand Avenue

Figure A-1
Correlation Map for Above-Ground Historic Resources Table
Cultural Resources
Earthquake Ready Burnside

Figure 2: Map of the Area of Potential Effect (APE) with locations of NRHP-listed and NRHP-eligible resources within the APE. Red arrow indicates location of the White Stag Sign.

ODOT INVENTORY OF HISTORIC PROPERTIES

SECTION 106 LEVEL OF EFFECT FORM

Continuation Sheet

Agency/Project: Oregon Department of Transportation/ Earthquake Ready Burnside Bridge ODOT Key Number: XXXXX, Federal Agency: Federal Highway Administration/Burnside Bridge [Federal-Aid No. C051(111)]	
Property Name: White Stag Sign	
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Figure 3: Aerial photograph with location of the White Stag Sign indicated by red line (Google Earth).

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Photographs

Figure 4: 1951 aerial photograph with location of the White Stag Sign indicated by red line (USGS EarthExplorer).

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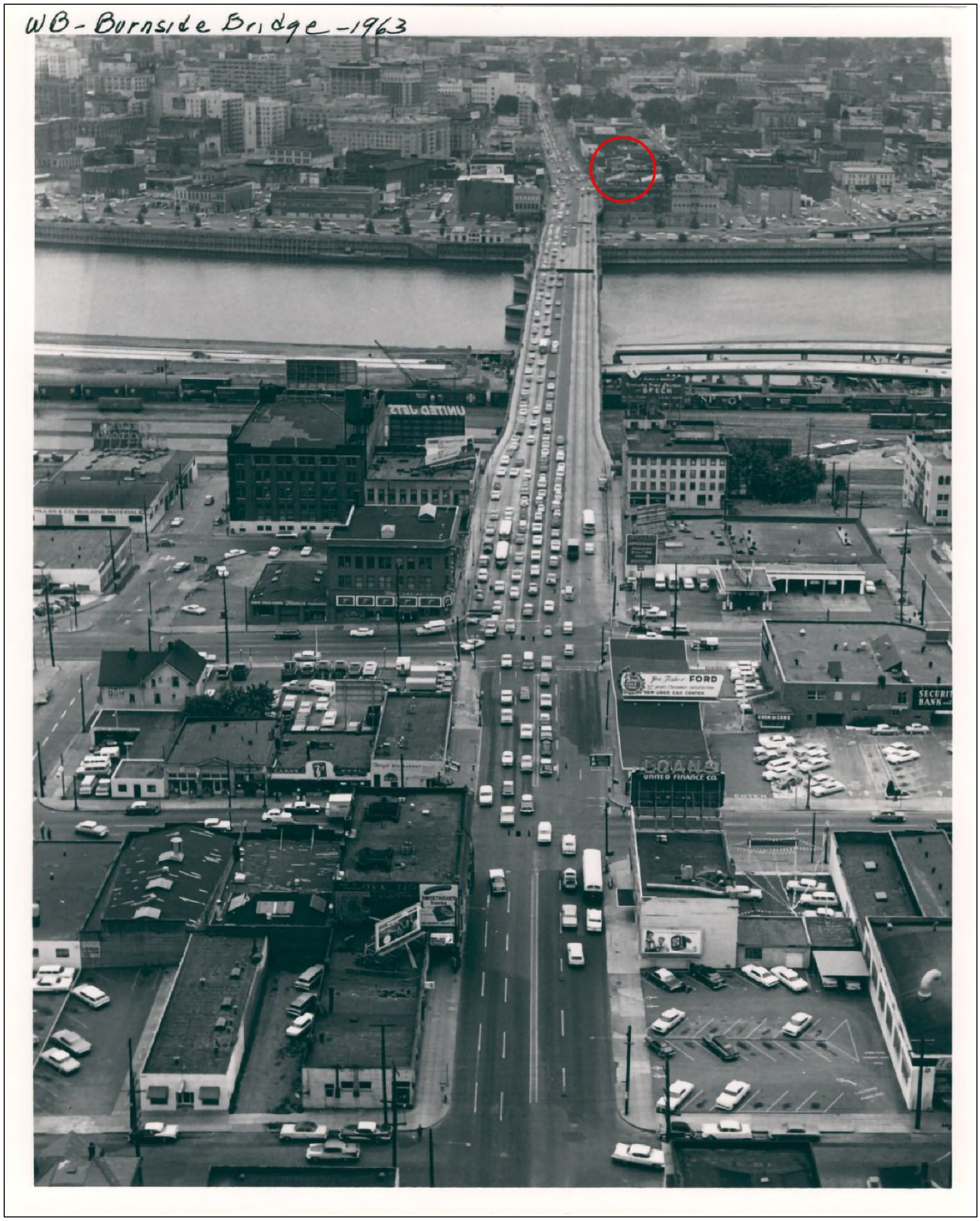

