Attachment M

Draft Section 4(f) Analysis

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Multnomah County

Attachment M. Draft Section 4(f) Analysis

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Acronyms, Initialisms, and Abbreviations

ADA	Americans with Disabilities Act
APE	Area of Potential Effect (term used for cultural resources)
API	Area of Potential Impact
BES	City of Portland Bureau of Environmental Services
CFR	Code of Federal Regulations
CIP	Capital Improvement Plan
CSZ	Cascadia Subduction Zone
EIS	Environmental impact statement
EQRB	Earthquake Ready Burnside Bridge
FHWA	Federal Highway Administration
FR	Federal Register
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
ODOT	Oregon Department of Transportation
OWJ	Official with Jurisdiction
PP&R	Portland Parks and Recreation
PSM	Portland Saturday Market
SHPO	State Historic Preservation Office
UPRR	Union Pacific Railroad
USC	United States Code
USDOT	U.S. Department of Transportation
WRWT	Willamette River Water Trail

Chapter 1 – Section 4(f) Technical Analysis

1.1 Introduction

This Section 4(f) analysis report has been prepared with and is attached as part of the Draft Environmental Impact Statement (EIS) for the Earthquake Ready Burnside Bridge (EQRB) Project. It is organized into the following chapters:

- Chapter 1 – Technical Analysis

  Identifies, describes, and provides preliminary determination of Section 4(f) use for Section 4(f) properties within the Project's Area of Potential Impact (API).

- Chapter 2 – Section 4(f) Evaluation

  Analyzes the alternatives that avoid Section 4(f) property and determines if they are feasible and prudent.

- Chapter 3 – Nationwide Programmatic Section 4(f) Evaluation for Projects that Necessitate the Use of Historic Bridges

  Applies and analyzes project details specific to the Burnside Bridge to document compliance with the programmatic evaluation.

Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966 prohibits FHWA and other USDOT agencies from using land from publicly owned parks, recreation areas (including recreational trails), wildlife and waterfowl refuges, or public and private historic properties unless there is no feasible and prudent alternative to that use and the action includes all possible planning to minimize harm to the property resulting from such a use. Section 4(f) properties include the following:

- Parks and recreational areas of national, state, or local significance that are both publicly owned and open to the public.
- Publicly owned wildlife and waterfowl refuges of national, state, or local significance that are open to the public to the extent that public access does not interfere with the primary purpose of the refuge.
- Historic sites of national, state, or local significance either listed on, or eligible for listing on the National Register of Historic Places (NRHP) in public or private ownership regardless of whether they are open to the public.
- Archaeological sites that are either listed on, or eligible for listing on, the NRHP and warrant preservation in place.

1.2 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 1-1 shows the project area.

1.3 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 (CSZ) earthquake. The Burnside Bridge would provide a reliable crossing for emergency response, evacuation, and economic recovery after an earthquake. Additionally, the bridge would provide a long-term safe crossing with low-maintenance needs.

1.4 Project Alternatives

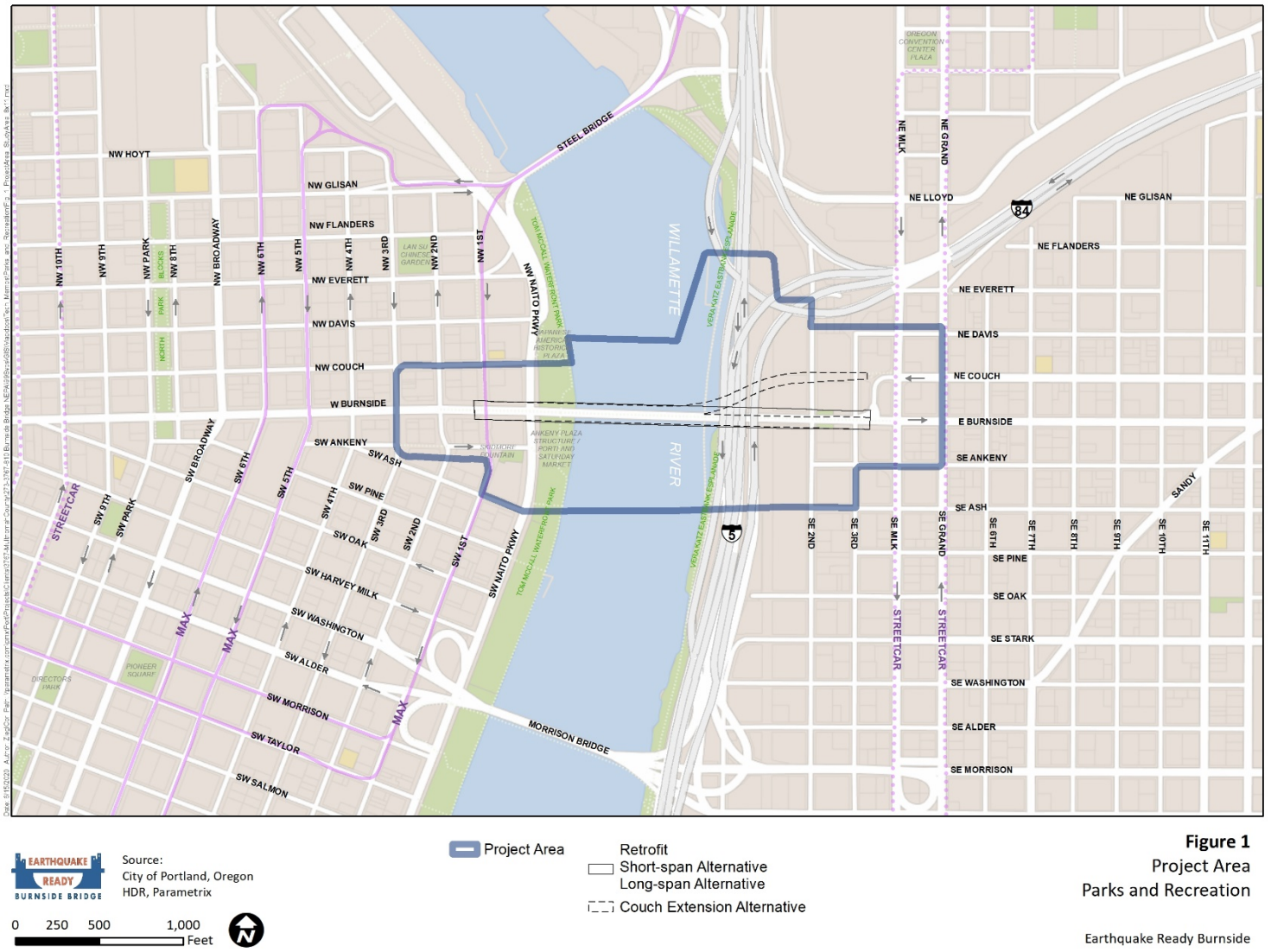
The project alternatives are described in detail with text and graphics in the *EQRB Description of Alternatives Report*. That report describes the alternatives' current design as well as operations and construction assumptions.

Briefly, the Draft EIS and this technical analysis evaluate the No-Build Alternative and four build alternatives. Among the build alternatives there is an Enhanced Seismic Retrofit Alternative that would replace certain elements of the existing bridge and retrofit other elements. There are three replacement alternatives that would completely remove and replace the existing bridge. In addition, the Draft EIS and this technical analysis consider options for managing traffic during construction. Nomenclature for the alternatives/options is:

- No-Build Alternative
- Build Alternatives
    - Enhanced Seismic Retrofit (Retrofit Alternative)
    - Replacement Alternative with Short-span Approach (Short-span Alternative)
    - Replacement Alternative with Long-span Approach (Long-span Alternative), the Draft EIS names this Alternative as the Preferred Alternative (with no temporary bridge)
    - Replacement Alternative with Couch Extension (Couch Extension)
- Construction Traffic Management Options
    - Temporary Detour Bridge Option (temporary bridge) includes three modal options:
        - Temporary Bridge: All modes
        - Temporary Bridge: Transit, Bicycles and Pedestrians only
        - Temporary Bridge: Bicycles and Pedestrians only
    - Without Temporary Detour Bridge Option (No Temporary Bridge)

Please see the *EQRB Description of Alternatives Report* (Multnomah County 2021c) for text, maps, and graphical descriptions of the alternatives.

Figure 1-1. Project Area



Source: City of Portland, HDR, Parametrix

1.5 Definitions

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

- **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. The API for Section 4(f) properties is defined in Section 1.7.1.

1.6 Section 4(f) Regulations

Federal requirements protecting publicly owned parks, greenspaces, recreational areas and trails, wildlife and waterfowl refuges, and public or private historic sites apply to all transportation projects that receive USDOT funding or require USDOT approval. These requirements, known as Section 4(f), are originally from Section 4(f) of the USDOT Act of 1966, which was recodified in 1983 as 49 United States Code (USC) 303, Policy on lands, wildlife and waterfowl refuges, and historic sites and 23 USC 138 Preservation of parklands. The implementing regulations for Section 4(f) are located at 23 CFR 774.

The Section 4(f) analysis relies on information from and coordination conducted for the *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e) and the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b).

1.6.1 Use of Section 4(f) Properties

Section 4(f) prohibits the use of Section 4(f) properties for USDOT-approved transportation projects except under certain defined circumstances. USDOT agencies, including the Federal Highway Administration:

> …may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if—

1. there is no prudent and feasible alternative to using that land; and
2. the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

A Section 4(f) "use" occurs under the following three scenarios:

(1) A Section 4(f) property is permanently incorporated into a transportation facility. Permanent incorporation can include fee simple acquisition as well as permanent easements.

(2) A Section 4(f) property is required, in whole or in part, for project construction-related activities. The Section 4(f) property is not permanently incorporated into a transportation facility, but the effects are considered to be adverse in terms of the preservation purposes the Section 4(f) statute. Such effects constitute a "use" unless the effects meet all the conditions for "temporary occupancy" as stated in 23 CFR §774.13(d). Temporary occupancy is not a "use."

(3) A Section 4(f) property is not permanently incorporated, but the transportation project's proximity effects are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. This is known as "constructive use." Examples of such use include the following:

- **Noise** – The projected noise level increase from the project substantially interferes with the use and enjoyment of a resource that is protected by Section 4(f), such as enjoyment of a historic site where a quiet setting is a generally recognized feature or attribute of the site's significance.
- **Aesthetics** – The proximity of the proposed project impairs the aesthetic quality of a resource, where aesthetic qualities are considered important contributing elements to the value of a resource, such as impairment to visual or aesthetic qualities that obstructs or eliminates the primary views of an architecturally significant historic building.
- **Access Restrictions** – The project results in a restriction of access to the Section 4(f) resource, which substantially diminishes the utility of the resource.
- **Vibration** – A vibration impact from the operation of a project substantially impairs the use of a Section 4(f) resource, such as projected vibration levels from a rail transit project great enough to affect the structural integrity of a historic building.
- **Ecological Intrusion** – The ecological intrusion of the project substantially diminishes the value of wildlife habitat in a wildlife or waterfowl refuge adjacent to the project or substantially interferes with the access to a wildlife or waterfowl refuge. There are no wildlife or waterfowl refuges in or adjacent to the project area, so ecological intrusion is not discussed further.

1.6.2 Exceptions to Section 4(f) Use

23 CFR 774.13 identifies various exceptions to the requirement for Section 4(f) approval. Subsection (d) provides that temporary occupancies of land that are so minimal as to not constitute a use are not considered a Section 4(f) use when the following conditions are satisfied:

- Duration must be temporary, i.e., less than the time needed for construction of the project, and there should be no change in ownership of the land;

- Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
- The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
- There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

1.6.3 Approval of Section 4(f) Use

When there is a use of Section 4(f) property, FHWA will determine what level of documentation is needed to make a Section 4(f) approval. Under Section 4(f), FHWA cannot approve the use of land from Section 4(f) properties as part of a transportation project unless:

- There is no feasible and prudent avoidance alternative to the use of land and the action includes all possible planning to minimize harm to the Section 4(f) property resulting from such use; or
- FHWA determines that the use of the property will have a *de minimis* impact. *De minimis* impacts related to historic sites are defined as the determination of either “no adverse effect” or “no historic properties affected” in compliance with Section 106 of the National Historic Preservation Act (NHPA). *De minimis* impacts on publicly owned parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not “adversely affect the activities, features, and attributes” of the Section 4(f) property. The Official with Jurisdiction (OWJ) must concur with the *de minimis* determination. For historic sites, the State Historic Preservation Office (SHPO) is the OWJ; for parks, recreation areas, and wildlife and waterfowl refuges, the OWJ is the official of the agency that owns and/or administers the property. If a transportation use of Section 4(f) property results in *de minimis* impact, analysis of avoidance alternatives is not required, and the Section 4(f) evaluation process is complete.

If impacts to a Section 4(f) resource do not meet the conditions for a *de minimis* impact determination, there are two approval options depending on the type of Section 4(f) use: A programmatic Section 4(f) evaluation or an individual Section 4(f) evaluation. These approval types are described below.

1.6.3.1 Programmatic Section 4(f) Evaluations

FHWA has issued five nationwide programmatic Section 4(f) evaluations which can be implemented if the project meets specific conditions. Two of the nationwide programmatic evaluations may be applicable to this Project:

1.6.3.2 Historic Bridge Programmatic Section 4(f) Evaluation

One of the five nationwide programmatic evaluations includes the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges. This programmatic Section 4(f) evaluation may be applied by FHWA to projects which meet the following criteria:

1. The bridge is to be replaced or rehabilitated with federal funds.
2. The project will require the use of a historic bridge structure which is on or is eligible for listing on the NRHP.
3. The bridge is not a National Historic Landmark.
4. The FHWA Division Administrator determines that the facts of the project match those sections of the programmatic Section 4(f) evaluation guidelines regarding alternatives, findings, and mitigation.
5. Agreement among FHWA, SHPO, and the Advisory Council on Historic Preservation has been reached through procedures pursuant to Section 106 of the NHPA.

Following publication of the Draft EIS, including the draft Section 106 Memorandum of Agreement (MOA), FHWA will review comments received from the public, agencies, and the Oregon SHPO and determine whether this Project meets the five criteria above. This determination will be included in the Final EIS.

1.6.3.3 Net Benefit Programmatic Section 4(f) Evaluation

The net benefit nationwide programmatic Section 4(f) evaluation is applicable when FHWA and the OWJ agree that due to the project, the use of the Section 4(f) property would result in a net benefit to the Section 4(f) property. The criteria for use include the following:

1. The proposed transportation project uses a Section 4(f) park, recreation area, wildlife or waterfowl refuge, or historic site.
2. The proposed project includes all appropriate measures to minimize harm and subsequent mitigation necessary to preserve and enhance those features and values of the property that originally qualified the property for Section 4(f) protection.
3. For historic properties, the project does not require the major alteration of the characteristics that qualify the property for the NRHP such that the property would no longer retain sufficient integrity to be considered eligible for listing. For archaeological properties, the project does not require the disturbance or removal of the archaeological resources that have been determined important for preservation in place rather than for the information that can be obtained through data recovery. The determination of a major alteration or the importance to preserve in place will be based on consultation consistent with 36 CFR Part 800.
4. For historic properties, consistent with 36 CFR Part 800, there must be agreement reached amongst the SHPO and/or Tribal Historic Preservation Officer, as appropriate, FHWA and the applicant on measures to minimize harm when there is a use of Section 4(f) property. Such measures must be incorporated into the project.

5. The official(s) with jurisdiction over the Section 4(f) property agree in writing with the assessment of the impacts; the proposed measures to minimize harm; and the mitigation necessary to preserve, rehabilitate and enhance those features and values of the Section 4(f) property; and that such measures will result in a net benefit to the Section 4(f) property.
6. FHWA determines that the project facts match those set forth in the Applicability, Alternatives, Findings, Mitigation and Measures to Minimize Harm, Coordination, and Public Involvement sections of the programmatic evaluation.

1.6.3.4 Individual Section 4(f) Evaluations

An individual Section 4(f) evaluation must be completed when approving a project that requires the use of Section 4(f) property if the use results in a greater than *de minimis* impact and a programmatic Section 4(f) evaluation cannot be applied. An individual Section 4(f) evaluation must document the proposed use of Section 4(f) properties by all project alternatives and make the following determinations:

1. That there is no feasible and prudent alternative that completely avoids the use of the Section 4(f) property; and
2. The project includes all possible planning to minimize harm to the Section 4(f) property resulting from the transportation use. (23 CFR 774.3).

This chapter identifies and describes the Section 4(f) properties in the EQRB project area and analyzes the potential of each of the Alternatives to use those resources. After public comments on this draft Section 4(f) Analysis are received, a final Section 4(f) Analysis will be prepared and issued with the Final EIS/Record of Decision.

1.7 Affected Environment

1.7.1 Area of Potential Impact

The API specifically for the Section 4(f) analysis is a combined API including the same area as that for the parks and recreation and archaeologic and historic resources Area of Potential Effect (APE).[1] The parks and recreation API is bounded by the parcels of land immediately adjacent to the project area (see Figure 1-1). There are no wildlife/waterfowl refuges present in or nearby the project area, so no separate API is defined for refuges.

FHWA is the lead federal agency and is responsible for defining the APE for EQRB; FHWA has delegated some NHPA responsibilities to the Oregon Department of Transportation (ODOT). Formal definition of the APE has been made in consultation with Oregon SHPO. The APE for the Project has been defined to address where the Project may have physical alterations to historic properties, as well as where there may be effects from noise and vibration, and changes to traffic patterns and the visual setting. The APE defined in consultation with the SHPO includes the maximum footprint of the build alternatives, including approaches and the temporary bridge proposed during

[1] Area of Potential Effect, or APE, is the term used when discussing an impact area for cultural or historic resources. When discussion all other type of resources, the term used is Area of Potential Impact, or API.

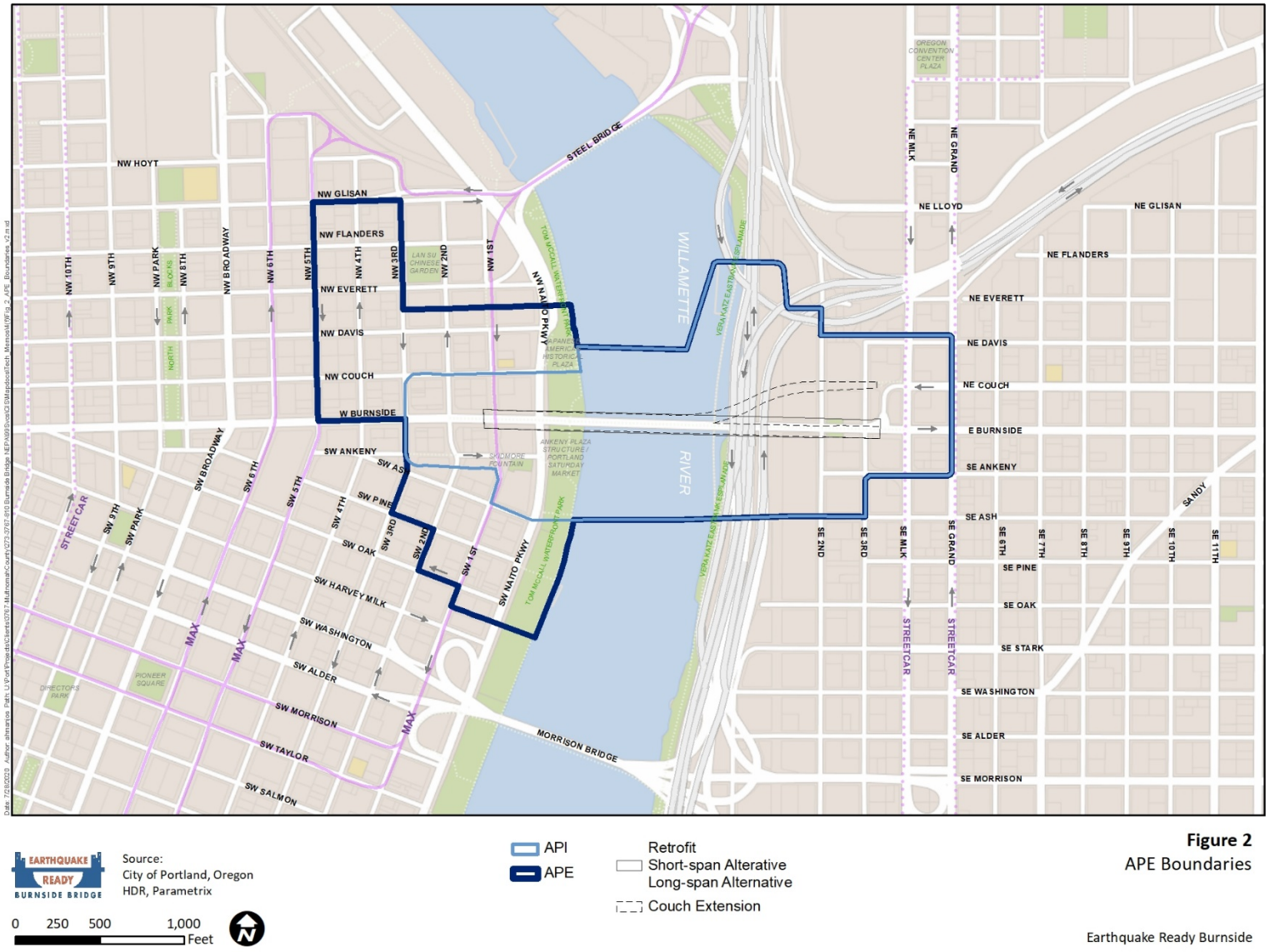
construction. The APE has also been defined to include all of the geographic extent of the New Chinatown/Japantown Historic District and Skidmore/Old Town National Historic Landmark District. The APE abuts the East Portland Grand Avenue Historic District at SE Ankeny and SE Grand Avenue, but that historic district is not within the APE. The APE therefore extends from SE Grand Avenue on the east to NW 5th Avenue on the west. The New Chinatown/Japantown Historic District boundaries are West Burnside north to NW Glisan, NW 5th Avenue on the west, and NW 3rd on the east. The Skidmore/Old Town National Historic Landmark District boundaries are irregular and are best defined as mapped in Figure 1-2.

1.7.2 Resource Identification and Evaluation Methods

This report relies on the data collected and analyzed in the *EQRB Parks and Recreation Resources Technical Report* (Multnomah County 2021e) and the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b).

Field visits to Section 4(f) properties within the API were conducted to confirm descriptions of existing conditions and observe activities at these properties.

Figure 1-2. APE Boundaries



Source: City of Portland, HDR, Parametrix

1.7.3 Section 4(f) Resources

1.7.3.5 Parks, Recreation, and Open Space Resources

Table 1-1 identifies publicly owned park, recreation, and open space areas within the API that qualify as Section 4(f) resources (also see Figure 1-3, Figure 1-4, and Figure 1-5). Additional information about each resource is available in the *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e).

Table 1-1. Section 4(f) Parks and Recreation Resources

ID	Resource	Ownership (Management)	General Resource Description and Features Within API
1	Governor Tom McCall Waterfront Park	City of Portland	Waterfront Park is an approximately 36-acre park that stretches between the Willamette River and Downtown Portland that was constructed between 1974 and 1978. The park replaced Harbor Drive to become the city's direct visual and physical access to the Willamette River. Features in the API include the following: • Willamette River Greenway Trail • Japanese American Historical Plaza • Ankeny Plaza Structure/Portland Saturday Market Location • The Meadow and Bill Naito Legacy Fountain
2	Vera Katz Eastbank Esplanade	City of Portland – Structure Oregon Division of State Lands – Beds and Banks of River	The 1.5-mile Esplanade extends north from the Hawthorne Bridge, past the Morrison and Burnside Bridges, and terminates at the Steel Bridge, with connections to eastside neighborhoods as well as across the river to Governor Tom McCall Waterfront Park. The City of Portland developed the Esplanade after its completion of the Eastbank Riverfront Park Master Plan in 1994 (City of Portland 1994). Construction was completed in May 2001. Features in the API include the following: • Open all hours, all days • Floating walkway • Stairs connecting to Burnside Bridge • Multi-use pedestrian and bicycle trail • Kevin J. Duckworth memorial Dock
3	Willamette River Greenway Trail	City of Portland (within API)	The Willamette River Greenway Trail is an interconnected network of trails as components of the Willamette River Greenway Program, originated with the Willamette River Greenway Act by the Oregon Legislature in 1967 and guided by Oregon Statewide Planning Goal 15 to preserve natural spaces and public access to the Willamette River. Features in the API include the following: • Trail on west side of the river travels within Waterfront Park, adjacent to the seawall where possible within the API. • Trail on east side of the river travels within the Esplanade.
4	Willamette River Water Trail	Oregon Parks and Recreation Department	The Willamette River Water Trail (WRWT) administered by the Oregon Parks and Recreation Department is a 216-mile-long water-based trail. The WRWT is not a specific location or route within the river, but as the Willamette passes under the Burnside Bridge, the WRWT does as well.

ID	Resource	Ownership (Management)	General Resource Description and Features Within API
5	Ankeny Plaza	City of Portland	Ankeny Plaza is a 1.33-acre City of Portland park property just south of the Burnside Bridge between SW 1st Avenue and SW Naito Parkway, adjacent to SW Ankeny Street. Features in the API include the following: • Hardscape plaza that features historic building material components, wrought iron details, and rows of deciduous trees. • Skidmore Fountain is a prominent feature in the park and is Portland's oldest piece of public art. • The plaza is used as part of the Portland Saturday Market.

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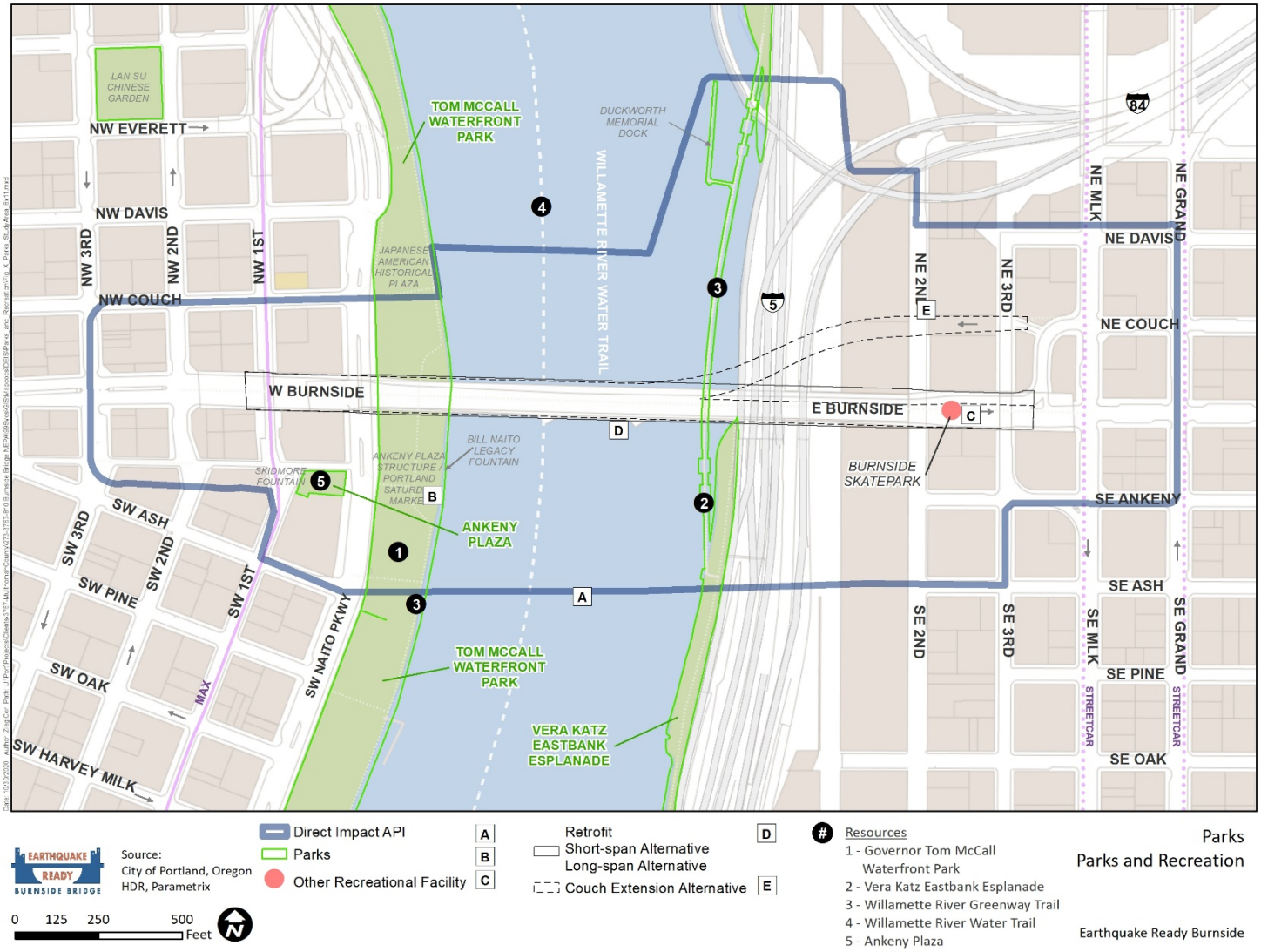
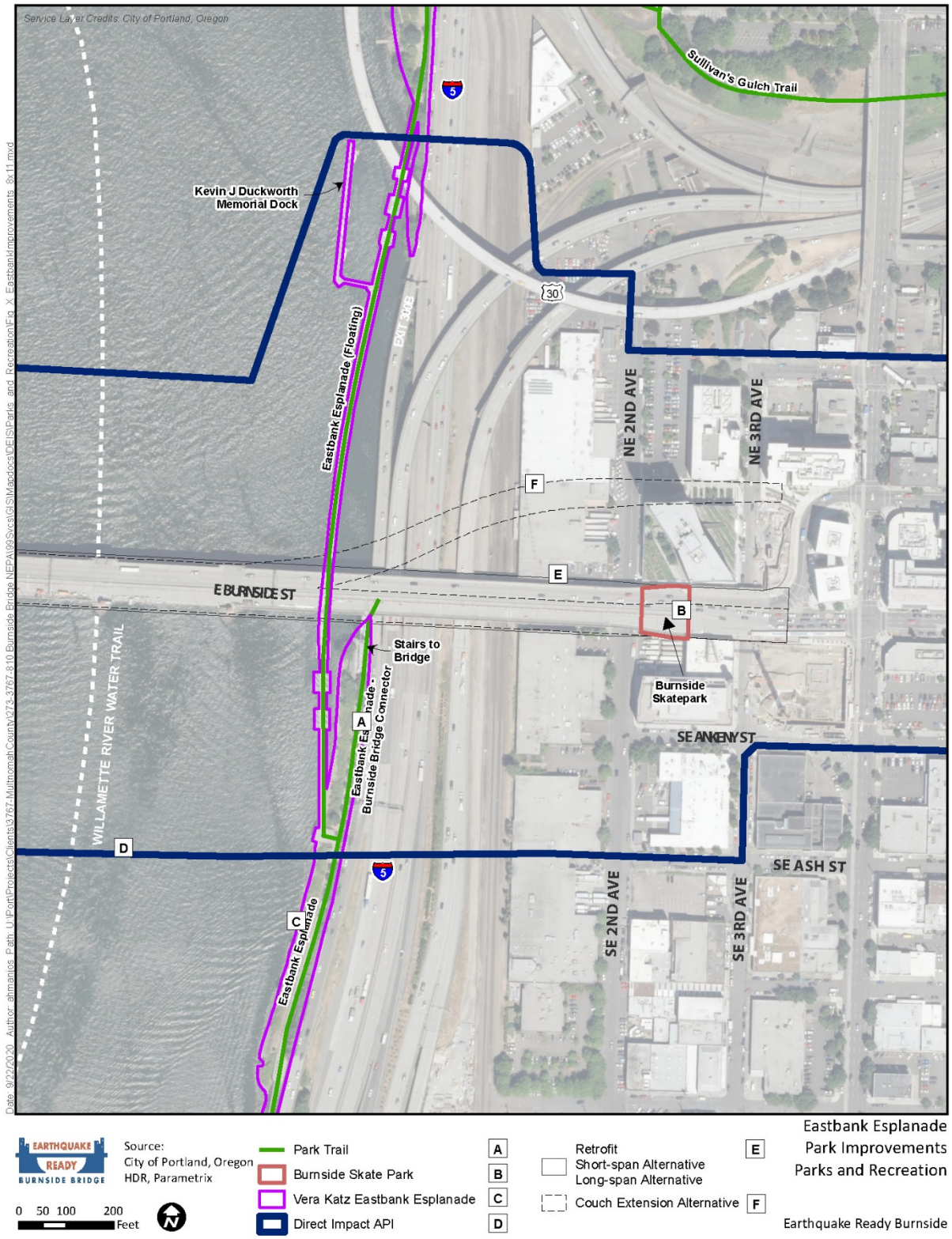
Figure 1-3. Parks and Recreation Sites



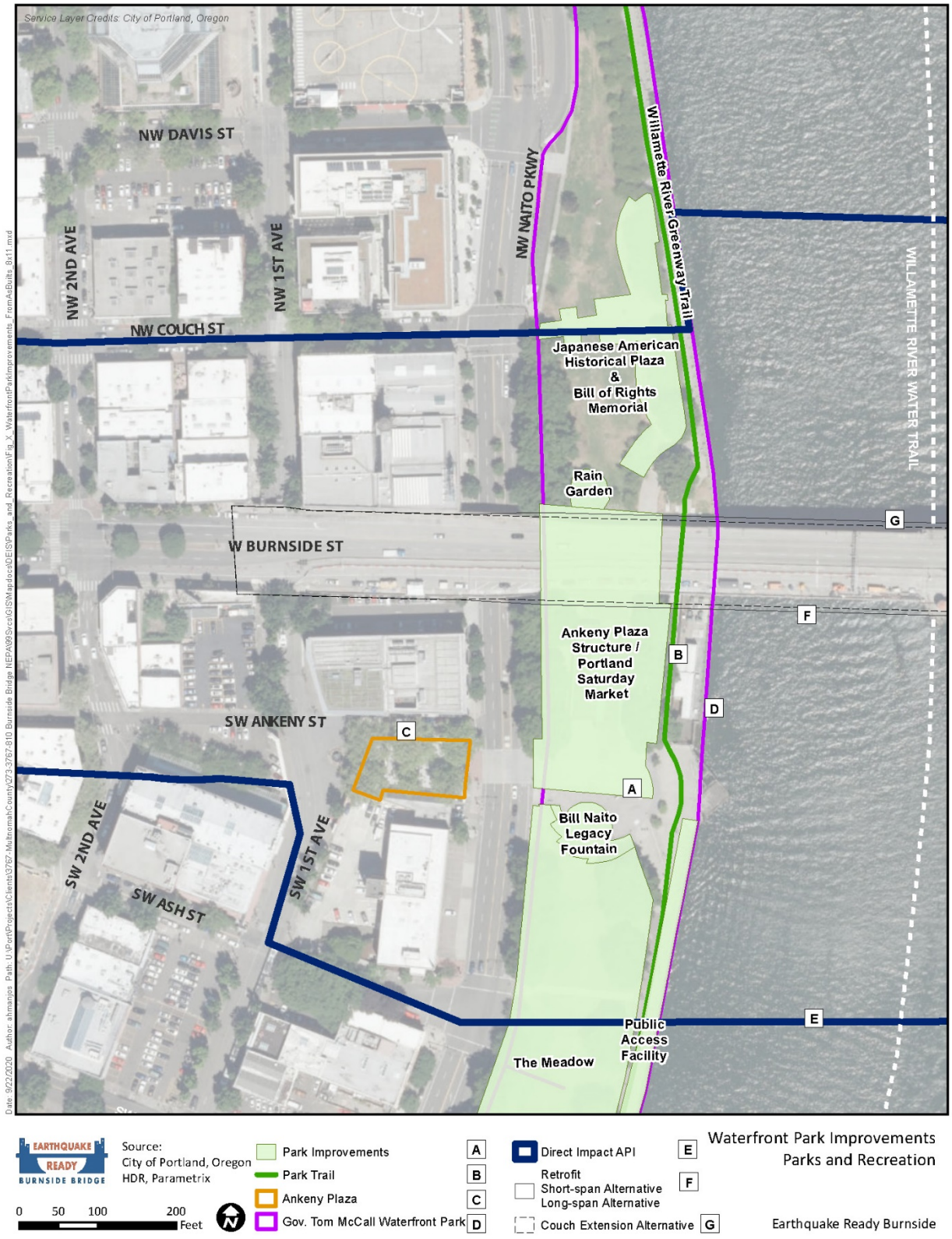
Source: City of Portland, HDR, Parametrix

Figure 1-4. Eastbank Esplanade



Source: City of Portland, HDR, Parametrix

Figure 1-5. Waterfront Park



Source: City of Portland, HDR, Parametrix

1.7.3.6 Historic Sites

The API encompasses portions of one historic district, Skidmore/Old Town National Historic Landmark District, and abuts two additional districts, New Chinatown/Japantown Historic District on the west side of the API and East Portland / Grand Avenue Historic District on the east side of the API (see Figure 1-6). The *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) identifies the contributing resources for the Skidmore/Old Town and New Chinatown/Japantown Historic Districts within the district boundaries but outside of the API. However, at the Oregon SHPO's direction, the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) focused the detailed survey on resources within the API.

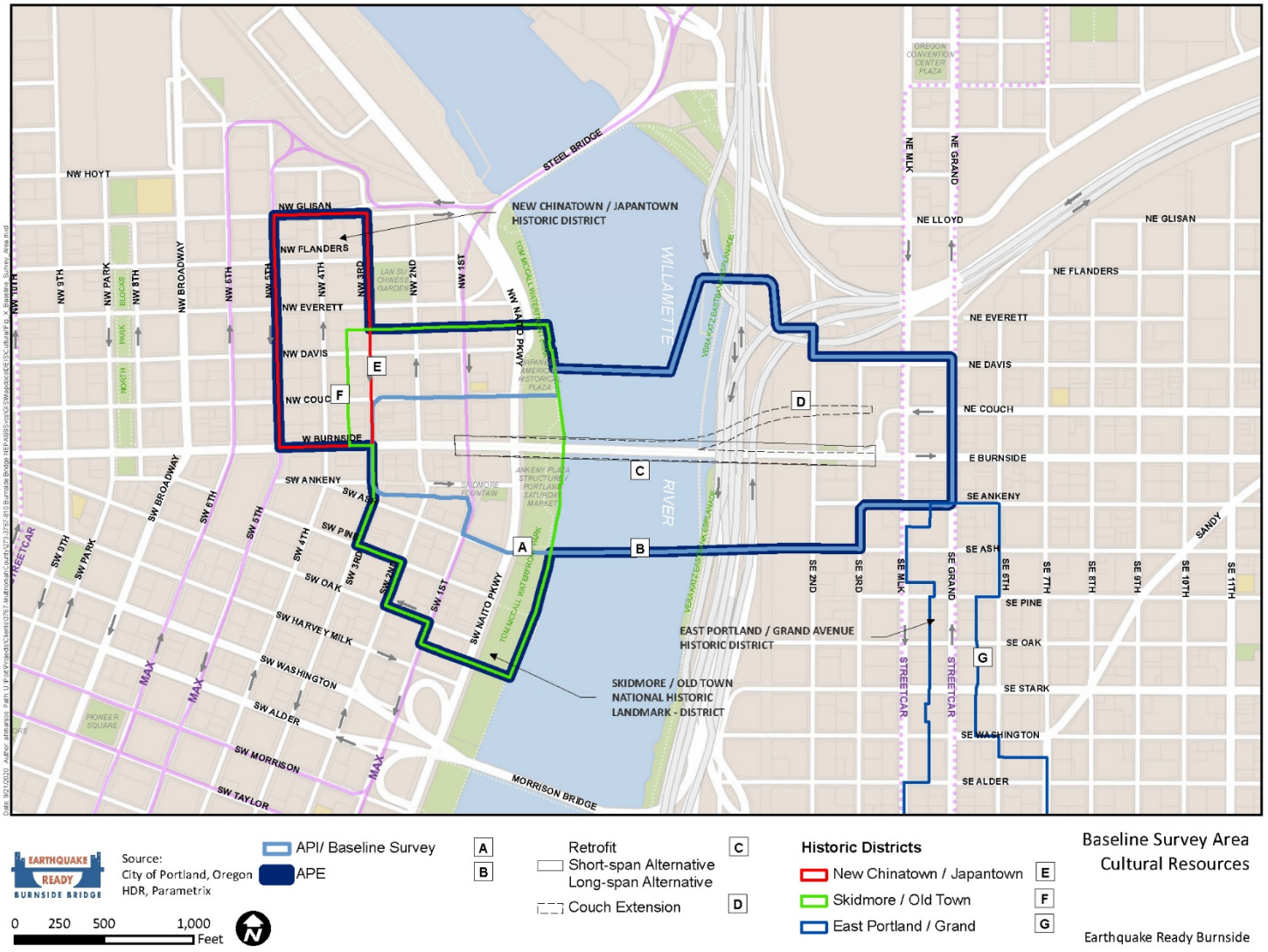
A total of 49 historic resources were identified.

There are 29 resources within the API currently listed on the NRHP as either contributing resources in the Skidmore/Old Town National Historic Landmark District or individually listed. An additional 8 resources are eligible for listing on the NRHP. The 29 listed resources and 8 eligible resources are included in Appendix A and are considered historic Section 4(f) resources (also see Figure 1-7).

Section 4(f) resources either listed or considered eligible for listing on the NRHP within the API notable for their proximity to the Burnside Bridge include the Burnside Bridge itself, the White Stag sign, Burnside Skatepark, and Ankeny Pump Station.

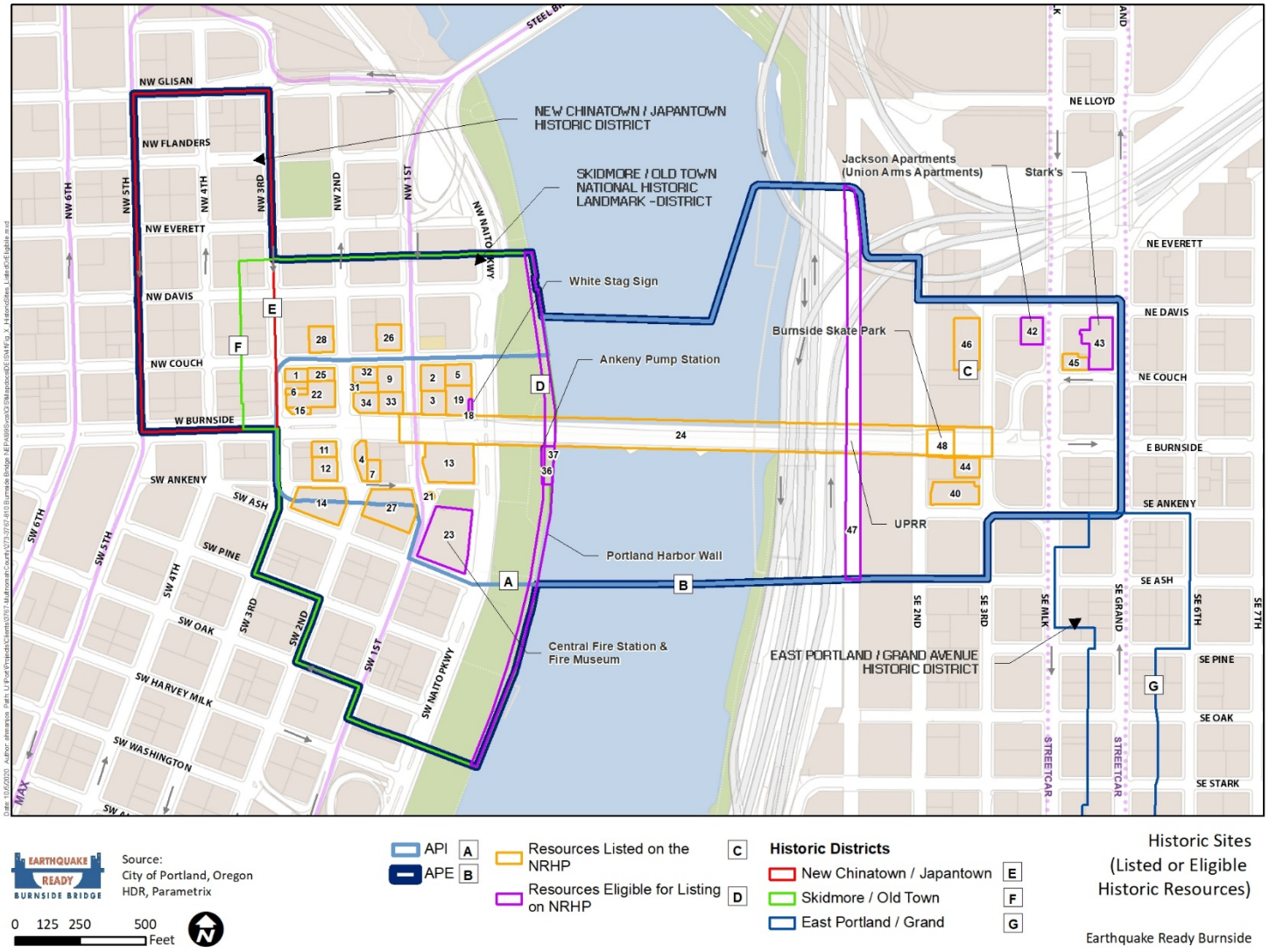
In addition to above-ground historic resources, there is one previously recorded archaeological site within the API. Its status is unevaluated at this time. Further determination is needed to establish whether retention in place is warranted.

Figure 1-6. Baseline Survey Area



Source: City of Portland, HDR, Parametrix

Figure 1-7. Historic Sites (Listed or Eligible Historic Resources)



Source: City of Portland, HDR, Parametrix

1.8 Assessment Methods

1.8.1 Use Assessment

All identified Section 4(f) properties were assessed to determine whether the project alternatives would result in a Section 4(f) use of the resource. The *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e) analysis assisted in determining impacts that could be considered a Section 4(f) use. Use of archaeological and historic resources was evaluated in conjunction with the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and the Findings of Effect prepared for the Section 106 analysis.

Conceptual engineering information for the build alternatives, in conjunction with property boundary and acquisition maps for the identified resources, were used to determine where the build alternatives might permanently or temporarily incorporate all or part of a Section 4(f) property into the transportation project. To determine whether there would be a constructive use, the Section 4(f) analysis evaluated whether there would be proximity impacts and determined whether the build alternatives would substantially impair protected activities, features, or attributes of adjacent or nearby Section 4(f) properties.

Where Section 4(f) use is anticipated, the agency with jurisdiction over that resource has been identified and contacted. The project team has arranged meetings with the Official with Jurisdiction over the properties to discuss the significance of the property and probable effects based on the assessment in this report.