Figure 5: Burnside Bridge westbound, 1963, location of White Stag sign indicated by red circle (Portland Archives A2005-001.106).

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Figure 6: Photograph of the White Stag Sign from the City of Portland, Oregon Historic Resource Inventory, 1984 (OR SHPO).

Figure 7: White Stag Sign, looking up toward the roof of the Willamette Tent and Awning building (Elizabeth O'Brien, 2019)

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Figure 8: White Stag Sign, looking west from west approach of Burnside Bridge (David Ellis, 2021).

Figure 9: White Stag Sign, looking northwest from west approach of Burnside Bridge (David Ellis, 2021).

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Figure 10: White Stag Sign, looking west from west approach of Burnside Bridge (David Ellis, 2021).

Figure 11: White Stag Sign, looking west from west approach of Burnside Bridge (David Ellis, 2021).

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Figure 12: White Stag Sign, looking west from center span of Burnside Bridge (Elizabeth O'Brien, 2019).

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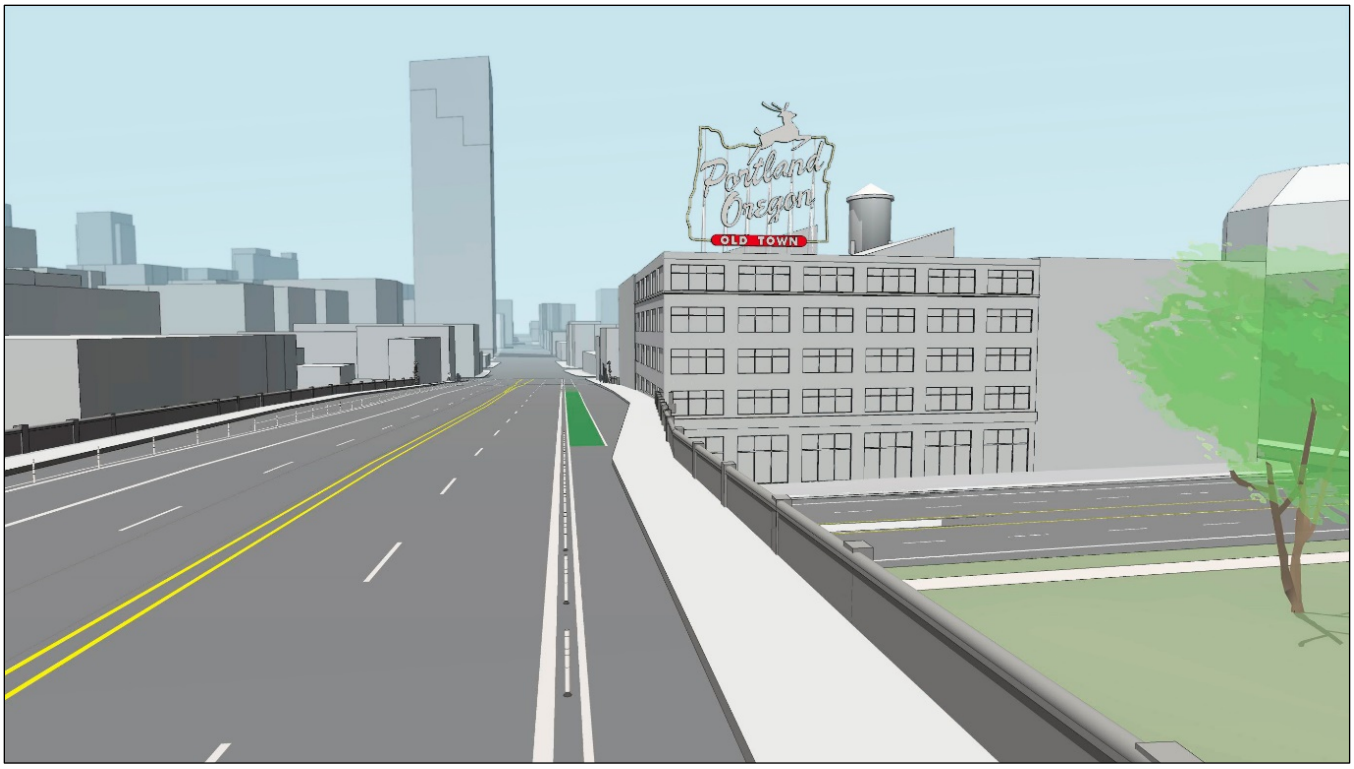

Figure 13: White Stag Sign, artist's rendering of existing condition of west approach (Fat Pencil Studio, 2021), view looking west.

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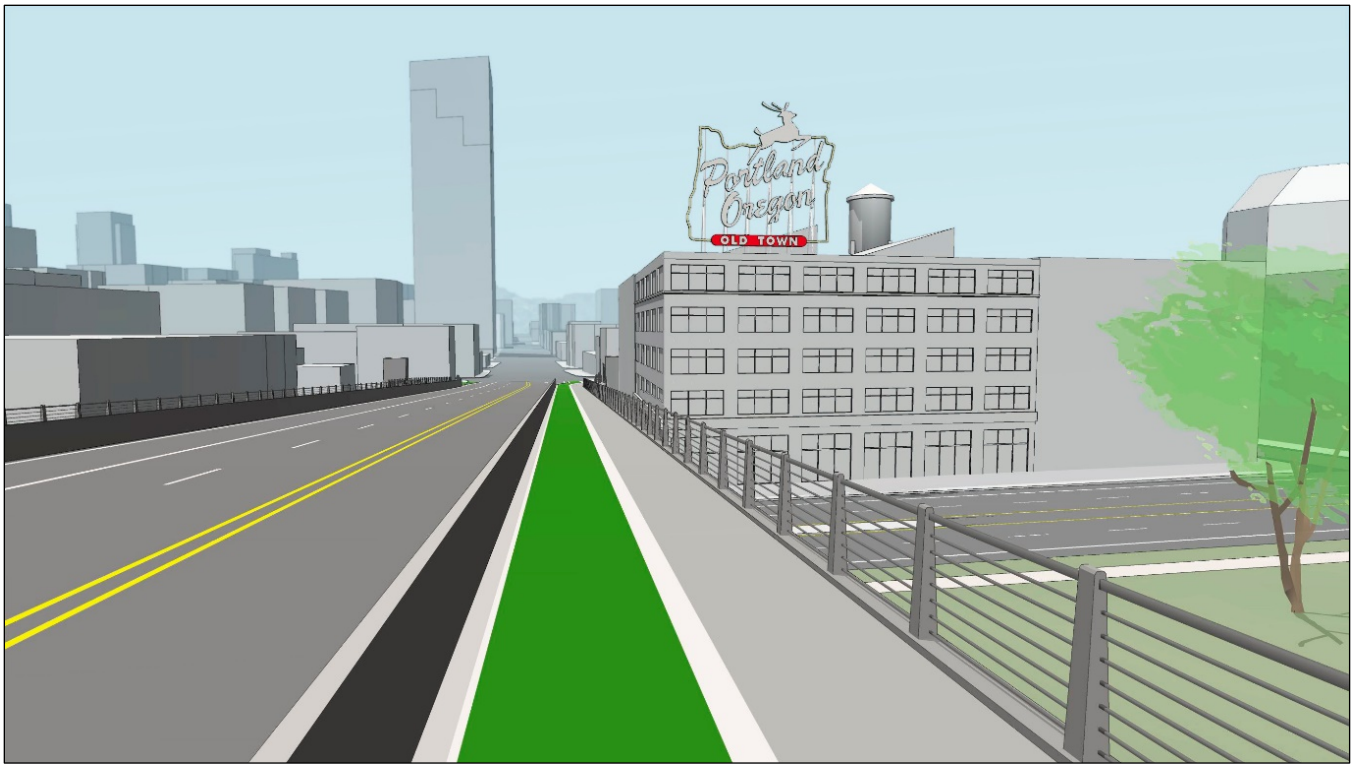