Chapter 1 – Section 4(f) Technical Analysis identifies the alternatives that involve use of a Section 4(f) property and which alternatives, if any, would avoid or reduce the use. This chapter also discusses potential beneficial effects to Section 4(f) properties.

1.8.2 Avoidance and Measures to Minimize Harm

When project impacts to a Section 4(f) resource cannot be addressed through a *de minimis* impact determination or a nationwide programmatic evaluation, the project must consider whether there are feasible and prudent alternatives that would avoid the Section 4(f) use. As defined in the Section 4(f) regulations, an alternative is feasible if it can be built as a matter of sound engineering judgment. An alternative is prudent if all the following requirements are met:

- It meets the project purpose and need and does not compromise the project to a degree that makes it unreasonable to proceed in light of its stated purpose and need.
- It does not cause extraordinary operational or safety problems.
- It causes no other unique problems or severe economic or environmental impacts.
- It would not cause extraordinary community disruption.
- It does not have construction costs of an extraordinary magnitude.
- There are no other factors that collectively have adverse impacts that present unique problems or reach extraordinary magnitudes.

If an alternative to avoid a Section 4(f) use is not feasible and prudent, that alternative may be removed from consideration. If there are no feasible and prudent alternatives that can avoid all Section 4(f) properties, then the project must determine which alternative results in the least overall harm, after considering the following factors:

- The ability to mitigate adverse impacts to each Section 4(f) property (including mitigation measures that result in benefits to the property)
- The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features of the Section 4(f) property
- The relative significance of each Section 4(f) property
- The views of the official(s) with jurisdiction over each Section 4(f) property
- The degree to which each alternative meets the purpose and need for the project
- After reasonable mitigation, the magnitude of any adverse impacts to properties not protected by Section 4(f)
- Substantial differences in costs among the alternatives

Avoidance and minimization measures are included in the EQRB Draft Section 4(f) Evaluation in Chapter 2.

1.9 Section 4(f) Preliminary Determinations of Use

1.9.1 Parks, Recreation, and Open Space Resources

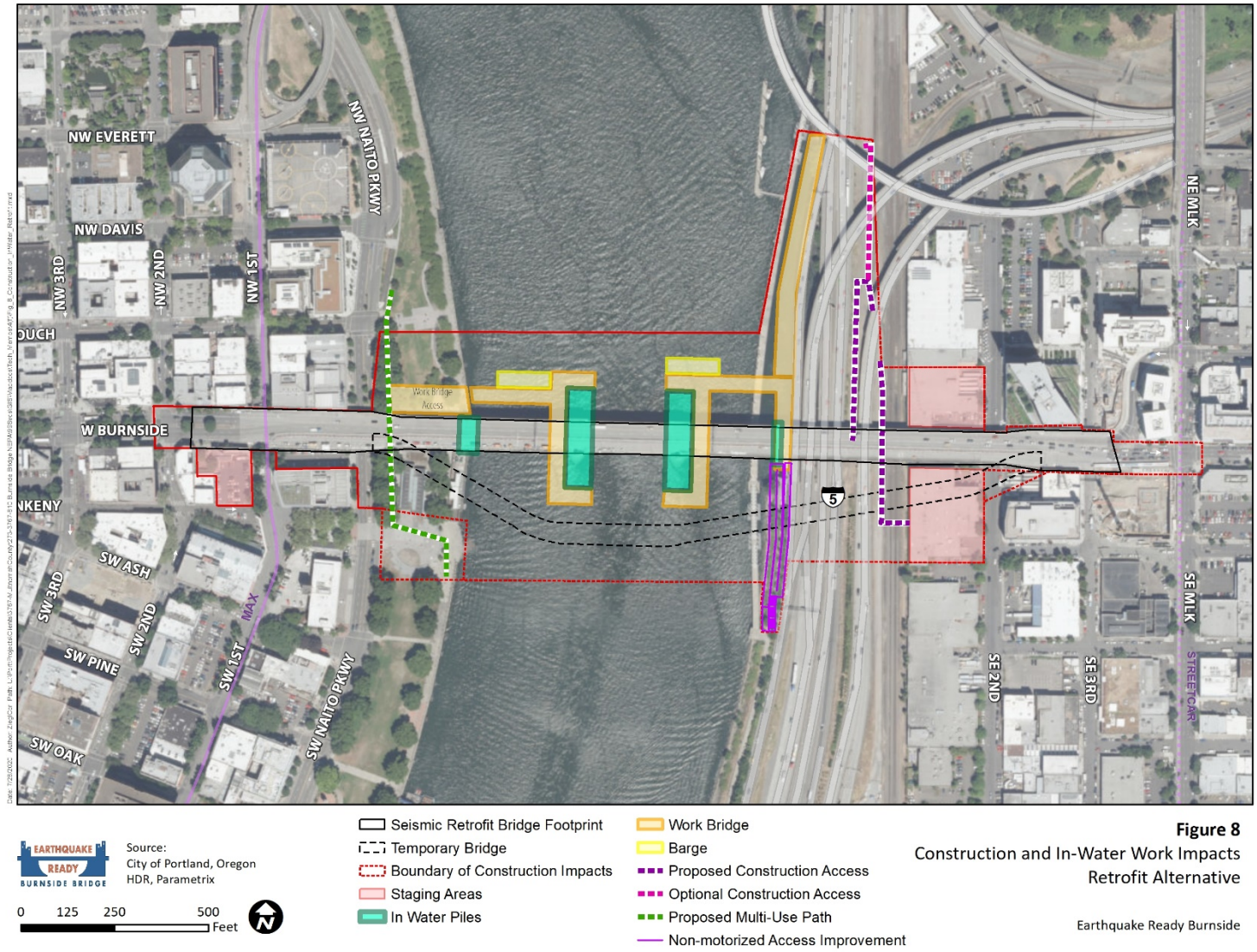
No permanent conversion of park property to a transportation or related use would occur under any of the build alternatives, thus no permanent use of Section 4(f) parkland resources is anticipated.

Temporary construction activities identified in the *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e) are anticipated to affect Waterfront Park, the Eastbank Esplanade, the Willamette Greenway Trail, and the Willamette River Water Trail (WRWT). These temporary construction activities are discussed below. No permanent use would occur within or adjacent to Ankeny Plaza, and no temporary activities would occur within Ankeny Plaza under any of the build alternatives, so this resource is not discussed further.

The area expected to be used by construction activities is shown on Figure 1-8 through Figure 1-11 as the Boundary of Potential Construction Impacts. Although the area is the same with respect to parks and recreation for all build alternatives, the length of time of construction and specific construction activities vary. With the addition of a temporary bridge to any build alternative, the Boundary of Potential Construction Impacts expands to the south. Table 1-2 summarizes the anticipated construction durations and closures with each of the build alternatives.

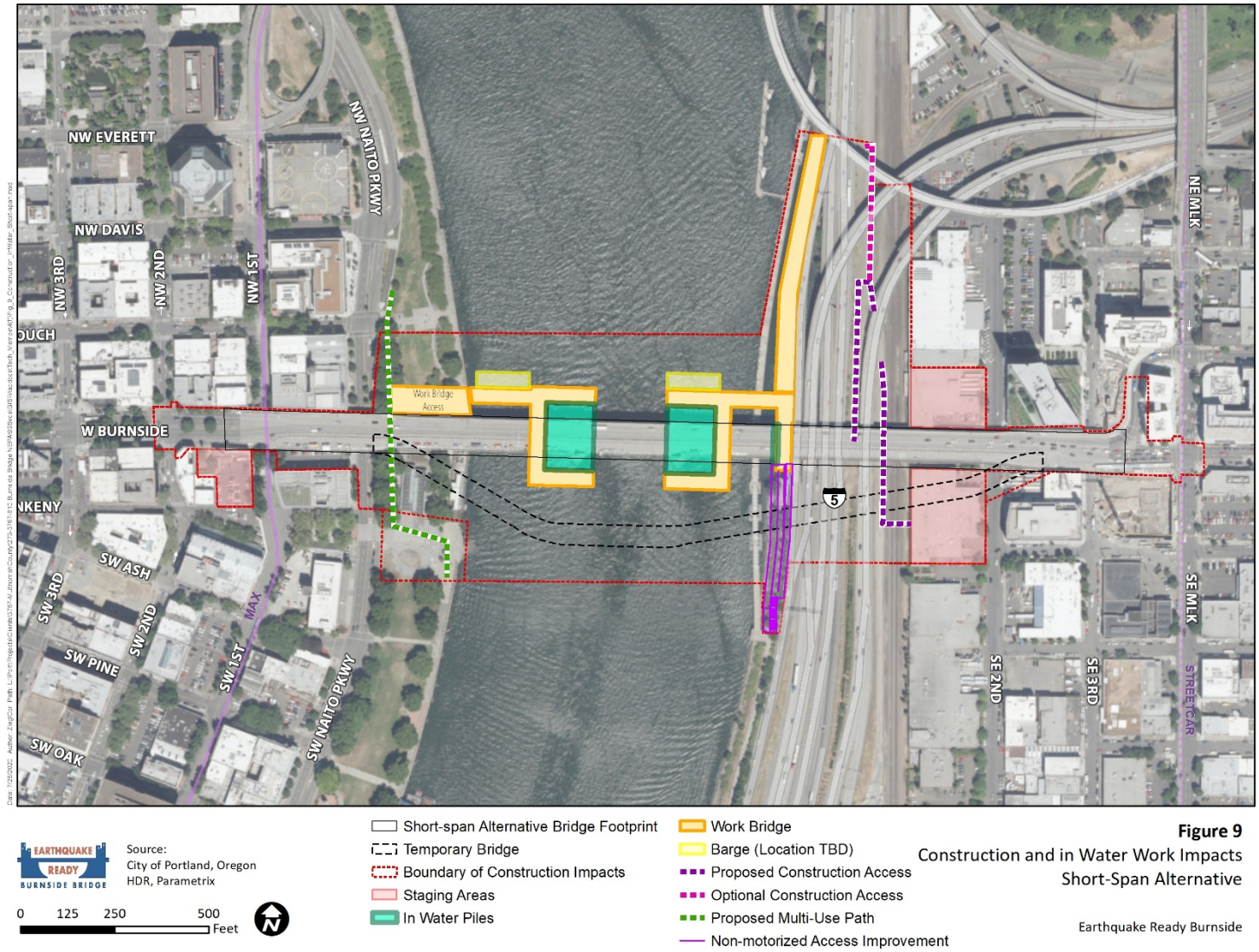
Table 1-3 summarizes specific types of construction activities for each alternative.

Figure 1-8. Construction and In-Water Work Impacts – Retrofit Alternative



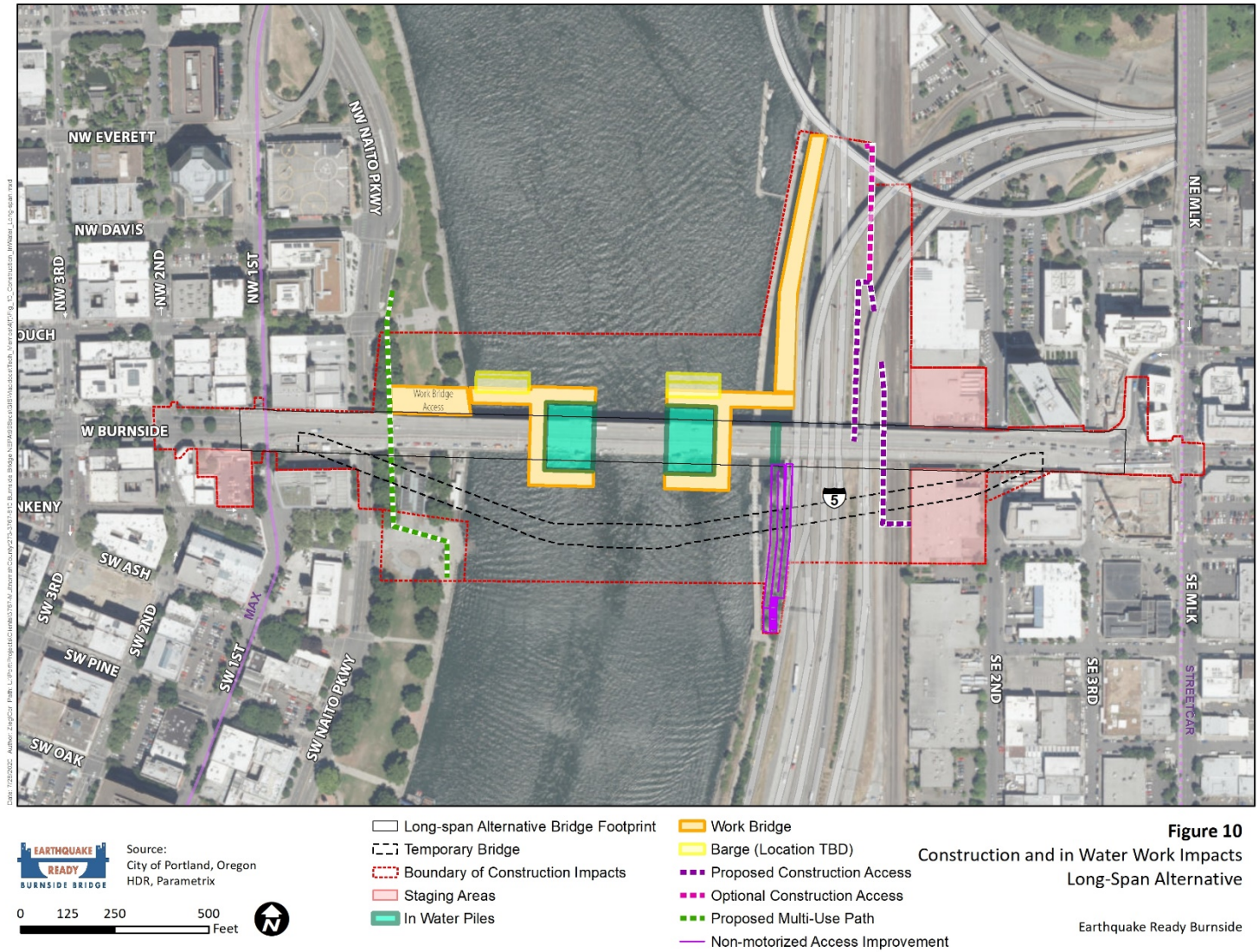
Source: City of Portland, HDR, Parametrix

Figure 1-9. Construction and In-Water Work Impacts – Short-Span Alternative



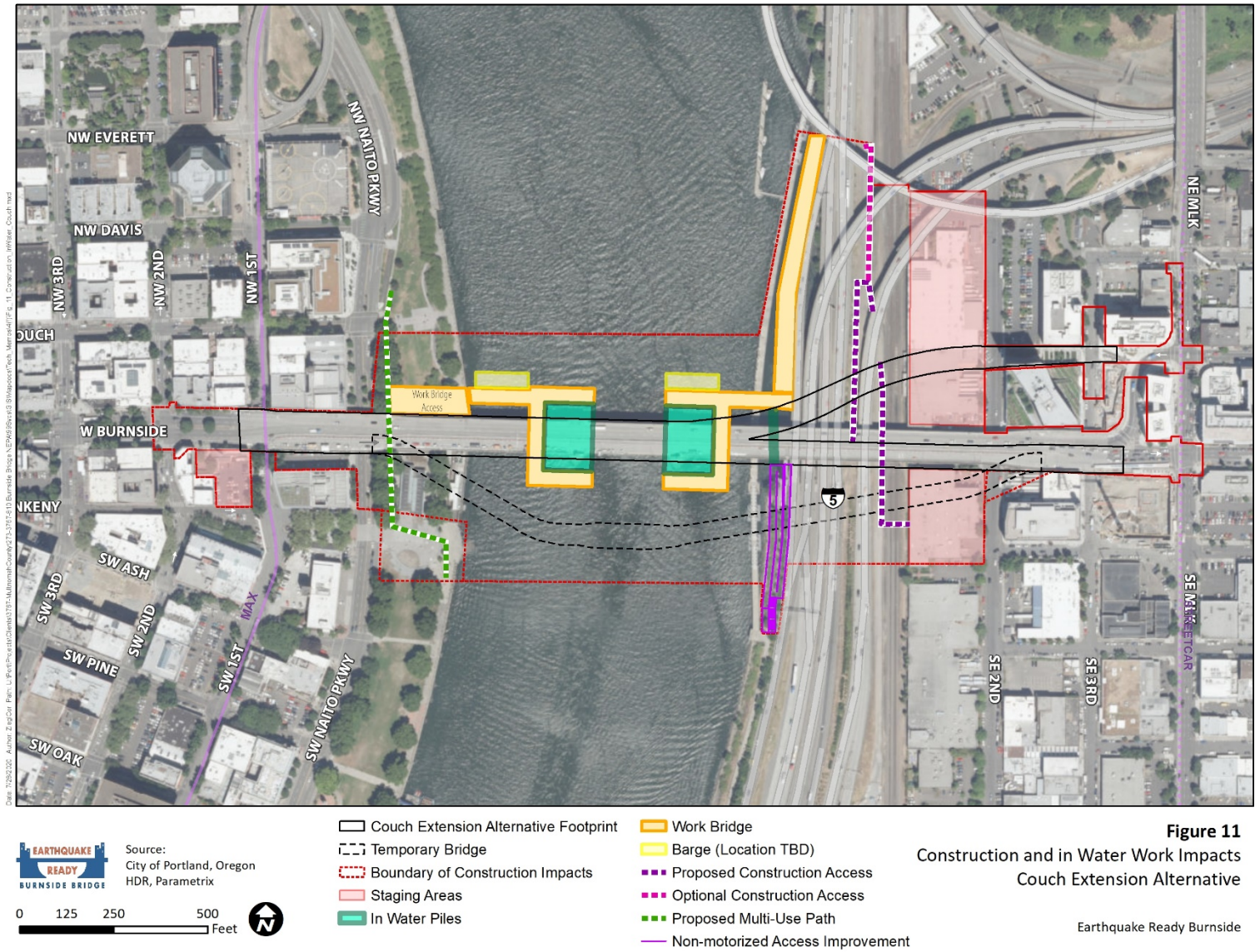
Source: City of Portland, HDR, Parametrix

Figure 1-10. Construction and In-Water Work Impacts – Long-Span Alternative



Source: City of Portland, HDR, Parametrix

Figure 1-11. Construction and In-Water Work Impacts – Couch Extension Alternative



Source: City of Portland, Oregon, HDR, Parametrix

Table 1-2. Construction Timing with Parks and Recreation Resources

	Retrofit	Short-Span Alternative	Long-Span Alternative	Couch Extension
Overall Construction – No Temporary Bridge	3.5 years	4.5 years	4.5 years	4.5 years
Overall Construction – w/ Temporary Bridge	5 years	6.5 years	6.5 years	6.5 years
Waterfront Park Restrictions – No Temporary Bridge	3.5 years	4.5 years	4.5 years	4.5 years
Waterfront Park Restrictions – w/ Temporary Bridge	5 years	6.5 years	6.5 years	6.5 years
Willamette River Water Trail Closure – No Temporary Bridge	6–10 weeks (intermittent)	6–10 weeks (intermittent)	6–10 weeks (intermittent)	6–10 weeks (intermittent)
Willamette River Water Trail Closure – Temporary Bridge	8–12 weeks (intermittent)	8–12 weeks (intermittent)	8–12 weeks (intermittent)	8–12 weeks (intermittent)
Eastbank Esplanade Detour and Dock Closure – No Temporary Bridge	26 months	30 months	18 months	30 months
Eastbank Esplanade Detour and Dock Closure – w/ Temporary Bridge	30 months	34 months	22 months	34 months

Table 1-3. Construction Activities within Parks and Recreation Resources

Resource and Anticipated Construction Activity	Retrofit	Short-Span Alternative	Long-Span Alternative	Couch Extension
Waterfront Park – Harbor Wall Replacement (segment)	Yes	Potential	No	Potential
Waterfront Park – Pier within Waterfront Park	Yes (expand existing)	Yes (new)	No	Yes (new)
Waterfront Park – In-Ground Improvements / jet grouting	Yes	Yes	No	Yes
Waterfront Park – Japanese American Plaza Southern Portion Closure	Yes	Yes	Yes	Yes
Waterfront Park – Ankeny Plaza (PSM) Structure Deconstruction/Rebuild	Yes – with a Temporary Bridge	Yes – with a Temporary Bridge	Yes – with a Temporary Bridge	Yes – with a Temporary Bridge
Waterfront Park – Bill Naito Fountain Area Temporary Closure	Yes – With a Temporary Bridge	Yes – With a Temporary Bridge	Yes – With a Temporary Bridge	Yes – With a Temporary Bridge
Waterfront Park – Willamette Greenway Trail Temporary Detour	Yes	Yes	Yes	Yes
Waterfront Park – Tree Removal North of Bridge (4 large and 20 smaller flowering ornamental trees)	Yes	Yes	Yes	Yes

Resource and Anticipated Construction Activity	Retrofit	Short-Span Alternative	Long-Span Alternative	Couch Extension
Waterfront Park – Tree Removal South of Bridge	No – (9 with a Temporary Bridge)	Yes – 2 (7 Additional from Temporary Bridge)	Yes – 2 (7 Additional from Temporary Bridge)	Yes – 2 (7 Additional from Temporary Bridge)
Eastbank Esplanade – In-ground Improvements / jet grouting	Yes	Yes	No	Yes
Eastbank Esplanade – Temporary Floating Esplanade Relocation/Detour	Yes	Yes	Yes	Yes
Eastbank Esplanade – Reconstructed Access to South Side of Bridge	Yes	Yes	Yes	Yes
Eastbank Esplanade – Piers Between Esplanade and Riverbank	Yes (existing)	Yes	No	Yes

1.9.1.7 All Parks and Recreation Resources

The *EQRB Noise and Vibration Technical Report* (Multnomah County 2021d) indicates that some phases of construction would result in relatively high construction noise levels with exceedances of the City of Portland's construction noise limits, but that these could be reduced by implementing mitigation measures. With these mitigation measures, Section 4(f) constructive use from noise and vibration is not anticipated at any parks and recreation resources. See the *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e) and *EQRB Noise and Vibration Technical Report* (Multnomah County 2021d) for additional information.

There would be no Section 4(f) use of parks and recreation properties with the No-Build Alternative.

1.9.1.8 Willamette River Water Trail

The *EQRB Parks and Recreation Technical Report* discusses recreation on the Willamette River in general, as well as the Willamette River Greenway Trail. Rivers and general recreation on rivers are not typically considered to be Section 4(f) resources, but an identified recreation area or water trail is a Section 4(f) resource. As such, this section only focuses on the WRWT. The WRWT is a designation and not a property, as such, no temporary or permanent easements are discussed for this resource.

All Build Alternatives

During construction of any of the build alternatives with the No Temporary Bridge Option, the navigation channel would remain open except for short-term closures. Each closure could be up to 3 weeks in duration, and the number of closures could range from 2 to 10 closures over the duration of construction, depending on the type of bridge lift chosen. A vertical lift would require a lower number of river closures while a bascule lift would require a higher number of closures. During the majority of the construction period, a minimum width of 165 feet would be open to navigation, thus, except for temporary closures up to 3 weeks in duration at a time, the WRWT would be accessible for passage

beneath the Burnside Bridge. With the Temporary Bridge Option for any of the build alternatives, there would be up to two additional 2-week-long closures.

The temporary construction impacts described above meet the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:[2]

- Duration/Ownership: Met – Construction activities would be shorter in duration than the full construction time for the Project, and there is no change in ownership.
- Nature/Magnitude: Met – The change to the resource is minimal in that the waterway would still be open to use for the majority of the construction period, and this location on the waterway is only a small part of the full water trail.
- Permanent Change/Temporary Interference: Met – There would be no permanent physical change to the water trail. The temporary closure of the main river channel passing under the bridge is minor enough in nature to meet this requirement. The portion of the WRWT temporarily closed is proportionately very small compared to the full length of the facility, such that it is not considered an interference to use of the facility.
- Restoration: Met – There would be no change to the condition of the water trail after the Project compared to before the Project.
- Documentation: Coordination with the Oregon Parks and Recreation Department is necessary to document agreement with this preliminary Section 4(f) determination of Temporary Occupancy.

As shown above, the WRWT would not be subject to a Section 4(f) use from permanent or temporary activities, but it is adjacent to, and passes beneath the Project, so whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – No long-term traffic noise levels are identified that would impact this noise-sensitive use.
- Aesthetics: No – River users pass under many bridges of various sizes, types, and styles. Although the replacement alternatives and design options would introduce a bridge of different bulk and potentially different style from the current Burnside Bridge, this would not alter the experience of WRWT users.
- Access: No – The Project would not alter permanent access to the WRWT.
- Vibration: No – There are no historic resource buildings within the WRWT.

Temporary Bridge Option

The inclusion of a temporary bridge would not affect the Section 4(f) use assessment described for the build alternatives.

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[2] Code of Federal Regulations (CFR) Title 23: Part 774, Section 13, outlines conditions under which a "Temporary Occupancy" of a Section 4(f) property would not be considered a section 4(f) "Use". The conditions for this type of exception are: occupancy duration must be temporary, with no change in ownership; nature/magnitude of changes to the resource must be minimal; absence of permanent physical impacts; full restoration following temporary impact; and documented agreement of the officials with jurisdiction.

Agency Coordination

The waterway portion of the WRWT is not owned or managed in a specific location within the river, and property management is limited to upland locations along the WRWT. The Project will not affect any managed properties, and no direct coordination has occurred with OPRD about the Project at this time. Concurrence with the preliminary finding below will be necessary.

Preliminary Section 4(f) Use Determination

The Willamette River Water Trail would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge based on the exception at 23 CFR 774.13(d).

1.9.1.9 Governor Tom McCall Waterfront Park

Enhanced Seismic Retrofit Alternative

The portion of Waterfront Park within the Boundary of Potential Construction Impacts would be closed to recreation uses for the construction periods shown in Table 1-2, and temporary construction easements in and potentially around this area would be necessary. No permanent property acquisition would occur. These construction periods are approximately the full duration of expected construction. Several changes to the use of Waterfront Park would occur during construction.

The closure north of the bridge would require that a portion of the Japanese American Historic Plaza and Bill of Rights Memorial area be temporarily closed for construction access. All the trees in this area would likely be removed. Notably, this includes 4 large mature deciduous trees and 20 ornamental flowering cherry trees adjacent to the plaza (see Figure 5 in the *EQRB Vegetation, Wildlife, and Aquatic Species Technical Report* [Multnomah County 2021f] for specific tree locations). After construction, the trees would be replaced. The full area from the north edge of the bridge to the south edge of the plaza pavers would be cleared and used as a construction and staging area. This would include demolition of the arching slate-covered berm that makes up the southern half of the Japanese American Historic Plaza and Bill of Rights Memorial. The closure of the southern half of the plaza removes half of the information and the first half of a progression of poetry and storytelling that is integral to the full experience of the plaza. The area would be returned to existing conditions after construction.

Portland Saturday Market (PSM) would need to operate at another location for the duration of construction. PSM is a large, well-attended attraction in this part of Waterfront Park bringing more visitors and users to the area than would use the park in its absence. No trees south of the bridge in the area of PSM would be removed under this alternative.

In addition to PSM normally occurring on a weekly basis (March through December), many other events are hosted in Waterfront Park on an annual basis. For the duration of construction, these events could not occur within the Boundary of Potential Construction Impacts area. Events normally held in the Japanese American Historical Plaza could still use the unimpacted north half of the plaza; however, because these events are typically memorials, vigils, and remembrance days, their reflective, quiet nature would likely be disturbed by intense construction on the bridge unless they occurred on the many

weekends when no major construction would occur. The many events held in the Meadow and further south in Waterfront Park could continue but would be restricted from park access within the Boundary of Potential Construction Impacts.

The Rose Festival and Fleet Week combined events generate the largest number of attendees of the annual events in Waterfront Park. Each year, the City of Portland imposes a road construction moratorium during the Rose Festival. The project team would request an exemption from the moratorium for bridge construction, but would specify that the contractor may need to provide access for the Fleet Week ships to dock along the Harbor Wall within the Boundary of Potential Construction Impacts and may need to provide safe public access for festival attendees to access the ships.

Portland Parks & Recreation (PP&R) maintenance activities rely on access under the Burnside Bridge, and maintenance vehicles and personnel need to pass under the bridge to access the north end of the park daily throughout the year and up to three times per day during the summer months. The project team would work with PP&R to provide safe maintenance access with this general frequency.

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Temporary occupancy of the Boundary of Potential Construction Impacts would last as long as the full construction period.
- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts to Waterfront Park; however, there would be significant temporary interference to activities and purposes of the recreation resource.

Replacement Alternatives

The temporary construction activities described above for the Retrofit Alternative all apply with the replacement alternatives with a few differences described in this section. In Waterfront Park, the Short-span Alternative would mean an additional year of closure within the Boundary of Potential Construction Impacts and the removal of two additional trees, south of the Burnside Bridge. The same detour restrictions would apply, but for 4.5 years (see Table 1-2). Within the Japanese American Historical Plaza, the same removal of trees and potential temporary impacts to the berm would occur, but reconstruction would occur 1 year later. The same is true for PSM operation. There are differences in pier and column locations, and the Short-span Alternative and Long-span Alternative would not require in-ground improvements (see Table 1-3), but those physical construction actions would not change the Boundary of Potential Construction Impacts that is the overall construction activity preventing recreational use of this area of Waterfront Park and its components.

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Temporary occupancy of the Boundary of Potential Construction Impacts would last as long as the full construction period.

- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts to Waterfront Park; however, there would be significant temporary interference to activities and purposes of the recreation resource.

Temporary Bridge Option

Any of the build alternatives with the Temporary Bridge Option would require an additional active construction area south of the bridge within Waterfront Park, shown as an expanded Boundary of Potential Construction Impacts area on Figure 1-8 through Figure 1-11. This would also include a larger temporary construction easement area. As a result, nine trees south of the Burnside Bridge would be removed and replaced after construction (see Figure 13 in the *EQRB Vegetation, Wildlife, and Aquatic Species Technical Report* [Multnomah County 2021f]). Under the replacement alternatives, seven of these trees are in addition to those removed by the construction of the replacement bridge, while under the Retrofit Alternative, all nine are in addition to the retrofit construction work. The Ankeny Plaza Structure would be deconstructed and stored. The structure would be reconstructed after bridge construction is complete.

The Bill Naito Legacy Fountain and surrounding hardscape plaza area would be closed and non-operational for recreation use for the duration of construction. The hardscape and other features would be protected from construction impacts and returned to existing conditions after construction is complete. Waterfront Trail/Willamette River Greenway Trail users would either be flagged through the area or would be rerouted around the work site using the east lane of Naito Parkway (Better Naito). In addition to these construction impacts, a temporary bridge would increase the duration of construction time as shown in Table 1-2. Thus, the temporary bridge increases the intensity and duration of the construction activities in Waterfront Park and the Willamette River Greenway Trail.

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Construction activities would be for the full construction time for the Project, but there is no change in ownership.
- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts to Waterfront Park; however, there would be significant temporary interference to activities and purposes of the recreation resource.

De Minimis Analysis

De minimis impacts on publicly owned parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not “adversely affect the activities, features, and attributes” of the Section 4(f) property. Although the area of impact within Waterfront Park is small compared to the overall size of the park, much of the impacted area is within parking or maintenance areas under the bridge and not within fully recreational areas, and the avoidance, minimization, and mitigation measures of the project mean that the park would be returned to the same or better condition after the project is complete, the length of time of recreation use restrictions under any of the alternatives

would adversely affect activities in the park. The temporary impacts are not *de minimis* under any of the alternatives.

Programmatic Approval Analysis

As discussed in Section 1.6.3, approval of Section 4(f) use can occur through programmatic Section 4(f) evaluations. The Programmatic Section 4(f) Evaluation and Approval for Transportation Projects That Have a Net Benefit to a Section 4(f) Property is potentially applicable for Section 4(f) use of Waterfront Park.

All measures to minimize harm and mitigation to preserve and enhance the features and values of the property must be found to result in a net benefit to the property. For Waterfront Park, under any build alternative, the Project would return all disturbed areas to pre-construction conditions, meeting all applicable City of Portland design and land use standards.

As a result of the Project, under the Long-span Alternative (identified as the Preferred Alternative), Waterfront Park would no longer have the many existing bridge supports within its boundaries under the bridge. Instead, there would be increased open area with longer unobstructed views north and south and obliquely to the Willamette River. Fewer bridge structures in the park also removes existing barriers to travel by maintenance vehicles and allows redesign of the space used by the PSM.

Preliminary conversations with PP&R have identified potential enhancements that would further create benefits in this area. These improvements are preliminary and will be refined further.

Agency Coordination

The project team has met several times with representatives of Portland Parks and Recreation and the stakeholders with activities or features within the affected area of Waterfront Park (see Table 1-4).

Table 1-4. Meetings with Parks and Recreation Stakeholders Regarding Waterfront Park

Stakeholder	Meeting Dates
Portland Parks & Recreation (PP&R)	July 3, 2019 July 31, 2019 October 29, 2019 November 25, 2019
Portland Parks Board	August 6, 2019
PP&R Parks Director	September 13, 2019
Japanese American Museum of Oregon	June 18, 2019 January 16, 2020
Portland Saturday Market	July 10, 2019 January 10, 2020
Rose Festival	July 18, 2019

Discussion of potential project impacts, Section 4(f) use, avoidance alternatives, and mitigation have occurred during these meetings. The Project has made efforts to avoid

impacts while still achieving the necessary earthquake resiliency of the Burnside Bridge and is anticipating that PP&R review of this draft technical analysis and draft evaluation will result in additional suggestions for minimization and mitigation measures and concurrence.

Preliminary Section 4(f) Use Determination

Waterfront Park would be subject to Section 4(f) use from temporary construction activities for all build alternatives with or without the temporary bridge.

1.9.1.10 Vera Katz Eastbank Esplanade

Enhanced Seismic Retrofit Alternative

The Boundary of Potential Construction Impacts for all build alternatives encompasses approximately 80 percent of the length of the floating portion of the Esplanade. Because construction barges would need to access both sides of the Esplanade and extensive work would occur directly above and below the Esplanade, it is impractical and unsafe to allow users access during construction. Temporary construction easements in and potentially around this area would be necessary. No permanent property acquisition would occur.

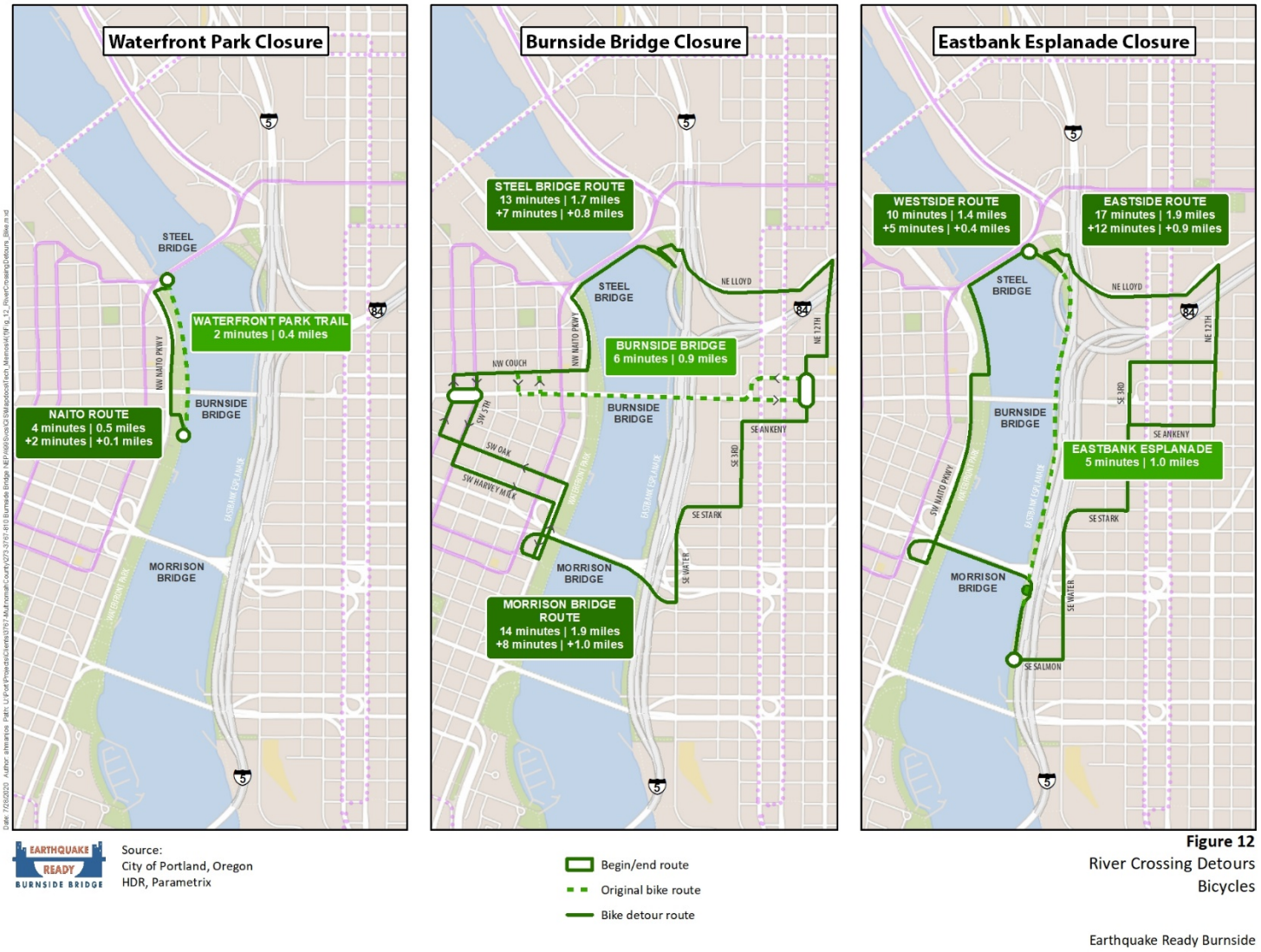
Intermittently during construction, portions of the floating structure (not including Kevin J. Duckworth Dock) would be disconnected and moved out of the way to allow barge movement and other construction activities. For the Retrofit Alternative, the estimated closure/detour length of time is 26 months (see Table 1-2). During this time, the Esplanade would not be available, and bike and pedestrian trail users would use the proposed detour routes shown in Figure 1-12 and Figure 1-13. Depending on the detour route taken, the added time would be 5 to 12 minutes for bicyclists and 10 to 15 minutes for pedestrians, and would be on surface streets rather than on the Esplanade's bike and pedestrian path floating in the nearshore area of the river.

As discussed for Waterfront Park, many events occur on the Esplanade throughout the year, often creating a loop route by linking up with a portion of the Willamette River Greenway Trail on the west side of the river. This route creates an uninterrupted circuit for events without the need to cross traffic, which has been noted as unique and very important to the events. As both of these trails would be temporarily closed and detoured by construction, many of the typical annual events would either not occur or would use detour routes. Detours would affect the overall length of loop route events and would generally avoid the waterfront for some or all of an event route. Preventing access along the Esplanade would make recreation in this location inaccessible, including the views across the river to downtown and the West Hills.

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts to the Esplanade; however, there would be significant temporary interference to recreation activities and purposes of the recreation resource.

Figure 1-12. River Crossing Detours – Bicycles



Source: City of Portland, HDR, Parametrix

Figure 1-13. River Crossing Detours – Pedestrian

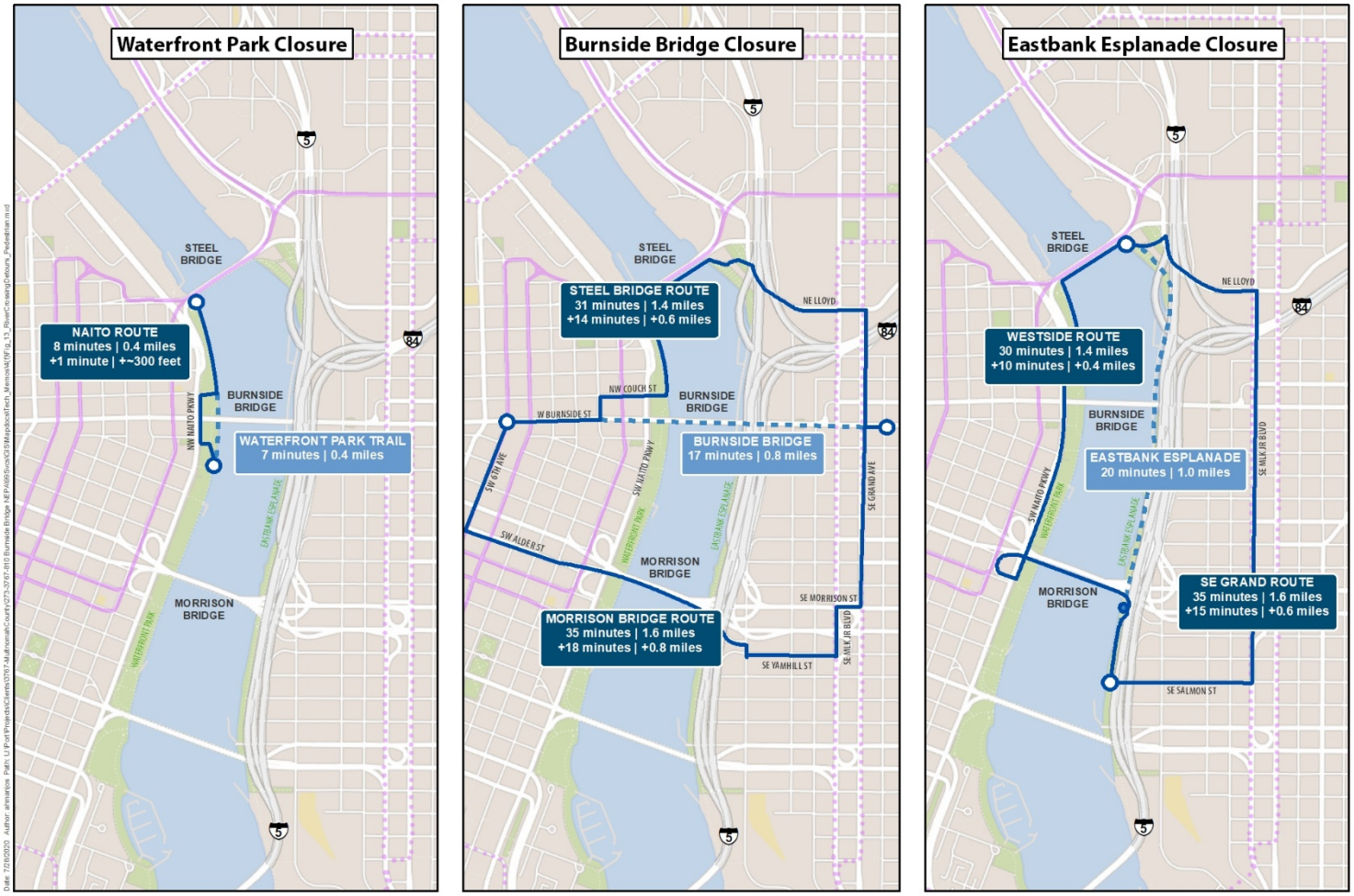


Figure 13
River Crossing Detours
Pedestrian

Earthquake Ready Burnside

Replacement Alternatives

The replacement alternatives would have the same Boundary of Potential Construction Impacts as all of the build alternatives with respect to the Eastbank Esplanade. Closure and detour around the floating portion of the Esplanade would occur to allow construction barge access for deconstruction of the existing bridge and construction of the new bridge. With the Short-span Alternative, the Esplanade would be closed for 30 months, while with the Long-span Alternative, the closure would last 18 months (see Table 1-2). The Long-span Alternative has the shortest overall closure of the Esplanade compared with the other build alternatives.

Detour routes and out-of-direction travel time and event disruption would be the same as described for the Retrofit Alternative but would last either 30 months or 18 months (Short-span Alternative and Long-span Alternative, respectively).

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts to the Esplanade; however, there would be significant temporary interference to recreation activities and purposes of the recreation resource.

Temporary Bridge Option

With the Temporary Bridge Option there would be an additional structure over a portion of the Esplanade during construction. The Esplanade would need a detour route for 4 months longer than with the No Temporary Bridge Option under all build scenarios (see Table 1-2).

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts to the Esplanade; however, there would be significant temporary interference to recreation activities and purposes of the recreation resource.

Access Options to Burnside Bridge

With the existing bridge, a stairway connects the southern sidewalk on the Burnside Bridge to the Eastbank Esplanade approximately 50 vertical feet below it. The stairway is primarily for pedestrians because it is not ADA-accessible and requires bicyclists to carry their bikes up or down the stairs. There is no existing connection between the Eastbank Esplanade and the bridge's northern (westbound) sidewalk and bike lane. There is ADA and bicycle access to the bridge approximately 1000 feet east of these stairs at the eastern end of the bridge, but there is no direct ADA or convenient bicycle access between the bridge and the Eastbank Esplanade.

The EQRB Project initially envisioned replacing the stairs with a similar stairs structure that may also include an elevator to provide Americans with Disabilities Act (ADA) access as well as easier bike access. Some stakeholders have indicated they would prefer a ramp structure instead. The project design team developed several potential options and preliminary permanent footprint and construction impact details, as summarized below. It is important to note that any of these access options are compatible with any of the EQRB bridge alternatives, and the impacts from the access options do not change the status of the determination of Section 4(f) use for the Eastbank Esplanade. The options being evaluated as part of the EIS include:

- Stairs and elevator on north and south sides of the bridge
- Stairs and elevator on south side of the bridge only, with a signalized mid-block crossing connecting the north and south sidewalks and bike lanes
- Ramps on north and south sides of the bridge and stairs on south side
- Ramp and stairs on south side only, with a signalized mid-block crossing connecting the north and south sidewalks and bike lanes

Both options with stairs and an elevator would not require additional temporary closure duration of the floating portion of the Esplanade compared to the 18 months needed to construct the Long-span Alternative without a temporary bridge. Both options with ramps would require an additional 2 to 3 years of closure for construction, meaning it would be closed for the full duration of bridge construction.

Both options with stairs and an elevator would not require additional physical impacts to the Esplanade compared to those identified with the Long-span Alternative without a temporary bridge. Both options with ramps would require additional impacts including removal and replacement of the floating bridge leading down from the at grade section to the floating section of the Esplanade.

De Minimis Analysis

De minimis impacts on publicly owned parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not “adversely affect the activities, features, and attributes” of the Section 4(f) property. Although the project has made all possible efforts to reduce the impacts to the Eastbank Esplanade, as it would completely remove the Esplanade from recreation use under all of the alternatives for up to 34 months, the temporary impacts would adversely affect recreation activities and are considered to be more than *de minimis*.

Agency Coordination

The project team has met several times with PP&R representatives and the stakeholders with activities or features within the affected area of the Eastbank Esplanade (see Table 1-5).

Table 1-5. Meetings with Parks and Recreation Stakeholders Regarding the Eastbank Esplanade

Stakeholder	Meeting Dates
Portland Parks & Recreation (PP&R)	July 3, 2019 July 31, 2019 October 29, 2019 November 25, 2019 May 21, 2020 May 29, 2020
Portland Parks Board	August 6, 2019
PP&R Parks Director	September 13, 2019

Early discussion of potential project impacts, Section 4(f) use, avoidance alternatives, and mitigation have occurred during these meetings. Additional and ongoing coordination will occur. The project team has made design and construction revisions, where possible, to avoid impacts and use while still achieving the necessary earthquake resiliency of the Burnside Bridge, and is anticipating that agency review of this Section 4(f) Analysis will result in additional suggestions for minimization and mitigation measures. However, it appears unlikely that PP&R would consider the project impacts to either qualify for the exception to Section 4(f) use under 23 CFR 774.13(d) or that there could be a net benefit to the Eastbank Esplanade.

Preliminary Section 4(f) Use Determination

The Eastbank Esplanade would be subject to a Section 4(f) use from temporary construction activities under all build alternatives with or without the temporary bridge and with any of the Access Options to Burnside Bridge.

1.9.1.11 Willamette River Greenway Trail

Enhanced Seismic Retrofit Alternative

The portions of the Willamette River Greenway Trail on the east and west sides of the river within the Boundary of Potential Construction Impacts would be closed to recreation uses for the construction periods shown in Table 1-2. These construction periods are approximately the full duration of expected construction. Several changes to the use of the Willamette River Greenway Trail would occur during construction. Temporary construction easements in and potentially around this area would be necessary. No permanent property acquisition would occur. Because the Willamette River Greenway Trail is co-located with both Waterfront Park and the Eastbank Esplanade, the temporary construction easements would be from the underlying property ownership.

With all of the build alternatives on the west side, within Waterfront Park, Greenway Trail users would either be flagged through the Boundary of Potential Construction Impacts or would be rerouted around the work site on the east lane of Naito Parkway, currently used for the Better Naito project. At most, the detour routes on the west side of the Willamette River are expected to add 2 minutes of detour travel time for north-south Greenway Trail users. Running and walking events that normally use the Willamette River Greenway Trail could continue to occur but would need to use the detour routes.

On the east side of the river the Willamette Greenway Trail would experience the same effects described above for the Eastbank Esplanade.

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Temporary occupancy of the Boundary of Potential Construction Impacts would last as long as the full construction period on the west side, but not on the east side.
- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts the trail; however, there would be temporary interference to activities on the trail.

Replacement Alternatives

The temporary construction activities described above for the Retrofit Alternative all apply with all of the replacement alternatives with a few differences described in this section. On the west side, the Short-span Alternative would mean an additional year of closure in the in the Boundary of Potential Construction Impacts. The same detour restrictions would apply, but for 4.5 years (see Table 1-2). There are differences in pier and column locations, and the Short-span Alternative and Long-span Alternative would not require in-ground improvements (see Table 1-3), but those physical construction actions would not change the Boundary of Potential Construction Impacts that is the overall construction use of the trail.

On the east side, with the Short-span Alternative, the Willamette River Greenway Trail co-located with the Esplanade would be closed for 30 months, while with the Long-span Alternative, the closure would last 18 months (see Table 1-2). The Long-span Alternative has the shortest overall closure of the Esplanade compared with the other build alternatives.

Detour routes and out-of-direction travel time and event disruption would be the same as described for the Retrofit Alternative but would last either 34 months or 18 months (Short-span Alternative and Long-span Alternative, respectively).

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Temporary occupancy of the Boundary of Potential Construction Impacts would last as long as the full construction period on the west side, but not on the east side.
- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts the trail; however, there would be substantial temporary interference to activities on the trail.

Temporary Bridge Option

Any of the build alternatives with the Temporary Bridge Option would require an additional active construction activity area south of the bridge, shown as an expanded

Boundary of Potential Impacts area on Figure 1-8 through Figure 1-11. This would also include a larger temporary construction easement area. However, with or without the temporary bridge west side Willamette Greenway Trail users would either be flagged through the area or would be rerouted around the work site using the east lane of Naito Parkway. Similarly, east side trail users would be offered the same detour with or without the temporary bridge. A temporary bridge would increase the duration of construction time as shown in Table 1-2. Thus, the temporary bridge increases the duration of a temporary adverse use of the Willamette River Greenway Trail.

The temporary construction impacts described above do not meet all of the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Temporary occupancy of the Boundary of Potential Construction Impacts would last as long as the full construction period on the west side, but not on the east side.
- Permanent Change/Temporary Interference: Not Met – There would be no permanent adverse impacts the trail; however, there would be significant temporary interference to activities on the trail.

De Minimis Analysis

De minimis impacts on publicly owned parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not "adversely affect the activities, features, and attributes" of the Section 4(f) property. The area of temporary impact along the Willamette River Greenway Trail within Waterfront Park (on the west side of the Willamette River) is small, and a short detour route would be available throughout construction. Because of the short length of the detour, and the fact that the detour only moves users to the west edge of the Waterfront Park, the Section 4(f) temporary occupancy of the Willamette River Greenway Trail is not considered to adversely affect activities, features, or attributes. However, because the Willamette River Greenway Trail on the west side of the river is often used in conjunction with the Willamette River Greenway Trail on the east side of the river as part of loop routes, the potential for a *de minimis* use determination needs to consider both sides together.

On the east side of the river, the portion of trail affected travels on the Eastbank Esplanade, and though the affected length is small compared to the overall size of the full Greenway Trail, the length of time of recreation use restrictions under any of the alternatives combined with the detour route that takes users away from the waterfront, means that the temporary occupancy that is a Section 4(f) use would adversely affect activities and is not considered to be *de minimis*.

Agency Coordination

Agency coordination with PP&R occurred at the same meetings as those identified for Waterfront Park and the Eastbank Esplanade, above.

Preliminary Section 4(f) Use Determination

The Willamette River Greenway Trail would be subject to a Section 4(f) use from temporary construction activities under all build alternatives with or without the temporary bridge.

1.9.2 Historic Sites

Above-ground cultural resources that qualify as Section 4(f) resources and that have the potential for Section 4(f) use are described in this section. The remainder of the historic above-ground resources discussed in the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) are not considered likely to be impacted or to have a Section 4(f) use and are not discussed further in this report.

1.9.2.12 Burnside Bridge

No-Build Alternative

There would be no Section 4(f) use of this resource as a result of the No-Build Alternative. However, with no action, in the event of the predicted CSZ earthquake, the existing Burnside Bridge would fail and collapse, and thus would no longer exist as a historic structure.

Enhanced Seismic Retrofit Alternative

The Burnside Bridge would undergo substantial upgrades with the Retrofit Alternative but would retain the bridge type and some of the existing design characteristics of its current condition. However, the Retrofit Alternative would remove and reconstruct Pier 4 approximately 34 feet to the west, which would visually shorten the eastern fixed span. In addition, the retrofit would compromise the bridge's historic integrity by altering the design, materials, workmanship and feeling of the structure. Those changes would alter the historic significance of the bridge to the extent that this Alternative would cause an overall adverse effect under Section 106.

- Permanent Incorporation Use: Yes – Section 106 analysis determined the proposed alteration of the bridge would remove its historic integrity.

Replacement Alternatives

The replacement alternatives would constitute a complete replacement of the current bridge which would be considered a permanent use under Section 4(f).

- Permanent Incorporation Use: Yes – The removal and replacement of the Burnside Bridge would result in an adverse effect under Section 106 and a permanent Section 4(f) use.

Temporary Bridge

The option of using a temporary bridge would not cause a Section 4(f) use of the Burnside Bridge.

De Minimis Analysis

The Retrofit Alternative and replacement alternatives are expected to have a permanent Section 4(f) use of the Burnside Bridge. The impact is not considered to be ***de minimis***.

Programmatic

As discussed in Section 1.6.2, the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges is available for projects that necessitate the use of historic bridges. This programmatic approach is only available if the project demonstrates there are no feasible and prudent alternatives to the use of the historic bridge structure and the project includes all possible planning to minimize harm.

According to 23 CFR 774.17, an alternative is not feasible if it cannot be built as a matter of sound engineering judgment, and an alternative is not prudent if:

- It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
- It results in unacceptable safety or operational problems;
- After reasonable mitigation, it still causes:
    - Severe social, economic, or environmental impacts;
    - Severe disruption to established communities;
    - Severe disproportionate impacts to minority or low-income populations; or
    - Severe impacts to environmental resources protected under other federal statutes.
- It results in additional construction, maintenance, or operation costs of an extraordinary magnitude;
- It causes other unique problems or unusual factors; or
- It involves multiple factors of the above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

Analysis of the use of this programmatic for Section 4(f) use of Burnside Bridge is provided in Chapter 3.

Agency Coordination

Review of use of the programmatic Section 4(f) evaluation will include FHWA, Multnomah County, ODOT, and Oregon SHPO. Multnomah County has conducted an extensive public outreach and agency coordination program, described in attachments to the Draft EIS. As formal consultation under Section 106 of the NHPA progresses, the programmatic Section 4(f) evaluation will be updated. As part of the Final EIS/Record of Decision, FHWA will confirm whether the Project meets the five criteria for the application of the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges.

Preliminary Section 4(f) Use Determination

The Burnside Bridge would be subject to Section 4(f) use that would be approved under the Nationwide Programmatic Section 4(f) Evaluation for Projects that Necessitate the Use of Historic Bridges for all build alternatives with or without the temporary bridge.

1.9.2.13 Portland Harbor Wall

No-Build Alternative

There would be no Section 4(f) use of the Portland Harbor Wall as a result of the No-Build Alternative. However, with no action, in the event of the predicted CSZ earthquake, the existing Burnside Bridge would fail and collapse, and due to its proximity and adjacent liquefiable soils, the Portland Harbor Wall could be damaged to an extent that it would need to be rebuilt and thus would no longer exist as a historic structure.

Enhanced Seismic Retrofit Alternative

Removal of a 150- to 175-foot segment of the Harbor Wall around Pier 1 is required for the Retrofit Alternative, which represents about 3 percent of the total length of the wall. The removal of the segment of the Harbor Wall is not considered an adverse effect under Section 106. However, the reconstructed portion of the wall would need to be consistent with the remaining portion.

Because the Portland Harbor Wall would not be subject to a Section 4(f) use from permanent or temporary activities, but is adjacent to the Project, whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receptor.
- Aesthetics: No – The Harbor Wall would not be affected by aesthetic changes from the project.
- Access: No – The Project would not alter long-term access to the Harbor Wall.
- Vibration: No – The resource is not a historic building susceptible to damage from vibration.

Replacement Alternatives

Removing any portion of the Harbor Wall is not necessary for the replacement alternatives because the piers would not be located at the existing Pier 1. However, in-ground seismic improvements by jet grouting are necessary from the Short-span Alternative replacement Bent 7 location to and under the Harbor Wall. Potential adverse effects of jet grouting include destruction of any existing buried archaeological resources, as well as damage to and settling of adjacent existing structures. The removal and reconstruction of a segment of the Harbor Wall in the event that in-ground seismic improvements causes damage to the wall is not considered an adverse effect under Section 106. However, the reconstructed portion of the wall would need to be consistent with the remaining portion.

Because the Portland Harbor Wall would not be subject to a Section 4(f) use from permanent or temporary activities, but is adjacent to the Project, whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The Harbor Wall is not a noise-sensitive receptor.
- Aesthetics: No – The Harbor Wall would not be affected by aesthetic changes from the project.
- Access: No – The Project would not alter long-term access to the Harbor Wall.
- Vibration: No – The Harbor Wall is not a historic building susceptible to damage from vibration.

Temporary Bridge

The Temporary Bridge Option would not affect the potential for a Section 4(f) use of the Harbor Wall.

Agency Coordination

Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about effects. Their comments during these interactions support the preliminary determination that the Project would have no adverse Section 106 effect on the Portland Harbor Wall. SHPO will also review the formal Finding of Effect for this resource.

Preliminary Section 4(f) Use Determination

The Portland Harbor Wall would not be subject to a Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.14 Burnside Skatepark

No-Build Alternative

There would be no Section 4(f) use of this resource as a result of the No-Build Alternative. However, with no action, in the event of the predicted CSZ earthquake, the existing Burnside Bridge would fail and collapse, and because the Burnside Skatepark is built into existing bridge components, it would also likely be destroyed and would no longer exist as a historic structure.

Enhanced Seismic Retrofit Alternative

Under the Retrofit Alternative, the Burnside Skatepark would be demolished during construction and not rebuilt. The skatepark is considered a Section 4(f) resource based on its status as eligible for listing on the NRHP and not for its recreation use (because it is not publicly owned and operated). Complete demolition of the skatepark removes its historic significance and would be a Section 106 adverse effect.

The skatepark's historic significance as an existing example of one of the first community-created and self-managed skateparks in the country would be removed and would cause an adverse effect to and Section 4(f) use of Burnside Skatepark.

Replacement Alternatives

Under the Short-span and Long-span Alternatives, the Burnside Skatepark would not be demolished and would remain unchanged. However, its use would be intermittently unavailable during construction as shown below in Table 1-6.

Table 1-6. Construction Timing at Burnside Skatepark

	Retrofit	Short-span Alternative	Long-Span Alternative	Couch Extension
Overall Construction – No Temporary Bridge	3.5 years	4.5 years	4.5 years	4.5 years
Overall Construction – Temporary Bridge	5 years	6.5 years	6.5 years	6.5 years
Burnside Skatepark Closure – No Temporary Bridge	Permanent	4–8 months	4–8 months	4–8 months
Burnside Skatepark Closure – Temporary Bridge	Permanent	8 months	8 months	8 months

The temporary construction impacts described above meet the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Met – Impact would be shorter in duration than the full construction time for the Project, and there is no change in ownership.
- Nature/Magnitude: Met – The ultimate condition of the skatepark would be as good or better than its current condition, with no change in footprint, structure, or types of recreation possible.
- Permanent Change/Temporary Interference: Met – There would be no permanent adverse impacts to the skatepark, and there would not be significant interference to activities and purposes of the resource as intermittent interruptions of use are short-term and do not diminish the qualities that make the site eligible for listing on the NRHP.
- Restoration: Met – The skatepark would be returned to as good or better condition after construction was complete.
- Documentation: Coordination with SHPO is necessary to document agreement with this preliminary Section 4(f) determination of Temporary Occupancy. See Appendix B.

As shown above, under the replacement alternatives, the Burnside Skatepark would not be subject to a Section 4(f) use from permanent or temporary activities, but it is adjacent to and beneath the Project, so whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The skatepark is not a noise-sensitive receptor.
- Aesthetics: No – The Project would not alter the aesthetics of the skatepark.
- Access: No – The Project would not alter long-term access to the skatepark.

- Vibration: No – The skatepark is not a historic structure susceptible to damage from vibration.

Temporary Bridge Option

For all alternatives with the Temporary Bridge Option, the east end tie-in with the permanent bridge structure would require placement of additional bridge columns within the skatepark, causing damage to the current configuration of the skatepark that would require at least half of the current structure to be repaired or replaced after construction. This is a much more intense use of the skatepark than with the No Temporary Bridge Option. Due to the placement of the temporary bridge columns, the full skatepark would be unavailable for use for 8 months, rather than for 4 to 8 months without a temporary bridge. The southern half of the skatepark would be unavailable for use for the duration of the construction, approximately 5 years. Demolition and reconstruction of a up to half of the skatepark, though a permanent impact to the full integrity of the resource and its listing on the NRHP, is not considered a permanent incorporation of the property.

The temporary construction impacts described above do not meet the conditions necessary for a Temporary Occupancy to not be considered a Section 4(f) use, as follows:

- Duration/Ownership: Not Met – Construction would be approximately the same duration as the full construction time for the Project, but there would be no change in ownership.
- Nature/Magnitude: Not Met – The ultimate condition of the skatepark would be as good or better than its current condition, with no change in footprint or types of recreation possible. However, with half of the skatepark reconstructed, it would lose its historic integrity.
- Permanent Change/Temporary Interference: Not Met – There would be permanent adverse impacts to the skatepark due to half of the site being reconstructed, thus impairing its historic integrity.
- Restoration: Not Met – The skatepark would be returned to as good or better condition after construction was complete; however, it would have significantly reduced historic integrity.

De Minimis Analysis

De minimis impacts related to historic sites are defined as the determination of either “no adverse effect” or “no historic properties affected” in compliance with Section 106 of the NHPA. The Retrofit Alternative is the only alternative that would have a Section 4(f) use. Because the skatepark would be permanently removed with this alternative, the use is not *de minimis*.

Under the Temporary Bridge Option, half of the skatepark would be demolished and reconstructed. Pending a final determination of an adverse effect under Section 106, because of the large proportion of the impact, this use would not be *de minimis*.

Agency Coordination

Representatives from the Burnside Skatepark Board of Directors have been involved in project development through citizen advisory committee meetings and direct outreach. In addition, individual meetings were held with Burnside Skatepark on January 15, 2020 and August 18, 2020. Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the Project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

The Burnside Skatepark would be subject to the following Section 4(f) use based on the different alternatives and options:

- **Section 4(f) use from the Retrofit Alternative with or without the temporary bridge.**
- **No Section 4(f) use for all replacement alternatives without the temporary bridge based on the exception at 23 CFR 774.13(d).**
- **Section 4(f) use from temporary construction activities for all replacement alternatives with the temporary bridge.**

1.9.2.15 White Stag Sign

No-Build Alternative

There would be no Section 4(f) use of the White Stag sign as a result of the No-Build Alternative. However, with no action, in the event of the predicted CSZ earthquake, the existing Burnside Bridge would fail and collapse, and due to its proximity, the White Stag sign could be damaged to an extent that it would need to be rebuilt and thus would no longer exist as a historic structure.

Enhanced Seismic Retrofit Alternative

No permanent use of the White Stag sign would occur under any of the build alternatives, and it is outside of the Boundary of Potential Construction Impacts. There would be no temporary construction use of the White Stag sign that would constitute a Section 4(f) use.

As shown above, the White Stage sign would not be subject to a Section 4(f) use from permanent or temporary activities, but it is adjacent to the Project, so whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receiver.
- Aesthetics: No – No adverse changes to the aesthetics of the resource or the setting are anticipated.
- Access: No – No permanent access changes are anticipated.

- Vibration: No – The resource is not considered susceptible to construction vibration damage. See Section 1.9.2.18 for vibratory effects on unreinforced masonry buildings, including the one the White Stag sign is attached to.

Replacement Alternatives

The Short-span Alternative, if it included a vertical lift for the movable span, could disrupt views of the White Stag sign from parts of the bridge and from the eastern shoreline south of the bridge. The Long-span Alternative, with above deck superstructure, and with the potential for a vertical lift movable span, would affect views of the White Stag sign from the same locations.

Whether or not the effect on views would be considered an adverse effect will depend on the movable span bridge type selected. Since the bridge type study is in progress, the Draft EIS and this technical analysis assume that the effect would be an adverse effect. Following the bridge type study, this assumption will be updated as necessary in the Final EIS and the Section 106 Agreement. There would be no temporary construction use of the White Stag sign.

As shown above, the White Stage sign would not be subject to a Section 4(f) use from permanent or temporary activities, but it is adjacent to the Project, so whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receiver.
- Aesthetics: No – The potential adverse changes to the views of and setting of the resource are not anticipated to rise to the level that would be considered a constructive use. The sign would continue to operate and would continue to be visible from many perspectives.
- Access: No – No permanent access changes are anticipated.
- Vibration: No – The resource is not considered susceptible to construction vibration damage. See Section 1.9.2.18 for vibratory effects on unreinforced masonry buildings, including the one the White Stag Sign is attached to.

Temporary Bridge Option

The Temporary Bridge Option would not affect the potential for a Section 4(f) use of the White Stag sign.

Agency Coordination

Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

The White Stag Sign would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.16 Ankeny Pump Station

No-Build Alternative

There would be no Section 4(f) use of the pump station as a result of the No-Build Alternative. However, with no action, in the event of the predicted CSZ earthquake, the existing Burnside Bridge would fail and collapse, and due to its proximity, the Ankeny Pump Station could be damaged to an extent that it would need to be rebuilt, and thus would no longer exist as a historic structure.

All Build Alternatives

No permanent use of the Ankeny Pump Station would occur under any of the build alternatives. The pump station building is within the Boundary of Potential Construction Impacts, and temporary construction easement for the project will be necessary, but access for BES activities would be maintained throughout construction. However, in-ground seismic improvements via jet grouting in the area around Pier 1, adjacent to the Ankeny Pump Station, are necessary with the Retrofit Alternative, Short-span Alternative, and Couch Extension Alternative. No in-ground improvements would be necessary near the Ankeny Pump Station under the Long-span Alternative.

Potential adverse effects of jet grouting could include damage to and settling of adjacent existing structures, such as the Ankeny Pump Station. The extent is unknown at this time; however, the Draft EIS and this technical analysis assume there will be no Section 106 adverse effects that would constitute a Section 4(f) use.

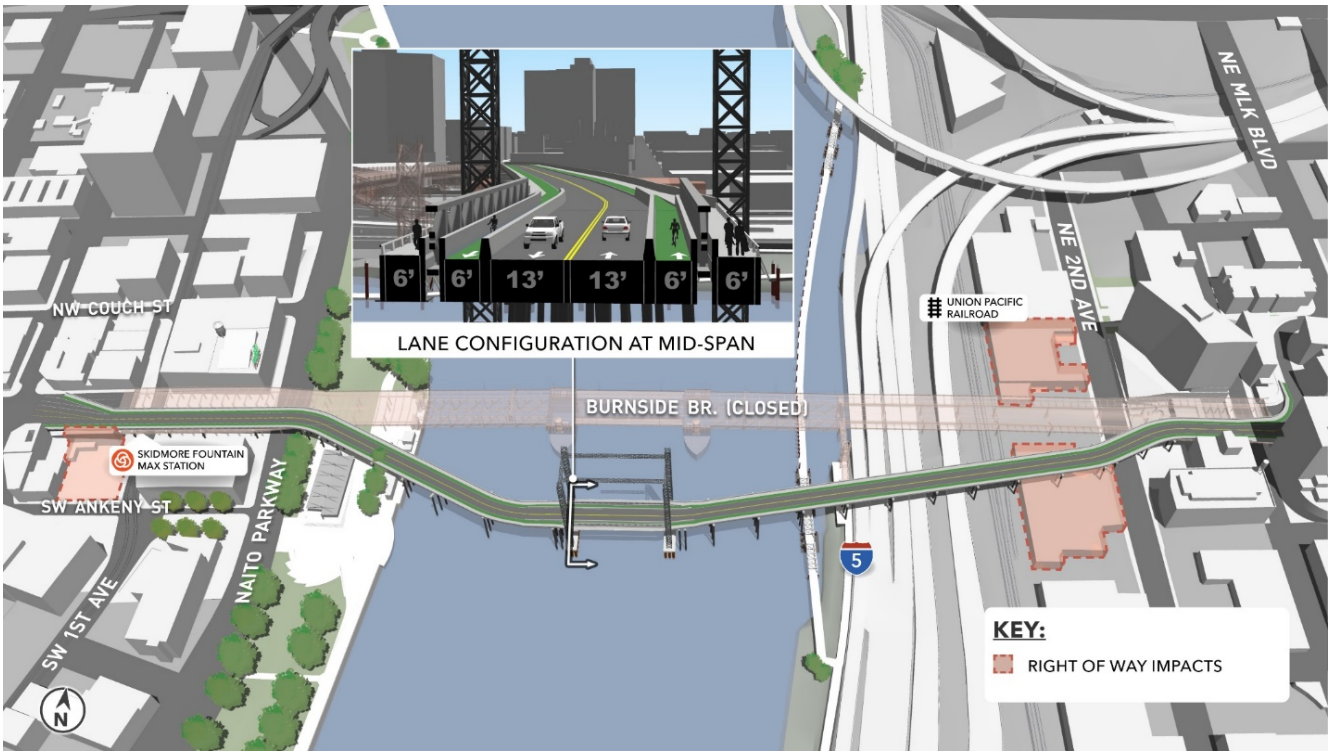
Because the Ankeny Pump Station would not be subject to a Section 4(f) use from permanent or temporary activities, but is adjacent to the Project, whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receiver.
- Aesthetics: No – No adverse changes to the aesthetics of the resource or the setting are anticipated.
- Access: No – No permanent access changes are anticipated.
- Vibration: No – The resource is not considered susceptible to construction vibration damage.

Temporary Bridge Option

The location of the temporary bridge shown on Figure 1-14 is conceptual; however, the project team anticipates any temporary bridge would be located on the south side of the Burnside Bridge, and would likely pass over the Ankeny Pump Station building. No direct permanent use of the Ankeny Pump Station building or affect its historic integrity would occur, and continued access to the pump station for operations and maintenance would be maintained throughout construction. Thus, no use under Section 4(f) is anticipated.

Figure 1-14. Proposed Temporary Bridge Location



Because the Ankeny Pump Station would not be subject to a Section 4(f) use from permanent or temporary activities, but is adjacent to, and in the case of the Temporary Bridge Option underneath, the Project, whether it is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receiver.
- Aesthetics: No – No adverse changes to the aesthetics of the resource or the setting are anticipated.
- Access: No – No permanent access changes are anticipated.
- Vibration: No – The Ankeny Pump Station is not considered susceptible to construction vibration damage.

Agency Coordination

Oregon SHPO has been involved in discussions about the Determination of Eligibility for Ankeny Pump Station and the assessment of Section 106 effects.

Preliminary Section 4(f) Use Determination

The Ankeny Pump Station would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.17 Union Pacific Railroad

No-Build Alternative

There would be no direct Section 4(f) use of this resource as a result of the No-Build Alternative. However, with no action, in the event of the predicted CSZ earthquake, the existing Burnside Bridge would fail and collapse, and due to its proximity, a small portion of the UPRR track could be damaged to an extent that it would need to be rebuilt.

All Build Alternatives

No permanent use of the UPRR track would occur under any of the build alternatives. The tracks are within the Boundary of Potential Construction Impacts, and temporary construction easements across the UPRR property would be necessary;[3] however, access for UPRR activities and operation would be maintained throughout construction. In-ground seismic improvements via jet grouting in the area around the tracks are necessary with the Retrofit Alternative, Short-span Alternative, and Couch Extension Alternative. No in-ground improvements would be necessary near the UPRR tracks under the Long-span Alternative.

Potential adverse effects of jet grouting could include damage to and settling of adjacent existing structures. The extent is unknown at this time; however, the Draft EIS and this technical analysis assume there will be no Section 106 adverse effects that would constitute a Section 4(f) use.

Because the UPRR tracks would not be subject to a Section 4(f) use from permanent or temporary activities but are adjacent to the Project, whether the tracks are subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receiver.
- Aesthetics: No – No adverse changes to the aesthetics of the resource or the setting are anticipated.
- Access: No – No permanent access changes are anticipated.
- Vibration: No – The resource is not a historic building susceptible to construction vibration damage.

Temporary Bridge Option

The location of the temporary bridge shown on Figure 1-14 is conceptual; however, the project team anticipates any temporary bridge would be located on the south side of the Burnside Bridge, and would likely pass over UPRR tracks. No direct physical impacts are known at this time that would permanently impact the UPRR tracks or affect the historic integrity, and continued access to the tracks would be maintained throughout construction.

[3] Note that the Couch Extension Alternative would require a permanent easement in addition to temporary construction easements. This permanent easement is not expected to create a Section 106 adverse effect on the UPRR tracks.

Because the UPRR tracks would not be subject to a Section 4(f) use from permanent or temporary activities but are adjacent to the Project, whether the tracks are subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – The resource is not a noise-sensitive receiver.
- Aesthetics: No – No adverse changes to the aesthetics of the resource or the setting are anticipated.
- Access: No – No permanent access changes are anticipated.
- Vibration: No – UPRR tracks are not considered a historic building susceptible to construction vibration damage.

Agency Coordination

No coordination specific to Section 4(f) has occurred with UPRR at this time. Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

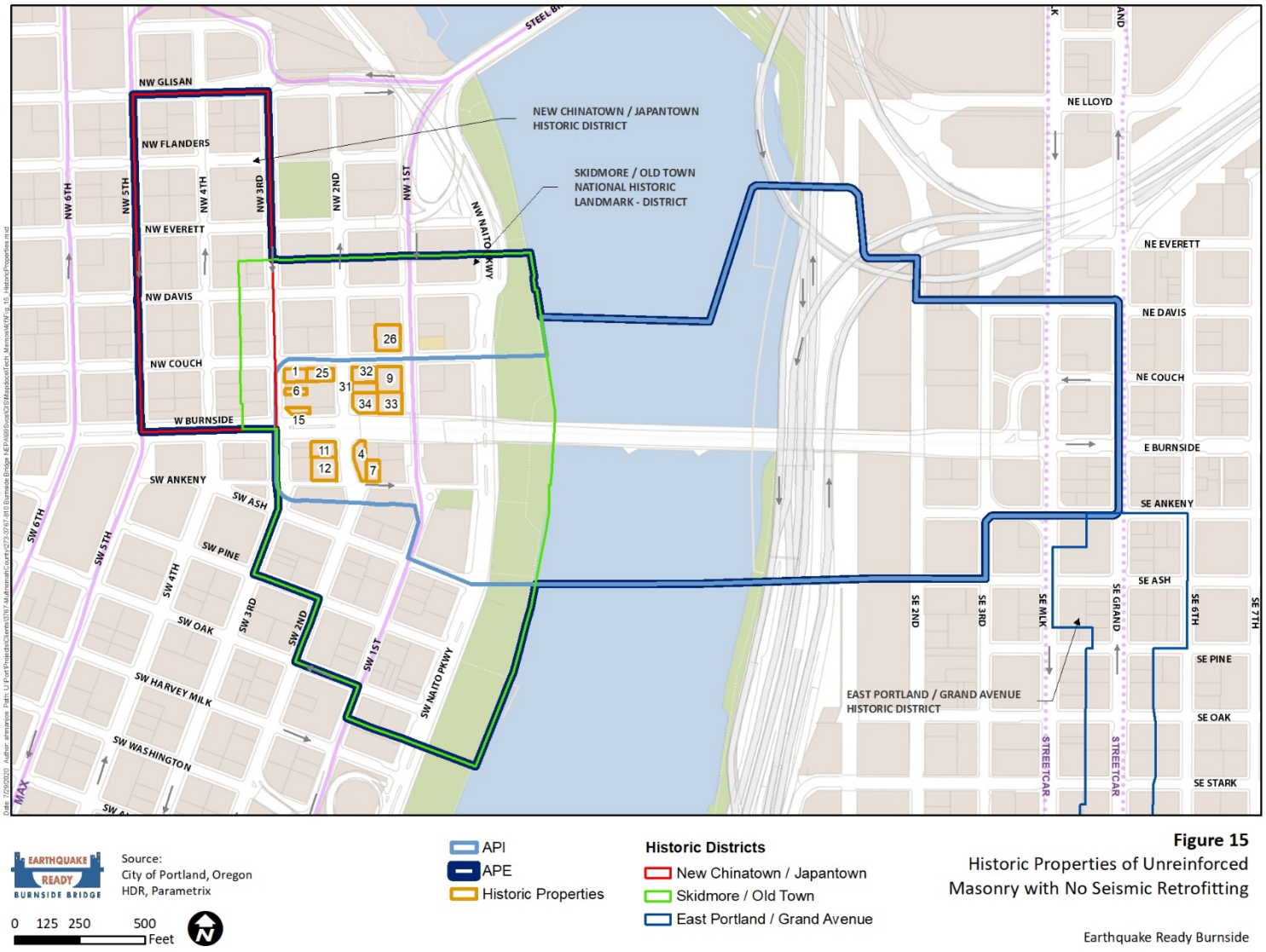
The UPRR would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.18 Unreinforced Masonry Historic or NRHP-Eligible Buildings

All the unreinforced masonry buildings in the API that have not had seismic retrofitting, and that are located adjacent or near to proposed bridge demolition and construction activities, would be subject to potential vibration damage from construction methods and demolition activities. The *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) identifies that unreinforced masonry buildings within 100 feet of construction activities could be affected (see Figure 1-15).

On the west side, there are 19 NRHP-listed or recommended eligible properties within 100 feet of the west approach or W Burnside Street between SW/NW 2nd Avenue and SW/NW 3rd Avenue. Four properties are the Burnside Bridge itself, the White Stag sign, the Harbor Wall, and the Ankeny Pump Station. The remaining properties are buildings that are of unreinforced masonry construction based on available information. Of these 15 buildings, available information indicates that 6 have been seismically retrofitted: 3 buildings that are now elements of the White Stag Block; the Reed Building; the Erickson Saloon; and the Fritz Building. The remaining 9 buildings could therefore be subject to potential damage from demolition/construction activity depending on the equipment used and the distance from the buildings.

Figure 1-15. Unreinforced Masonry Historic Buildings



Source: City of Portland, HDR, Parametrix

Because the identified buildings would not be subject to a Section 4(f) use from permanent or temporary activities but are adjacent to the Project, whether they are subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – No long-term traffic noise impacts are identified that would constitute adverse effects to any noise-sensitive receptors at historic buildings.
- Aesthetics: No – No permanent changes to the aesthetics of historic buildings or settings that would constitute an adverse effect are anticipated.
- Access: No – No permanent restrictions to access to historic buildings that would constitute an adverse effect are anticipated.
- Vibration: No – Historic, unreinforced masonry buildings may be susceptible to adverse effects from vibrations due to construction activities. However, impacts to structural integrity would be avoided by (1) monitoring in each potentially affected building during relevant construction activities, and (2) using alternative construction techniques where needed to avoid generating vibration that would cause structural damage.

Agency Coordination

Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

Unreinforced Masonry Historic or NRHP-Eligible Buildings would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.19 Skidmore/Old Town National Historic Landmark District

The Portland Harbor Wall, Ankeny Pump Station, and the White Stag sign are recommended as eligible for listing on the NRHP and are within the Skidmore/Old Town National Historic Landmark District. However, these resources are considered non-contributing because they are outside of the period of significance for the district. Thus, potential Section 4(f) use of the Portland Harbor Wall, Ankeny Pump Station, and the White Stag sign would not constitute a permanent or temporary occupancy use of the district.

There is no permanent or construction activity Section 4(f) use of the district, but as the Project occurs within the district, whether the district is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – No long-term traffic noise impacts are identified that would constitute adverse effects to any noise-sensitive receptors at historic buildings.
- Aesthetics: No – No permanent changes to the aesthetics of historic buildings or settings that would constitute an adverse effect are anticipated. The west end of the historic Burnside Bridge is within the district and the main span of the bridge is visible from the westernmost historic buildings, so there is potential for the design of the bridge to affect the setting of the district.

  - With the Retrofit Alternative, the bridge would likely have a very similar appearance to current bridge when viewed from the district, so no impact is anticipated.
  - With the replacement alternatives, the bridge may have a different appearance depending on the options selected and type of lift span; however, the bridge is not a contributing resource to the district, and with the variety of bridge types visible to waterfront structures, these changes would not be adverse and would not constitute a Section 4(f) constructive use.

- Access: No – No permanent restrictions to access to historic buildings that would constitute an adverse effect are anticipated.
- Vibration: No – See discussion above for unreinforced masonry buildings.

Agency Coordination

Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

Skidmore / Old Town National Historic Landmark District would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.20 New Chinatown/Japantown Historic District

No resources contributing to the New Chinatown/Japantown Historic District are anticipated to be impacted or experience a Section 4(f) use, thus no Section 4(f) use of the district is anticipated. However, as the Project occurs adjacent to the district, whether the district is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – No long-term traffic noise impacts are identified that would constitute adverse effects to any noise-sensitive receptors at historic buildings.
- Aesthetics: No – No permanent changes to the aesthetics of historic buildings or settings that would constitute an adverse effect are anticipated. No part of the bridge is within the district, and there is no potential for the design of the bridge to affect the setting of the district.
- Access: No – No permanent restrictions to access to historic buildings that would constitute an adverse effect are anticipated.
- Vibration: No – See discussion above for unreinforced masonry buildings.

Agency Coordination

Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

New Chinatown/Japantown Historic District would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.21 East Portland Grand Avenue Historic District

No resources contributing to the East Portland Grand Avenue Historic District are anticipated to be impacted or experience a Section 4(f) use, thus no Section 4(f) use of the district is anticipated. However, as the Project occurs adjacent to the district, whether the district is subject to a Section 4(f) constructive use must be considered. The following assessment has determined that there would not be a constructive use:

- Noise: No – No long-term traffic noise impacts are identified that would constitute adverse effects to any noise-sensitive receptors at historic buildings.
- Aesthetics: No – No permanent changes to the aesthetics of historic buildings or settings that would constitute an adverse effect are anticipated. No part of the bridge is within the district, and there is no potential for the design of the bridge to affect the setting of the district.
- Access: No – No permanent restrictions to access to historic buildings that would constitute an adverse effect are anticipated.
- Vibration: No – See discussion above for unreinforced masonry buildings.

Agency Coordination

Oregon SHPO has reviewed the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) and has been in conversations with the project team about eligibility and Section 106 effects.

Preliminary Section 4(f) Use Determination

East Portland / Grand Avenue Historic District would not be subject to Section 4(f) use under all build alternatives with or without the temporary bridge.

1.9.2.22 Archaeological – Below-Ground Resources

Based on analysis in the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b), there are no archaeological resources in the API that would be subject to Section 4(f), because there has not been a determination, nor is it anticipated, that any of the potential resources warrant in-place conservation.

1.10 Summary of Section 4(f) Preliminary Determinations of Use

Table 1-7 summarizes Section 4(f) uses by resource, alternative, and documentation needed with the Preferred Alternative, the Long-span Alternative without a temporary bridge.

Table 1-7. Summary of Section 4(f) Use Types and Documentation Type, by Alternative

	Retrofit	Short-Span Alternative	Long-Span Alternative (Preferred Alternative)	Couch Extension	Temporary Bridge	Section 4(f) Documentation Type Needed for the Preferred Alternative
Willamette River Water Trail	No Section 4(f) Use (Temporary Construction Activity)	No Section 4(f) Use (Temporary Construction Activity)	No Section 4(f) Use (Temporary Construction Activity)	No Section 4(f) Use (Temporary Construction Activity)	No Change	Temporary Occupancy Letter
Gov. Tom McCall Waterfront Park	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	No Change	Individual 4(f) Evaluation
Vera Katz Eastbank Esplanade	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	No Change	Individual 4(f) Evaluation
Willamette River Greenway Trail	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	No Change	Individual 4(f) Evaluation
Burnside Bridge	Section 4(f) Use (Permanent Incorporation)	Section 4(f) Use (Permanent Incorporation)	Section 4(f) Use (Permanent Incorporation)	Section 4(f) Use (Permanent Incorporation)	No Change	Historic Bridge Programmatic
Harbor Wall	None	None	None	None	No Change	N/A
Burnside Skatepark	Section 4(f) Use (Permanent Incorporation)	No Section 4(f) Use (Temporary Construction Easement	No Section 4(f) Use (Temporary Construction Easement	No Section 4(f) Use (Temporary Construction Easement	Section 4(f) Use (Temporary Construction Easement)	Temporary Occupancy Letter
Ankeny Pump Station	None	None	None	None	No Change	N/A
UPRR Tracks	None	None	None	None	No Change	N/A
Unreinforced Masonry Historic Buildings	None	None	None	None	No Change	N/A
Skidmore/Old Town National Historic Landmark District	None	None	None	None	No Change	N/A

	Retrofit	Short-Span Alternative	Long-Span Alternative (Preferred Alternative)	Couch Extension	Temporary Bridge	Section 4(f) Documentation Type Needed for the Preferred Alternative
New Chinatown/ Japantown Historic District	None	None	None	None	No Change	N/A
East Portland Grand Avenue Historic District	None	None	None	None	No Change	N/A
Archaeological	None	None	None	None	No Change	N/A

N/A = Not applicable

Note: . The temporary construction easements required for the Eastbank Esplanade and the Willamette Greenway Trail by all alternatives do not meet the criteria in CFR 23, Section 774.13(d) Temporary occupancies of land that are so minimal as to not constitute a use within the meaning of Section 4(f).

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Chapter 2 – Draft Section 4(f) Evaluation

This Draft Section 4(f) Evaluation has been prepared to be submitted with the Draft EIS for the EQRB Project. Project location, purpose, and alternatives are described in Chapter 1 of this draft Section 4(f) Analysis along with a preliminary determination of use for eligible properties.

2.1 Description of Section 4(f) Properties

This section briefly describes the Section 4(f) properties and resources that would be subject to use by any of the project alternatives. Full descriptions and determinations of use is available in Chapter 1 of this report, the *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e), and the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b).

2.1.1 Parks, Recreation, and Open Space Resources

Table 2-1 identifies publicly owned park, recreation, and open space areas within the API that qualify as Section 4(f) resources and that would be subject to a Section 4(f) use by one or more of the EQRB alternatives (also see Figure 1-3, Figure 1-4, and Figure 1-5 in Chapter 1).

Table 2-1. Section 4(f) Parks and Recreation Resources Subject to Use

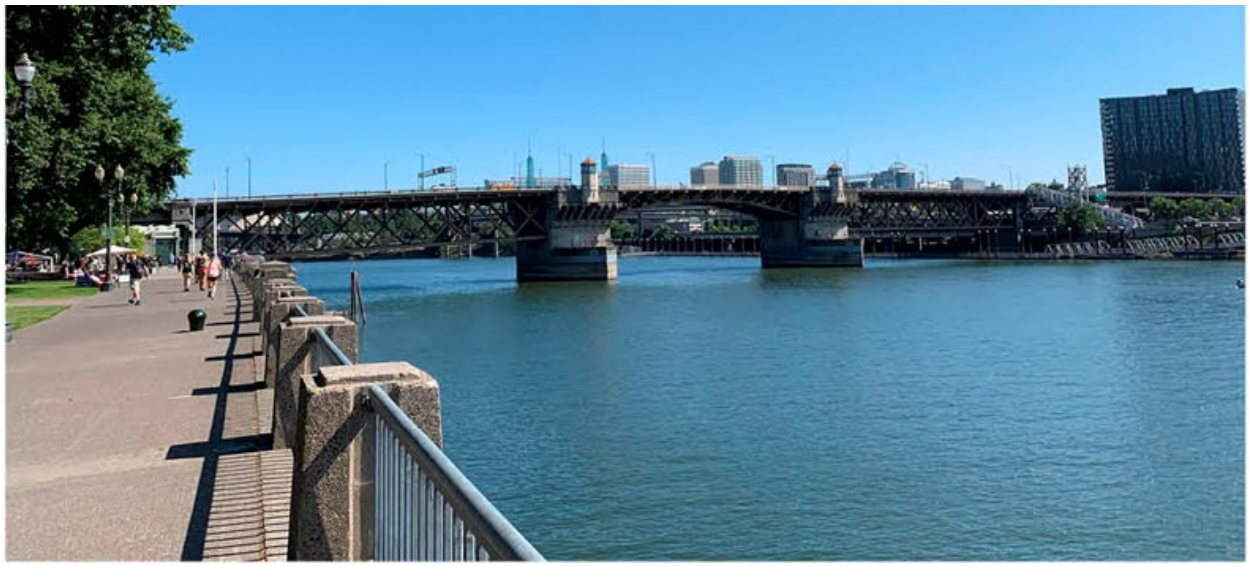
ID on Figure 1-3	Resource	Ownership (Management)	General Resource Description and Features Within API
1	Gov. Tom McCall Waterfront Park (Figure 2-1)	City of Portland	Waterfront Park is an approximately 36-acre park that stretches between the Willamette River and Downtown Portland that was constructed between 1974 and 1978. The park replaced Harbor Drive to become the city's direct visual and physical access to the Willamette River. Features in the API include the following: • Willamette River Greenway Trail • Japanese American Historical Plaza • Ankeny Plaza Structure/Portland Saturday Market Location • The Meadow and Bill Naito Legacy Fountain
2	Vera Katz Eastbank Esplanade (Figure 2-2)	City of Portland – Structure Oregon Division of State Lands – Beds and Banks of River	The 1.5-mile Esplanade extends north from the Hawthorne Bridge, past the Morrison and Burnside Bridges, and terminates at the Steel Bridge, with connections to eastside neighborhoods as well as across the river to Governor Tom McCall Waterfront Park. The City of Portland developed the Esplanade after its completion of the Eastbank Riverfront Park Master Plan in 1994 (City of Portland 1994). Construction was completed in May 2001. Features in the API include the following: • Open all hours, all days • Floating walkway • Stairs connecting to Burnside Bridge • Multi-use pedestrian and bicycle trail • Kevin J. Duckworth memorial Dock

ID on Figure 1-3	Resource	Ownership (Management)	General Resource Description and Features Within API
3	Willamette River Greenway Trail (Figure 2-3)	City of Portland (within API)	The Willamette River Greenway Trail is an interconnected network of trails as components of the Willamette River Greenway Program, originated with the Willamette River Greenway Act by the Oregon Legislature in 1967 and guided by Oregon Statewide Planning Goal 15 to preserve natural spaces and public access to the Willamette River. Features in the API include the following: • Trail on west side of the river travels within Waterfront Park, adjacent to the seawall where possible within the API. • Trail on east side of the river travels within the Esplanade.

Figure 2-1. Views of Waterfront Park

Figure 2-2. View of the Vera Katz Eastbank Esplanade, Looking South under the Burnside Bridge

Figure 2-3. View of the Willamette River Greenway Trail, West Side, Looking North, toward the Burnside Bridge



2.1.2 Historic Sites

Section 4(f) resources either listed or considered eligible for listing on the NRHP within the Area of Potential Effect notable for their proximity to the Burnside Bridge include the Burnside Bridge itself, the White Stag sign, Burnside Skatepark, and Ankeny Pump Station. Of these, the Burnside Bridge and Burnside Skatepark would be subject to Section 4(f) use. Section 4(f) use of the Burnside Bridge is not included in this Section 4(f) Evaluation because it is documented through use of the separate Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges. As such, Burnside Skatepark is the only historic Section 4(f) site included here.