Figure 14: White Stag Sign, artist's rendering of replacement west approach span, view looking west (Joel Newman, Fat Pencil Studio, 08/17/2021).

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Figure 15: White Stag Sign, artist's rendering of existing condition of center span, view looking west (Joel Newman, Fat Pencil Studio, 08/17/2021).

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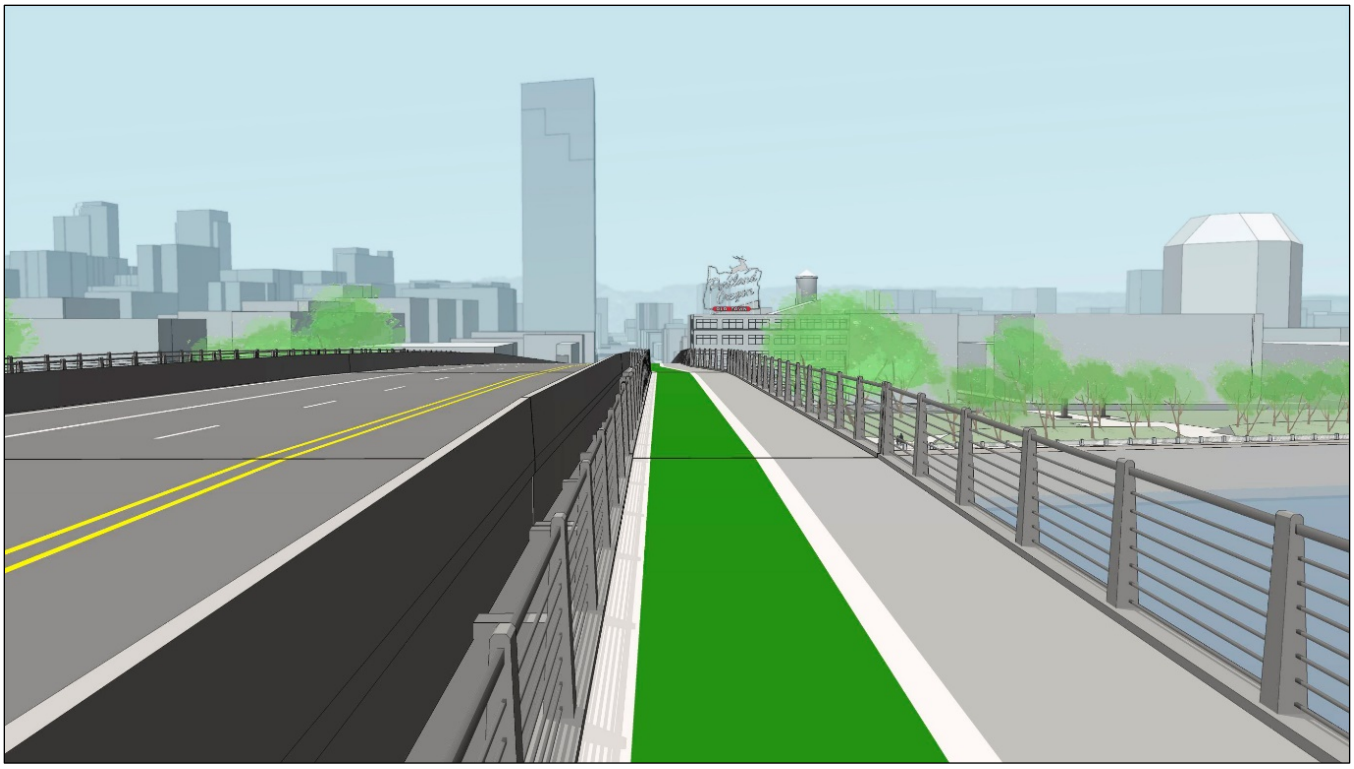

Figure 16: White Stag Sign, artist's rendering of replacement center span (bascule option), view looking west (Joel Newman, Fat Pencil Studio, 08/17/2021).