Table 2-2. Section 4(f) Historic Sites Subject to Use

ID on Figure 1-7	Resource	Ownership (Management)	General Resource Description and Features Within API
48	Burnside Skatepark (Figure 2-4)	City of Portland Right-of-Way	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 public property underneath the east approach of the Burnside Bridge, but it is not a public park. The skatepark is the first known do-it-yourself (DIY) poured-concrete skatepark built in the United States and was at the forefront of a trend in DIY skatepark design and community. The skatepark known internationally and draws skaters young and old, having built a reputation for its challenging features. The local skater community accepts that the overall design is constantly evolving and appreciates that the park is not an official park. Although sanctioned by the City of Portland in 1992, the skatepark continues to be shaped by the skater community without City involvement (Bredesen 2019; Chemotti 2015). The Burnside Skatepark is recommended to be eligible for listing in the NRHP under Criteria A and C and meets Criteria Consideration G. See the *EQRB Cultural Resources Technical Report* (Multnomah County 2021b) for details.

Figure 2-4. View of Burnside Skatepark Looking West

Source: City of Portland, HDR, Parametrix; Note: This figure includes all the parks and recreation resources discussed in the *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e).

2.2 Section 4(f) Preliminary Determinations of Use Summary

Table 2-3 summarizes Section 4(f) resources that will have a Section 4(f) use that has been determined to be not *de minimis* and for which a programmatic Section 4(f) approval is not applicable. These resources are included in this Draft Section 4(f) Evaluation. Full details for use determination are available in Chapter 1, Section 4(f) Technical Analysis.

Table 2-3. Section 4(f) Resources Covered in the Individual Section 4(f) Evaluation

	Retrofit	Short-Span Alternative	Long-Span Alternative (Preferred Alternative)	Couch Extension	Temporary Bridge	Section 4(f) Documentation Type Needed for Preferred Alternative
Gov. Tom McCall Waterfront Park	Section 4(f) Use	Section 4(f) Use	Section 4(f) Use	Section 4(f) Use	No Change	Individual 4(f) Evaluation
Vera Katz Eastbank Esplanade	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	No Change	Individual 4(f) Evaluation
Willamette River Greenway Trail	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	Section 4(f) Use (Temporary Construction Easement)	No Change	Individual 4(f) Evaluation
Burnside Skatepark	Section 4(f) Use (Permanent Incorporation)	No Section 4(f) Use (Temporary Construction Easement	No Section 4(f) Use (Temporary Construction Easement)	No Section 4(f) Use (Temporary Construction Easement	Section 4(f) Use (Temporary Construction Easement)	Temporary Occupancy Letter

NOTE: The Temporary Construction Easements required for Waterfront Park, the Eastbank Esplanade, and the Willamette Greenway Trail by all alternatives do not meet the criteria in CFR 23, Section 774.13(d) Temporary occupancies of land that are so minimal as to not constitute a use within the meaning of Section 4(f).

2.3 Alternatives to Avoid Use of Section 4(f) Properties

This section analyzes whether there is an alternative that avoids all Section 4(f) use.

23 CFR 774.3 states FHWA may not approve a Section 4(f) use unless a determination is made that:

- There is no feasible and prudent avoidance alternative, as defined in § 774.17, to the use of land from the property; and

- The action includes all possible planning, as defined in § 774.17, to minimize harm to the property resulting from such use; or
- FHWA determines that the use of the property, including measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant, will have a *de minimis* impact, as defined in § 774.17, on the property.

This section discusses the requirement that there is no feasible and prudent alternative that completely avoids the use of Section 4(f) property.

Chapter 2 of the Draft EIS and the *EQRB Description of Alternatives* (Multnomah County 2021c) describe the process used to identify and screen project concepts through to selecting the alternatives evaluated. That process eliminated alternatives that did not meet the purpose and need of the project and were not feasible or prudent. The No-Build Alternative, build alternatives, and construction alternatives and how they avoid use or minimize harm are described below.

2.3.1 No-Build Alternative

The No-Build Alternative would avoid the Section 4(f) use of the Willamette River Greenway Trail and the Eastbank Esplanade, and would avoid a permanent use of the Burnside Skatepark, but it is not a prudent alternative. It would not meet the purpose and need of the Project because it would not provide an earthquake-resilient Willamette River crossing. Thus, the No-Build Alternative is not considered prudent.

In addition, following a major CSZ earthquake, the No-Build Alternative would result in severe damage and loss of use of the Willamette Greenway Trail, the Eastbank Esplanade, and the Burnside Skatepark.

2.3.2 Build Alternatives

None of the proposed build alternatives avoids all Section 4(f) use. When there is no feasible and prudent avoidance alternative, FHWA may approve only the alternative that causes the least overall harm to Section 4(f) property. See Section 2.4.3 for a discussion determining the alternative with the least overall harm.

2.3.3 Construction Alternatives

Because the Section 4(f) uses are primarily due to construction activities (except for impacts to Burnside Skatepark under the Retrofit Alternative), this section focuses on construction alternatives. During development of the build alternatives, the project team evaluated many approaches to construction access, sequencing, and material storage areas, specifically with the goal of avoiding impacts to Section 4(f) properties. It was determined early on that construction access from the east bank of the Willamette River is not feasible, thus access must be from the west side. To reduce the area needed within Waterfront Park (and the west side of the Willamette River Greenway Trail), it was assumed that where possible, materials could be delivered by barge rather than assembled within the park adjacent to the bridge. Further reducing the area needed within Waterfront Park was determined to be infeasible because of the need to stage and maneuver equipment and gain access to the adjacent bridge itself as well as the work

bridge in the river. Based on that process, the following describes the necessary access and construction actions and infrastructure (see the *EQRB Construction Approach Technical Report* [Multnomah County 2021a]):

- West side site access to bridge – Access to the project area from the west side would likely be from Naito Parkway. The area around the bridge would be a necessary staging area for equipment and materials. The contractor would need a minimum of 40 feet outside the bridge limits on the north side in order to gain access to a work bridge in the river. For equipment and material staging, the contractor would need to use the area encompassing the area under the bridge, and a large area south of the bridge in park property.
- Willamette River west work bridge – The project team assumes that the western river pier (Pier 2/Bent 8 [Bent 7 for the Long-span Alternative]) would be accessed by a work bridge extending from the west bank, just north of the existing bridge. Depending on which alternative is selected, the existing Pier 1 may need to be accessed by a work bridge as well. Work bridge "fingers" would extend around three sides of Pier 2/Bent 8 (Bent 7 for the Long-span Alternative), with the channel side of the pier kept clear for river traffic.
- The Esplanade travels directly beneath the east fixed truss of the Burnside Bridge on floating structure and continues north toward Lloyd Boulevard. Where the Esplanade crosses under the bridge, there are several construction activities that would impact the Esplanade, all of them requiring that the floating portion of the Esplanade be shut down, disconnected, and temporarily relocated.
- All build alternatives include some specific actions requiring the temporary relocation of the Esplanade. These include:
    - Bent 10 (or the new Pier 4 in the Retrofit) is within very close proximity to the Esplanade. In order to build the pier (shafts, columns, and cap), the Esplanade would need to be temporarily relocated or shut down to allow for equipment on barges to access the work. If the Long-span Alternative were selected, this impact would not occur.
    - Ground improvements are needed for pier construction directly below the Esplanade. The Esplanade would need to be temporarily relocated or shut down to allow for barge-mounted equipment to perform the work safely. If the Long-span Alternative was selected, this impact would not occur.
    - For the Retrofit Alternative, the east truss would be cut back to the new Pier 4. During truss demolition, the Esplanade would need to be temporarily relocated or shut down due to safety implications.
    - For the Short-span and Couch Extension Alternatives, the east truss would be removed in its entirety. The Esplanade would need to be temporarily moved from its location and/or closed to public access for this operation.
    - For all build alternatives (except the Long-span Alternative), during girder erection over I-5, it is expected that the girders would need to be erected from the river. To do this, the Esplanade would need to be shut down and temporarily relocated to allow barge access close to the east bank.

  - For the Long-span Alternative, a temporary tower would likely be erected adjacent to the Esplanade. During erection of the arch pieces and deck, the Esplanade would need to be shut down and temporarily relocated to allow barge access close to the east bank.
  - In order to construct and deconstruct the east work bridge for all build alternatives, the Esplanade would need to be disconnected and temporarily moved out of the way to allow barge equipment to enter the space between the existing Esplanade alignment and the east bank.
- No construction alternatives were identified that would avoid temporary impacts (deconstruction and temporary closure) to the Eastbank Esplanade or Willamette River Greenway Trail.
- The following describes the necessary access and construction actions and infrastructure related to construction that affects the Burnside Skatepark:
  - Deck demolition (Retrofit)
  - Complete bridge structure demolition while leaving existing Bent 25 in place (all replacement alternatives)
  - Installation of longitudinal bridge struts (Retrofit)
  - Bridge girder erection on east approach (all replacement alternatives)
  - Bridge superstructure construction on east approach (all build alternatives)
  - Bridge girder erection on east approach associated with temporary bridge construction (all replacement alternatives with a temporary bridge)
- No construction alternatives were identified that would avoid temporary impacts (temporary closure) to Burnside Skatepark.

2.4 Minimization and Mitigation of Harm

Section 4(f) of the USDOT Act also requires that all possible measures for minimizing or mitigating harm have been incorporated into the project. This section describes those measures for Waterfront Park, Eastbank Esplanade, Willamette River Greenway Trail, and Burnside Skatepark.

The Project will be required to obtain local permitting approvals through a PP&R Non-Park Use Permit (NPUP) and compliance with City of Portland Title 11 Trees and Title 33 Planning and Zoning standards. The NPUP, Title 11, and Title 33 approvals will incorporate conditions requiring the Project to provide mitigation and meet minimization development standards. The NPUP is also expected to include provision for monetary compensation for loss of park event revenue fees due to project construction effects. The monetary loss is not considered a Section 4(f) use.

2.4.1 Governor Tom McCall Waterfront Park

Options for minimizing harm to Waterfront Park can include mitigation actions under the National Environmental Policy Act process. Mitigation for temporary, construction-phase impacts would primarily include returning park facilities to their pre-construction (or

better) condition. This would require close coordination with PP&R, the Japanese American Museum of Oregon, and PSM. Mitigation for restricted use is being provided in the form of detour routes for the Waterfront Trail. Some possible mitigation options for the southern portion of the Japanese American Historical Plaza could include the following:

- Carefully plan deconstruction to facilitate reassembly post-construction.
- Provide for a temporary exhibit in the unimpacted area of the plaza to highlight the information currently provided in the southern half of the memorial.
- Involve the Japanese Consul for replacement of removed ornamental flowering cherry trees.
- Involve memorial designers and stone mason during deconstruction and reconstruction.
- Coordinate closely with the Japanese American Museum of Oregon on the formation of these and other mitigation solutions.

2.4.2 Vera Katz Eastbank Esplanade

Options for minimizing harm to the Eastbank Esplanade can include mitigation actions under the National Environmental Policy Act process. Mitigation for restricted use is being provided in the form of detour routes for the Esplanade to ensure the north-south bike and pedestrian connections remain usable while the Esplanade is closed.

Other potential minimization measures include selecting alternatives and/options that have less impact or shorter duration closures of the Esplanade, including:

- The Long-span Alternative would reduce the duration of closure by 8 months to 1 year compared to other alternatives.
- The No Temporary Bridge Option would reduce the duration of closure by about 4 months compared to the Temporary Bridge Option.
- Selecting either of the access options to Burnside Bridge with stairs and an elevator would not increase the duration of the closure compared to the Long-span Alternative and would not require removal and reconstruction of the floating bridge.

2.4.3 Willamette River Greenway Trail

The *EQRB Parks and Recreation Technical Report* (Multnomah County 2021e) includes mitigation for restricted use in the form of detour routes for the trail to ensure the north-south bike and pedestrian connections remain usable.

2.4.4 Burnside Skatepark

The replacement alternatives with no temporary bridge minimize the impact to the skatepark compared to the Retrofit Alternative or any alternative with a temporary bridge. Beyond that, the construction planning has evolved during the development of alternatives in an effort to minimize impacts allowing for shorter closures of 4 to 8 months of the skatepark, rather than for the full construction period. Construction designs for the

replacement alternatives would keep an existing bridge bent incorporated into the Skatepark undisturbed to the extent practicable.

2.4.5 Alternative with the Least Overall Harm

When there is no feasible and prudent avoidance alternative, FHWA may approve only the alternative that causes the least overall harm to Section 4(f) property. All of the build alternatives would permanently use the Burnside Bridge (an historic Section 4(f) resource) reviewed under a programmatic Section 4(f) documentation (see Chapter 3). In addition, the Retrofit Alternative would also permanently use a second Section 4(f) resource – the Burnside Skatepark. The replacement alternatives would have no Section 4(f) use of the skatepark. All other impacts from the build alternatives on Section 4(f) resources would occur during construction activity and would cease thereafter. Based on this, the Retrofit Alternative would not cause the least harm.

The replacement alternatives have nearly identical Section 4(f) uses affecting the same properties. It has also been noted above in this analysis that all of the replacement alternatives would disturb the same amount of area within each Section 4(f) property for which a temporary construction activity is identified, thus area of disturbance is not a determining factor to identify the alternative with least harm.

However, because all Section 4(f) uses caused by the replacement alternatives would occur during the construction phase, it is useful to compare the durations of construction phase effects on properties determined to experience a Section 4(f) use. The alternative with least overall harm should be the replacement alternative with the shortest overall duration of project construction effects to properties with a Section 4(f) use. The replacement alternatives would have nearly identical construction durations within the various Section 4(f) properties with the exception that the Long-span Alternative would have the shortest construction duration and disturbance within the Eastbank Esplanade (18 months compared to 30 months). However, if an access option from the Esplanade to the Burnside Bridge utilizing ramps is selected, construction disturbance and closure of the Esplanade would be the same for all replacement alternatives, lasting the full duration of bridge construction, approximately 4.5 years.

Thus, based on type of use and duration of impact, the Long-span Replacement Alternative with no temporary bridge would have the least overall harm to Section 4(f) properties.

2.5 Contacts and Coordination

As described above, coordination has occurred with multiple bureaus within the City of Portland with regard to parks resources. Coordination with Oregon SHPO has occurred with respect to cultural resources. As the Section 4(f) process continues, additional discussions are expected. As of the publication of the Draft EIS, the Section 4(f) compliance is only partially complete. Additional steps to complete Section 4(f) compliance will include:

- Secure input on the draft Section 4(f) documentation from the public during the Draft EIS comment period in January/February 2020

- Continue coordinating with the City of Portland regarding the potential for a Net Benefit to Waterfront Park, and for potential mitigation for impacts to the Eastbank Esplanade. (November 2020 through April 2021)
- Coordinate with the State Office of Parks and Recreation Department regarding a Temporary Occupancy Exception for the Willamette River Water Trail. (November 2020 through April 2021)
- As needed, update the discussion of historic resources use in the Section 4(f) document, based on input received through the Section 106 process from consulting parties, the Oregon State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP). (December 2020 through February 2021)
- Update the discussion of mitigation for historic resources in the Section 4(f) document, based on input received through the Section 106 process from consulting parties, the Oregon State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP). (December 2020 through June 2021)
- Publish the Final Section 4(f) Evaluation together with the Final EIS, and allow a waiting period before signing the Record of Decision (alternatively, the Final Section 4(f) Evaluation could be published for public review prior to publishing the Final EIS).

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Chapter 3 – Draft Nationwide Programmatic Section 4(f) Evaluation for Projects that Necessitate the Use of Historic Bridges

3.1 Federal Highway Administration Nexus

The Earthquake Ready Burnside Bridge (EQRB) Project (Project) would replace the existing Burnside Bridge. Planning and design costs are entirely locally funded but the project is pursuing a combination of local, state, and federal funding for the construction costs.

3.2 Description of the Section 4(f) Resource

When it opened to traffic in 1926, the Burnside Bridge, which replaced the original 1892 bridge, was acclaimed for its use of the double-leaf bascule while also employing a concrete deck for the moveable span. The Burnside Bridge remains largely intact and continues to maintain its historic integrity and to convey its period of significance (Kramer 2012). The current bridge initially supported six lanes of traffic, but in 1995, one traffic lane was converted into bicycle lanes. The bridge now has bicycle lanes and sidewalks in both directions, and it has five motor vehicle lanes: two westbound and two eastbound general traffic lanes plus one eastbound transit-only lane. The bridge has had minor modifications since it was constructed: electric streetcar service ended in the late 1940s, lighting and traffic control devices were updated in the 1950s, automobile traffic gates were installed in 1971, and the bascule pier fenders were replaced on the upstream side in 1983. Multiple deck resurfacing 28 projects and expansion joint repairs have been conducted over the years.

The bridge has been the subject of a HAER documentation (Wood Wortman 2006) and is listed individually in the NRHP in 2012 as a part of the Willamette River Highway Bridges Multiple Property District meeting the eligibility requirements under Criterion A and Criterion C (Kramer 2012). The west approach of the bridge is within the Skidmore/Old Town NHL District boundaries. Ira G. Hedrick and Robert E. Kremers produced the initial bridge design for Multnomah County employing a bascule-type patented by Joseph B. Strauss. Noted bridge engineer Gustav Lindenthal replaced the bridge team and completed the work with minor changes to the original design, employing architects Houghtaling and Dougan for consultation of design. Portland Bridge Company completed the construction work.

3.3 National Register Status

The Burnside Bridge was listed individually in the NRHP in 2012 as a part of the Willamette River Highway Bridges Multiple Property District meeting the eligibility requirements under Criterion A and Criterion C. The Burnside Bridge has been determined eligible under Criterion A for its statewide significance for its association with the development of Portland and its transportation network, especially in contributing to the development of central business district since its construction in 1926. The Burnside

Bridge is also of statewide significance under Criterion C as one of the heaviest bascule bridges in the United States and as the first such bridge to rely upon a concrete deck surface for its movable span.

3.4 Project Use of Section 4(f) Resource

The Burnside Bridge would undergo substantial upgrades with the Retrofit Alternative but would retain the bridge type and some of the existing design characteristics of its current condition. However, the Retrofit Alternative would remove and reconstruct Pier 4 approximately 34 feet to the west, which would visually shorten the eastern fixed span. In addition, the retrofit would compromise the bridge's historic integrity by altering the design, materials, workmanship and feeling of the structure. Those changes would alter the historic significance of the bridge to the extent that this alternative would cause an overall adverse effect under Section 106.

The replacement alternatives (including the Preferred Alternative Long-span Alternative) would constitute a complete replacement of the current bridge which would result in an adverse effect under Section 106 and a permanent Section 4(f) use.

The option of using a temporary bridge would not cause a Section 4(f) use of the Burnside Bridge.

A Section 106 Finding of Effect (FOE), prepared for FHWA by Multnomah County and ODOT, resulted in a finding of "Historic Properties Adversely Affected" for the Project's effects to the Burnside Bridge. The project team has sent the FOE to the Oregon SHPO and anticipates concurrence with the adverse effect finding in winter 2021. This programmatic will be updated with those details prior to the release of the Final EIS. Consequently, the project impacts constitute a Section 4(f) use. To mitigate this adverse effect finding, the project team anticipates FHWA, Multnomah County, and SHPO will execute a Section 106 Programmatic Agreement. The project team is seeking input through the Section 106 process from consulting parties, Oregon SHPO, and the Advisory Council on Historic Preservation (ACHP) through early Spring 2021. Mitigation measures and a draft Section 106 Programmatic Agreement are anticipated in summer 2021.

3.5 Alternatives

Per the Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges, the following alternatives avoid any use of the historic bridge:

- Do nothing.
- Build a new structure at a different location without affecting the historic integrity of the old bridge, as determined by procedures implementing the NHPA.
- Rehabilitate the historic bridge without affecting the historic integrity of the structure, as determined by procedures implementing the NHPA.

The EQRB Project conducted multiple project planning and feasibility analyses to evaluate and screen potential alternatives. See the *EQRB Description of Alternatives Technical Report* (Multnomah County 2021c); the narrative below provides a summary of the process and alternatives considered.

3.5.1 Do nothing

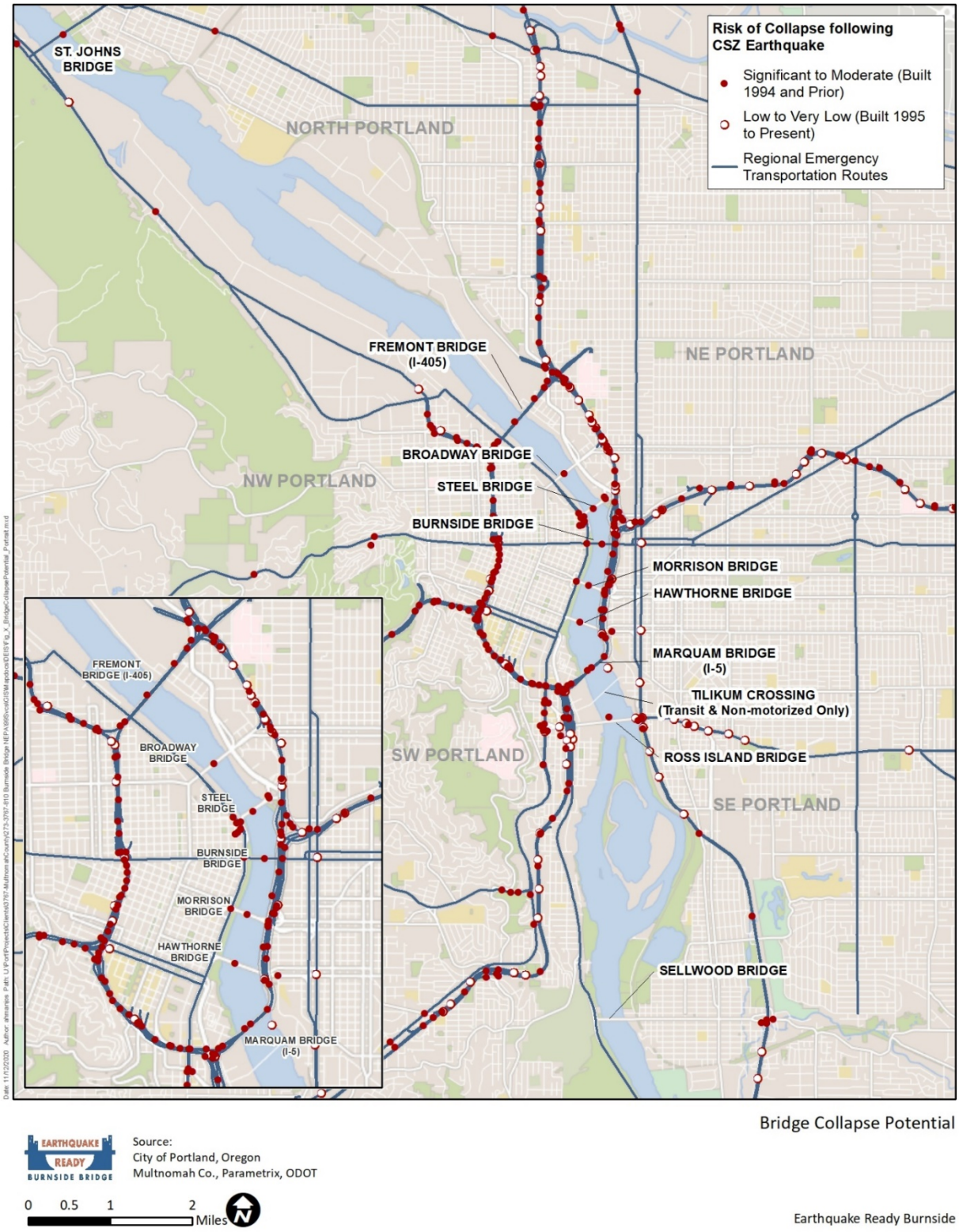
This alternative consists of leaving Burnside Bridge in its current condition. Multnomah County first identified the need for seismic resiliency of the Burnside Bridge through the County's Willamette River Bridges Capital Improvement Plan (2015–2034) (CIP). The CIP process notes that the County's four historic movable bridges lack the seismic resiliency to withstand moderate to major earthquakes and identifies that as a component of Metro's Regional Lifeline Route corridor, the Burnside Bridge must meet a higher performance standard than the other three downtown movable bridges (see Figure 3-1). The CIP process determined that the Burnside Bridge should remain fully operational to vehicles and river traffic following a magnitude 9.0 CSZ earthquake, while the other three should meet a seismic standard allowing the bridge superstructure to not collapse during smaller magnitude 4 +/- earthquakes (Multnomah County 2015). A seismically resilient Burnside Bridge, beyond its current capability, would support the region's ability to provide rapid and reliable emergency response, rescue, and evacuation after a major earthquake, as well as enable post-earthquake economic recovery. This is integral to the Project's purpose and need statement and means that taking no action under the do nothing alternative would not fulfill the purpose and need for the Project. Thus, the do nothing alternative is not a prudent alternative.

Per the Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges:

The do nothing alternative has been studied. The do nothing alternative does not correct the situation that causes the bridge to be considered structurally deficient with respect to seismic standards. The do nothing alternative ignores the basic transportation need.

- Maintenance – The do nothing alternative does not address the above problem of the need for a seismically sufficient bridge connected to Metro's Regional Lifeline Route corridor. Normal maintenance is not considered adequate to correct the situation.
- Safety – The do nothing alternative does not address the above problem of the need for a seismically sufficient bridge connected to Metro's Regional Lifeline Route corridor. Because the bridge deficiencies with respect to seismic standards, it poses unacceptable safety hazards to the traveling public. As such, the do nothing alternative is not considered a feasible and prudent alternative.

Figure 3-1. Bridge Collapse Potential



3.5.2 Build a new structure at a different location without affecting the historic integrity of the old bridge, as determined by procedures implementing the NHPA.

This alternative consists of constructing a new bridge on a different alignment such that it would not affect the historic integrity of the existing bridge. The new bridge would meet all current traffic, load capacity, and safety design standards.

Multnomah County conducted a feasibility analysis, documented in the EQRB *Feasibility Study Report* (Multnomah County 2018) in which the project team analyzed more than 100 Willamette River crossing options. The alternatives development phase included options to attempt to accomplish the purpose and need for the Project in a different location, including nine alternatives for enhancing or replacing a bridge other than the historic Burnside Bridge, including the following:

- Fremont Bridge
- Broadway Bridge
- Steel Bridge
- Morrison Bridge
- Hawthorne Bridge
- Marquam Bridge
- Tilikum Crossing Bridge
- Ross Island Bridge
- Sellwood Bridge

All of these alternative bridge locations, except for the Morrison Bridge, failed Step 1 of the screening process that involved pass/fail criteria reflecting the Project's core intent. Except for the Morrison Bridge, the alternative locations failed each of the 12 criteria. The pass/fail criteria included:

Criterion I. Compatibility with other major infrastructure – This criterion eliminated alternatives that caused prolonged, substantial interruption or degradation of the use or function of adjacent, major public infrastructure.

Criterion II. Seismically resilient and operational Willamette River crossing – This criterion eliminated alternatives that did not meet the project's definition of being "fully functional" following a CSZ 8+ earthquake.

Criterion IIIa. Unobstructed Willamette River crossing lifeline route – This criterion eliminated alternative crossing locations (e.g., the Steel Bridge, Hawthorne Bridge, Tilikum Bridge, and others) that would have two or more earthquake-related blockages (on the access route to and from the Burnside lifeline route).

Criterion IIIb. Rapid emergency response across the Willamette River – This criterion eliminated alternative crossing locations that would add excessive travel time because of distance from the Burnside corridor for emergency vehicles crossing the river and using the Burnside lifeline route.

Criterion IIIc. Congestion avoidance on a Willamette River crossing – This criterion eliminated crossing alternatives that would have too little post-earthquake capacity to allow reliable and rapid emergency response after a major earthquake.

Step 2 used similar criteria to Step 1, focusing on meeting the core intent of the Project, but assigned a scoring system. The Morrison Bridge alternative, the only one left that would enhance a different bridge, received a score of 32 percent of the possible points, and it was determined through input from stakeholders, committees, and the project team that it offers no unique advantages compared to the other alternatives, and it did not perform well enough to advance for further analysis (Multnomah County 2018). In addition, the Morrison Bridge, like the Burnside Bridge, is also listed in the NRHP (as of 2012). Thus, no alternatives that would use a bridge different from the existing Burnside Bridge advanced to the next step of screening, meaning that none was considered a prudent alternative that would adequately fulfill the purpose and need of the Project.

Step 3 evaluated the remaining alternatives with six criteria divided into 17 scored measures. The six topics included:

Topic 1: Seismic Resiliency – Support Reliable and Rapid Emergency Response after an Earthquake

Topic 2: Non-Motorized Transportation – Support Access and Safety for Bicyclists, Pedestrians and People with Disabilities

Topic 3: Connectivity – Support Street System Integration and Function (Affects all Modes)

Topic 4: Equity/Environmental Justice – Minimize Adverse Impacts on Historically Marginalized Communities

Topic 5: Built Environment – Promote Land Use Compatibility and Minimize Impacts on Parks and Historic Resources

Topic 6: Financial Stewardship – Ensure Public Funds are Invested Wisely

Step 3 included 26 alternatives in the location of the Burnside Bridge, including a tunnel option and 12 twin bridge options. Based on criteria and measure evaluation, these options did not move forward in the study.

Per the Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges:

Investigations have been conducted to construct a bridge on a new location or parallel to the old bridge (allowing for a one-way couplet), but, for the following reasons, these alternatives are not feasible and prudent:

- Adverse Social, Economic, or Environmental Effects – Building a new bridge away from the present site would result in social, economic, or environmental impact of extraordinary magnitude.

  Through the alternatives screening and evaluation process described above, it was determined that all potential locations away from the present site that did not pass Step 1 or Step 2 screening would result in social, economic, and environmental impacts of extraordinary magnitude because they would not provide a seismically resilient bridge meeting the purpose and need of the project and would leave the

region vulnerable to extreme social, economic, and environmental harm from a major earthquake.

Through the alternatives screening and evaluation process described above, it was determined that all potential locations away from the present site that passed Step 1 and Step 2 in the alternatives screening and could meet the purpose and need for the Project would cause one or more unacceptable effects. These potential locations included a tunnel or one of the twin bridge options. Through Step 3 describe above, it was determined that these options would include displacement of a significant number of businesses, serious disruption of established travel patterns, increased impacts to parks and recreation resources, or adverse effects to historic sites or districts.

- Engineering and Economy – Where difficulty associated with the new location is less extreme than those encountered above, a new site would not be feasible and prudent where cost and engineering difficulties reach extraordinary magnitude.

  Estimated cost was evaluated as part of the Step 3 alternatives evaluation. Figure 11 in the 2018 Feasibility Study shows that the tunnel option was expected to be extraordinarily more expensive than the rest of the alternatives. The tunnel option cost estimate was $3,200 million, which the next most expensive option was $9 million (costs with detoured traffic).

3.5.3 Rehabilitate the historic bridge without affecting the historic integrity of the structure, as determined by procedures implementing the NHPA.

This alternative would rehabilitate the existing bridge to the extent possible. The Project studied the Enhanced Retrofit Alternative which would make changes to the bridge sufficient to create the seismic stability prescribed by the purpose and need for the project, but would retain as much of the existing bridge as possible. Section 106 analysis found that the Retrofit Alternative would change the bridge to the extent that the bridge would no longer be considered eligible for NRHP listing. The Retrofit Alternative would modify piers, bents, footings, and some of the trusses of the Burnside Bridge, as well as replace other trusses, the bridge deck and mechanical equipment. A retrofit would modify Piers 1 through 3 and construct a new Pier 4. Piers 2 and 3 would be more massive in structure and form both above and below water. The new Pier 4 would be constructed approximately 34 feet west of the existing pier and would consist of a cross beam supported by two columns. It would therefore no longer be a concrete structure and it would no longer have the decorative pier cap also found on Pier 1. The relocation of Pier 4 would alter the original pier symmetry. With these alterations to the bridge's original engineering and design, the Burnside Bridge's integrity would be compromised, and it would no longer be eligible for listing on the NRHP. Thus, this alternative does not offer a feasible and prudent alternative that would not affect the bridge's integrity.

Per the Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges:

Studies have been conducted of rehabilitation measures, but, for the following reason, this alternative is not feasible and prudent:

- Structural Sufficiency – The bridge is so structurally deficient that it cannot be rehabilitated to meet minimum acceptable seismic requirements without affecting the historic integrity of the bridge.

3.6 Measures to Minimize Harm

It has been determined that no feasible and prudent alternatives exist to the full replacement and removal of the Burnside Bridge.

Per the Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges:

This programmatic Section 4(f) evaluation and approval may be used only for projects where the FHWA Division Administrator, in accordance with this evaluation, ensures that the proposed action includes all possible planning to minimize harm. The following apply to this Project:

- For bridges that are to be rehabilitated to the point that the historic integrity is affected or that are to be moved or demolished, the FHWA ensures that, in accordance with the Historic American Engineering Record (HAER) standards, or other suitable means developed through consultation, fully adequate records are made of the bridge;

  The Burnside Bridge would be demolished. Fully adequate documentation of the bridge will be defined as part of the Section 106 process which will be completed prior to finalization of the Section 4(f) documentation.

- For bridges that are to be replaced, the existing bridge is made available for an alternative use, provided a responsible party agrees to maintain and preserve the bridge;

  The Burnside Bridge would be replaced. Potential reuse of components of the bridge will be explored as part of the Section 106 process which will be completed prior to finalization of the 4(f) documentation. Structural engineers do not believe that any structural components could be reused due to age and design, but non-structural components, such as operator towers and handrail balustrades, are likely feasible to reuse. Reuse of these components has been included as mitigation in the Draft EIS.

- For bridges that are adversely affected, agreement among the SHPO, ACHP, and FHWA is reached through the Section 106 process of the NHPA on measures to minimize harm and those measures are incorporated into the project. This programmatic Section 4(f) evaluation does not apply to projects where such an agreement cannot be reached.

  Response not yet available. A description of measures developed during the Section 106 Programmatic Agreement process will be added when available.

3.7 Coordination

The EQRB Project has coordinated with the SHPO and the *EQRB Cultural Resource Technical Report* (Multnomah County 2021b) has been reviewed by SHPO and City of Portland staff. For broader reach, the project solicited input from the public, various

stakeholders and the Citizens' Task Force during the Feasibility Study and other early scoping work as well as through the public process to identify a recommended Preferred Alternative. ODOT has consulted with interested Tribes. See the EQRB Round 1 Public Engagement Summary[4] and EQRB Round 2 Public Engagement Summary[5] documents for details of coordination with affected parties. A consulting parties meeting was held November 30, 2020, and as part of the Section 106 process additional coordination with consulting parties, Tribes, and others will occur. The project team expects FOE concurrence and first draft of the Section 106 Programmatic Agreement in early spring 2021, with the final completed in late summer 2021.

3.8 Summary

The project meets all criteria included in the Nationwide Programmatic Section 4(f) Evaluation for Projects that Necessitate the Use of Historic Bridges approved on July 5, 1983.

All required alternatives have been evaluated, and the findings made are clearly applicable to this Project. The Project includes all possible planning to minimize harm and assurances that those measures to mitigate for use of the Section 4(f) resource will be completed.

3.9 Approval

FEDERAL HIGHWAY ADMINISTRATION

By: _____ Date:_____

[Name Here]

Oregon Division Administrator

[4] https://multco.us/file/87617/download

[5] https://multco.us/file/93292/download

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Chapter 4 – Preparers

Name	Professional Affiliation	Education	Years of Experience
Jennifer Hughes	Parametrix	Environmental Planner	20

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Chapter 5 – References

Multnomah County.

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2021c. EQRB Description of Alternatives. https://multco.us/earthquake-ready-burnside-bridge/project-library.

2021d. EQRB Noise and Vibration Technical Report. https://multco.us/earthquake-ready-burnside-bridge/project-library.

2021e. EQRB Parks and Recreation Technical Report. https://multco.us/earthquake-ready-burnside-bridge/project-library.

2021f. EQRB Vegetation, Wildlife, and Aquatic Species Technical Report. https://multco.us/earthquake-ready-burnside-bridge/project-library.

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Appendix A. NRHP-Listed or -Eligible Resources

Table A-1. Listed or Eligible Historic Resources – Section 4(f) Historic Sites

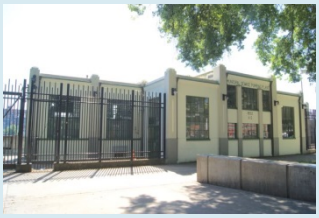
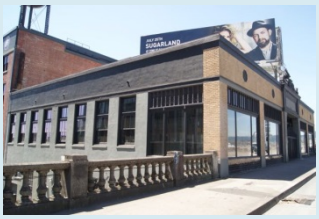
Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 1/ 26-32 NW 3rd Ave 1N1E34CA -09600 S. Ban Building (Old Town Café; Aldo Rossi Building)	1894 Richardsonian Romanesque Building; Storefront modifications	**Skidmore Old Town Historic District National Landmark – Eligible Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	
Map ID 2 30-34 NW 1st Ave 1N1E34DB -00400 Blagen Block	1888 High Victorian Italianate Building - Warren H. Williams, architect and Neils Blagen, builder; Massive cast iron façade; Storefront restoration after 1980 Fire	**Skidmore Old Town Historic District National Landmark -Contributing** Portland City Landmark **Designated** No change in NRHP status recommended	
Map ID 3 5 NW Naito Pkwy/ 10-32 NW 1st Ave. 1N1E34DB -00600 (White Stag Block)	1889 Italianate Sullivanesque Building; South Façade modified 1926 for Burnside Bridge Construction, ca. 2006 extensive renovations; consolidated into White Stag Block 2008	**Skidmore Old Town Historic District National Landmark -Contributing** Portland City Landmark **Designated** *No change in NRHP status recommended*	
Map ID 4 134 W. Burnside St/ 20 SW 2nd Ave 1N1E34CD -00300 Salvation Army Building	1905 Twentieth Century Classical Fraternal Building; Corner cut prior to 1925, storefront modifications reversible	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Rank III** No change in NRHP status recommended	
Map ID 5 25-33 NW Naito Pkwy (also 5 NW Front St) 1N1E34DB -00600 Bickel Block (White Stag Block)	1883 High Victorian Italianate Building with Cast Iron Storefront - Justus Krumbein, architect; Extensive renovations ca. 2006; Building consolidated 2008 with Skidmore Block and White Stag Building	**Skidmore Old Town Historic District National Landmark –Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	

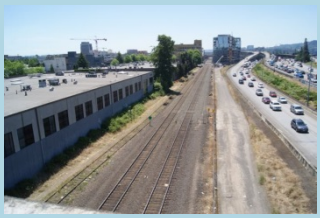
Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 6 14-18 NW 3rd Ave 1N1E34CA -09900 Glade Hotel	1900 Twentieth Century Romanesque Building; First floor cornice removed and storefront some modifications	**Skidmore Old Town Historic District National Landmark –Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	
Map ID 7 131 SW Ankeny St 1N1E34CD -00200 Young's Marble Works (Salvation Army Building)	1880 Brick Utilitarian Building; Modification of stucco application and some storefront modifications	**Skidmore Old Town Historic District National Landmark –Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	
Map ID 9 31 NW 1st Ave 1N1E34DB -01000 Norton House	ca. 1875 Italianate Building; Third floor destroyed by fire; 1977-78 modifications include storefront modifications and replacing shed roof canopy with metal structure	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	
Map ID 11 9-11 SW 2nd Ave 1N1E34CD -00400 Holm Hotel	ca. 1890 Italianate Commercial Building; Façade alterations likely from time of Burnside Street widening; storefront modifications ca. 1985.	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change in NRHP Status Recommended*	
Map ID 12 15-27 SW 2nd Ave Western Rooms	1906 Second Renaissance Revival Commercial Building; Some alterations to storefronts	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	

Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 13 16-28 SW 1st Ave 1N1E34DC -90000 Reed Building (Packer-Scott Building, Skidmore Fountain Building)	1890 Richardsonian Romanesque Commercial Building - Whidden & Lewis Architects; Floor added in 1996; Addition (east) added ca. 2008	**Skidmore Old Town Historic District National Landmark -Contributing** Portland Historical Landmark **Unranked** *No change in NRHP status recommended*	
Map ID 14 223-225 SW Ash St 1N1E34CD -01700 Bickel Building (Wachsmuth Building)	1892 Italianate Commercial Building with ca. 1920 Commercial Addition	**Skidmore Old Town Historic District National Landmark -Contributing** Portland Historical Landmark **Unranked** *No change in NRHP status recommended*	
Map ID 15 219 W Burnside St 1N1E34CA -10100 Wax Building (United Clothing Building)	1926 Commercial Building - Harold Marsh, architect	**Skidmore Old Town Historic District National Landmark –Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	
Map ID 18 67 W Burnside St White Stag Sign	1940 Former White Stag Sign, Object – Ramsay Sign Co., Builder	**Skidmore Old Town Historic District National Landmark -Non-Contributing (outside period of significance)** Portland Historic Landmark **Unranked** *Recommended individually NRHP-eligible*	
Map ID 19 67 W Burnside St Willamette Tent & Awning	1907 Brick Utilitarian Building; Altered in 1926 for construction of Burnside Bridge; Fifth floor addition; Rehabilitation of façade and storefronts	**Skidmore Old Town Historic District National Landmark -Contributing** Portland Historic Landmark **Unranked** *No change in NRHP status recommended*	
Map ID 21 100 SW Ankeny St Skidmore Fountain	1887 Classical granite and bronze fountain (Object) – Olin L. Warner, sculptor and J.M. Wells, architect; Restoration in 2005	**Skidmore Old Town Historic District National Landmark -Contributing** Portland City Landmark **Unranked** *No change in NRHP status recommended*	

Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 22 9-15 SW 2nd Ave Thru-block building facing NW Second and Third 1N1E34CA -09400 Erickson's Saloon / Pomona Hotel / Fritz Hotel	1912 Twentieth Century Classical Building – Aaron H. Gould, architect; Rehabilitation ca. 1985 (Erickson's Saloon / Pamona Hotel) ca. 1985 Rehabilitation; 2015 Rehabilitation (Fritz Hotel)	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change in NRHP status recommended*	
Map ID 23 55 SW Ash St 1N1E34DC -01400 Central Fire Station & Fire Museum	1952 Modern Building – Jones and Marsh, architects; Renovation and seismic upgrade 2008	**Skidmore Old Town Historic District National Landmark -Non-Contributing (Out of Period)** No Local Landmark Status **Unranked** *Recommendation of NRHP Eligibility under Criteria A and C.*	
Map ID 24 0 W Burnside St Burnside Bridge	1924-1926 Bascule Bridge, Structure – Kendrick/Kremers/Lindenthal	**National Register** No Local Landmark Status **Rank II** *No change recommended in NRHP status*	
Map ID 25 27-33 NW 2nd Ave Couch Street Building (Jazz De Opus Building)	1912 Commercial Building; Addition of some incompatible doors and windows in 1972	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 26 107 NW Couch St Fleischner Building (Norcrest China Co.)	1906 Twentieth Century Romanesque Building – Edgar Lazarus, architect; Renovations and signage mid-1980s	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 27 50 SW 2nd Ave 1N1E34DC -01100 New Market Theater	1872 High Victorian Italianate Building – Piper and Burton, architects; Sheldon/Eggleston/Reddick Architects 1982	**Skidmore Old Town Historic District National Landmark -Contributing** Portland Historic Landmark **Unranked** *No change to NRHP status recommended*	

Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 28 205 NW Couch St 1N1E34CA -08500 Rich Hotel / Rich Block	1914 Commercial Building	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 31 32 NW 2nd Ave 1N1E34CA -09100 Skidmore Development Company	1913 Commercial Builidng; Storefront modifications reversible, historical character intact	**Skidmore Old Town Historic District National Landmark -Contributing** No Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 32 14-32 NW 2nd Ave 1N1E34CA -09100 Philips Hotel (Captain Couch Square / Couch Block Building)	1904/1913 Commercial Building; Minor modifications to storefront	**Skidmore Old Town Historic District National Landmark -Contributing** No Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 33 101-117 W Burnside St Bates Building	ca. 1885 Nineteenth Century Utilitarian Commercial Building; 1925 modifications, other storefront alterations reversible	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 34 2-12 NW 2nd Ave 1N1E34CA -09200 Burnside Hotel (Shoreline Hotel)	ca. 1901 Twentieth Century Commercial building; 1926 Modifications to façade and corner canted; storefront modifications reversible	**Skidmore Old Town Historic District National Landmark -Contributing** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 36 Naito Pkwy Harbor Wall	1929 Wood and concrete harbor wall, structure	**Skidmore Old Town Historic District National Landmark -Non-Contributing (outside period of significance)** No Local Landmark Status **Unranked** *Recommended Eligible for listing in NRHP under Criteria A, B, and C*	

Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 37 30 SW Naito Pkwy 1N1E34DC-00100 Ankeny Pumping Station	1929/1951 Art Deco Concrete Building; Ornamental fencing in 2007	**Skidmore Old Town Historic District National Landmark -Non-Contributing (outside period of significance)** No Local Landmark Status **Unranked** *Recommended Eligible for listing in the NRHP under Criteria A, B and C*	
Map ID 40 205 SE Ankeny St / 17 SE 3rd Ave 1N1E34DD -00800 Blake-McFall Company Building / Emmett Building	1915 Conventional Commercial Brick Warehouse Building MacNaughton & Raymond Architects	**NRHP Individually Listed** Portland Historical Landmark **Rank III** *No change to NRHP status recommended*	
Map ID 42 131 NE MLK Blvd 1N1E34DA -03100 Jackson Apartments (Union Arms Apartments)	1911 Late Nineteenth Century.-Early Twentieth Century Commercial Apartment Building; Claussen & Claussen Architects; G.W. Jackson Contractor/Owner; 20 ft. of east façade removed during 1930 Union Ave. widening, commercial spaces and storefronts reconfigured into apartments	**Not Eligible/Not Contributing, 2002 Section 106 Evaluation** No Local Landmark Status **Unranked** *Recommended Eligible for listing in the NRHP under Criteria A and C*	
Map ID 43 107 NE Grand Ave 1N1E35CB -03900 Stark's	1922 Commercial Building; Stucco, brick, and concrete building; Newer storefront windows	**Not Eligible/Not Contributing, 2001 Section 106 Evaluation** No Local Landmark Status **Unranked** *Recommended Eligible for listing in the NRHP under Criteria A and C*	
Map ID 44 230 E Burnside St 1N1E34DD -00700 Frigidaire Building (R.J. Templeton Building)	1929 Commercial Building – Knighton & Howell, architects	**NRHP Individually Listed** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 45 100 NE MLK Blvd 1N1E35CB -03800 Alco Apartments (Vivian Apartments)	1912 Commercial Building – MacNaughton & Raymond, architects; 1939 remodel Currently under renovation (2019)	**NRHP Individually Listed** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	

Map ID No. **Property Location** **State ID** **Common Name** **(Historic Name)**	**Construction Date** **Resource Type**	**Previous Evaluation** **National Register Status** Local Landmark Status **City of Portland Ranking** *Recommendation*	**Photograph of Resource**
Map ID 46 123 NE 3rd Ave 1N1E34DA -02800 Eastside Exchange (Ira F. Powers Warehouse & Factory)	1925 Commercial Building with Modernist Influences – Claussen & Claussen, architects	**NRHP Individually Listed** No Local Landmark Status **Unranked** *No change to NRHP status recommended*	
Map ID 47 UPRR (Oregon & California / Southern Pacific East-Side Division Railroad)	1868/1887 Railroad alignment (structure)	**No Previous Evaluation** No Local Landmark Status **Unranked** *Recommended Eligible for listing in the NRHP under Criterion A and B*	
Map ID 48 Burnside Skatepark	1990 Concrete Skatepark, (structure)	**No Previous Evaluation** No Local Landmark Status **Unranked** *Recommended Eligible for listing in the NRHP under Criterion A, C and Criterion Consideration G*	

Appendix B. Temporary Occupancy Exemption – Burnside Skatepark

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Oregon
Kate Brown, Governor

Department of Transportation
Region 1
123 NW Flanders St.
Portland, OR 97209-4012
(503) 731-8200
Fax: (503) 731-8259

December 29, 2020

FILE CODE:

Christine Curran
Deputy State Historic Preservation Officer
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97310-1271

Subject: **Section 4(f) No Use of Section 4(f) Resources—Temporary Occupancy**
Burnside Skatepark
Earthquake Ready Burnside Bridge Project
Portland, Multnomah County, Oregon
ODOT Key No. TBD
Federal-Aid No. C051(111)
SHPO Case No. 18-1479

Dear Ms. Curran:

The Earthquake Ready Burnside Bridge Project may be constructed in part with Federal Highway Administration (FHWA) funds. The Oregon Department of Transportation (ODOT) is acting as an agent of FHWA in ensuring that the project proponent, Multnomah County, complies with relevant federal regulations. Among them, ODOT must ensure that the project satisfies Section 4(f) of the Department of Transportation Act of 1966. Therefore, ODOT is seeking written concurrence from the Oregon State Historic Preservation Office (Oregon SHPO) to confirm that a Section 4(f) use will not occur in the Burnside Skatepark, a historic site, based on the project satisfying all temporary occupation exception conditions contained in 23 CFR 774.13(d). The following information provides the justification for this assertion. (Figure 1 shows the location of Burnside Skatepark on the east side of Second Avenue under the Burnside Bridge; Figure 2 is a photograph of the Burnside Skatepark.)

Section 4(f) of the United States Department of Transportation Act (DOT Act) of 1966 (49 U.S.C. 303(c)) requires that the proposed ***use*** of any land from a significant historic site be given particular attention. The Burnside Skatepark is a significant historic site under Section 4(f) because it is eligible for the National Register of Historic Places. The Burnside Skatepark is not a publicly owned park, recreation area or wildlife and waterfowl refuge under Section 4(f) because it has not received official designation as such by a Federal, State, or local agency. "Use" of a Section 4(f) resource, defined in 23 CFR 774.17(p), occurs in the following circumstances:

1. When land is permanently incorporated into a transportation facility;

2. When there is a temporary occupancy of Section 4(f) property that is adverse in terms of the statute's preservationist purpose; or

3. When there is a constructive use of land, which occurs when the transportation project does not incorporate land, but its proximity substantially impairs the activities, features, or attributes that qualify a resource for protection under Section 4(f). A determination of constructive use is based on the criteria in 23 CFR 774.15.

Although the proposed Earthquake Ready Burnside Bridge Project will not require the incorporation of the Burnside Skatepark into a transportation facility, nor will there be any permanent impacts to the historic site, there will be a temporary occupancy of a portion of the historic site during the project. The Section 4(f) legislation states that if the five conditions in 23 CFR 774.13(d), commonly known as the "temporary occupation exception criteria," are met, then the temporary occupancy is not adverse in terms of the Section 4(f) statute's preservationist purpose and therefore it does not constitute a "use" as defined under Section 4(f).

This letter provides findings with respect to the five conditions (temporary occupation exception criteria) and concludes that all conditions are met, thereby resulting in a determination that there will be no Section 4(f) "use" of the Burnside Skatepark resulting from the Earthquake Ready Burnside Bridge Project. Your concurrence is requested with these findings.

FINDINGS—TEMPORARY OCCUPATION EXCEPTION CRITERIA (23 CFR 774.13(d)(1) through (5))

(1) *Duration must be temporary, i.e., less than the time needed for construction of the project, and there should be no change in ownership of the land;*

Finding: Construction of the Earthquake Ready Burnside Bridge Preferred Alternative (the Long-span Alternative), will take approximately 4.5 years. Because the Burnside Skatepark is located directly beneath the bridge, it will need to be closed for safety reasons several times during that period. The total cumulative duration of closure will be 4 to 8 months. Temporary skatepark closures are needed to ensure safety during overhead demolition of the existing bridge and occasional periods of overhead construction of the new bridge. There will be no change in ownership of the Burnside Skatepark property.

While the project proponent is committed to a maximum duration of skatepark closure, the project proponent will coordinate the exact timing of those closures and specific conditions with the Burnside Skatepark Board after a contractor is hired. The project proponent, through coordination with the Burnside Skatepark Board, has identified the following measures to minimize impacts to skatepark users:

- Provide the Burnside Skatepark Board with advanced notice regarding the timing of Burnside Skatepark closures.

- Maintain adequate user access to the Burnside Skatepark when it is not closed. The southern access is the most important. When and if the southern access is closed while the skatepark is open, provide alternate access to the skatepark from the north.
- Provide, or support the Burnside Skatepark Board in providing, signage for skatepark users regarding the timing of temporary closures, and regarding any revisions to access locations to the skatepark.
- If existing Burnside Skatepark lighting is unusable during bridge demolition or construction, provide temporary replacement lighting, particularly during winter months.
- When possible, avoid closing the Burnside Skatepark during the skatepark's annual Halloween event.
- During bridge construction and when the Burnside Skatepark is open, ensure that there is occasional vehicle access to the north side of the skatepark adjacent to the Yard building to allow the Burnside Skatepark Board or other volunteers to deliver materials and equipment that may be needed for occasional skatepark maintenance. Coordinate with the Burnside Skatepark Board on the timing of such maintenance.
- When not necessary, avoid using parking spaces adjacent to the Burnside Skatepark to store bridge construction equipment while the skatepark is open.

(2) *Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) resource are minimal;*

Finding: The Earthquake Ready Burnside Bridge Preferred Alternative will cause no long-term or permanent changes to the Burnside Skatepark but it could cause inadvertent damage to skatepark surfaces during bridge demolition or construction of the new bridge. Any such damage is expected to be minor and the project will repair the damage (see repair protocol in Condition 4, below). There will be no change to the intended use of the Section 4(f) resource.

(3) *There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;*

Finding: The Earthquake Ready Burnside Bridge Preferred Alternative will have no permanent impacts to the Burnside Skatepark. As noted above in Condition 1, temporary skatepark closures will be necessary for safety, but these will not diminish the qualities that make the Burnside Skatepark eligible for listing on the National Register of Historic Places, and thus eligible for Section 4(f) protection as a historic site.

(4) *The land being used must be fully restored, i.e., the resource must be returned to a condition which is at least as good as that which existed prior to the project; and*

Finding: At the Burnside Skatepark Board's request, Multnomah County has agreed that if there is incidental damage to the Burnside Skatepark during construction of the Earthquake Ready Burnside Bridge Preferred Alternative, the County will provide necessary repair materials or funds to the Burnside Skatepark Board to make the repairs prior to reopening the skatepark.

(5) *There must be documented agreement of the appropriate Federal, State, or local officials having jurisdiction over the resource regarding the above conditions.*

Finding: This letter serves as documented agreement by the Oregon SHPO that the above conditions have been met.

Please respond to this request for concurrence in writing at your earliest convenience and return the concurrence to me at the address listed in the letterhead.

Please contact me at (503) 731-8239 or at robert.w.hadlow@odot.state.or.us if you would like additional information or if you have any concerns. Thank you for your consideration of this proposal.

Sincerely,

Robert W. Hadlow, Ph.D.
Senior Historian

The Oregon SHPO, as the official with jurisdiction for the Burnside Skatepark, concurs with the assessment that a Section 4(f) use will not occur at the historic site based on the Earthquake Ready Burnside Bridge Project satisfying all five conditions (the temporary occupation exception criteria) contained in Section 23 Code of Federal Regulations (CFR) 774.13(d).

Signature: _____ Date: 1/6/2021
Oregon SHPO official
Oregon SHPO

Comment: Please revise and resubmit this temporary occupancy finding if a different alternative than the preferred alternative is forwarded for construction.

Copies to:

Emily Cline, Environmental Program Manager, FHWA—Oregon Division, Salem
Denis Reich, Environmental Manager, ODOT Region 1, Portland
Roy Watters, Archaeologist, ODOT, Salem
Megan Neill, Engineering Services Manager, Multnomah County
Jeff Buckland, Environmental Project Manager, ODOT Region 1, Portland
ODOT File Type E

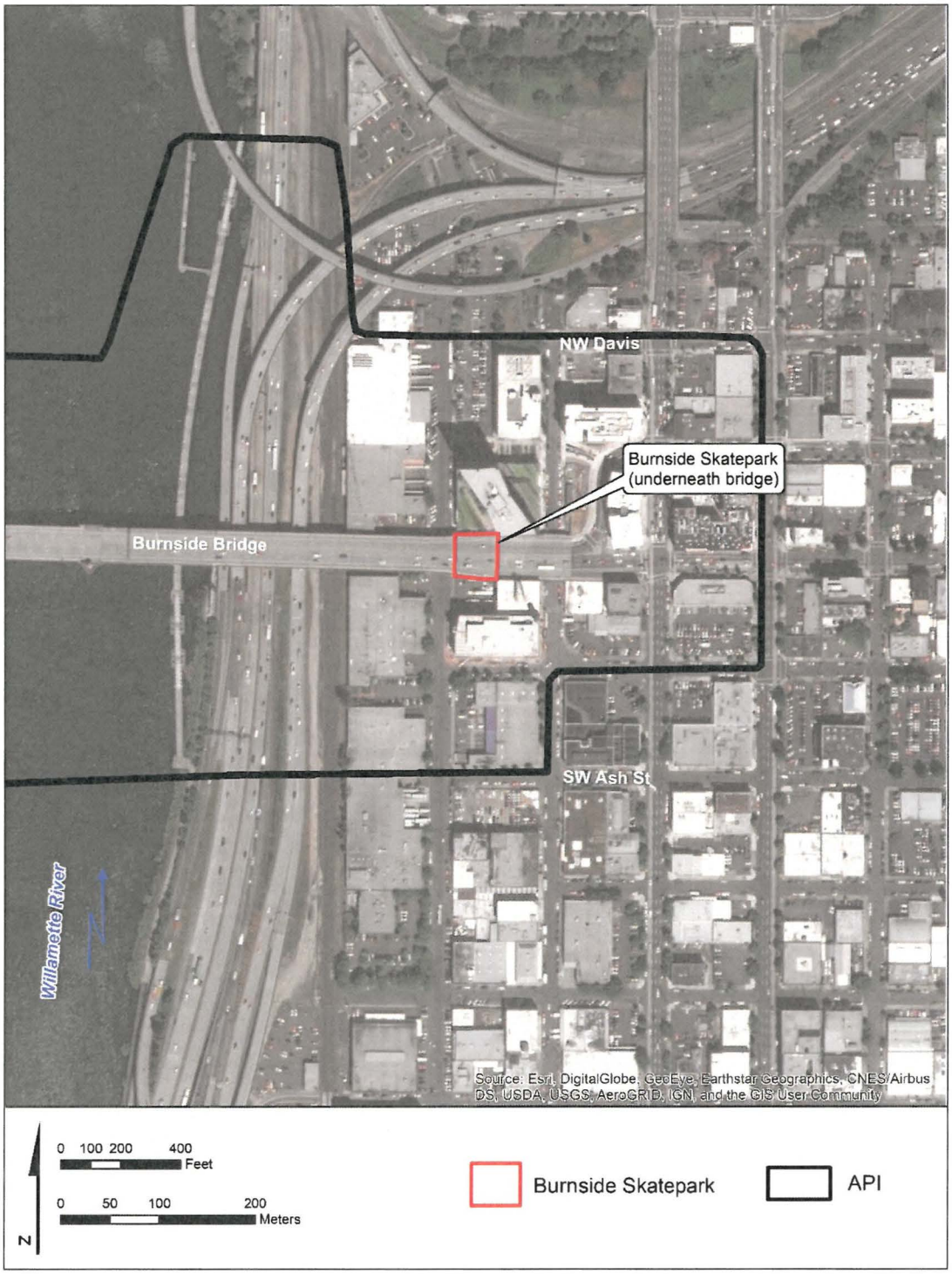

Figure 1. Location of the Burnside Skatepark (beneath the Burnside Bridge).

Figure 2. Looking northeast into the Burnside Skatepark.

Appendix C. NRHP Determinations of Eligibility and Findings of Effect

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Oregon
Kate Brown, Governor

Parks and Recreation Department
State Historic Preservation Office
725 Summer St NE Ste C
Salem, OR 97301-1266
Phone (503) 986-0690
Fax (503) 986-0793
www.oregonheritage.org

December 21, 2020

Mr. John Raasch
Oregon Department of Transportation
Environmental & Hydraulic Engineering Section
4040 Fairview Industrial Dr SE
Salem, OR 97302

RE: SHPO Case No. 18-1479
ODOT Project, Earthquake Ready Burnside Bridge (EQRB), Federal Aid C051(111)
10 Historic Determinations of Eligibility
Burnside Street across the Willamette River, Portland, Multnomah County

Dear Mr. Raasch:

We have reviewed the ten Determinations of Eligibility submitted on the Earthquake Ready Burnside Bridge Project referenced above, and we concur with the determination that the following properties are eligible for listing in the National Register of Historic Places.

- Ankeny Pump Station, 30 SW Naito Parkway
- The Burnside Skatepark
- Central Fire Station, 65 SW Naito Parkway
- Oregon and California RR, Southern Pacific East Side Division RR
- The Portland Seawall
- Thompson Starks Building, 107 NE Grand Avenue
- Union Arms Apartment, 131 NE Martin Luther King, Jr. Boulevard
- White Stag Sign, 5 NW Naito Parkway

We also concur with the finding of not eligible for the building at 118 NE Martin Luther King, Jr. Boulevard and the Joe Fisher Co. building at 30 NE Martin Luther King, Jr. Boulevard.

This letter refers to above-ground historic resources only. Comments pursuant to a review for archaeological resources, if applicable, will be sent separately. We look forward to receiving the future Finding of Effect documentation for these eligible resources, for the Burnside Bridge, the New Chinatown/Japantown Historic District, and the Skidmore/Old Town National Historic Landmark.

Please feel free to contact me if you have any questions, comments or need additional assistance.

Sincerely,

Sarah Jalving

Sarah Jalving
SHPO/ODOT Liaison
(503) 508-0212
Sarah.Jalving@oregon.gov

cc: Robert Hadlow, ODOT

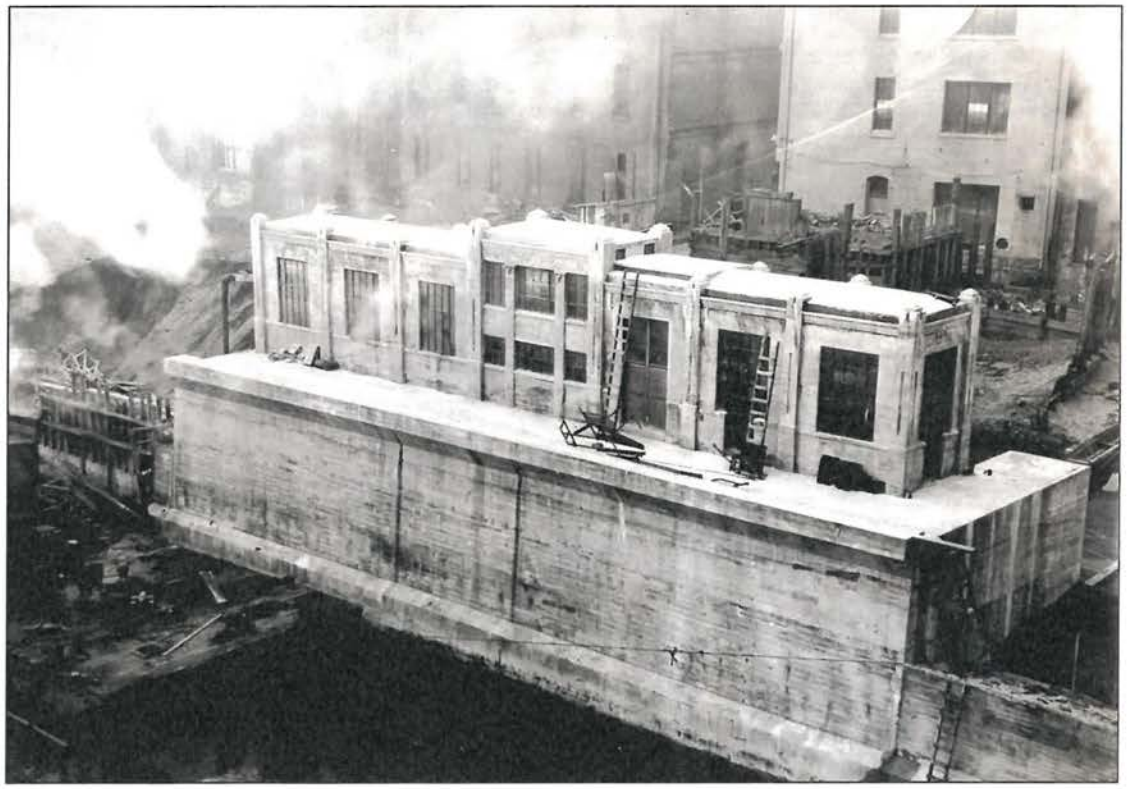
SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Ankeny Pumping Station (now referenced as Ankeny Pump Station)	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oregon	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Pumping Station	Construction Date: 1929/1951-1952
Architectural Classification / Resource Type: Art Deco/ Building	Alterations & Dates: 1951-1952, 1960s, 1990s, 2017
Window Type & Material: Multi-light/Metal	Exterior Surface Materials: Primary: Concrete Secondary: Decorative:
Roof Type & Material: Flat/ Membrane	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☒Excellent Good ☐Fair ☐Poor



Ankeny Pumping Station after completion in 1929, facing southwest.

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: July 23, 2019

106 Documentation: Individual Properties

Property Name: Ankeny Pumping Station				
Street Address: 30 SW Naito Parkway		City, County: Portland, Multnomah		
Architect, Builder or Designer (if known): Olaf Laurgaard, City Engineer	Owner:	☐Private ☐Federal	☒Local Government ☐Other	☐State

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

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 stormwater 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 seawall 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.

Alterations

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

Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah

Description (continued)

the building. Tice Electric Company replaced the interior electrical system in 2017. Catena Consulting Engineers completed a recent seismic upgrade (Catena 2019). There are currently six pumps, two 250HP and four 200HP, housed in the pumping station (Tice Electric Company 2019).

Significance

The Ankeny Pumping Station is a part of important municipal project that the City of Portland undertook in 1927-1929, building an interceptor sewer project combining a sewer system, pumping station, and harbor wall. The massive project was built to improve stormwater flow and prevent flooding in the City's commercial core area which plagued Portland's waterfront. Two branches extended from Ankeny south to Jefferson and north to Glisan (Laurgaard 1933:5). Olaf Laurgaard, the City Engineer who served in an important period of the City's growth, conceived the project as the population was expanding, streets now had to accommodate automobile traffic, and to address the growing demands on the sewage system.

The Laurgaard Plan was a general plan proposed by Olaf Laurgaard in the early 1920s near the beginning of Laurgaard's career with the City. He proposed a number of improvements in a large scheme to improve the west harbor front, razing a number of buildings along Front, building a new railroad terminal along the waterfront, improving bridge approaches, and the elements of the interceptor project (Laurgaard 1921). The interceptor sewer project was constructed to consolidate the sewage drop from the west side into the river at one location and protect against flooding.

When work began, Laurgaard oversaw the construction of Ankeny Pumping Station. A local construction company, J.F. Shea Company, completed the construction. Consulting engineers were D.C. Henny and J.C. Stevens (*Oregonian* 1929:26).

A state sanitary authority organized in 1938 was mandated to bring local cities and industries into compliance with regards to the disposal of sewage into the public waterways. Many projects were undertaken to meet these new requirements including an expansion of the Ankeny Pumping Station in the early 1950s (Lambert 1952:1). Ankeny Pumping Station was enlarged doubling its capacity. New piping transferred waste to a new connecting pumping station on the east side of Willamette River where a sewage treatment plant would treat the sewage before dumping it into the Willamette River (*Oregonian* 1952:14). F. T. Neidmeyer stamped the addition's final as-builts. The 1952 date on the west façade notes the completion date of the expansion project.

Olaf Laurgaard

Olaf Laurgaard has strong associations with the planning and the implementation of the sewer interceptor project. He would later be known as the "father of the Portland waterfront" and the project was considered one of his greatest achievements while working for the City (*Oregonian* 1945:5). Laurgaard's sixteen years serving as Portland's City Engineer were productive and critical to the growing city's infrastructure. He was responsible for $60,000,000 of work including "the laying of some 400 miles of streets and sewers, and the widening of 47 miles of streets" (*Oregonian* 1945:5).

Laurgaard was born in Norway to Olaf Christian and Marie "Mary" Ciclie (Meinhardt) and came to the U.S. as an infant in 1880. His parents located in Wisconsin. Laurgaard obtained a civil engineering degree from University of Wisconsin in 1903 and also naturalized in that year. In Laurgaard's early professional career as a civil engineer, he worked on several waterworks projects: an Okanogan dam project at Conconully, Washington, and moved to a Carey Act project in Central Oregon in 1916 (Franklin 1913:337; *Semi-Weekly Spokesman-Review* 1916:6). He married Goldie while working in Conconully, and they would have two children.

Laurgaard oversaw many city projects and undertook many plans to improve the city's infrastructure. He oversaw many street-widening projects including: the Eastside plan to widen East Burnside, Couch, and Sandy Boulevard, (*Oregonian* 1923a:16, 1923b:65). The harbor improvement project is considered one of his most notable achievements while working with the City.

Laurgaard became embroiled in a high-profile case that involved the construction of a Public Market along the harbor wall. Mayor Baker, who was allegedly bribed, two City commissioners, and several others associated with the municipal market project including Laurgaard were indicted on lesser charges in 1932. Ultimately the officials and Laurgaard were acquitted of "charges of malfeasance in office," but politically the damage was irreparable, and Laurgaard was left no choice but to resign in 1933 (*Oregonian* 1933a:1; The Oregonian 1933b:3).

Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah

Significance (continued)

After his involvement with the Baker trial, Laurgaard relocated to Southern California where he worked as construction engineer for the Parker Dam project on the Colorado River (*Capitol Journal* 1934:7). He later worked for the Tennessee Valley Authority and during World War II as an engineer for the U.S. Maritime Commission in Alameda, California, where he became ill and died in 1945 (*Oregonian* 1945:5).

The Ankeny Pumping Station is recommended to be eligible for listing in the NRHP under Criterion A and Criterion C:

Criterion A – *Significant*

Under Criterion A, Ankeny Pumping Station is recommended eligible for listing at the local level, under Criterion A for its associations with events that have made a significant contribution to the broad patterns of our history in an important feature interceptor sewer system and a larger redevelopment of Portland's west waterfront. Constructed in 1929, the pumping station continues to function as a part of Portland's sewer system.

Criterion B – *Not Significant*

Under Criterion B, properties may be eligible for the NRHP if they are associated with the lives of significant people in our past. The primary person associated with the Ankeny Pumping Station is Olaf Laurgaard. However, as engineer of the project, it is more appropriate to evaluate his importance under Criterion C.

Criterion C – *Significant*

Under Criterion C, Ankeny Pumping Station is a good example of an Art Deco style pumping station constructed in the early 1930s embodying distinctive characteristics of a type and style. The pumping station is also a significant engineering feature of a major infrastructure project engineered and implemented by City Engineer Olaf Laurgaard who played a significant role in the City's development during the 1920s. The pumping station is therefore recommended eligible for listing in the NRHP under Criterion C.

Criterion D – *Not Significant*

Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites.

Integrity

The Ankeny Pumping Station continues to retain historical integrity to convey its significance. The Ankeny Pumping Station retains historical integrity of its location, riverfront setting and feeling; the pumping station's overall design, workmanship and materials remain intact and are representative of the period of its construction; and continues to maintain its associations with its original use, therefore, the Ankeny Pumping Station is recommended eligible for listing in the National Register of Historic Places.

Sources

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

Capitol Journal
1934 Laurgaard To Build Big $20,000,000 Dam. 13 Apr:7. Salem, Oregon.

Harper, Franklin
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Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah

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SECTION 106: SUPPLEMENTAL MAPS

Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah

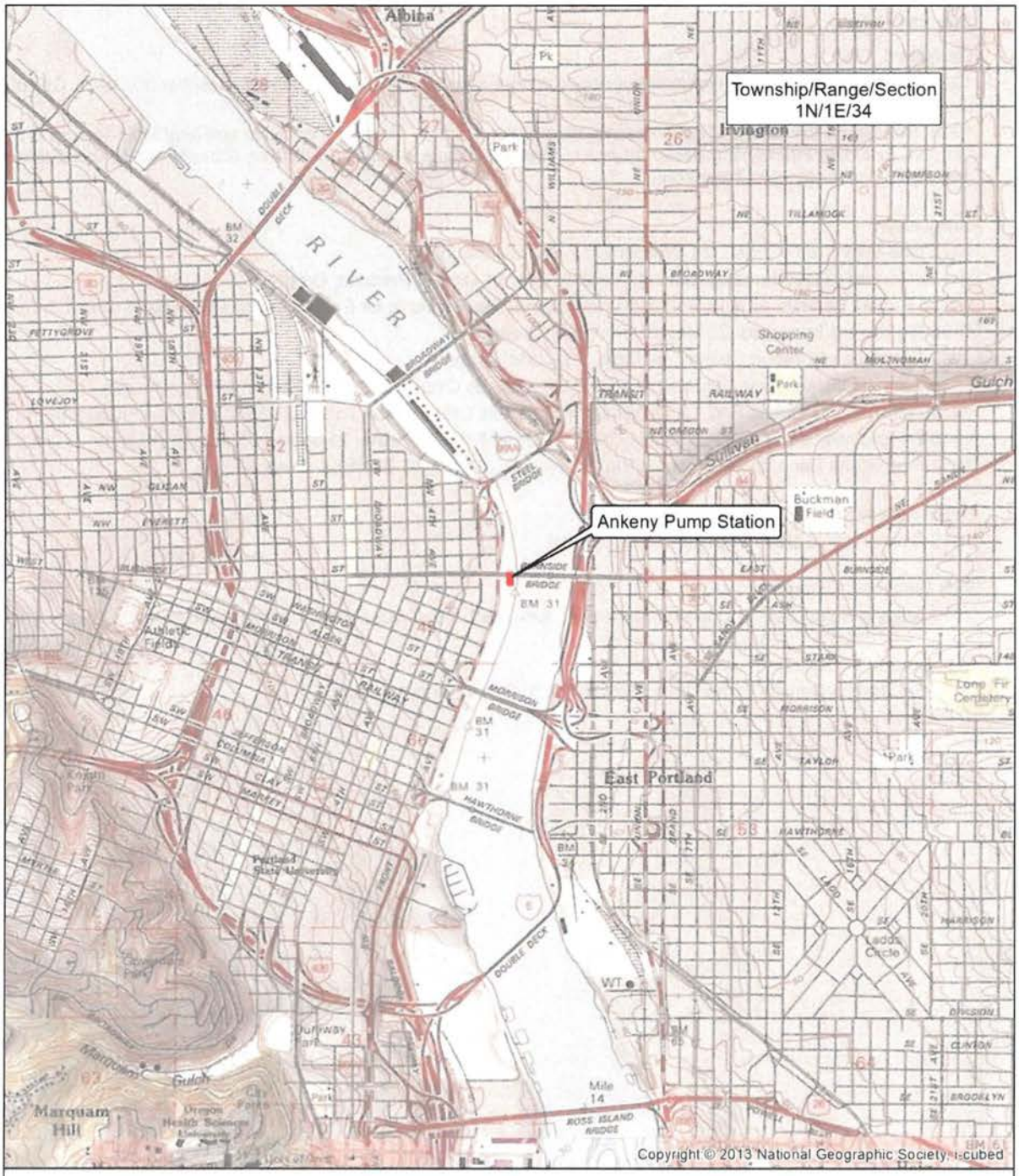


Figure 1. Ankeny Pumping Station location.

Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah

Figure 2. Current imagery depicting Ankeny Pumping Station and API.

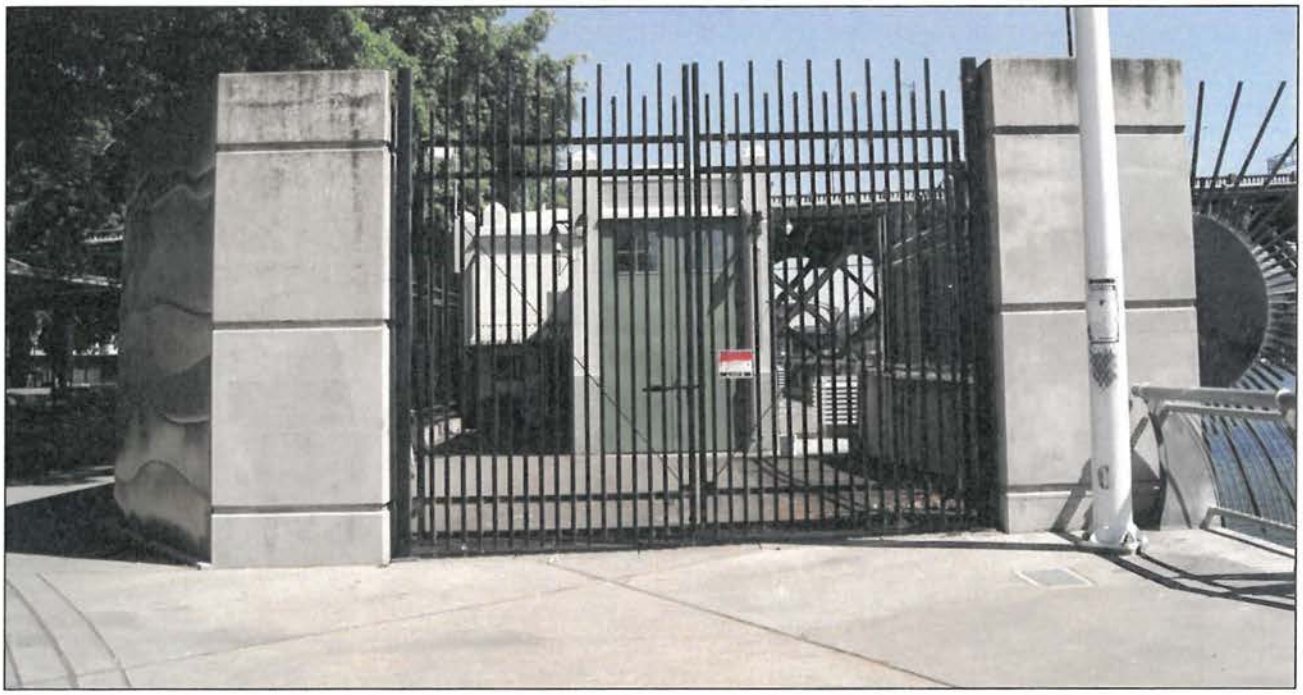
Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah

View: The east and north facades of the Ankeny Pumping Station; the view is towards the southwest.

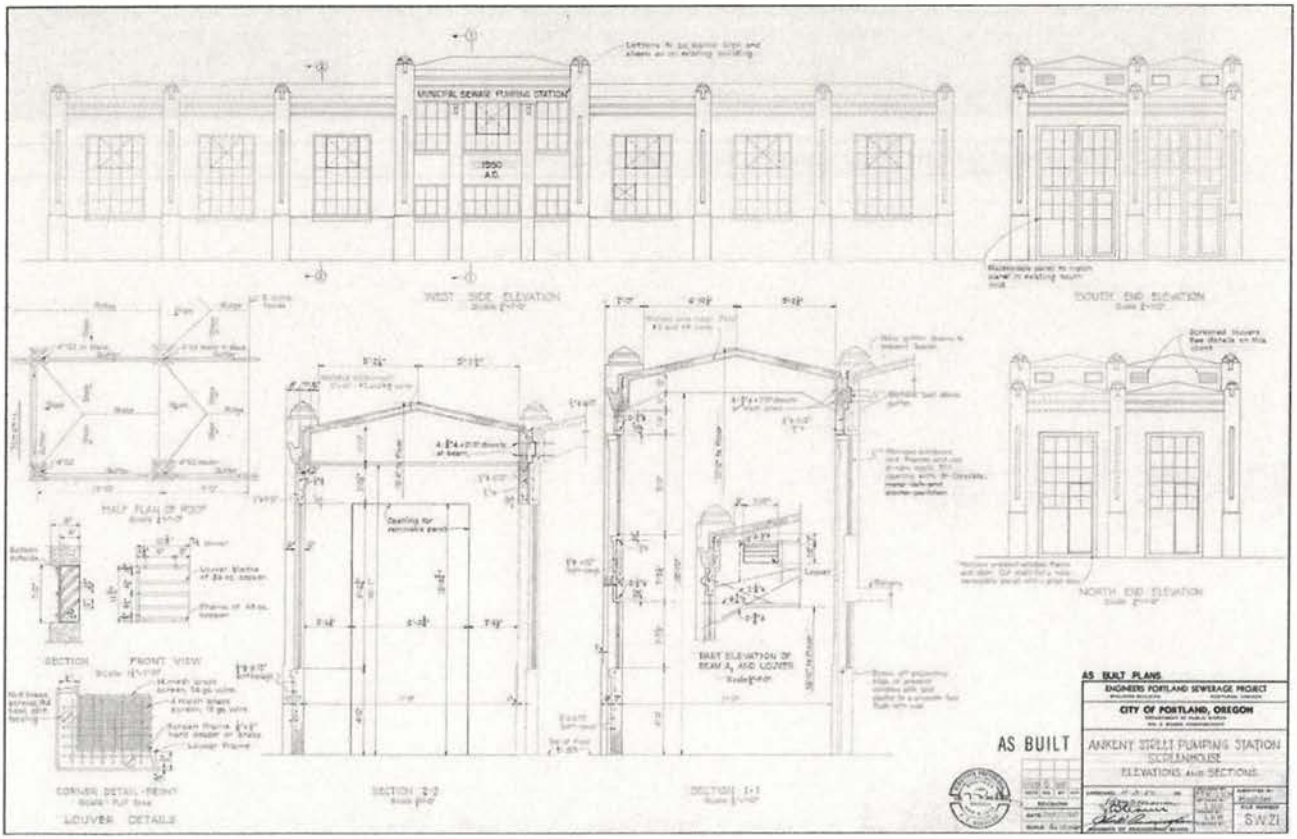
View: The Ankeny Pumping Station's east façade; the view is towards the southeast.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah



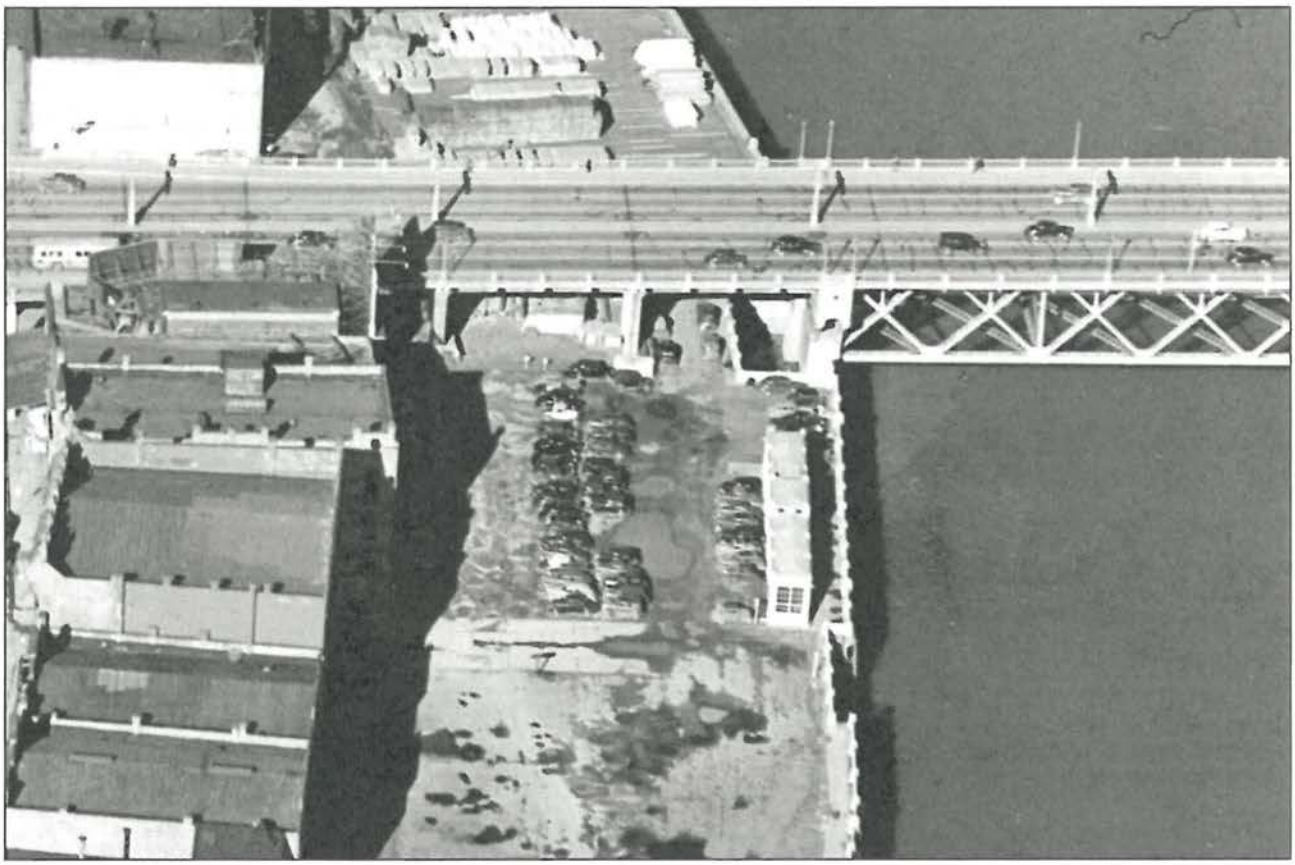
View: The south façade of the Ankeny Pumping Station; the view is towards the north.



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

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Ankeny Pumping Station	
Street Address: 30 SW Naito Parkway	City, County: Portland, Multnomah



View: Aerial view of Ankeny pump station in 1935, view is from the south.

SHPO Case#18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name:	
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah
USGS Quad Name: *Portland, Oregon*	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Commercial	Construction Date: ca. 1927
Architectural Classification / Resource Type: Early Twentieth Century, Street-car Era/Commercial/Industrial	Alterations & Dates: ca. 2015
Window Type & Material: six light and modern steel store front windows and doors	Exterior Surface Materials: Primary: brick Secondary: poured concrete Decorative: concrete detailing below parapet
Roof Type & Material: Flat with parapet; gable shaped parapet along façade	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐Poor

The building's west façade; the view is towards the east.

Preliminary National Register Findings: ☐**National Register listed**

☐**Potentially Eligible:** ☐Individually ☐As part of District

☒**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☒Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WCRA Date Recorded: September 29, 2020

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name:		
Street Address: 118 NE Martin Luther King Blvd.		City, County: Portland, Multnomah
Architect, Builder or Designer (if known): unknown	Owner: ☒Private ☐Federal ☐Local Government ☐Other ☐State	

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

118 NE Martin Luther King Blvd is a one-story, Street Car-era, Early Twentieth Century Commercial/Industrial building constructed ca. 1927. A 2001 Section 106 evaluation gave the building a ca. 1916 date, but based on Sanborn Fire Insurance Maps and other historical information it appears to date to ca. 1927 (SHPO 2001; Sanborn Fire Insurance Co. 1924-1928; R.L. Polk & Co. 1928). The auto-related industrial/commercial building is situated in the Central Eastside neighborhood, which is a mix of commercial, industrial, warehousing, and residential uses. The neighborhood has seen a recent rapid expansion in the changes of use in historic buildings and an increase in modern commercial and large-scale multi-family buildings.

Prior to the building's construction ca. 1927, the neighborhood was a mix of residential and commercial buildings. Most of the block was populated by residences, except for a blacksmith shop specializing in wagons and carriages at the block's northwest corner (Sanborn Fire Insurance Co. 1908-1909).

Physical

The ca. 1927 building has a 40' x 100' footprint and stands one-story tall on a poured concrete foundation. The building is constructed of poured concrete and the west façade is brick in a common bond above and running bond-clad pilasters. A flat roof with a parapet caps the building; along the west façade the parapet's center is gable-shaped. The building's exterior walls have been more recently painted.

The primary west façade is divided into three large bays with circa 2015 modern storefront windows and one overhead retractable door opening. Each bay retains the above transom light configuration. The primary entry is in the center bay, retaining the original recessed configuration with a modern door. A modern, metal-framed roof canopy shelters the center entry. Wood plank benches hang from the wall for outdoor restaurant seating. The south bay features the attached bollards belying the opening's former use as a vehicular entrance and has a modern, glazed retractable garage door. Detailing is minimal, a soldier brick course caps the openings and a bold shield motif is spaced below the parapet coping along the façade.

The north façade is utilitarian in design and construction. The poured concrete wall is imprinted with the wood plank formwork. Six-light, steel windows are spaced along the wall and a single steel door entry is situated east of the windows. Modern steel mechanical panels have been added to this wall. The building retains the original massing, parapet configuration, and windows bays along its west façade.

Alterations

Alterations to the building were made ca. 2015 as a part of plans produced by Hennerbery Eddy Architects, for the attached Stark Vacuum Company building. The alterations and details include the new storefront windows and entry awnings. The Interior improvements include reconfiguring the interior space into two units for tenant leasing (Nextportland 2015).

History

The introduction of motorized vehicles spurred a number of commercial enterprises replacing blacksmith shops and livery stables. Automobile ownership in Portland, and the U.S. would exponentially grow during the early Twentieth Century. Automobile ownership was spurred by Henry Ford's introduction of the Model T, in 1908 and the car's availability from Ford's mass production lines established in 1913. Ford's innovations in the Model T, how it was manufactured and its approachable cost, would significantly influence American culture (Flink 1972). In Portland, many early automotive businesses were attracted to Portland's eastside near Martin Luther King Blvd and Grand Avenue as car ownership grew in the 1910s and 1920s. This increase continued as Multnomah County, vehicle registration more than doubled from 36,000 in 1920 to 96,000 in 1930 (Abbott 1995:47).

As car ownership expanded in the U.S., the consumer desired more than the basic Ford production car. In the mid-1920s, General Motors established control of the American market by developing strategies to sell more cars through planned

Property Name:		
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): unknown	Owner: ☒Private ☐Local Government ☐State ☐Federal ☐Other	

Description (continued)

obsolescence, sales, marketing, and financing (Flink 1972). Locally, demands for auto services on Portland's east side encouraged the growth of parking garages, repair garages and auto dealerships along Grand Avenue and Martin Luther King Blvd (Union Avenue). The subject building replaced a residence ca. 1927 as a part of the demands in this growing commercial market.

The building's original owner and builder were not identified. By 1928, George C. Rupprecht, likely its earliest occupant, operated an auto top and upholstery business at this location. Overtime, Rupprecht adapted his business to include auto body and paint shop, as well. Rupprecht continued his operation at this location from circa 1928 until his death in 1940 (*Oregonian* 1940).

After Rupprecht's death, several other auto body shop type businesses occupied the building during the 1940s. Smith Lyons Motor Co. operated an auto body shop in the late 1940s and early 1950s (Oregonian 1947; R.L. Polk & Co. 1952). The building sat vacant several years circa 1963-1964 and was advertised as an industrial building (Oregonian 1964)

George C. Rupprecht

George C. Rupprecht, likely the building's first and one of its longest occupants, was an upholsterer. Rupprecht was born in Bavaria, Germany and came to the U.S. in 1896. He initially settled in Missouri where in 1900, he married Cecelia (Ancestry.com 2020). Rupprecht worked in the saddle making business before moving to Oregon in the 1920s (U.S. Bureau of Census 1920). Rupprecht operated his business at this location from ca. 1927 until his death in 1940 at the age of 74, adapted to the changing economy in the Great Depression (R.L. Polk & Co. 1928.

Significance

The commercial/industrial building at 118 NE Martin Luther King Blvd. is recommended to be not eligible for listing in the NRHP not meeting the below listed criteria for evaluation:

Criterion A, Not Significant: Under Criterion A, the building is recommended to be not eligible for listing for its historical associations. Although it has associations with the auto industry and the commercial enterprises that expanded Portland's east side it does not demonstrate significance in commercial history for this period, as such the building is recommended to be not eligible.

Criterion B, Not Significant: Under Criterion B, the building has no known associations with specific people important in history, it therefore is not considered eligible for listing in the NRHP under Criterion B.

Criterion C. Not Significant: Under Criterion C, although an auto-related industrial building, the building individually does not rise to the level of embodying distinctive characteristics of a type, design or engineering, nor does it represent the work of a master; as such the building is recommended to be not eligible listing in the NRHP.

Criterion D, Not Significant: Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites and in the case of this building, information can be yielded through written documentation.

The building complex retains integrity of location, setting, feeling and association; there is some loss of integrity in its design and materials with door storefronts altered on the north and west segments, though the bays are left intact; overall the building complex is representative of historic period from ca. 1927, except for modifications made ca. 2015.

Property Name:	
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah
Architect, Builder or Designer (if known): unknown	Owner: ☒Private ☐Local Government ☐State ☐Federal ☐Other

Sources

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nextportland
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1940 Portland City Directory. R.L. Polk & Co., Portland, Oregon.
1952 Portland City Directory. R.L. Polk & Co., Portland, Oregon.

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1908-1909 Sanborn Fire Insurance Map.
1924-1928 Sanborn Fire Insurance Map.

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2001 118 NE Martin Luther King Blvd., Oregon Historic Site Record. Electronic document, Oregon Historic Sites Database searchable database, accessed June 1, 2020.

U.S. Bureau of Census
1920 Fourteenth Census of The United States. Government Printing Office, Washington, D.C.