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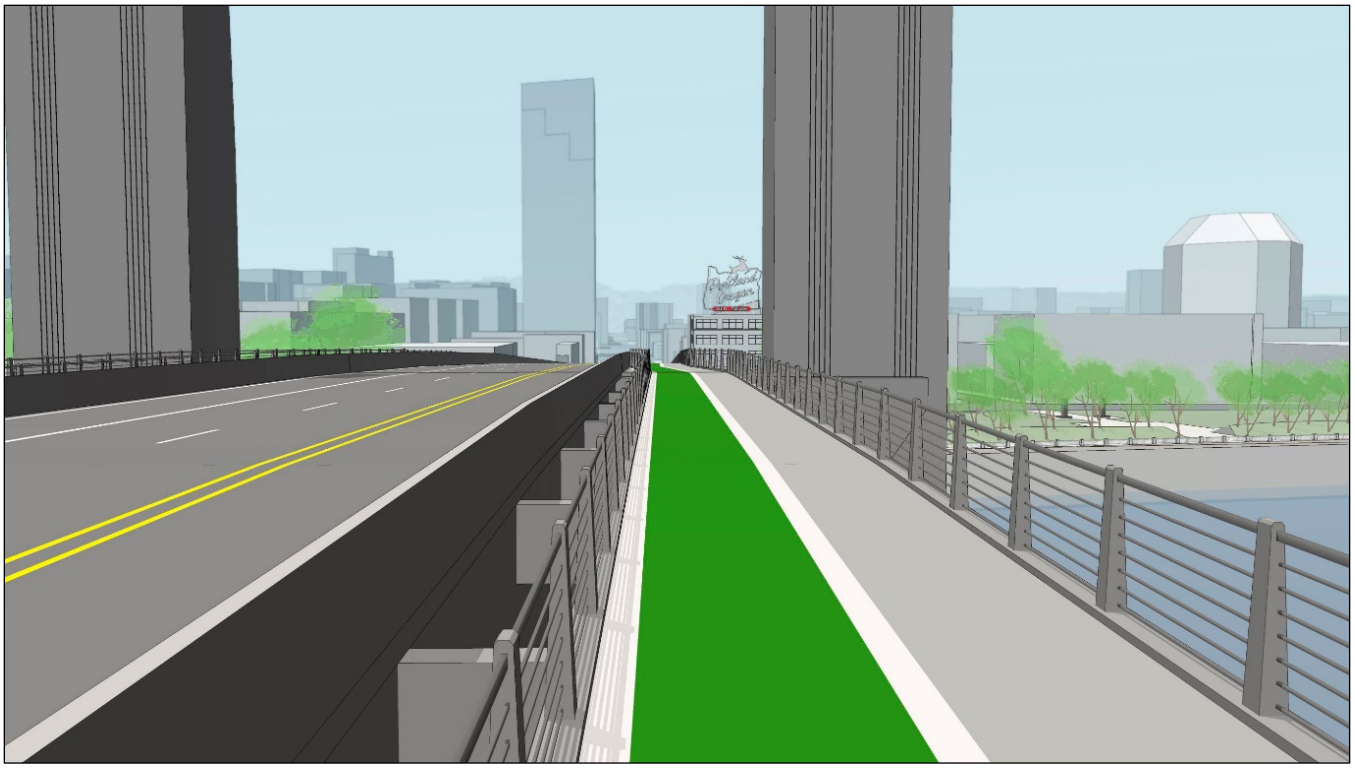

Figure 17: White Stag Sign, artist's rendering of replacement center span (vertical lift option), view looking west (Joel Newman, Fat Pencil Studio, 08/17/2021).