Property Name	
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

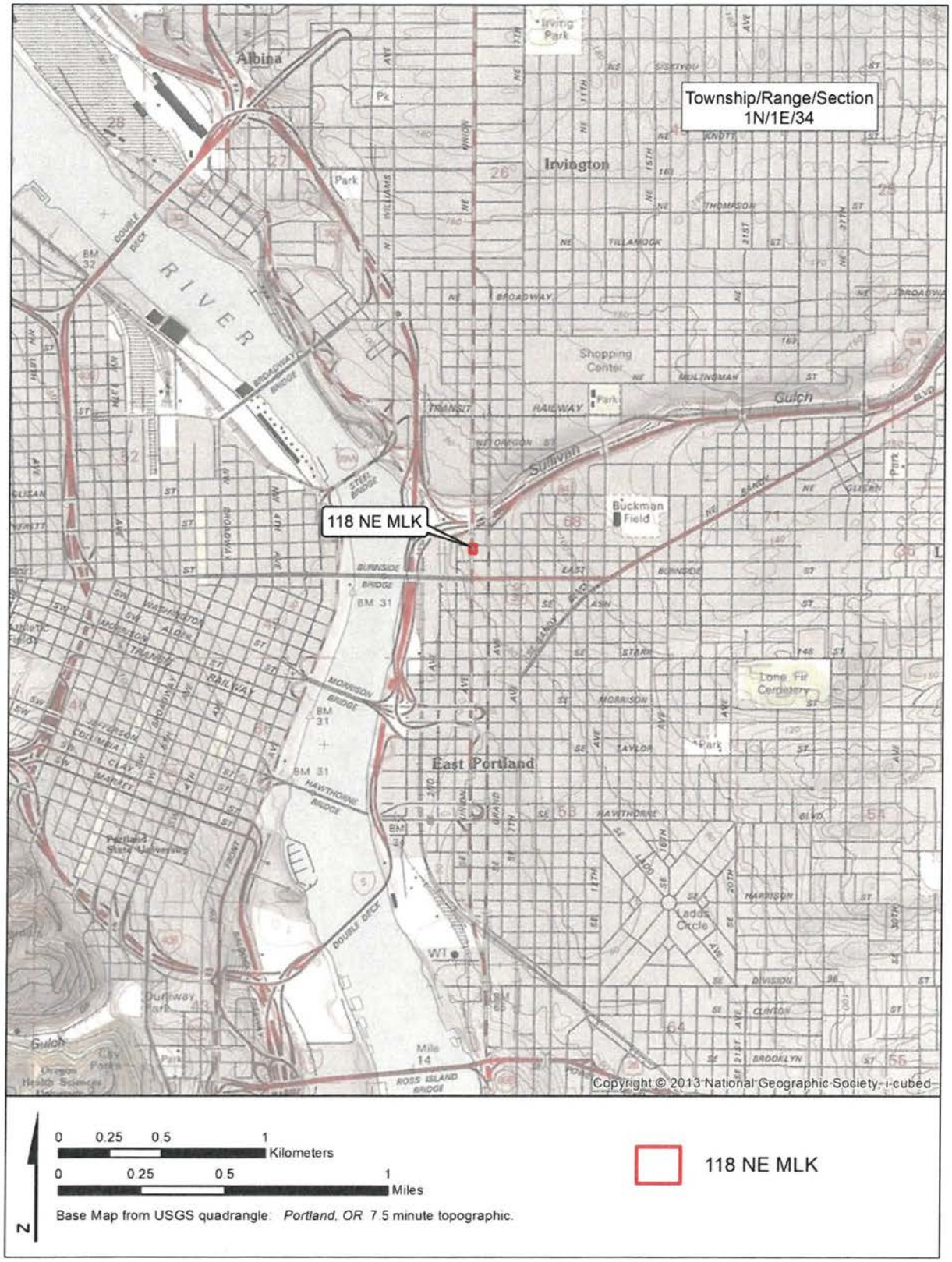


Figure 1. 118 NE Martin Luther King Blvd location.

Property Name	
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

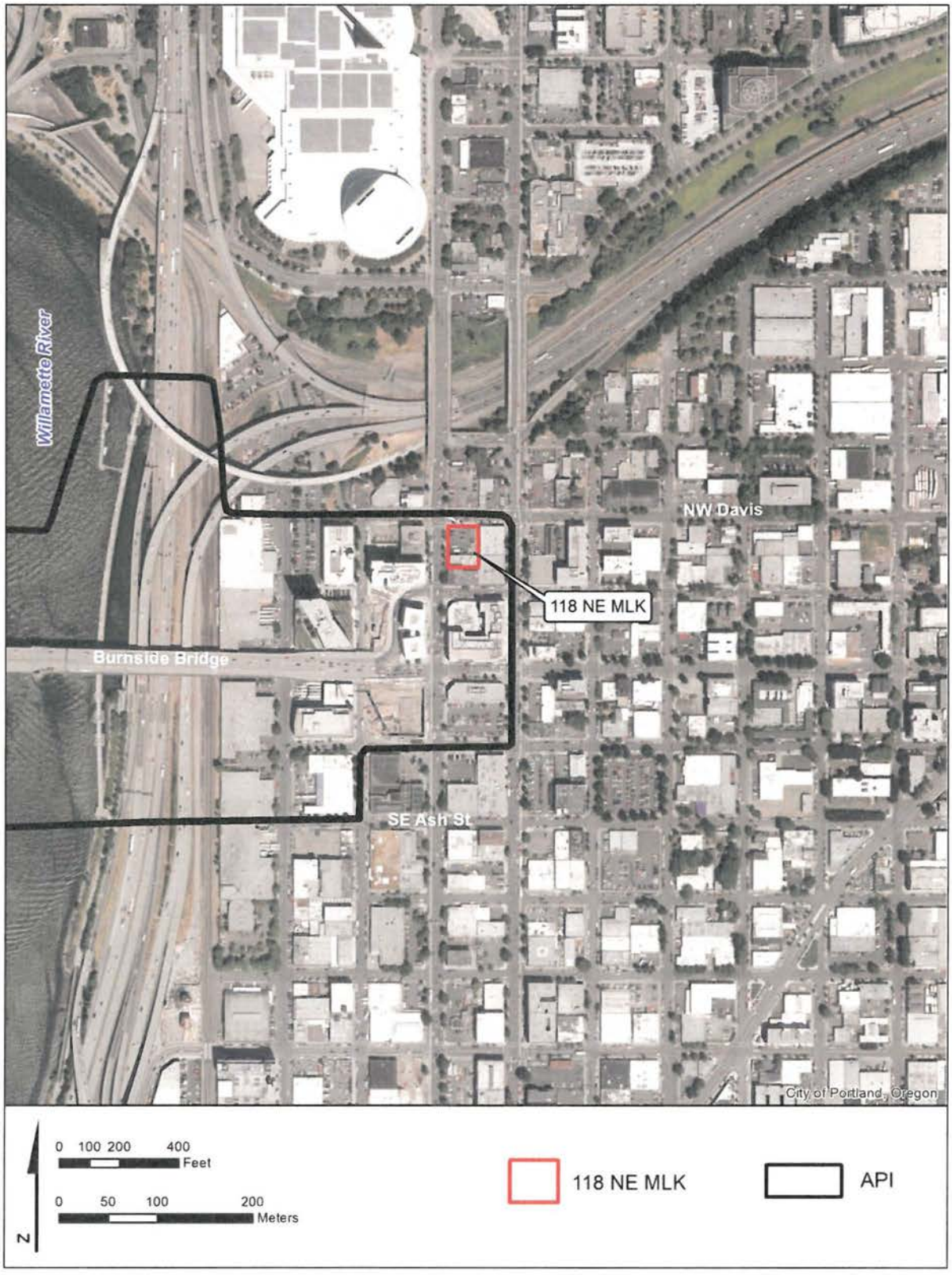


Figure 2. Current imagery depicting 118 NE Martin Luther King Blvd and API.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

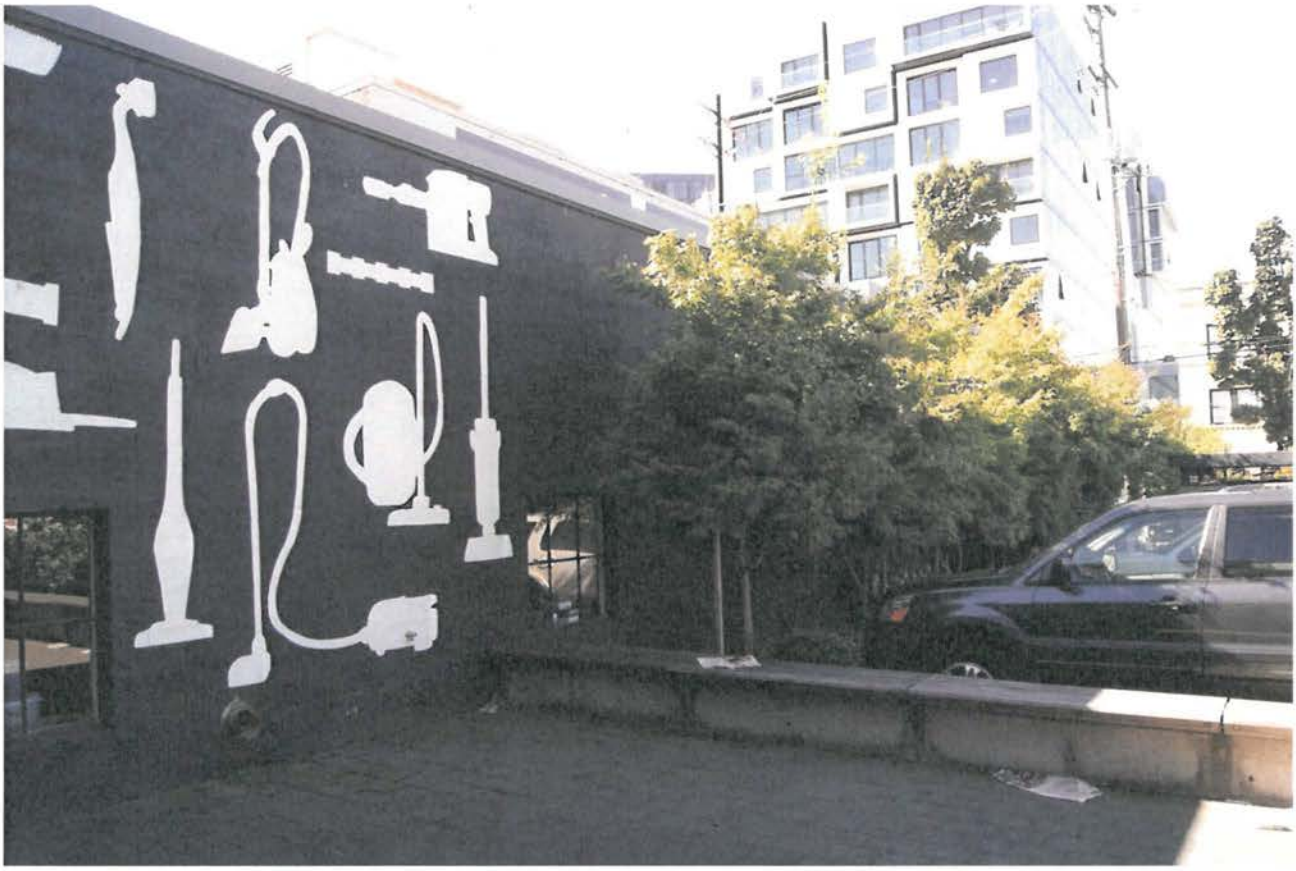
Property Name	
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

View: A view of the building's west façade; the view is towards the east.

View: A view of the building's north façade; the view is towards the southeast.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name	
Street Address: 118 NE Martin Luther King Blvd.	City, County: Portland, Multnomah



View: A view of the building's north façade; the view is towards the southwest.

SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Burnside Skatepark	
Street Address: Second Avenue and East Burnside	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oregon	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Skatepark	Construction Date: 1990-present
Architectural Classification / Resource Type: Structure	Alterations & Dates: Ongoing changes
Window Type & Material: N/A	Exterior Surface Materials: Primary: poured concrete Secondary: Decorative:
Roof Type & Material: N/A	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐Poor

An overall view of the Burnside Skatepark; the view is towards the northeast.

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: July 23, 2019

106 Documentation: Individual Properties

Property Name: Burnside Skatepark				
Street Address: Second and East Burnside Street		City, County: Portland, Multnomah		
Architect, Builder or Designer (if known): Multiple volunteers, see below	Owner:	☐Private ☐Federal	☒Local Government ☐Other	☐State

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

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 and since then, many of the features have been replaced since the park was first constructed excluding the concrete wall facing Second Avenue (Borden 2019:157).

Significance

The Burnside Skatepark, built in the early 1990s, is the first known do-it-yourself (DIY) skatepark constructed in the U.S. and was at the forefront of a new trend in skatepark design and community.

Historical Context: Skateboarding

This overview history of skateboarding is based primarily on Bruffett and Mattick (2013), Ellerbe (2018), Hamm (2004), Mortimer (2015), Vee (2020a), and Yochim (2010). It should be noted here that there are some different interpretations of the historical evolution of skateboarding among these sources.

Skateboarding developed in the 1950s and grew in the 1960s, initially associated with surfing culture in California. The first generation of skateparks were constructed in the 1970s. Most of these were privately owned and charged admission fees. The KonaUSA skatepark (1977) in Jacksonville, Florida, was and continues to be a private facility and is considered the oldest continuously operating skatepark in the world. A few public skateparks were also constructed in the 1970s, including the Bro Bowl (1978; officially the Perry Harvey Sr. Park Skateboard Bowl) in Tampa, Florida, which was listed on the NRHP in 2013 but subsequently demolished in 2015. This initial era of skateparks was short-lived, with the private parks closing due to liability issues. Many of this first generation of skateparks were designed and built with little input from skaters themselves. Although a few skateparks survived into the early 1980s, most skateboarders moved to street skating or building backyard ramps. Street skating contributed to negative public perceptions of skaters in the 1980s due to perceived damage to streets, sidewalks, curbs, and other public property, and many communities banned skateboarding. It was also associated with the evolution of "punk" culture in the 1970s and 1980s, which included elements of anti-authoritarianism and opposition to corporate and consumerist culture.

With the disappearance of most public and private skateparks by the late 1980s, a few skaters took the initiative of building skateparks that were publicly accessible and more expansive than backyard ramps. These do it yourself (DIY) parks were often constructed illegally on vacant lots without landowner knowledge or permission and at locations out of the public eye. These DIY skateparks represented an interest in "vert" or "tranny" skating, with an emphasis on skating vertical rather than the horizontal surfaces of street skating. Street skating dominated skating in the 1980s and 1990s, so vert skaters had few venues as few skateparks of this era had vertical surfaces.

The DIY parks initially attracted little interest among street skaters or the public with few exceptions (Burnside Skatepark is an important exception). The late 1990s saw a revived interest in skateboarding and a shift of focus from street skating to vert skating. ESPN's first X Games in 1995 sparked more public interest in the sport. The growing numbers of skaters led to a second wave of skatepark development, with a greater emphasis on public parks in response to provide more managed opportunities for vert skating. At the same time, DIY parks were seen as maintaining the punk character of skating in response to the mainstreaming and co-opting of skating culture.

The DIY skateparks of the early 1990s were major influences on the design of subsequent public skateparks, with skaters themselves engaged with design issues (although balanced with concerns for safety, security, and maintenance at public parks). Two of the biggest skatepark developers currently in the U.S.—Grindline and Dreamland—were founded by skaters who were involved in the initial construction of the Burnside Skatepark (Mark Scott established Dreamland in 1990; Mark "Monk" Hubbard first worked at Dreamland and then founded Grindline in 2002).

Property Name: Burnside Skatepark	
Street Address: Second and East Burnside Street	City, County: Portland, Multnomah

Significance (continued)

Burnside Skatepark History

The beginning of Burnside Skatepark dates to 1990:

> The event that quietly helped to resurrect skateboarding from its third slump and that paved the way for the greatest skatepark revolution occurred under a cloak of darkness in the late summer or early fall of 1990 [Hamm 2004:217].

A small group of Portland skaters decided to construct a skatepark under the eastern approach to the Burnside Bridge. That location had already attracted skaters as it offered protection from the rain and featured a massive, slanting concrete wall good for vert skating. The overlooked derelict space provided the perfect opportunity for the unofficial skate project. In the beginning, the park was constructed of donated materials, with the skaters pouring several bags of concrete mix at a time (Bredesen 2019). Small-scale banks were created along a rear concrete wall. More banks and modifications were soon constructed by "a handful of disenfranchised skateboarders . . . in a city politically and climatically inhospitable to their way of life" (Hamm 2004:221). As the Skatepark expanded, a pier (bents) supporting the bridge was incorporated into the park's design. The land was and is owned by the City of Portland but was vacant in 1990. Of the first skaters involved with its construction, Mark "Red" Scott, Bret Taylor, Osage Buffalo, Sage Bolyard, and Chris Bredesen, several went on to form their own companies spawning a nationwide industry and an entirely new trend in skatepark design.

The Skatepark continued to physically evolve as a DIY park by skaters, using scavenged and donated materials. The Burnside skaters developed working relationships with local businesses, neighborhood organizations, the police, and City officials. Local businesses were especially pleased by the reduction in crime in the area around the skatepark. In 1992, the City Council unanimously adopted a resolution supporting "the community's desire to continue the skateboarding under the east end of the Burnside Bridge." Letters of support included the chief of police, three neighborhood and community organizations, and local businesses (Portland City Council Resolution 35009, 1992, on file, Portland City Archives and Records Management).

The Burnside Skatepark's allure is in the challenging ride that it offers, once noted in *Thrasher* magazine "one of the fastest, scariest, and punkest parks on the planet" (Borden 2019:158). And likewise:

> Burnside has never been an easy place to skate. And for that reason, among others, some skateboarders have chosen not to frequent the place. But skateboarders who over the years have dedicated a fair amount of time and blood to Burnside have found rich reward. Because it offers a spectrum of challenges—from bathtub-tight transitions to gigantic ones, from smooth metal coping to jagged concrete lips, from street-inspired pyramid hits to a yard of solid vert capped with pregnant pool coping, all linked by countless lines—any dedicated local with a natural supply of adrenaline and, perhaps, with slightly oversized *huevos* can become an exceptional skateboarder. Simply stated: If a skater can achieve and maintain speed and adaptability in good form at Burnside, he or she can go on to skate anything, anywhere, with outstandingly aggressive grace. For this envelope-pushing influence alone, the world of skateboarding owes a great debt to Burnside and the men who made it [Hamm 2004:229].

The defining character of Burnside Skatepark is that it is continuously evolving and that evolution is by the skaters themselves. It has achieved iconic status at local, regional, national, and international levels for its DIY construction. While it is on City land, it is not managed as a City park with all the typical bureaucratic requirements and controls of an official city facility. Another character-defining feature of Burnside Skatepark is its art, in the form of what is often termed graffiti continuously evolving images on banks, ramps, walls, and the bridge bent.

Burnside Skatepark's influence is reflected and acknowledged in numerous sources:

- "The Burnside Project is what many skaters across the country identify as one of, if not the, best skate facility in the United States" (Jones and Graves 2000).
- "The modern skatepark revolution began with the DIY construction of Burnside. Before Burnside, there were only a handful of skateparks, and it was painfully obvious that they weren't built by skateboarders. [Now we have] progressively constructed parks all over the world" (Hamm 2010).
- "Arguably the most famous do-it-yourself skatepark, Burnside has expanded and developed over the past 20 years and is now recognized by skaters all over the world" (Alex Z. 2013)
- "Burnside makes an unforgettable impression on anyone upon first encounter. As it should. Since it's superlative and the foundation, and that's not hyperbole, for everything that came after" (Weyland 2014).

Property Name: Burnside Skatepark	
Street Address: Second and East Burnside Street	City, County: Portland, Multnomah

Significance (continued)

- "Unsanctioned skate parks (or DIYs) below bridges are actually kind of a thing; among the most famous—and now officially municipally sanctioned—are Burnside, beneath the Burnside Bridge on the Willamette River in Portland, Oregon, and FDR Park, beneath I-95 in South Philadelphia" (Murtha 2017).
- "They have created their own community. Their own little slice of urban heaven, one that is significant enough to draw people in from all over the world . . . It exists not only in legend, but in the present" (LoveSkateMag 2018).
- "All the skatepark construction companies that came out of Burnside (Grindline, Evergreen, Dreamland, etc.) have been at the forefront of skatepark design and construction ever since. They deserve praise and recognition for the proliferation of facilities that have been built around the world in the last two decades. And, again, there probably wouldn't be a Vans Park Series if it weren't for the skatepark renaissance that began under a bridge in Portland. (It could even be argued that Burnside is partly responsible for the discipline of Olympic park skating. "Thanks Burnside!")" (Carnie 2019).
- "Burnside Skate Park has been featured in numerous skate magazines, video games and is considered a classic skate park by skateboarding pros" (Rudolph 2019).
- "It has become a paradigm for other parks that followed across the US . . . It's tough to describe Burnside with mere words—it may well be one of the greatest skateparks in the world, according to many" (Vee 2020b).
- "One of the most famous parks in the United States. Built by skaters on the east side of the river in downtown Portland. The city let them keep building and a masterpiece was born" (sk8parkatlas.com 2020).
- "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).
- "One of the best skateboard facilities in the world" (Eisenhour 2020).
- "Christened in 1990 under the east end of Burnside Bridge the project set the template for renegade DIY skatepark construction worldwide. Burnside remains one of the most culturally important, ATV influential, and gloriously difficult skateparks to master on the planet" (*TransWorld SKATEboarding* 2020).
- Burnside Skatepark "was a catalyst for the current public-skatepark boom" (The Skatepark Project 2020).

These references clearly establish the foundational role the Burnside Skatepark has played and continues to play, not only in skatepark design, but in the evolution of the sport itself. Skating and skaters initially developed as a popular recreational activity, then became marginalized in the later 1970s and 1980s with its associations with punk culture. The Skatepark reflects important features of punk culture in its DIY construction and design and its use of graffiti as artistic expression. With the mainstreaming of skating beginning in the late 1990s and into the present, Burnside Skatepark has become a definitive symbol of the punk origins of skating. Because it is designed, constructed, and managed by skaters, it is globally regarded as the ultimate skatepark for serious skaters. As Keith Hamm, a prominent chronicler of skating, observed (quoted above), "If a skater can achieve and maintain speed and adaptability in good form at Burnside, he or she can go on to skate anything, anywhere, with outstandingly aggressive grace." Burnside Skatepark can thus be seen as defining skateparks and skating itself; it has an unparalleled reputation.

Burnside Skatepark has been the subject of three documentaries:

- *Full Tilt Boogie: The Story of the Burnside Skatepark* (2012) https://vimeo.com/51164175
- *Under the Bridge:25 Years Fighting for Burnside Skatepark* (2015) https://vimeo.com/144192466
- *Socially Infamous: Skate Culture Under the Bridge* (2018) https://sbcskateboard.com/socially-infamous/

Five commercial films have included scenes shot at Burnside: *Free Willy* (1993), *Foxfire* (1996), *The Hunted* (2003), *Paranoid Park* (2007), and *Untraceable* (2008). The Skatepark was a relatively minor backdrop in *Foxfire, The Hunted,* and *Untraceable*; was more prominently featured in *Free Willy*; and was a major element in *Paranoid Park*, where it was featured as "Eastside Skatepark."

Tony Hawk's ProSkater1 video game features nine levels, only two of which are based on actual skateparks, Burnside and House of Vans in Chicago, which is an indoor skatepark. They are also included as levels in ProSkater 2X; Burnside is also included in one version of ProSkater3.

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Significance (continued)

Other skateparks recognized as historically significant include:

The Rom

The Rom in east London, England, was constructed in 1978 with a design by Adrien Rolt, a major skatepark designer in the 1970s. In 2014, it was designated a Grade II building in the National Heritage List for England (Historic England 2020)

"The Rom stakepark, built in 1978 to the designs of Adrian Rolt/G-force, is listed at Grade II for the following principal reasons: * Historic interest: this is agreed to be the best, and most completely preserved, of a small number of purpose-built skateparks to survive from the early years of British skateboarding; * Design and technical interest: devised by Adrian Rolt of G-force, the leading skatepark designer of the late 1970s, and executed in seamless pressurized concrete, the Rom is closely based on Californian prototypes which themselves derive from elements of the public realm (swimming pools, drainage conduits etc.) appropriated during the pioneering phase of the sport; * Cultural interest: an icon of the British skateboard scene, and thus an important and enduring strand in late-C20 and contemporary youth culture."

Bro Bowl

The Bro Bowl in Tampa, Florida, was listed on the NRHP in 2013. The Bro Bowl was not a skatepark but was a skateboard rink. In developing Peter Harvey Park, the City's initial plan was to include a swimming pool. When it was decided a pool was not feasible, the proposed pool location was redesignated for a skateboard rink. No one in Tampa had experience designing skateboard facilities. A City employee proposed a design based on a photograph he had seen of California skaters in a swimming pool; hence the bowl form. The bowl was constructed in 1978 and the park opened in 1979. The Bro Bowl soon attracted national attention, bringing noted professional skaters to the park, and being featured in Tony Hawk's Underground video game.

Major redevelopment of the park area began to be planned in 2006, including demolition of the Bro Bowl. In 2012, the City was awarded federal funding for the new park development (Bruffett and Mattick 2013). The Bro Bowl was demolished in 2015 with construction of the new park. The new park has included a new skatepark that incorporates design elements of the original Bro Bowl (Davis 2017).

The Bro Bowl was listed on the NRHP in 2012 under Criteria A and C and Criteria Consideration G.

Burnside Skate Park Eligibility

The Burnside Skatepark is eligible for the National Register under Criterion A (with Criteria Consideration G) and under Criterion C (with Criteria Consideration G) as an exceptionally important historic property that achieved its significance less than fifty years ago.

Criterion A with Criteria Consideration G – Significant and Exceptionally Important

Under Criterion A, with Criteria Consideration G, the Burnside Skatepark is significant and exceptionally important for its seminal role in the development and design of DIY skateparks in the U.S. and Europe. As referenced above, Burnside Skatepark has been cited as the exemplar of and model for all later DIY skateparks. Diligent research has failed to find any reference to an older DIY skatepark that is still being used. It has served as the impetus for the construction of public skateparks beginning in the late 1990s and early 2000s.The character of skating itself—especially park skating (which was scheduled to become a competition sport at the 2020 Olympics)—has been influenced not only by the physical features of Burnside Skatepark but the tricks required to successfully negotiate those features.

Under Criteria Consideration G, when defining "exceptional importance" for historic properties that have achieved their significance less than fifty years ago, one must consider "both the historic context and the specific property's role in that context" (National Park Service 1997:42). The historic context for addressing the Burnside Skatepark is the development of skateboarding and the associated construction of skateparks. Burnside Skatepark was constructed at a critical moment in the history of skateboarding, with the sport transitioning from a period of declining public support and few skateparks to one of a growing number of skaters and a greater need for skateparks. Construction of DIY parks by skaters was a crucial response and one that spurred a new wave of development of public parks. Construction of Burnside Skatepark is considered to have been formative in that new era, shaping both the character of later skateparks and helping to shape the entire sport. Its role in this context cannot be understated and its influence is widely recognized at national and international levels

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Significance (continued)

Criterion B – Not Significant

Under Criterion B, the Burnside Skatepark is not associated with a single or several individuals significant to our past, but by the nature of its construction as a DIY project was a community effort, and therefore is not significant under Criterion B.

Criterion C with Consideration G – Significant and Exceptionally Important

Under Criterion C, with Criteria Consideration G, the Burnside Skatepark is significant and exceptionally important for its pivotal role in establishing the DIY skatepark type, its community-based DIY methods of construction, and its continuing pivotal role in influencing skatepark feature designs that have been incorporated into later DIY and public skateparks. The Burnside Skatepark helped establish the current standard of all concrete construction for the both DIY and public skateparks. The Burnside Skatepark was a pioneer in developing a challenging complex of features now widely used such as vert walls, bowls, cradles, humps, pyramids, and lumps into one park. The most defining physical feature of the Skatepark is its dynamic character; it is continuously evolving as features are added, removed, and modified. The use of graffiti as artistic expression also helps define Burnside Skatepark. Not surprisingly, graffiti is a common feature of DIY skateparks but is usually prohibited at public parks, where commissioned murals may be installed (although such works may capture some of the design elements of graffiti).

Criterion D – Not Significant

Under Criterion D the Burnside Skatepark offers no information potential not already available in written and visual media and therefore is not significant under Criterion D.

Integrity

The Burnside Skatepark retains historical integrity of location, setting, materials, workmanship, feeling, and association. Although the design of the skatepark continues to evolve, this is an integral part of the Burnside Skatepark culture which strives to continually enhance the skating experience.

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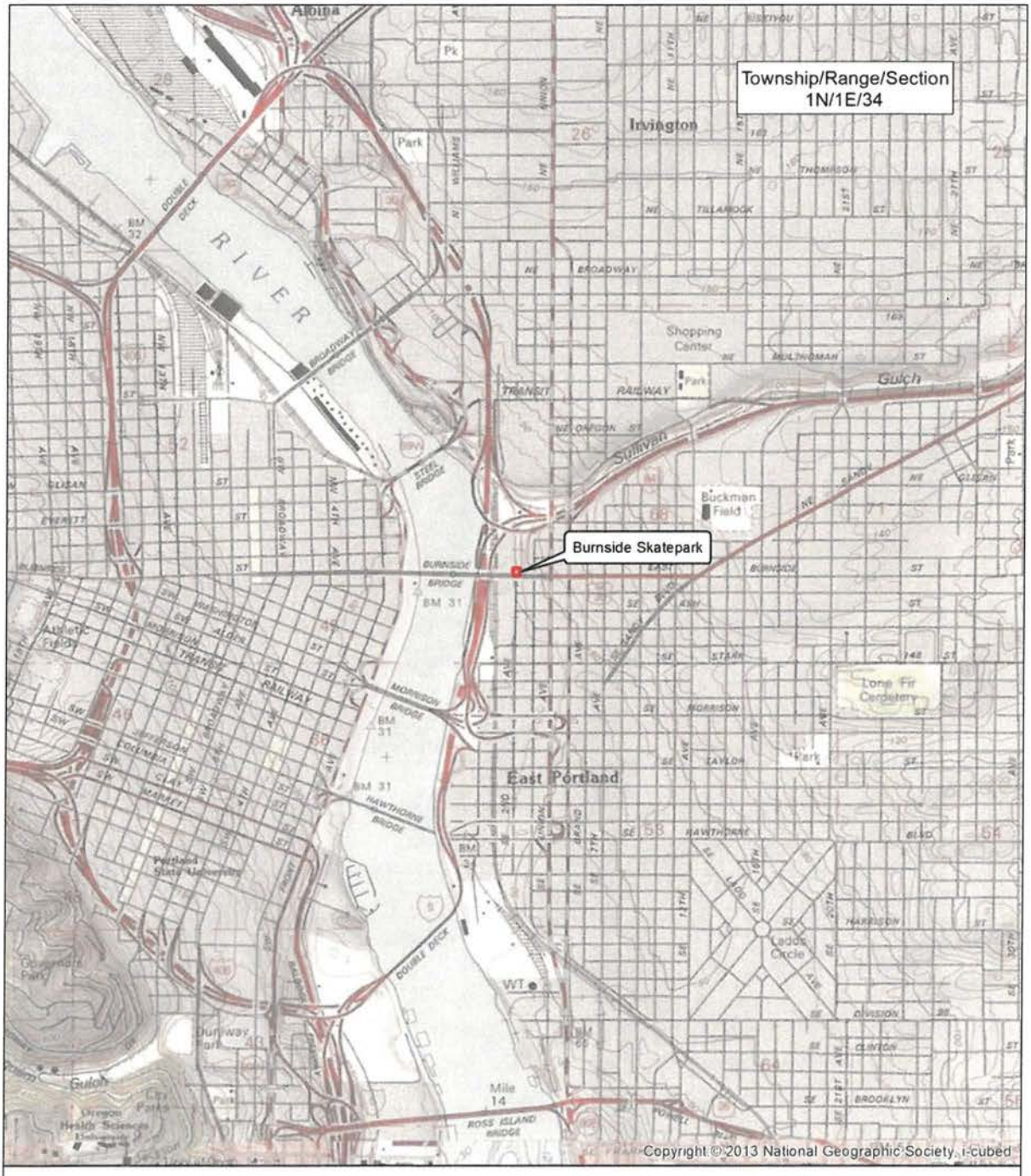


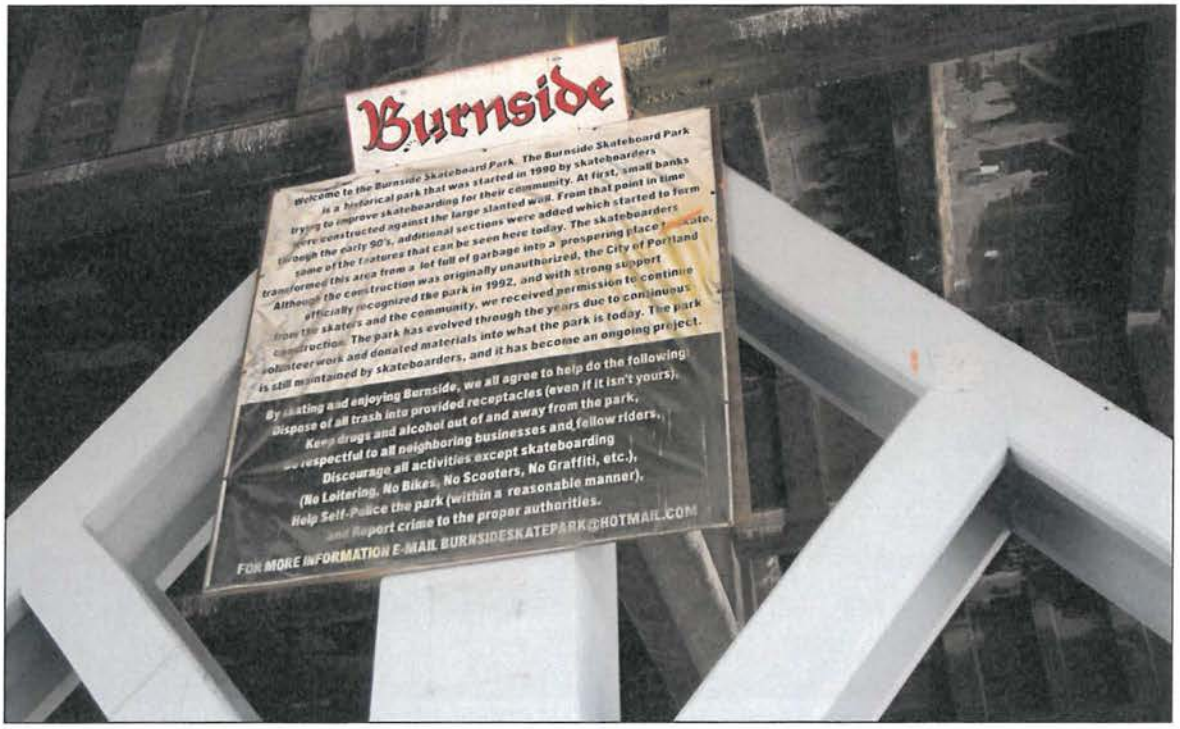
Figure 1. The Burnside Skatepark location.

Property Name: Burnside Skatepark	
Street Address: Second and East Burnside Street	City, County: Portland, Multnomah

Figure 2. Current imagery depicting the Burnside Skatepark and API.

Property Name: Burnside Skatepark	
Street Address: Second and East Burnside Street	City, County: Portland, Multnomah

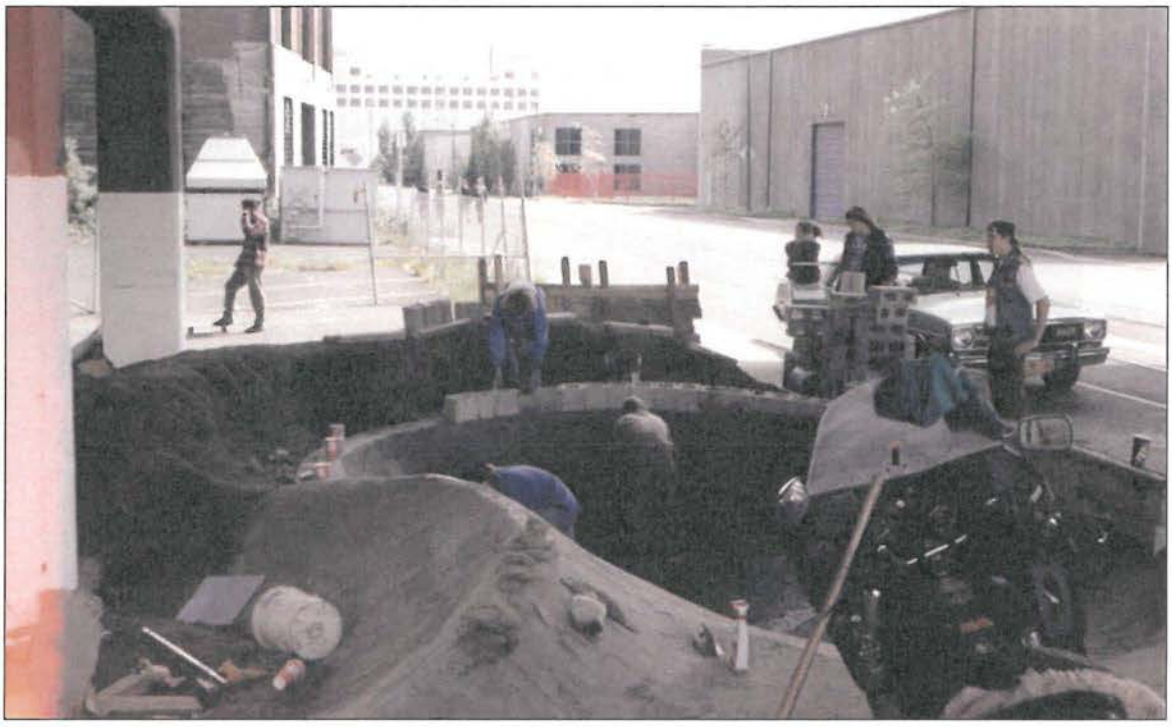
View: A view showing how the Burnside Bridge's columns have been incorporated into skating features. Looking southwest (Photo courtesy www.burnsideproject.org, used with permission).



View: A sign mounted at the Burnside Skatepark, the view is towards the east.

Property Name: Burnside Skatepark	
Street Address: Second and East Burnside Street	City, County: Portland, Multnomah

View: The first development of the Skatepark circa 1990-1991. The view is to the north. (Photo courtesy www.burnsideproject.org, used with permission).



View: DIY construction at the Skatepark, circa 1990-1993. The view is towards the south. (Photo courtesy www.burnsideproject.org, used with permission).

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Street Address: Second and East Burnside Street	City, County: Portland, Multnomah

View: DIY construction at the Skatepark, dated to 1990-1993, The view is towards the south. (Photo courtesy www.burnsideproject.org, used with permission).

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

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View: Example of Skatepark art, The view is towards the southeast (photo courtesy of Burnside Skatepark Facebook).

View: Past example of Skatepark art, The view is towards the east (photo courtesy of Burnside Skatepark Facebook).

SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oregon	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Fire Station and Administrative Office	Construction Date: 1950-1951
Architectural Classification / Resource Type: Modernist/ Building	Alterations & Dates: Ca. 1980; 2008-2010
Window Type & Material: Vertical sash with below horizontal/likely metal frame	Exterior Surface Materials: Primary: Brick Secondary: Decorative: Limestone and Granite
Roof Type & Material: Flat with parapet/ Unknown	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐Poor

Historic Photo of Portland Central Fire Station (Fire Station 1) from the 1950s (*Portland Online Photo*).

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: July 23, 2019

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Property Name: Central Fire Station/ Station No. 1				
Street Address: 65 SW Naito Parkway		City, County: Portland, Multnomah		
Architect, Builder or Designer (if known): Jones & Marsh, architects	Owner:	☐Private ☐Federal	☒Local Government ☐Other	☐State

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

The Central Fire Station (Station No. 1) is a three-story building with a basement constructed in 1951 on tax lot 1N1E34DC 1400 Portland, Multnomah County, Oregon in Section 34, Range 1 North, Range 1 East, Willamette Meridian. The most recent modifications made to the building were in 2008-2010. The building has an approximate 80' x 180' footprint and, is constructed of reinforced concrete with a brick veneer. Exterior trim work is limestone and granite. Original features include a six-story drill/hose tower and a parking area west of the building (*Oregonian* 1950:9). A circa 1980 single story addition is attached to the north façade adjacent to Ankeny Plaza. The building has a flat roof with parapet.

The overall design by architects Jones & Marsh is a Modernist style expressed through the building's horizontal massing, ribbons of windows, and sparse detailing. The building's restrained detailing appears to be inspired by the earlier work of Pietro Belluschi who in the 1930s designed the Portland Art Museum while working for A.E. Doyle (Hartwig 1970). While the Central Fire Station is more modernistic in its horizontal form and composition, in both buildings, their red brick exterior is contrasted with bands of lighter material for window and door trim. The restrained use of detailing gives the Central Fire Station an elegant and sustaining aesthetic quality.

The primary façades include the main pedestrian entry on the south façade facing SW Ash and the east façade oriented towards SW Naito Parkway where the emergency vehicles emerge from six vehicular bays within the main mass and a seventh within a circa 1980 one-story north addition. The east façade at the ground level provides access to the street from the vehicular bays, also includes a pedestrian door with an above octagonal light, and a window bay to the far south. The south bay windows are replacements in a configuration similar to the original windows. Horizontal ribbons of windows span the second and third floors of the east façade. The windows are replacement vertical lights above a smaller horizontal light that appear to be in metal frames. Although the windows' inner configuration is different than the original, they do not compromise the overall historical integrity of the façades. A limestone molding surrounds each band of windows, with a slightly broader continuous horizontal sill. Granite trim surrounds the vehicular doors, octagonal light, and pedestrian door. The retractable vehicular doors are replacements but maintain the gridded light pattern similar to the original doors. The letters above the pedestrian door read: PORTLAND FIRE & RESCUE.

The south façade has a single-story projecting brick entry at the ground level. The entry recess is faced with granite. Windows on the second and third levels are single, paired, and in threes, trimmed by limestone bands.

The north façade features a single-story circa 1980 addition that is home to the Fire Museum. The brick clad addition has a flat roof and a vehicular bay facing SW Naito Parkway. Belgian block cobbles pave the interior floor where historic firefighting equipment is displayed. Salvaged cast-iron artifacts are embedded into the exterior brick wall facing Ankeny Plaza.

The west façade has groups of three, single windows with a vertical sash above narrow horizontal lights. Bands of limestone trim surrounding the windows contrasting with the exterior red brick veneer walls. The six-story tower is attached to the exterior wall and has vertical window openings on five of the six levels all trimmed with limestone sills. Ribbons of windows are situated on the north section of the building on the second and third floors, above a newer vehicular bay on the first floor. A single-story projection houses the rear entry, supported by a single metal column on the north opening.

Alterations

Construction of a single story museum addition began in 1978 and was completed over several years as funds became available. A renovation and seismic upgrade was completed in 2008-2010 funded by a 1998 Bond Measure. Peck Smiley Ettlin, architects who had extensive experience in designing firefighting related buildings, completed the drawings (Mortenson 2008). Degenkolb Engineers undertook the seismic engineering for the building. Retaining the overall historic appearance of the building was important to the process. A number of improvements were made to the interior to meet current standards for physical disabilities, offices, and separate dorms for men and women (Leeson 2007:11-12).

Permit records show that solar facilities were installed on roof in 2018.

Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

Significance

Portland's fire fighters were essential from the time the city began as a frontier settlement on the Willamette River in 1850. Initially, volunteer fire fighters provided protection. Pioneer Fire Company No. 1 was recognized as a city volunteer fire department in 1851 (Lansing 2003:44). All able male citizens were expected to participate when the alarm was sounded. A levy passed in 1856 to purchase a steam engine drawn by manpower (Hoover 1950:8-9). Cisterns were built underneath street intersections to draw water for fighting fires. The first approved for construction in 1856 were wood structures built below the city streets (Lansing 2003:77). By 1860, three fire stations served the small city along the west bank of the Willamette River. Two city fires in the 1870s impressed upon civic leaders that firefighting equipment must be improved. Eventually horse drawn equipment was introduced in the 1880s and the City's forces were completely motorized by 1920 (Hoover 1950:8-9).

Fire Station No. 1, constructed 1950-1951, replaced the prior Central Fire Station located at SW 4th and Taylor (*Oregonian* 1952). One of the reasons for relocating the station to its current location was because of traffic congestion at city intersections impeded a quick response to emergencies. It was hoped that the new fire station's proximity to Harbor Drive and Front Avenue would allow emergency vehicles better access to Portland's east side and east-west streets in west side Portland (*Oregonian* 1949c:1)

Construction on the Central Fire Station was carried out 1950-1951. Jones & Marsh Architects designed and completed the architectural drawings for the facility. The building permit for the project was issued less than two months before the death of Jones. Their design included a landscaping plan relocating the Skidmore Fountain near the front entry, though public sentiment prevented this from happening (Oregonian 1949a). The building contractor C.M. McCorkum Company was awarded the contract submitting the lowest bid of $448,144.00 (*Oregonian* 1949b). The first floor included equipment storage, a kitchen, recreation room, and handball court. Dormitories including a "snore room", locker rooms, and a library were situated on the second floor, and administrative offices, photo laboratory and lecture hall were located on the third floor (*Oregonian* 1951b:15). The interior featured a tile mural of an old horse-drawn steam engine that had been relocated from a fire station in NE Portland (*Oregonian* 1951a). The latest equipment was used in the station including an alarm system that when sounded automatically opened the fire truck doors.

Fire Chief Edward Grenfell was in charge of the station when it first opened in 1951. Three fire stations were consolidated into this single building and five firefighting companies (*Oregonian* 1951b:15). About the time Central Fire Station opened the Korean War had intensified. During this period, Central Fire Station served as an important meeting place for civic and government officials in strategizing and providing basic training for civil defense which was a major topic during the Cold War era (*Oregonian* 1951).

A one-story brick building attached to the north façade was started in 1978 to house the Jeff Morris Fire Fighting Museum. The museum officially opened in 1985 after a series of fundraising efforts to complete the museum honoring former firefighter Jeff Morris (Zaitz 1978:17). After closing in 2008 for fire station renovations, the museum was reopened in 2018 (Portland Fire and Rescue 2018).

As the mission of the firefighting evolved and included emergency services, the name Portland Bureau of Fire, Rescue, and Emergency Services (FD&R) was adopted in 1988. By this time all fire fighters were also trained in emergency services and the majority of fire fighters work centered on responding to emergency situations.

In 1998, a significant bond measure was passed to improve seismic issues within the fire bureau. Work on the Central Fire Station began in 2008-2010.

Station No. 1 continues to maintain an important presence within the community as an operating fire station, main administrative office of the chief and deputies, and operating much as it was originally intended.

Jones & Marsh

Jones & Marsh were a highly competent architectural firm made up of partners George H. Jones and Harold D. Marsh. The Central Fire Station was one of the last buildings completed by the Jones & Marsh partnership before the death of Jones in 1950. During their early collaboration and later partnership, Jones & Marsh worked on a number of civic and educational buildings maintaining a solid reputation for their projects. Jones and Marsh's collaboration began in the mid-1930s and would continue until Jones died at the age of 62 while working at their office in 1950. One of Jones and Marsh's early collaborations was the Public Works Administration (PWA) -funded Canby City Hall (1936), which gained national attention in 1939, "as an

Property Name: Central Fire Station/ Station No. 1	
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Significance (continued)

ideal modest city hall" (Oregon Historical Sites Database 2014). The Linnton Fire Station, completed in 1938, hinted to their later work at Portland Central Fire Station. During World War II, the Jones & Marsh partnership was part of a select group of architects working on public housing projects for Portland Housing Authority. They were also responsible for civic and educational buildings. Near the end of their partnership they completed work at Concordia College (Luther Hall) and at Oregon State College (OSU), notably Gill Stadium, an exuberant, Art Deco-styled building, which opened in 1949, and also the Neo-Classical-styled Dearborn Hall (1947) (Atwood 1989; SHPO 2019). Jones & Marsh's versatility in architectural styles and design are well represented in these last projects. The Portland Fire Station will be remembered as one of Jones & Marsh's last projects before Marsh's death January 9, 1950. The fire station's plans were complete by September 1949 and ground broken in early November 1949 (Oregonian 1949:7; Oregonian 1949:10).

Both Jones and Marsh had solid reputations prior to joining together. George Jones had previously worked for the Portland Public Schools as the Superintendent of Buildings, as had his father Thomas J. Jones (Entrix 2009). George Jones is one of the most influential architects of Portland's public schools in the early 20th century (Entrix 2009). Harold D. Marsh had worked on many residential projects and civic buildings, several of which were located in Klamath Falls (Atwood 1989).

George Howell Jones was born in Portland in 1887 and would eventually follow in his father, Thomas Jones, footsteps as an architect for Portland School District No. 1. Jones studied engineering and architecture at Oregon State College for two years (1907-1909) and in 1913 completed a degree at Massachusetts Institute of Technology (*Oregonian* 1950:15). Jones worked in an architectural office in New York City before serving in World War I. Jones gained further architectural experience in New York City after the war before returning to Portland. Jones gained employment as a draftsman for Portland School District. No. 1 and by 1923, he was listed as an architect for the school district (R.L. Polk & Co 1921; 1923). Jones worked for Portland's school district through part of the Great Depression and by 1934 had opened an office in the Woodlark Building sharing an office with H.D. Marsh (R.L. Polk & Co. 1933, 1934; Ritz 2002). Jones worked independently and also collaborated with Harold D. Marsh before forming a partnership, Jones & Marsh, in 1940 (Ritz 2002). The Central Fire Station would be one of Jones' last buildings, as he died of a heart attack while Jones & Marsh were engaged in the Central Fire Station's construction phase.

Harold Dickson Marsh was about the same age as Jones. Marsh was born in 1889 to Robert K. Marsh and Marie Geer Marsh. Like Jones, Marsh attended Oregon State College, then Oregon Agricultural College, and obtained a Master of Science degree at MIT in 1913 (Atwood 1989; Ritz 2002). Jones practiced architecture, but for a period of time during the Great Depression served as president of his father's printing company, Marsh Printing Co. (R.L. Polk & Co 1932,1933). Eventually Marsh was able to work full time as an architect, moving to the Woodlark Building, where he collaborated with Jones and formed a partnership (R.L. Polk & Co. 1938). After the death of Jones in 1950, Marsh continued working independently on other projects. Marsh died in 1969 (Atwood 1989).

Criterion A, Significant: Under Criterion A, the Central Fire Station (Station No. 1) is recommended eligible for listing at the local level, under Criterion A for its associations with events that have made a significant contribution to the broad patterns of our history. Constructed in the Post World War II period, the Central Fire Station continues to serve the community as the central Fire Department and Rescue (also called FD&R) administrative building, a working fire station, and as a community meeting place.

Criterion B, Not Significant: The Central Fire Station is not associated with specific people important in history, therefore it is not considered eligible for listing in the NRHP under Criterion B.

Criterion C, Significant: Under Criterion C, the Central Fire Station is a good example of a Modernist style fire station constructed in the mid-twentieth century. The fire station embodies distinctive characteristics of a type and style as applied by architects Jones & Marsh, and is therefore recommended eligible for listing in the NRHP under Criterion C.

Criterion D, Not Significant: Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites.

Integrity

The Central Fire Station retains excellent historical integrity of location, design, setting, workmanship, and feeling. Also, the building retains its strong associations with its original use as a working fire station, central administrative office, and community meeting place for issues related to emergency services. Window alterations, door replacements and the north addition have been done sympathetically and do not compromise the overall historical integrity of the building.

Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

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Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

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Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

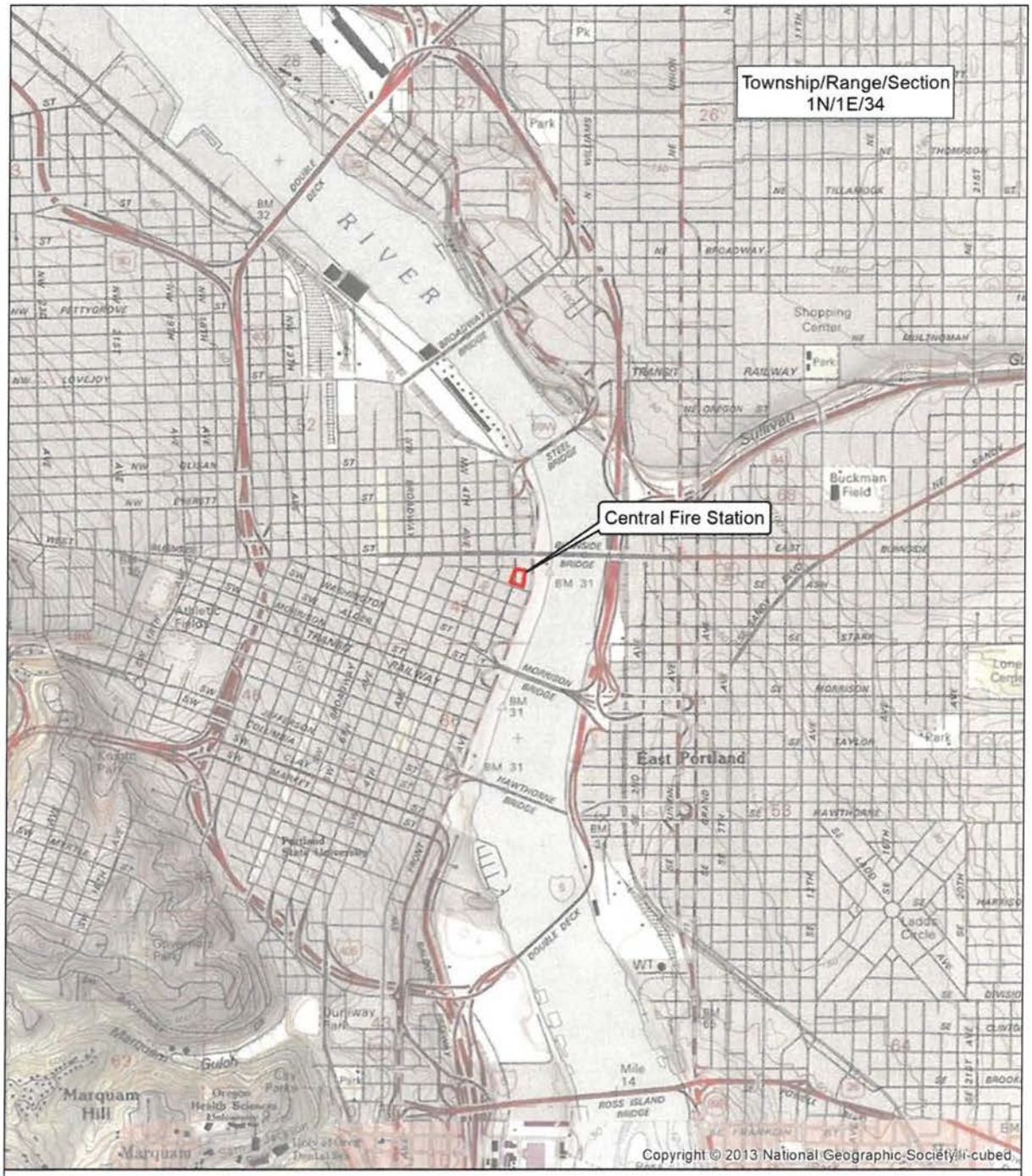

Figure 1. Central Fire Station location.

Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

Figure 2. Current imagery depicting Central Fire Station and API.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

View: Central Fire Station's south and east facades. The view is towards the northwest.

View: The rear (west) façade of the Central Fire Station. The view is towards the northeast.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Central Fire Station/ Station No. 1	
Street Address: 65 SW Naito Parkway	City, County: Portland, Multnomah

View: The north façade of the circa 1980 addition built to house the Fire Museum. The view is towards the southeast.

SHPO Case#18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Agency/Project: Federal Highway Administration/ Burnside Bridge	
Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oreg.	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Social Services Building	Construction Date: 1941
Architectural Classification / Resource Type: Streamline Moderne Commercial- altered/ Building	Alterations & Dates: 1957; ca. 1960s; 1976-1977; ca. 2015
Window Type & Material: store fronts/ steel	Exterior Surface Materials: Primary: brick veneer Secondary: steel vertical panels Decorative:
Roof Type & Material: flat with parapet, unknown	
Condition: ☐Excellent ☒Good ☐Fair ☐Poor	Integrity: ☐Excellent ☐Good ☒Fair ☐Poor

The north and west facades of 30 NE Martin Luther King Blvd looking southeast.

Preliminary National Register Findings: ☐**National Register listed**

☐**Potentially Eligible:** ☐Individually ☐As part of District

☐**Not Eligible:** ☒In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building		
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): J.G. Killgreen and Flynn (builder)	Owner: ☐Private ☐Federal ☒Local Government ☐Other	☐State

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

The former Joe Fisher Co. /Bank of Portland Building/Hooper Detoxification Center/ Jeanne Rivers Building is a 1941 two-story Streamlined Modern Commercial building that has had a series of remodels over the course of its lifetime. In 1957, the auto showroom was converted into a bank. More exterior improvements were made at a later date, and again in 1977 when was converted into the Hooper Detoxification Center. The building sits at the northwest corner of the intersection of NE Martin Luther King Boulevard and NE Couch Street in Portland, Oregon. The neighborhood is a commercial/industrial neighborhood that is rapidly being redeveloped with commercial and large-scale multi-family buildings. Portland architect Don Byers, designed the 1957 updates when the building was converted from an auto showroom to a bank. Don Byers was an active local architect best known for his Universal Plan Service plan books. Wolf Zimmer Gunsul Frasca, Partneship prepared further design updates in 1976, when Multnomah County purchased the building and converted the former bank into a detox center.

Physical

The Bank of Portland building is situated on a 100' x 100' lot and stands two stories high on a poured concrete foundation with basement. The building is essentially square in plan except for a rounded corner oriented to the northwest; the roof is a flat roof with parapet. Originally designed in the Streamlined Moderne style, the building has generally maintained an element of its streamline character despite receiving fairly extensive modifications in the late 1950s, 1960s and 1977. It currently reflects the character of the 1970s-1980s with the design influence of the architectural firm Wolff Zimmer Gunsul Frasca, Partnership when the building was reconfigured for use as a detox center. Already a prominent architectural firm, the architectural office would shortly in 1977 become known as Zimmer Gunsul Frasca (ZGF) and would exponentially grow into one of Portland's architectural powerhouses influencing the Portland city skyline (Oregonian 1976a; Ritz 2002 451-453).

The building's north façade is bisected by the original monolithic brick-clad pier that rises above the north parapet acting as a transition element between two building segments: a brick faced building segment to the east and the curving, stream-lined design of the west segment. The north façade's east half at street level, is divided into three slightly recessed windows bays, former vehicular access bays, with horizontal ribbons of vertical glass panels and corresponding horizontal window bays with steel-framed windows, and center sections that have been infilled. The east segment is clad with brick. A recessed entrance is situated at the transition between the two building segments. A concrete planter wraps around the stream-lined segment at the storefront base facing the corner and NE Martin Luther King Blvd.

The west section begins on the north façade and curves around the corner and straightens along the west facade. The second floor overhanging the first floor, is lit with evenly spaced windows of vertical metal-framed panels consisting of one large pane and one vertical. Ca. 1970s vertical metal panels clad the second floor. A ribbon of vertical, metal-framed storefront windows light the ground level. Several brick clad column supports are spaced along the west façade. Another entrance is at the south end of the building's west façade.

The building, constructed in 1941, was a partially open on the west façade as used-car showroom. The building was constructed for an estimated cost of $50,000. It was proudly noted when it was built as a "New Streamlined Automotive Building" (Oregonian 1941:18). The east segment was open on both floors and the three bays on the north façade were also open for parking cars.

Alterations

In 1947, the auto dealership was converted into a bank. The open areas on the first and second floors facing NE MLK were enclosed and a ribbon of what appears to be glass block wrapped around the west façade on the second floor. Architect Don C. Byers prepared the plans for the bank remodel and Lorenz Bruun was the contractor (Oregonian 1957:28). The realities of heat gain from a continuous ribbon of glass along the west façade were rectified sometime in the 1960s-early 1970s. A 1976 Oregonian photograph shows the ribbon of glass replaced by evenly spaced windows shaded by a continuous metal awing (Oregonian 1976b:D2). Wolf Zimmer Gunsul Frasca Partnership, Architects prepared plans for Multnomah County converting the building into a detox center (Oregonian 1976:B1).

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah

More recent remodel plans for owner Central City Concern was prepared by Merryman Barnes Architects including a rooftop addition and what appears to be interior modifications (City of Portland 2020).

History

The building over the course of its lifetime has served several functions in part reflecting changing community cultural patterns. Portland auto distributor, Joe Fisher, constructed the building for used auto sales. Fisher's overall business history highlights some of phases of the retail auto industry of the Mid-Twentieth Century. In the first decades of the Twentieth Century the introduction of motorized vehicles spurred a number of commercial enterprises replacing blacksmith shops and livery stables on Portland's east side. Automobile ownership in Portland, and the U.S. would exponentially grow during the early Twentieth Century. Automobile ownership was spurred by Henry Ford's introduction of the Model T, in 1908 and the car's availability from Ford's mass production lines established in 1913. Ford's innovations in the Model T, how it was manufactured and approachable cost would significantly influence American culture (Flink 1972).

In Portland, many early automotive businesses were attracted to Portland's eastside near Martin Luther King Blvd (Union Ave) and Grand Avenue as car ownership grew in the 1910s and 1920s. This increase continued as Multnomah County, vehicle registration more than doubled from 36,000 in 1920 to 96,000 in 1930 (Abbott 1995:47). By 1929, car production reached its highest numbers reaching a saturation point (Flink 1972). Locally, demands for auto services on Portland's east side encouraged the growth of parking garages, repair garages and auto dealerships along Grand Avenue and former Union Avenue. Used cars sales gained momentum during the 1930s, and were the only option when new motor vehicle production for the general public stopped in 1942 due to World War II. Joe Fisher's 1941 Used Car Center would fill this market during the war years making a striking and unapologetic design choice for displaying used cars. When the war ended, new car sales again took off (Flink 1972).

When Joe Fisher, then Dodge-Plymouth distributor, constructed the used-car sales building, he also has several previous eastside locations including at the location of the D.P. Thompson Co. Investment building situated at 107 NE Grand Avenue. The new building was constructed with a ramp along the east wall leading to the second floor for parking cars and featuring open walls on the west façade facing NE Martin Luther King Blvd. showcasing two floors of used cars (Sanborn Map 1950; Oregonian 1941:23).

Along with a changing car market and Joe Fisher 's interest in banking, Fisher offered his building for the construction of an independent local bank that he organized with other local businessmen. Fisher took a great interest in the financial market in the late 1950s, also establishing the Bank of St. Helens, where he served as the president, and also Bank of Klamath Falls (Oregonian 1957:20). Fisher and a group of business leaders chartered the new Bank of Portland in 1956-1957. The new bank incorporated some the benefits of open vehicular bays along NE Couch Street for a drive-thru teller (Oregonian 1957:1). When The Bank of Portland opened in July 1957, S.L. Gardner served at the bank's president (Oregonian 1957:17). Within two years of opening in 1959, the bank merged with Security Bank of Oregon ca. 1959 becoming the East Portland Branch of the Security Bank of Oregon (Oregonian 1965:17). The bank building served the community into the early-to mid-1970s.

Multnomah County purchased the building ca. 1976 for social services converting the building into a treatment center. Remodeling began in 1977 for the David Hooper Detoxification Center (Oregonian 1976:D2). The remodel building has been used for social services for following decades and more recently named the Jeanne Rivers Building.

Currently, the building houses services for Multnomah County including the Crisis Assessment and Treatment Center (CATC) (Multnomah County 2020).

Joe Fisher

James O. Fisher, Sr. "Joe" began working in the automobile business in 1925 in Portland. When opportunity struck, he opened Dodge dealerships in Oregon, Washington and farther afield, finally landing back in Portland in 1939. He began his Portland auto dealer career with a Dodge dealership. Over the course of time he would sell Fords, and several lines of import cars. His son, Jim Fisher joined him in the business and would purchase the west side location on W. Burnside where he transformed the location into service center. Joe Fisher played an early role in the building's construction and the later conversion into The Bank of Portland. He took an interest in banking and would be instrumental in the three banks, including the Bank of Portland, situated within the subject building (Oregonian 1983:107; Oregonian 1987:13).

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah

Significance

Criterion A, Significant: Under Criterion A, the Bank of Portland building has historical associations with the auto industry and the commercial enterprises that grew from the introduction of the automobile. Constructed the 1941, the building reflects a time that used car sales replaced new car ownership due to a saturated market. As the building has been remodeled extensively, it no longer adequately reflects this period in its design, materials, workmanship, feeling and associations and is therefore recommended not eligible for listing under Criterion A.

Criterion B, Not Significant: Under Criterion B, the Bank of Portland building has associations with Portland car dealer. James O. Fisher, Sr. who had the building construction in 1941 and was influential in its conversion into a bank in 1957. Although having these associations with Fisher, the building has been remodeled and no longer reflects the period of his influence and history, therefore the building is recommended not eligible for listing in the NRHP under Criterion B.

Criterion C. Significant: Under Criterion C, the Bank of Portland is no longer representative of the auto dealership/garage type of building constructed in the 1940s, nor no longer is representative of the Mid-Century period, when it was converted into a bank. Although designed by Don Byers, the building as a remodel and not the best representation of his work, nor does the bank building reflect is original use as auto-garage building. Further modifications made in the 1977, by architects, Wolff Zimmer Gunsul Frasca, are less the 45 years and as such, the building is recommended to be not eligible for listing under Criterion C.

Criterion D, Not Significant: Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites and in the case of the Bank of Portland building, information related to the building can be yielded through existing documentation and records.

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Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah

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Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

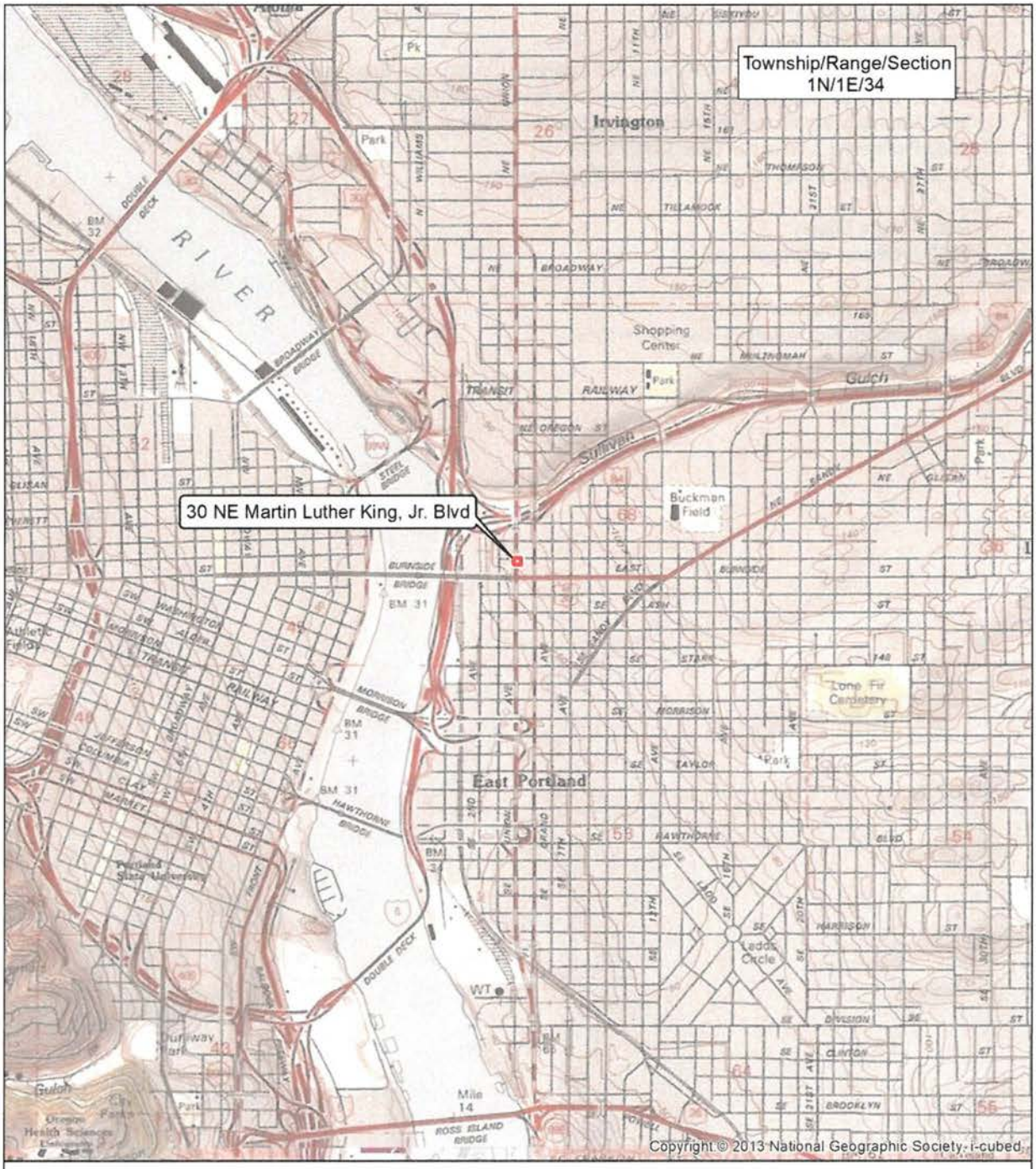


Figure 1. Location of 30 NE Martin Luther King, Jr. Blvd

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

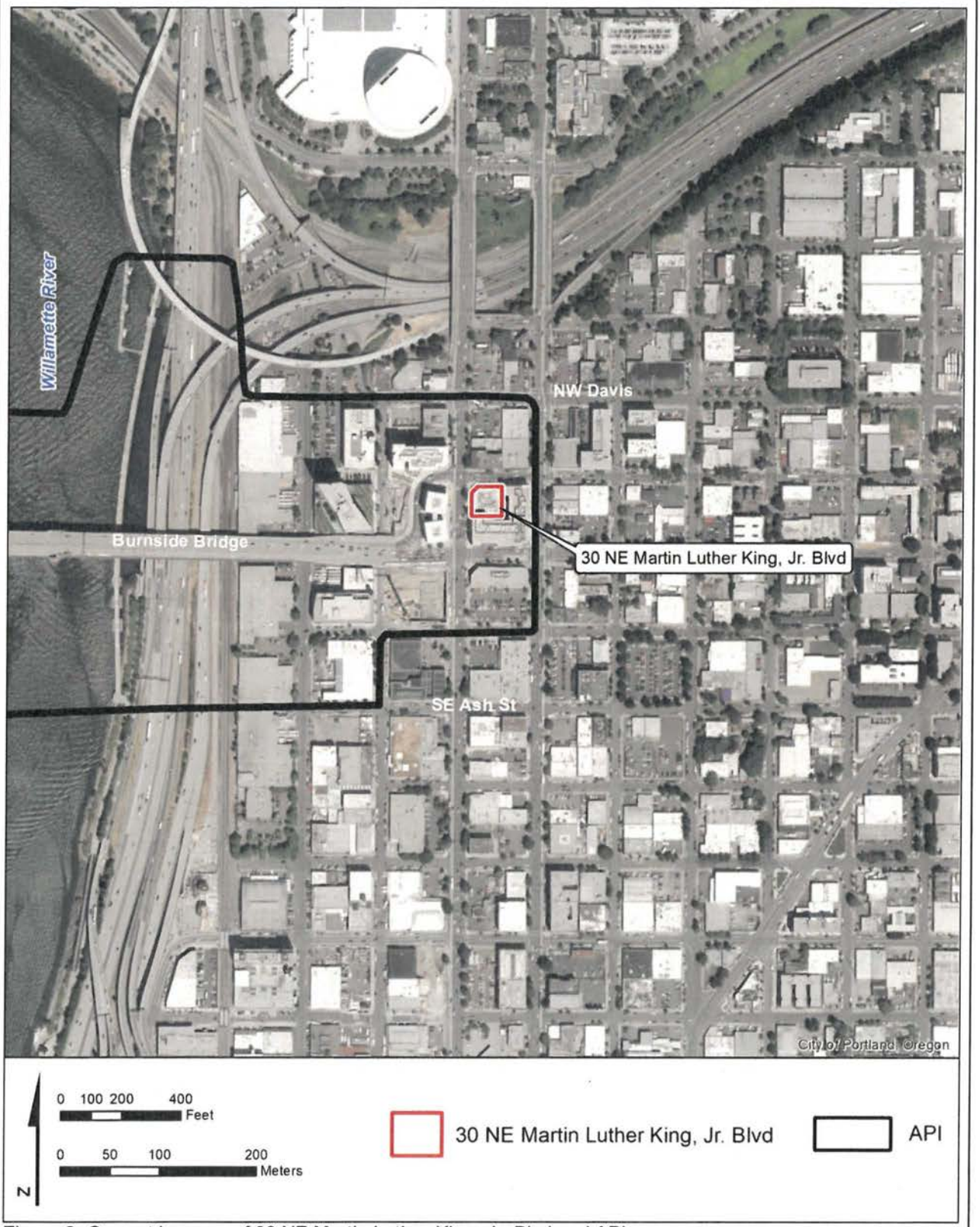


Figure 2. Current imagery of 30 NE Martin Luther King, Jr. Blvd and API.

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah

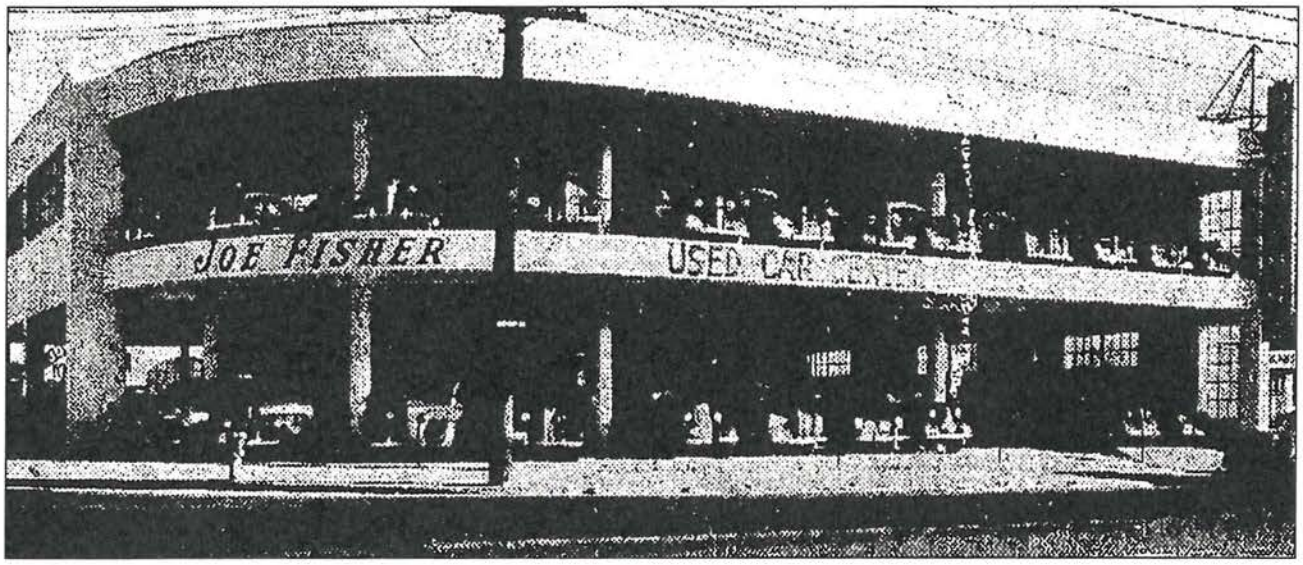
View:. The north façade of 30 NE Martin Luther King Blvd. Building looking southwest.

View: A closer view of the transition between the east and west building segments; the view is to the southeast.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah

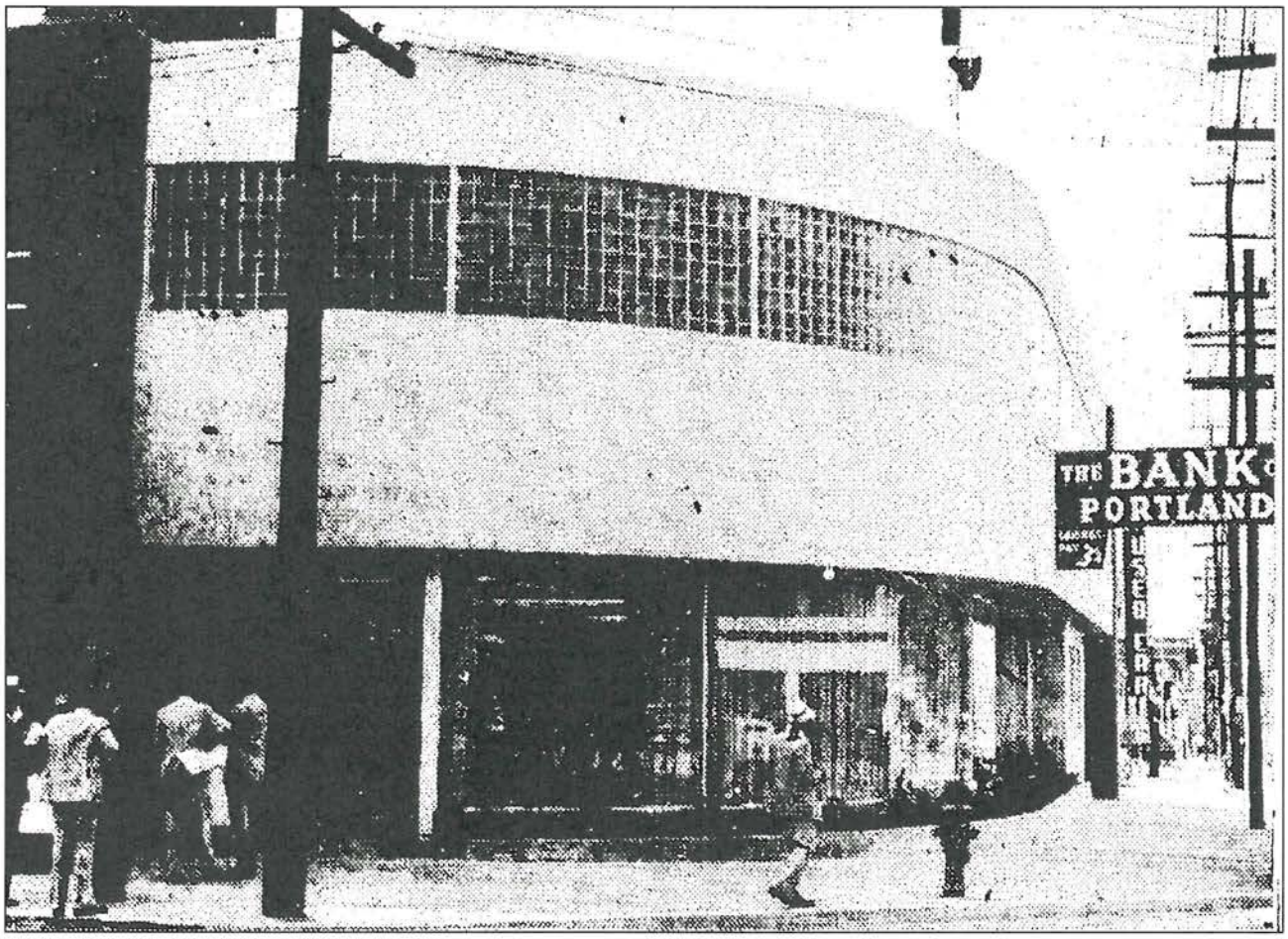
View:. The west building segment's west façade; the view is towards the southeast.



View: A 1941 *Oregonian* photo showing Joe Fisher's used car showroom after it was completed (*Oregonian* 1941).

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Joe Fisher Co./Bank of Portland/Hooper Detoxification Center/Jeanne Rivers Building	
Street Address: 30 NE Martin Luther King, Jr. Blvd.	City, County: Portland, Multnomah



View:. A 1957 *Oregonian* photo showing the building converted into The Bank of Portland (*Oregonian* 1957).

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Oregon & California R.R./ Southern Pacific East Side Division Railroad/ UPRR	
Street Address: First Avenue NE and SE (segment of RR)	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oregon	Township: 1 North Range: 1 East Section: 34
This property is part of a ☒District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble: Oregon & California R.R./ Southern Pacific East Side Division Railroad/ UPRR	
Number and Type of Associated Resources in Grouping/Ensemble: Within the segment, the alignment	

Current Use: Railroad	Construction Date: 1868
Architectural Classification / Resource Type: Structure	Alterations & Dates: 1878 to Roseburg; 1887 to Ashland
Window Type & Material: N/A	Exterior Surface Materials: Primary: Poured Concrete Secondary: Timber Decorative: Concrete and Steel Railing
Roof Type & Material: N/A	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐Poor

A view of the historic alignment of the Oregon and California RR where it travels along SE First Avenue. The view is towards the south with Interstate 5 to the right.

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☐Individually ☒As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: July 23, 2019

106 Documentation: Individual Properties

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Property Name: Oregon & California RR/Southern Pacific East Side Division Railroad/UPRR		
Street Address: First Avenue NE and SE (segment location)	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Oregon & California Railroad	Owner: ☒Private ☐Federal ☐Local Government ☐Other ☐State	

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

The Oregon & California RR/ Southern Pacific East Side Division Railroad/UPRR railroad segment within the project area in Portland, Oregon, is located within Township 1 North, Range 1 East, Section 34, Willamette Meridian. Within the project area the railroad segment runs from SE Ash Street north to a mid-point in Sullivan's Gulch. The area is a mix of industrial and warehousing that was established next to the railroad. Interstate 5 and approaches to Interstate 84 are situated near the rail corridor. More recently, an influx of multi-family housing is growing near the Burnside Bridge.

The alignment consists of two lines of standard-gauge track running north to south on First Avenue on a bed of timbers and rock ballast and, in places, asphalt. An abandoned siding is situated east of the two sets of actively used track. Other features visible at the north end of the segment include a switch track and wye. Trestles depicted in historic photographs are no longer evident. The trackage, ballast, and other associated features have been maintained and replaced over time, and as such are non-historic. The historic alignment on First Avenue within the project area is what is recommended significant.

Significance

The UPRR alignment, earlier known as the Oregon & California Railroad and later the Southern Pacific East-Side Division Railroad, is not officially recorded in the Oregon Historical Sites Database in the east Portland area although it is recorded in other segments of the state. The rail line has strong associations with settlement in Oregon and was instrumental in building Oregon's statewide economy.

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.

Criterion A – *Significant*

The Oregon & California RR/UPRR alignment has strong associations with the settlement in Oregon and was instrumental in supporting growing local commerce north and south into California similarly as the Southern Pacific Railroad ; The Siskiyou Line's recommendation and as concurred by SHPO in 2013 (Bell 2013). The Oregon & California RR/UPRR alignment is recommended to be eligible under Criterion A for its strong associations with the development of the railroad system supporting Oregon commerce and settlement.

Criterion B – *Significant*

The Oregon & California Railroad has strong associations with Benjamin Holiday, an early railroad investor, who was highly influential in building the rail alignment. His involvement was critical and as such the railroad is recommended eligible under Criterion B demonstrating his achievement.

Property Name: Oregon & California RR/Southern Pacific East Side Division Railroad/UPRR	
Street Address: First Avenue NE and SE (segment location)	City, County: Portland, Multnomah

Significance (continued)

Integrity

The UPRR segment within the project area retains historical integrity of alignment and is able to convey to significance through its location, its design in retaining its historical associations and alignment, and use of similar materials that were used overtime, and its associations of maintaining its original use.

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Property Name: Oregon & California RR/Southern Pacific East Side Division Railroad/UPRR	
Street Address: First Avenue NE and SE (segment location)	City, County: Portland, Multnomah

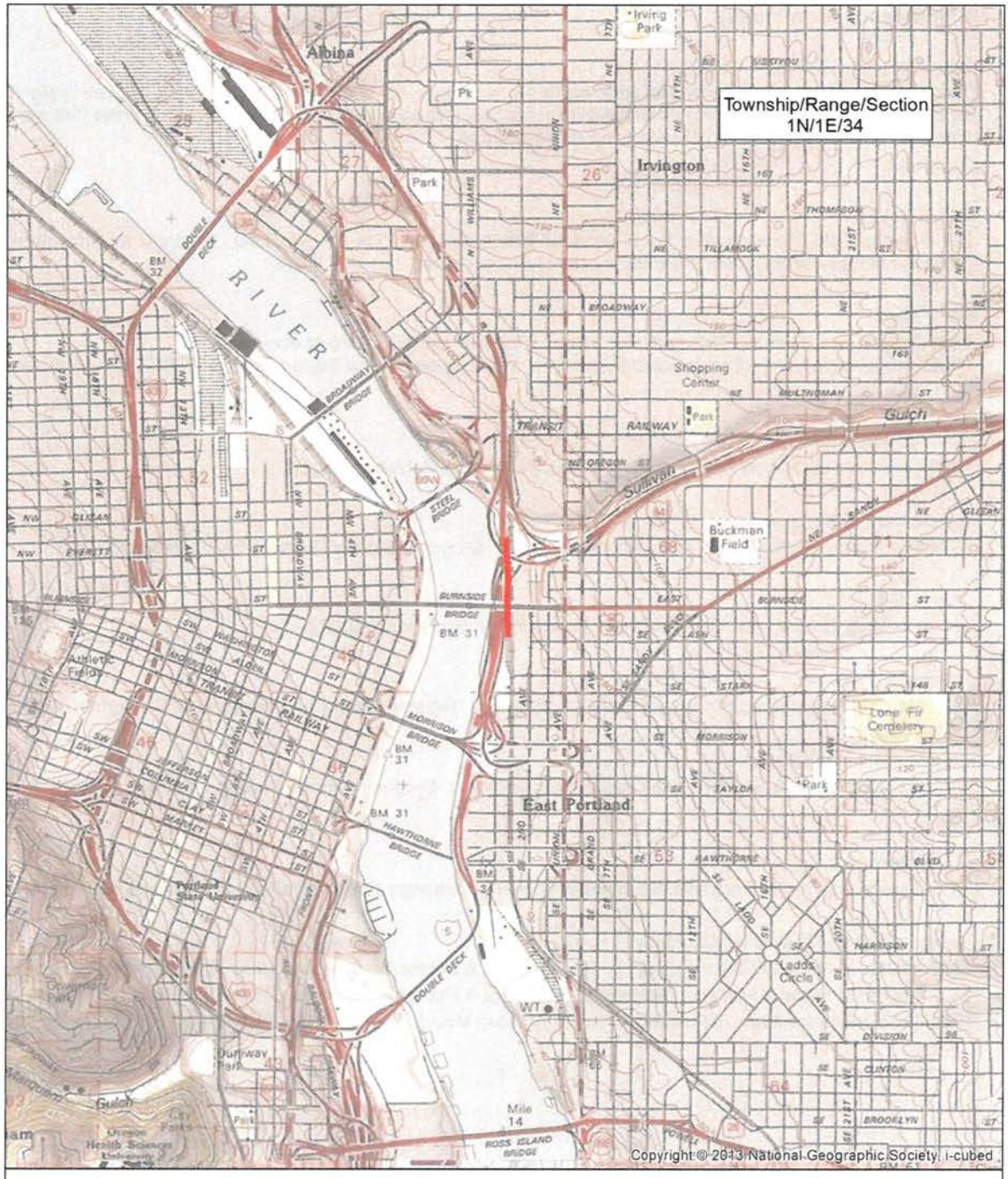


Figure 1. UPRR location.

Property Name: Oregon & California RR/Southern Pacific East Side Division Railroad/UPRR	
Street Address: First Avenue NE and SE (segment location)	City, County: Portland, Multnomah

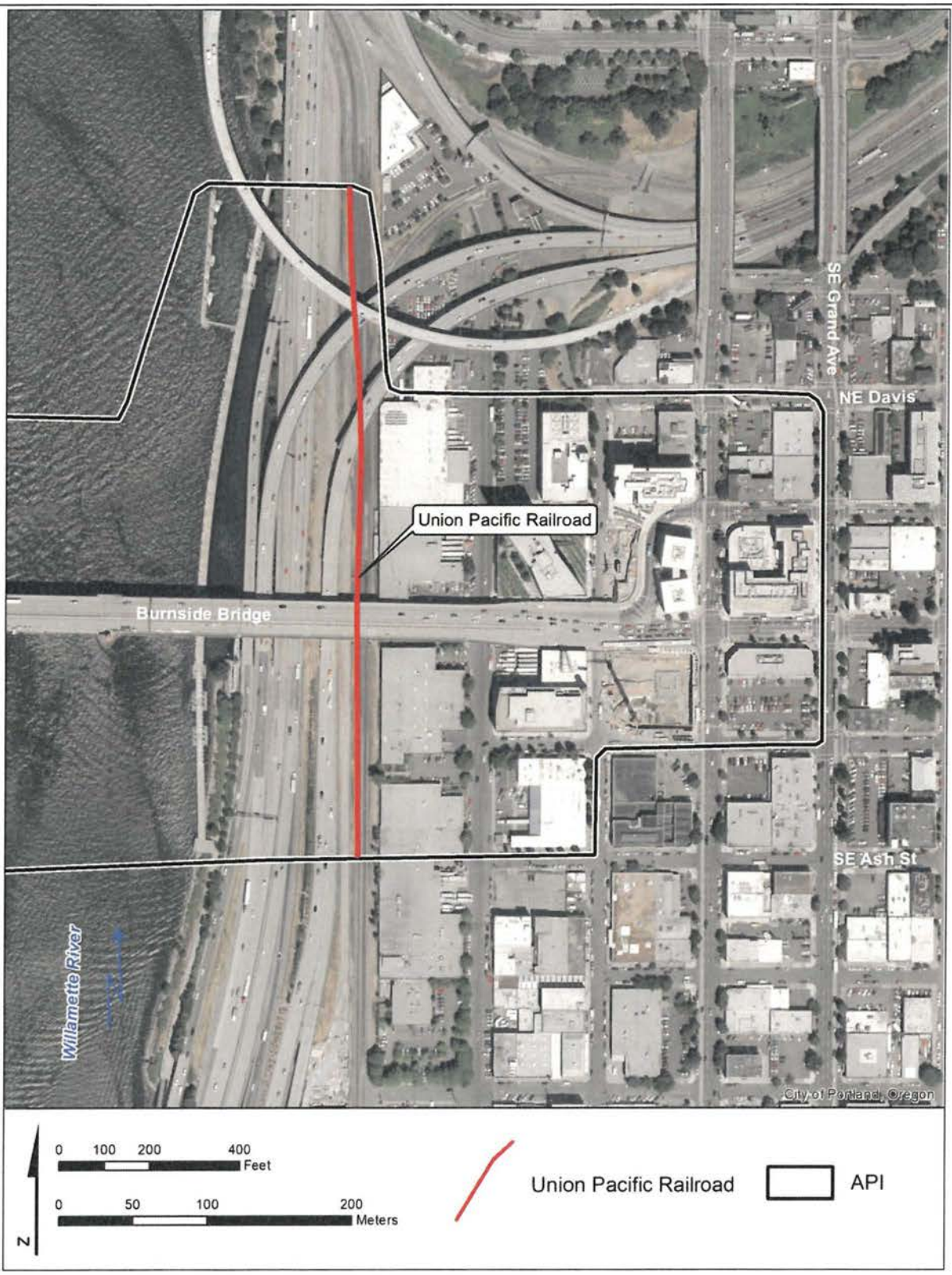
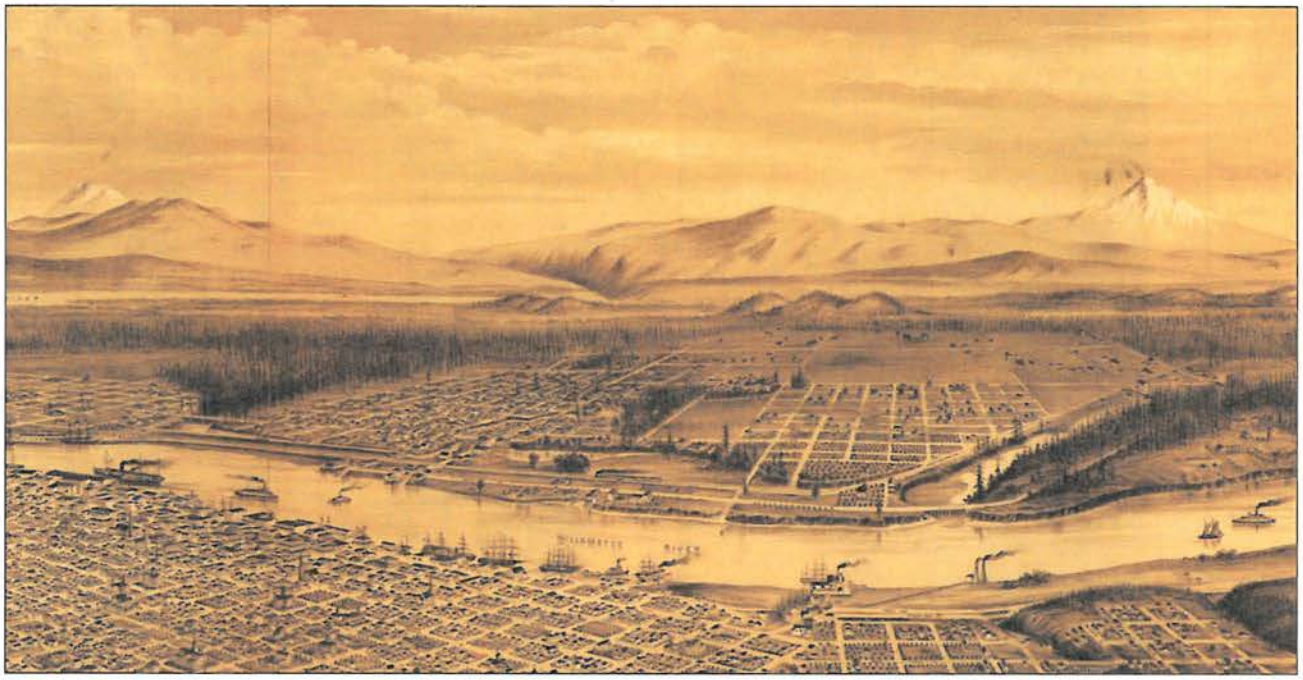


Figure 2. Current imagery depicting UPRR and API.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Oregon & California RR/Southern Pacific East Side Division Railroad/UPRR	
Street Address: First Avenue NE and SE (segment location)	City, County: Portland, Multnomah



View: 1879 panorama with Oregon & California Railroad depicted on east bank of Willamette River.

View: View of the historic railroad alignment (ca. 1918), view is to the east. The eastern approach of the original Burnside Bridge is on the right (Oregon Historical Society OrHi44795).

SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oregon	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Seawall	Construction Date: 1928-1929
Architectural Classification / Resource Type: Utilitarian/ Structure	Alterations & Dates: Railing-1977
Window Type & Material: N/A	Exterior Surface Materials: Primary: Poured Concrete Secondary: Timber Decorative: Concrete and Steel Railing
Roof Type & Material: N/A	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☒Excellent ☐Good ☐Fair ☐Poor

A view of the Portland Harbor Wall and the Ankeny Pumping Station taken from the Burnside Bridge; the view is towards the southwest. Note the original concrete rail panels adjacent to the pumping station.

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: July 23, 2019

106 Documentation: Individual Properties

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Property Name: Portland Seawall / Harbor Wall				
Street Address: Foot of SW Jefferson to Foot of NW Glisan		City, County: Portland, Multnomah		
Architect, Builder or Designer (if known): Olaf Laurgaard, City Engineer	Owner:	☐Private ☐Federal	☒Local Government ☐Other	☐State

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

The Portland Harbor Seawall/Harbor Wall is a wood and concrete structure constructed in 1928-1929 as a part of the Front Street Intercepting Sewer project along Portland's waterfront. The project consisted of building a mile-long wall along Willamette River harbor line and an accompanying sewer system running from Jefferson to Glisan Streets. The purpose of the system was to consolidate the city business center's stormwater lines to a single outflow to the Willamette River and to minimize the risk of flooding in the downtown area. The Harbor Wall is situated on public property along the Willamette River harbor line and extends from the foot of SW Jefferson to NW Glisan Streets. The subject segment contained within this evaluation extends from NW Couch Street to SW Ankeny Street, Section 3, Township 1 North, Range 3 East, Willamette Meridian. The Harbor Wall adjacent to the park walkway is incorporated into today's Tom McCall Waterfront Park (built 1974).

Physical Description

The Harbor Wall extends from NW Glisan Street, south to SW Jefferson Street, measuring approximately 5400-feet long. 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. 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 south 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 along the waterfront, park of the interceptor plan allowing the gravity-fed sewer to flow in high flood stages (Laurgaard 1933:2).

Alterations

Alterations to the wall have been minimal, until the 1970s when the City under took a major plan to revamp Portland's waterfront removing Harbor Drive and creating what would become Tom McCall Waterfront Park, opening up the waterfront to the public. Mitchell Associates created the design plans for replacing the seawall columns similar in design to the original. Steel railings with 1" x 1" balusters visually opened the wall to the river (Mitchell Associates 1977). The overall structure has not been altered since constructed.

Significance

The City of Portland's Harbor Wall is a part of a larger project that the City of Portland undertook in the 1920s building an interceptor sewer project combining a sewer system, pumping station, and the seawall. The overall project saw the removal of buildings along Front Street and derelict wharves along the harbor front completely changing the character of Portland's harbor. Olaf Laurgaard, the City Engineer who served in an important period of the City's growth, conceived the project as the population was expanding, streets now had to accommodate automobile traffic, and the growing demands on the sewage system.

The Laurgaard Plan, as it was commonly known, was a general plan proposed by Olaf Laurgaard in 1920 near the beginning of Laurgaard's career with the City (Laurgaard 1933:1). Laurgaard proposed a number of improvements in a large scheme to improve the west harbor front, razing a number of buildings along Front, building a new railroad terminal along the waterfront, improving bridge approaches, and the elements of the interceptor project (Laurgaard1921).

The interceptor sewer project was constructed to consolidate the sewage drop of "20 west side sewers" into the river at one location and protect against flooding in the City's commercial area near Portland's waterfront (Taylor 1929:31). Two branches

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Significance

of the sewer line and the seawall extended from Ankeny south to Jefferson and north to Glisan (Laurgaard 1933:5). The harbor wall project followed the harbor line along the waterfront and added a 25-foot wide esplanade adjacent to the wall (*Oregonian* 1930:9).

Work on the Harbor Wall proceeded after a series of legal proceedings and the acquisition of land stalled the project. Some questioned the legitimacy of the Harbor Wall as a part of the sewer interceptor project, but it was proven to be an integral part of the project. The Harbor Wall was recognized as the most significant engineering and construction achievement of the project and a testament to Olaf Laurgaard, the project's Engineer of Record (Barbur 1921:27).

J. F. Shea Company was awarded the construction contract in November 1926 with the lowest bid of $2,135,000 (Laurgaard 1933:4). After the death of the company's owner, John F. Shea, the construction project was sublet to Pacific Bridge Company operated by F. W. Swigert who completed the work with oversight from J.F. Shea Company (*Oregonian* 1926:18). City Bridge Engineer, F.T. Fowler oversaw the project under Laurgaard (Taylor 1929:31).

The Harbor Wall's construction entailed a major excavation along the waterfront and building the wooden cribbing for the base structure. From the beginning the excavation crews encountered ground conditions of quicksand, varying sand types, and in other segments "sawmill refuse and miscellaneous fill" (Laurgaard 1933:10). The engineers and construction crews devised creative methods to mitigate for the challenges, which included special machinery for the construction of the wood framed cribs and dumping rock (Taylor 1929:31). Experimental engineering data was put to the test in constructing the base cribs walls and the fill stabilizing the structures (Laurgaard 1933:33). A barge was set up as a concrete plant where the materials were mixed and poured for the concrete bulkhead which was poured in two layers (Laurgaard 1933:64). When the project was completed in 1929, the overall project was hailed as a success and the engineers and contractors were recognized for their efforts.

In 1943, Harbor Drive opened as the downtown route of US 99W travelling near the waterfront. With time, new alternative freeways navigated through the city essentially replacing the older road (Lloyd 2014). With the completion of the Fremont Bridge and the 405 freeway loop, which bi-passed the city's commercial core, Harbor Drive could be closed for waterfront development (*Oregonian* 1973:22; CH2M 1972:42). The Waterfront Plan of the 1970s proposed a complete revamping of the waterfront, eliminating Harbor Drive and creating a parkway along the waterfront, originally known as Waterfront Park. Included in the plan were improvements to the Harbor Wall of replacing the concrete railing with an open metal rail allowing an improvement visual connection to the river. This work was completed in phases from 1975 to 1988, opening officially in 1978.

Over time, the Harbor Wall was tested with success. During the 1948 flood, sandbags were placed in open rail sections and at the base of the concrete panels and held. Again in 1996, volunteers joined city workers in installing plywood panels alongside the railings successfully protecting the city's waterfront. Steel panels have since been constructed to provide a temporary barrier during future flooding (Portland Online 2019).

Olaf Laurgaard

Olaf Laurgaard has strong associations with the planning and the implementation of the 1920s sewer interceptor project as the Engineer of Record. He would later be known as the "father of the Portland waterfront" and the project was considered one of his greatest achievements while working for the City (*Oregonian* 1945:5). Laurgaard's sixteen years serving as Portland's City Engineer were productive and critical to the growing city's infrastructure. He was responsible for $60,000,000 of work including "the laying of some 400 miles of streets and sewers, and the widening of 47 miles of streets" (*Oregonian* 1945:5).

Laurgaard was born in Norway to Olaf Christian and Marie "Mary" Ciclie (Meinhardt) and came to the U.S. as an infant in 1880. His parents located in Wisconsin. Laurgaard obtained a civil engineering degree from University of Wisconsin in 1903 and also naturalized in that year. In Laurgaard's early professional career as a civil engineer, he worked on several waterworks projects: an Okanogan dam project at Conconully, Washington, and moved to a Carey Act project in Central Oregon in 1916 (Franklin 1913:337; *Semi-Weekly Spokesman-Review* 1916:6). He married Goldie while working in Conconully, and they would have two children.

Laurgaard oversaw many city projects and undertook many plans to improve the city's infrastructure. He oversaw many street-widening projects including: the Eastside plan to widen East Burnside, Couch, and Sandy Boulevard, (*Oregonian* 1923a:16, 1923b:65). The harbor improvement project is considered one of his most notable achievements while working with the City.

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

Significance (continued)

Laurgaard became embroiled in a high-profile case that involved the construction of a Public Market along the harbor wall. Mayor Baker, who was allegedly bribed, two City commissioners, and several others associated with the municipal market project including Laurgaard were indicted on lesser charges in 1932. Ultimately the officials and Laurgaard were acquitted of "charges of malfeasance in office, " but politically the damage was irreparable, and Laurgaard was left no choice but to resign in 1933 (The Oregonian 1933a:1; The Oregonian 1933b:3). After his involvement with the Baker trial, Laurgaard relocated to Southern California where he worked as a construction engineer for the Parker Dam project on the Colorado River (*Capitol Journal* 1934:7). He later worked for the Tennessee Valley Authority and during World War II as an engineer for the U.S. Maritime Commission in Alameda, California where he became ill and died in 1945 (*Oregonian* 1945:5).

The Portland Harbor Wall is recommended to be eligible for listing in the NRHP under Criteria A and C as outlined in U.S. Department of the Interior's National Register Bulletin, How to Apply the National Register Criteria for Evaluation.

Criterion A – *Significant*

Under Criterion A, Portland Harbor Wall is recommended eligible for listing at the local level 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.

Criterion B – *Not Significant*

Under Criterion B, properties may be eligible for the NRHP if they are associated with the lives of significant people in our past. The primary person associated with the Portland Harbor Wall is Olaf Laurgaard. However, as engineer of the project, it is more appropriate to evaluate his importance under Criterion C.

Criterion C – *Significant*

Under Criterion C, Portland Harbor Wall is significant 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, and is therefore recommended eligible for listing in the NRHP under Criterion C.

Criterion D – *Not Significant*

Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites and the Portland Harbor Wall can be best interpreted through Olaf Laurgaard's extensive written documentation.

Integrity

Portland Harbor Wall continues to retain historical integrity to convey its significance: Small sections have been altered but overall the alignment and the structure are intact. The Harbor Wall retains historical integrity of its location; its overall structural design; workmanship in terms of the structure; and its riverfront setting; modifications were made to the railing in the 1970s but the majority of materials remain in place as engineered in the 1920s.

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Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

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1933a Last of Market Case Indictments Wiped Off Slate by Circuit Judge. 6 Sept:1. Portland, Oregon.
1933b Laurgaard's Duties End, City Engineer To Quit His Official Desk Today. 21 Nov:3. Portland, Oregon.
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1973 Fremont Bridge opens with a wheeze. 16 Nov:22. Portland, Oregon.

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Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

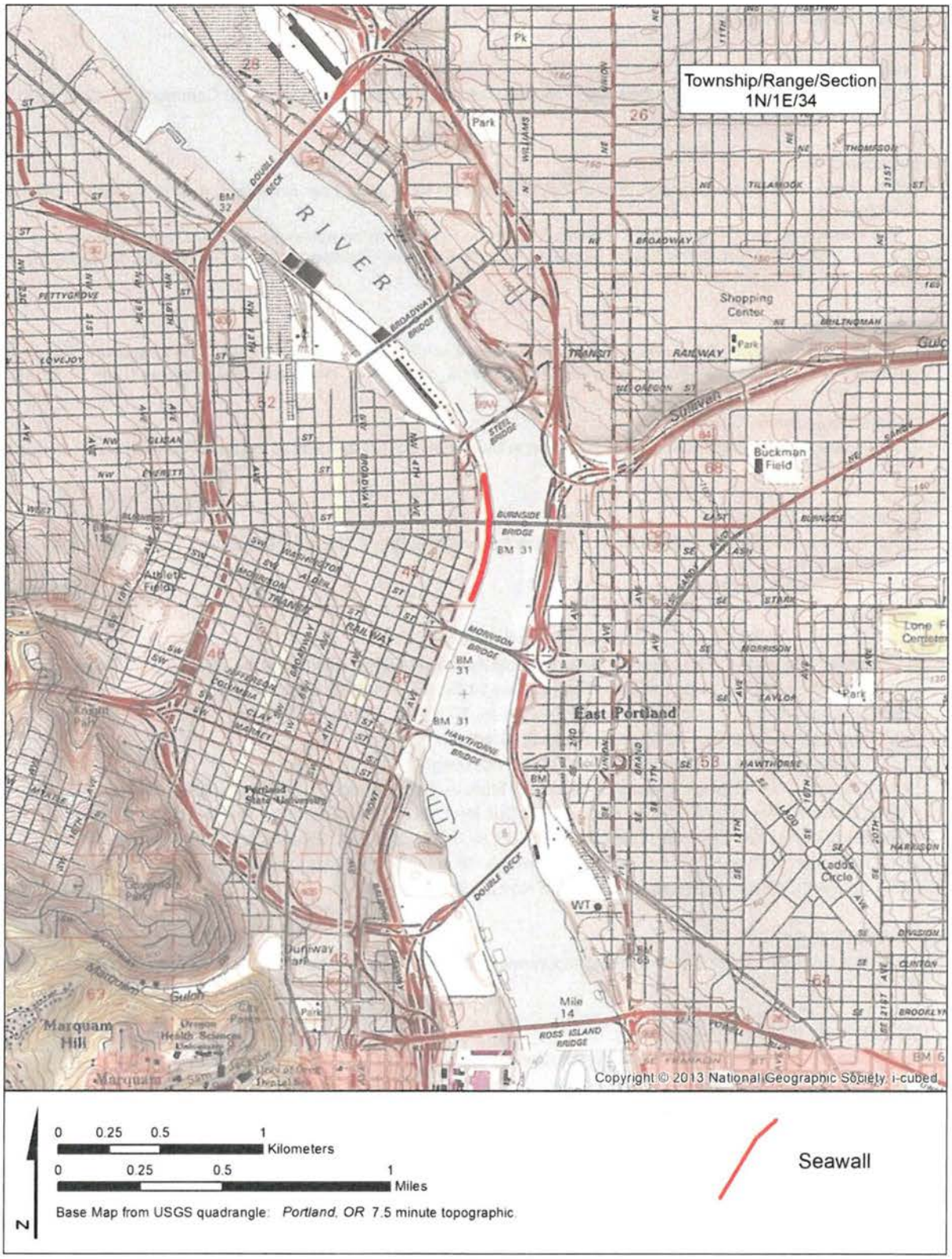


Figure 1. Harbor Wall location within API. *Note*: Harbor Wall extends both north and south outside the API.

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

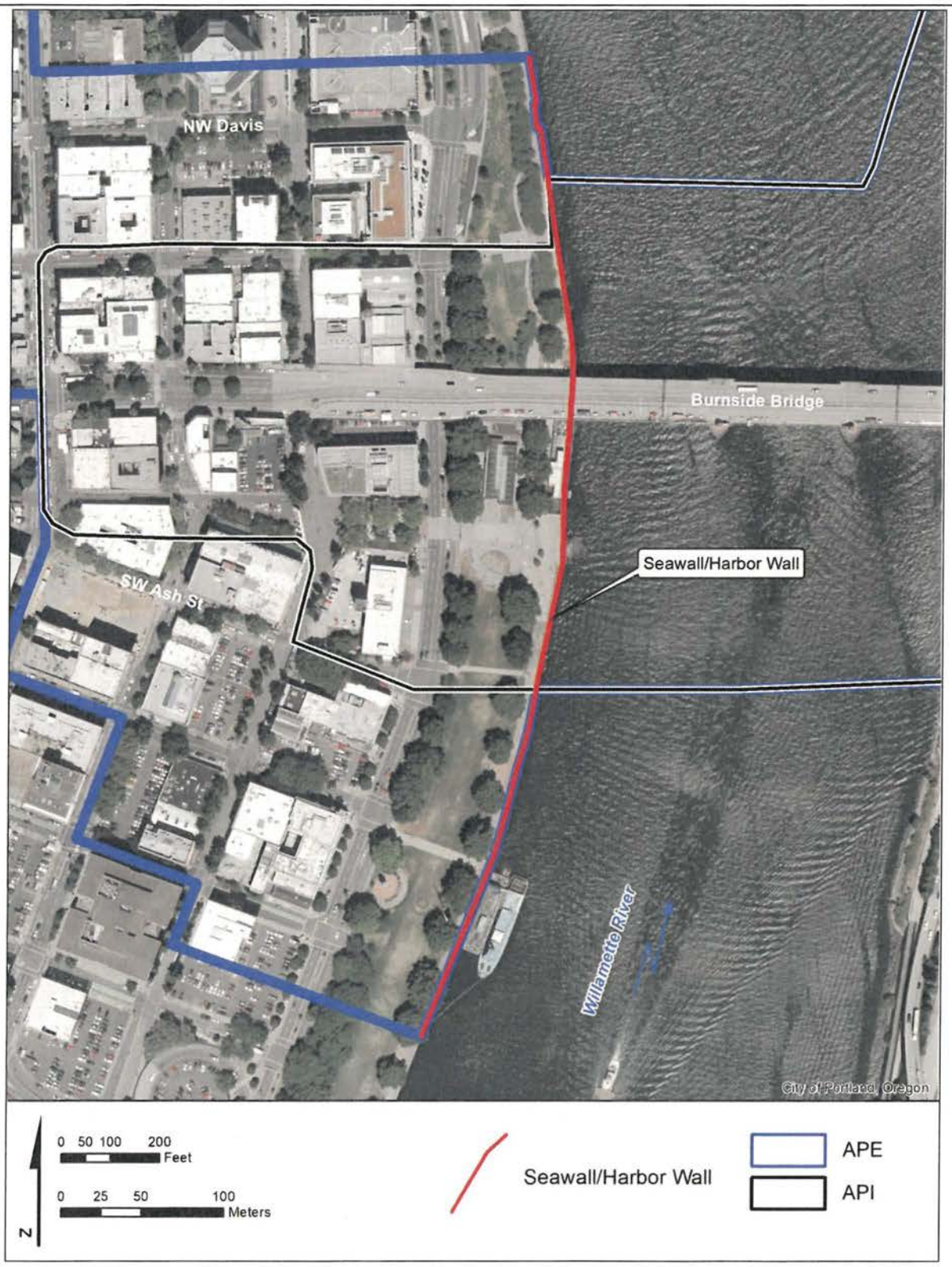
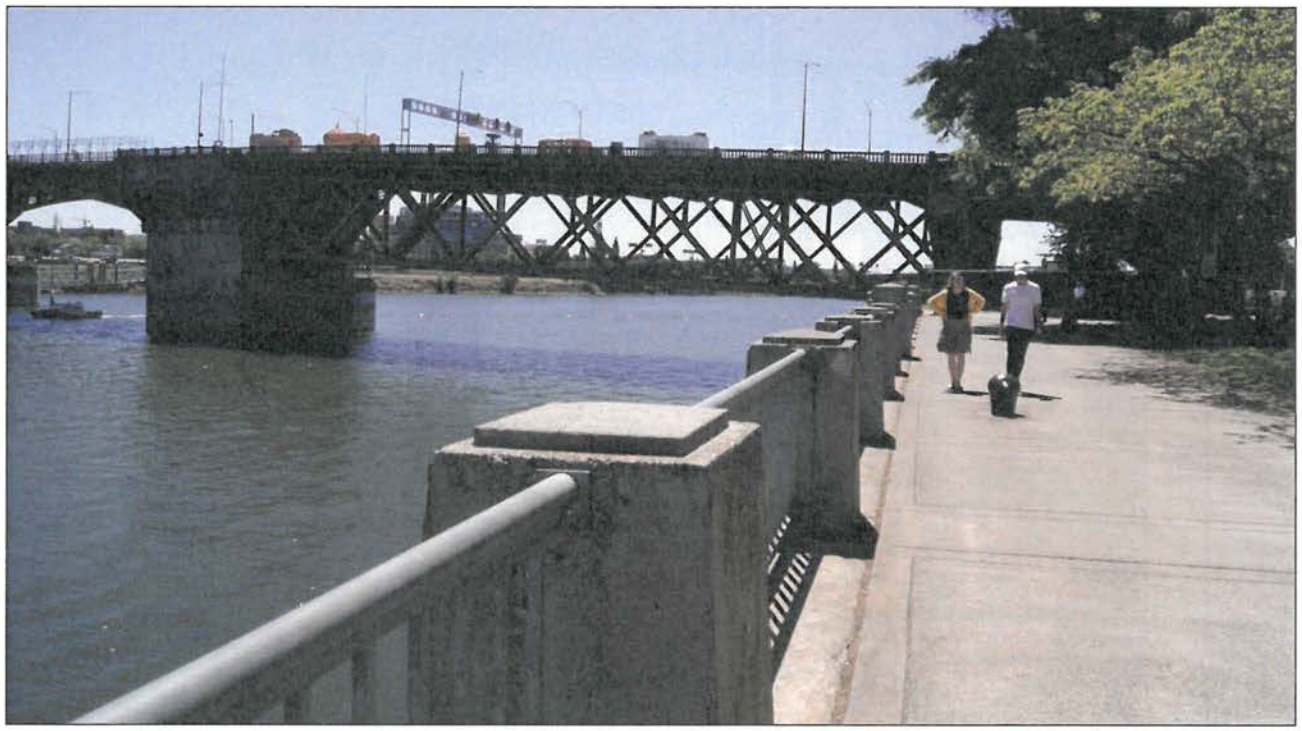


Figure 2. Current aerial depicting Harbor Wall and API. *Note*: Harbor Wall extends outside the API.

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

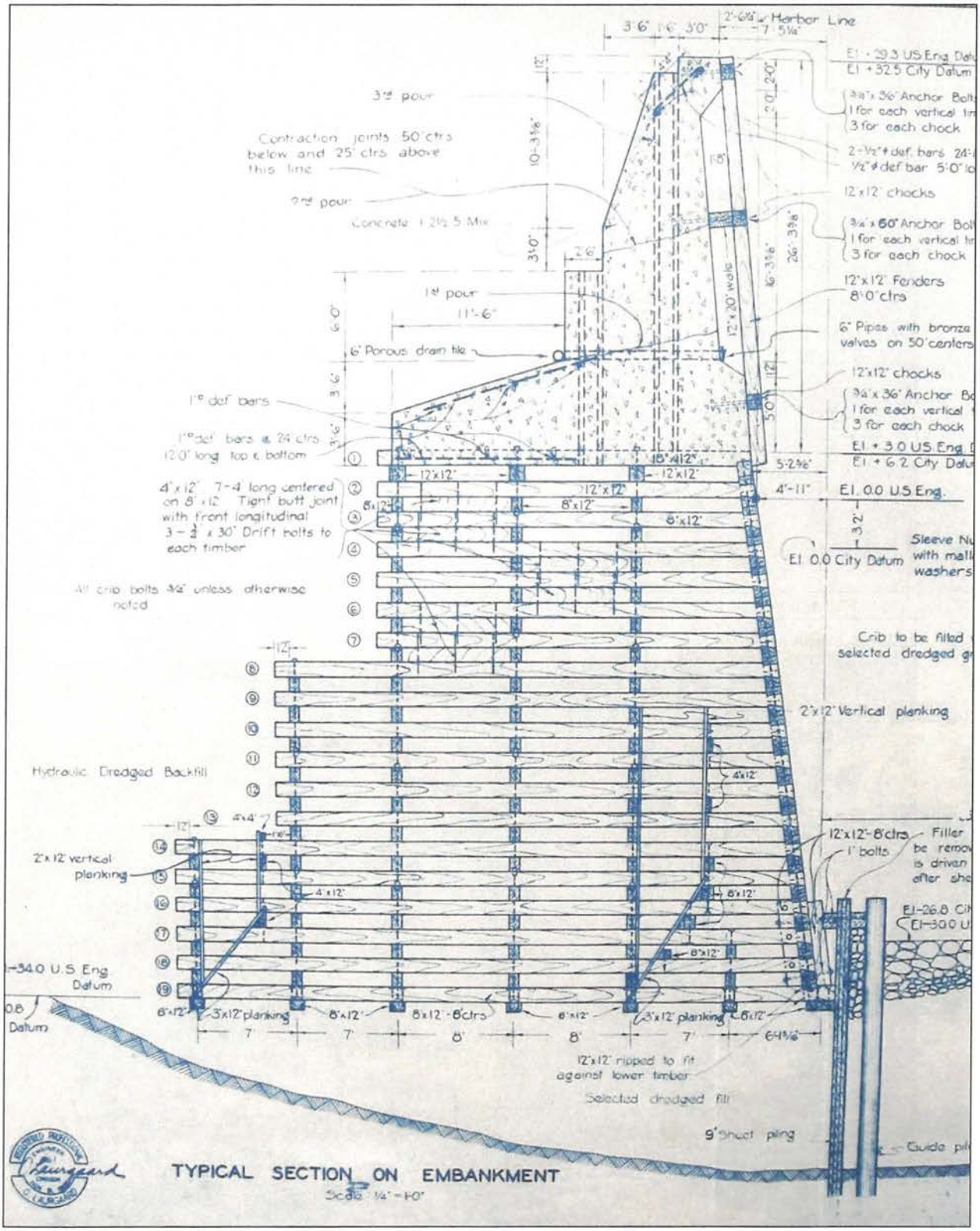


View: Portland Harbor Wall and an example of the 1977 railing modification; the view is towards south.

View: A typical cross section of Portland Harbor Wall cribbing from Olaf Laurgaard's (1933) treatise.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

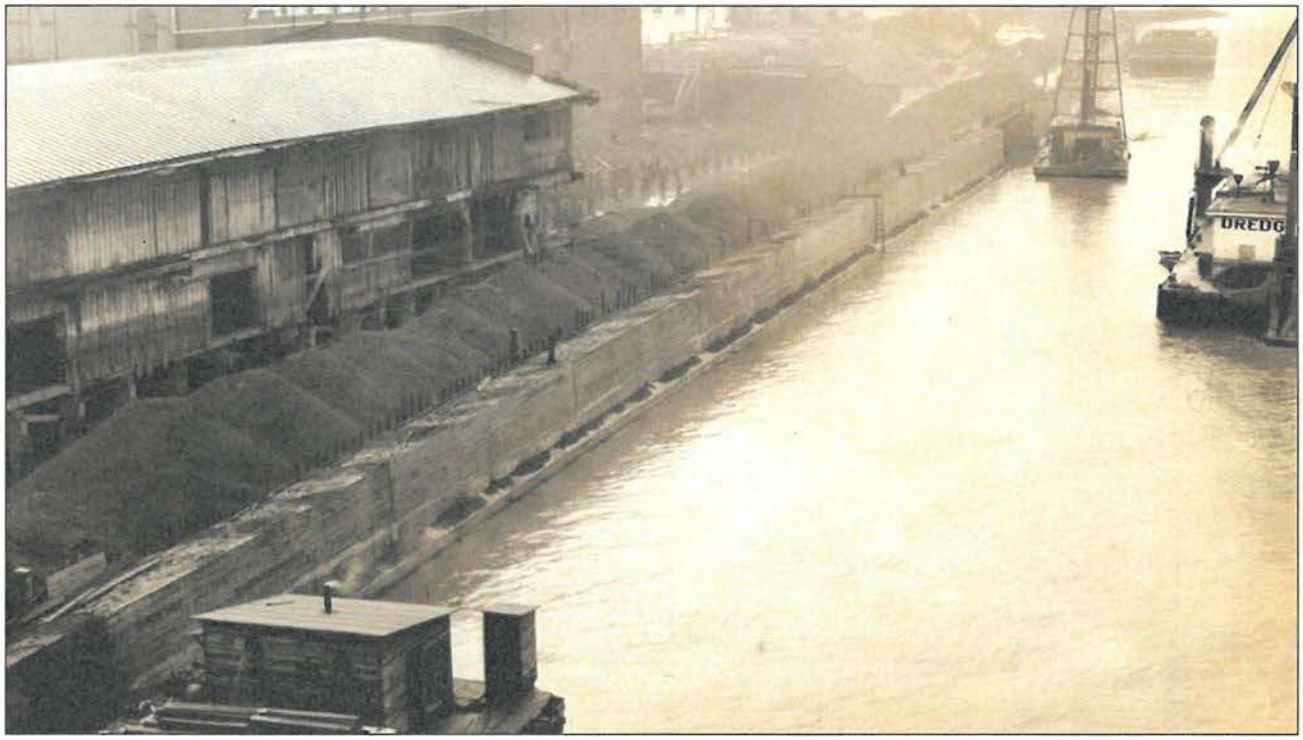
Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah



View: A typical cross-section of the Harbor Wall in Laurgaard's (1933) project report.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah



View: Portland Harbor Wall under construction in 1928, view facing northwest.

View: Portland Harbor Wall prepared for the 1948 Flood. Burnside Bridge is viewed to the north.

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

View: The Harbor Wall where it is built around Pier 1 of the Burnside Bridge, view facing southeast.

View: A small concrete structure built on the Harbor Wall south of Burnside Bridge's Pier 1, view to east.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Portland Seawall / Harbor Wall	
Street Address: Foot of SW Jefferson to Foot of NW Glisan	City, County: Portland, Multnomah

View: The Harbor Wall's original concrete bulkhead and railing where it faces Pier 1, view towards southwest.

SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: The D.P. Thompson Co. Investment property/ Stark's Vacuum Company	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah
USGS Quad Name: *Portland, Oregon*	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Commercial Building	Construction Date: 1921; 1926; 1927
Architectural Classification / Resource Type: Late 19th and Early Twentieth Century Commercial/ Building	Alterations & Dates: 2015
Window Type & Material: store fronts/ steel	Exterior Surface Materials: Primary: stucco Secondary: Decorative: Tile work
Roof Type & Material: flat with parapet, unknown	
Condition: ☐Excellent ☒Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐Poor

Stark's Vacuum Company's south building segment showing the south and east facades; view to the northwest.

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

Property Name: The D.P. Thompson Co. Investment property; Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah
Architect, Builder or Designer (if known): John G. Wilson (architect); J.G. Killgreen and Flynn (builders)	Owner: ☒Private ☐Local Government ☐State ☐Federal ☐Other

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

The former D.P. Thompson Company Investment property is a one-story, Street Car-era, Early Twentieth Century Commercial building. The brick and concrete building complex was constructed in two phases, during the 1920s, and one circa 1916. The complex takes up the east half of the block facing NE Grand Avenue and includes the attached ca. 1916 building facing west onto NE Martin Luther King Blvd. in Portland, Oregon. The building complex is situated in the Central Eastside neighborhood, which is a mix of commercial, industrial, warehousing, and residential uses. The neighborhood has seen a recent rapid expansion in the changes of use in historic buildings and an increase in modern commercial and large-scale multi-family buildings. Local builder, J.G. Killgreen constructed two building sections in the 1920s for The D.P. Thompson Company, an investment company that built a number of commercial buildings and warehouses during the early Twentieth Century. Portland architect, John G. Wilson, prepared the drawings for south half of the building.

The D.P. Thompson Company constructed the northern building segment in 1921 on the northeast quarter block facing NE Grand Avenue and NE Davis Street. The building originally housed a trucking company. New building occupants, Fields Motor Car Company, took over the building in 1926-1927 and an addition constructed on the southeast quarter block facing NE Couch Street and NE Grand Avenue.

The D.P. Thompson Company, as owners, let out contracts for at least two phases of work on the building in the 1920s. The building was constructed on land held by the Thompson family, "J.N. Teal et al", and then transferred to The D.P. Thompson Company in 1909. The plot consisted of the east half of the block, Lots 5, 6, 7 & 8 of Block 108, East Portland (Oregonian 1909:14). At that time, the area was a mix residential and commercial, most of the block was populated by residences, except for a blacksmith shop specializing in wagons and carriages at the northwest corner (Sanborn Fire Insurance Co. 1908-1909).

Physical

The former D.P. Thompson Company investment property complex has a rectangular footprint consisting of two separate building episodes. The north building was built in 1921; the south half built several years later in 1926. The entire building complex stands one-story tall. Each phase has a flat roof with parapet and stands on a concrete foundation. The two segments are similar in design, scale, and detailing with some slight variations. The east segments feature shaped parapets with shallow gables. The exterior walls are brick and concrete, covered with stucco and the floors are concrete. The south building segment has more detailing as it was intended at an auto showroom. The south building bays are defined by capped pilasters, sign band, and above cornice. Remnants of decorative tile work are present in the sign band. The parapet's gable motif incorporates an elongated shield motif.

The north facade is divided into six large window bays with modern storefronts. One bay features trim work surrounding the former vehicular entrance. The east façade's north half has modern ca. 2015 steel storefront windows, as well. Modern, metal flat canopies shelter the entrances. A large vehicular bay centered in the east façade's north half is surrounded by trim and protected by attached bollards at the former door opening's base. The windows on the south half are circa 1960s metal-framed storefronts and older canvas awnings. A neon wall sign and blade sign of Stark's Vacuum Company faces NE Grand Avenue above the retail store's main entrance.

The south façade is divided into four bays defined by capped pilasters. The two western most bays are further subdivided in half by narrow pilasters. The windows feature ca. 1960s storefronts. The panels above feature diamond-patterned tile work centered within the main four bays. Another Stark's neon sign hangs from the corner.

The north segment's west wall is utilitarian showing a mix of masonry materials: concrete, painted brick and stucco clad parapet. Some former openings are infilled openings and others have modern steel storefront windows, and canopies over modern entries. The south building is attached to the west neighboring building.

The northwest quarter of the block is an open parking lot that serves the north building's current occupant. The 1950 Sanborn map depicts the open space as a used car lot also containing four small structures projecting from the north building's west wall providing associated auto services: tire service, washing, steam cleaning, polishing and repairing (Sanborn Fire Insurance Co. 1908-1950).

Property Name: The D.P. Thompson Co. Investment property; Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah
Architect, Builder or Designer (if known): John G. Wilson (architect); J.G. Killgreen and Flynn (builders)	Owner: ☒Private ☐Local Government ☐State ☐Federal ☐Other

Description (continued)

The D.P. Thompson Auto Building was an investment property constructed for the commercial transportation industry in a period of expansion of the industry. Initially used for a trucking company, Purple Trucking Company, within several years, auto dealership, Fields Motor Car Company took over the facility, and in this time period expanded into three connected building segments. The D.P. Thompson Company retained ownership of the building while leasing it to various dealerships through the 1920s-1940s.

The D.P. Thompson Co. hired Killgreen & Young contractors in 1921 to build the first building on the northern half of the land plot for an estimated $16,000. A lease was set up with The Purple Trucking Company to move into the building, once it was completed. The truck company's east side operation remained in the building until circa 1925-1926 (Oregonian 1921:9; R.L. Polk & Co. 1925; 1926; City of Portland 1921).

The D.P. Thompson Company again contracted J.G. Killgreen for the construction of a second building in 1926. Architectural drawings were prepared by John G. Wilson. The new building, constructed directly south of the original building was similar in design and scale (City of Portland 1926). J.G. Killgreen teamed up with J.K. Flynn under the company name, Killgreen & Flynn (R.L. Polk & Co. 1925). The plan was to have the building completed in time for the opening of the Burnside Bridge (*Oregonian* 1926).J.G. Killgreen completed additional repair work in 1927 for a cost of $5,000 (Oregonian 1927:10).

Fields Motor Car Co., a Chevrolet car dealership, moved into the new building complex, under the terms of a lease with The D.P. Thompson Company. The newly completed building became the dealership's company's headquarters. The Chevrolet dealership operated a number of lots and showrooms spread across the city, several of them relatively close in and near the headquarters (Lockley 1928; R.L. Polk & Co. 1930). The transition to the new building may reflect the company's change in leadership from Leroy R. Fields, the company's president who died in 1927, to his brother and former vice-president, Arthur L. Fields (Lockley 1928). The completion of the Burnside Bridge may have been another factor.

Polk's Portland City Directories demonstrate that several different car dealerships occupied the building complex in the years following Fields Motor Company relocation further south by 1937. W.W. Shipley Co., another auto dealership, took over the facilities by 1937 and in the early 1940s; Joe Fisher Dodge-Plymouth Distributor housed its east side shop within the building (R.L. Polk & Co. 1937, 1943). Lee Cosart Motor Company followed from ca. 1952 to ca. 1959, and Dodge City, Inc. by 1960 (R.L. Polk & Co. 1952, 1959, 1960). A 1947 photo of NE Grand Avenue shows the building's south end. The Plymouth–Dodge dealership is painted white and covered with painted signage advertising their products graphics above the windows and the south east corner pilaster is emblazoned with "Plymouth" "Dodge". A neon-lit blade sign hung near the building's southeast corner "Plymouth, Dodge, Trucks."

Starks Vacuum Company later moved into the building. The building was a local fixture with its iconic neon signage and vacuum museum through the last half of the twentieth century. Stark's used the north half for warehouse storage. A photo depicting the building prior to the 2015 remodel shows the east façade window and door bays boarded up, while retaining several vehicular bays on the north wall.

Stark's Vacuum Company recently subdivided the building space redeveloping the north half into retail/creative office spaces in 2015. Stark's vacuum showroom is situated in most south half. Hennerbery Eddy prepared design improvements (nextportland 2015).

The northwest quarter of the block is an open parking lot that serves the north building's current occupant. The 1950 Sanborn map depicts the open space as a used car lot also containing four small structures projecting from the north building's west wall providing associated auto services: tire service, washing, steam cleaning, polishing and repairing. Auto Upholstery services were situated in the west facing building (Sanborn Fire Insurance Co. 1908-1950).

History

The D.P. Thompson Co. Building is situated in the former city of East Portland, constructed several decades after the annexation of East Portland with City of Portland in 1891. The completion of the first Burnside Bridge in 1894, and the

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Description (continued)

addition of streetcar lines encouraged residential and commercial growth in the immediate area making land in the vicinity attractive to investors like D.P. Thompson Company. As the east side of Portland grew and demands and services made it ripe for development, residences near the east of bridge no longer represented the highest and best land use and were replaced by commercial buildings in the 1910s- 1920s (Sanborn Fire Insurance Co. 1909; 1924-1928)

The introduction of motorized vehicles spurred a number of commercial enterprises replacing blacksmith shops and livery stables. Automobile ownership in Portland, and the U.S. would exponentially grow during the early Twentieth Century. Automobile ownership was spurred by Henry Ford's introduction of the Model T, in 1908 and the car's availability from Ford's mass production lines established in 1913. Ford's innovations in the Model T, how it was manufactured and approachable cost would significantly influence American culture (Flink 1972).

In Portland, many early automotive businesses were attracted to Portland's eastside near Martin Luther King Blvd and Grand Avenue as car ownership grew in the 1910s and 1920s. This increase continued as Multnomah County, vehicle registration more than doubled from 36,000 in 1920 to 96,000 in 1930 (Abbott 1995:47).

As car ownership expanded in the U.S., the consumer desired more than the basic Ford production car. In the mid-1920s, General Motors established control of the American market by developing strategies to sell more cars through planned obsolescence, sales, marketing, and financing (Flink 1972). It was at this pivotal time that Fields Motor Company began expanding its business and made the subject building its headquarters for selling Chevrolets. By 1929, car production reached its highest numbers and Fields place in the market made them a successful local business enterprise (Flink 1972;). Locally, demands for auto services on Portland's east side encouraged the growth of parking garages, repair garages and auto dealerships along Grand Avenue and Martin Luther King Blvd (Union Avenue). The D.P. Thompson Company building was built in the 1921 on cusp of this, and continued to expand the building to meet the needs the growing commercial market. City Directories demonstrate that auto businesses typically populated several blocks with new car sales, used cars, and repair services.

The D.P. Thompson Company

The D.P Thompson Company was a family business originating from the estate of David P. Thompson, a leading businessman who died in December 1901. Both Mr. and Mrs. Thompson had long ties to Oregon both arriving as young people in the 1840s and early 1850s. Mr. Thompson travelled overland to Oregon City in 1853 where he worked to build a new life. Thompson initially cut wood and would find work as a surveyor eventually marrying the daughter of another surveyor, and later managed a mill. Mr. Thompson eventually developed a thriving construction company that built the Oregon Railway & Navigation Railroad through Eastern Oregon. He became heavily involved in banking and Republican politics. Over the course of his career, Thompson served temporarily as the governor of the Idaho Territory (1875-1876), as Portland's mayor, in the State Legislature, and an unsuccessful run for the State governor. Thompson's last political post was an appointment as an Emissary to Turkey in 1892-1893 (Oregonian 1892:10; Oregonian 1893:10). Thompson's wife, Mary R. Meldrum, had ventured west with her parents, John and Susan Meldrum, in 1845, also landing in Oregon City. She and Thompson married in 1861 (Oregonian 1901:1,10). They had a son, Ralph, and two daughters, Bessie M. and Genevieve (Oregonian 1938:4).

Mr. Thompson left a sizable estate when he died in 1901. His estate was split between Mrs. Thompson, their two daughters, and provisions were made for Ralph, who apparently had disabilities. Investment funds, to be used in real estate ventures, were set aside to ensure continued financial support of Ralph (Oregonian 1901:10). The D.P. Thompson Company may have worked for this purpose, while also maintaining the family's wealth. Son-in-law, Joseph N. Teal, married to their daughter, Bessie M., was the executor of Thompson's estate (Oregonian 1909:6). Teal, an attorney and as a trusted member of the family's business holdings, was the leading force behind the D.P. Thompson Company, serving as its president. Thompson's widow, Mary R., was the company's vice-president (R. L. Polk & Co. 1913). The company operated into the 1940s, the daughter later becoming the company president. The company actively invested in numerous projects constructing commercial, and industrial buildings on the west and east sides of the Willamette River. When Mrs. Thompson died in 1938, she also left a sizable estate valued at $750,000. The bulk of the estate was passed to the daughters (Oregonian 1938:4).

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Description (continued)

Joseph N. Teal

Joseph Nathan Teal, the Thompsons' son-in-law, also came from a prominent, Portland pioneer family. His father, Joseph Teal, had successful dealings in Portland's real estate market. In 1870, the young Teal lived in his parent's large household with a number of servants and business staff all living under the same roof (U.S. Bureau of Census 1870). Teal worked as a rancher in Eastern Oregon, and later obtained a law degree. As an attorney, Teal was instrumental in waterway issues related to shipping rates along the Columbia River. In the 1920s, he was a U.S. Shipping Commissioner (Corning 1989:239). Teal married Bessie N. in 1894 and by the time of the 1900 Census, their home also sheltered Bessie's parents and her sister, Genevieve, who was still in school (U.S. Bureau of Census 1900). After Thompson died in 1901 the family formed the D.P. Thompson Company, Teal serving as president.

Fields Motor Car Company

In the early years of the building, circa 1927, the building became the headquarters of Fields Motor Car Company, a successful, car dealership. Taking advantage of the growing auto market, the company began as Regner & Fields selling Fords. Brothers, Leroy R. Fields and Arthur L. Fields, formed their own company, Fields Motor Car Company in 1919 selling Chevrolets (Lockley 1928; U.S. Bureau of Census 1910). By 1927, their operations were spread across the city with "9 Stores and Lots", many of which were situated on Portland's east side (Oregonian 1927:27). Arthur Lewis Fields took over the company after the death of his older brother, Leroy R. Fields in 1927.

Arthur L. Fields

Arthur Lewis Fields was born and raised in Portland. Born to Lewis R. and Lillie Fields in 1887. He would spend to two years studying at Stanford University before settling in Portland to establish a career. Fields took on several jobs before partnering with his brother in the car business in 1916. They joined A.W. Regner in Regner & Fields and eventually established their own company in 1919 (S.J. Clark 1928). A.L. Fields developed into a noted civic leader. He was involved in many Portland activities and eventually became the president of the Portland Chamber of Commerce. His business continued to prosper on the Portland's Eastside, near the end of his career the business was known for its large neon sign at the west of the Burnside Bridge, "Fields Chevytown." Fields died in 1969 and for a while his wife took over the business with the company manager.

John G. Wilson

John Graham Wilson, a Portland-based architect, worked in the Portland from the early 1900s until his death in 1941. Though not well recognized, Wilson was responsible a fair number of buildings in the Portland area. Those noted in the *Oregonian* included mostly commercial buildings: retail stores, garages, industrial buildings, and at least a few hotels. Of the few known works, most have been lost with time or are heavily remodeled. Of the buildings investigated, the subject building is one of his nicest, intact examples. Hesse-Martin Iron Works (1917), a utilitarian industrial building located between SE 9th and 10th Avenue on SE Taylor remains fairly intact. Hotel Gratton (1912) in Milwaukie was demolished in 2000 (*The Oregon Daily Journal* 1911; City of Milwaukie 2020).

Born to Charles and Isabelle Wilson in 1871 in Illinois, John G. Wilson moved with his parents to Portland circa 1880 (1910 U.S. Bureau of Census). Of the family's six children, three would follow their father, Charles, into the building trades. John G. Wilson worked as an architect and his two brothers James and Edward, a contractor and carpenter (U.S. Bureau of Census 1920). John gained experience working as a draftsman for Whidden and Lewis circa 1902 and in Emil Schact's architectural office circa 1905 (Ritz 2002; R.L. Polk & Co. 1902; 1903; 1905). He soon ventured out on his own, briefly working with William Travis Jr. circa 1910 (Ritz 2002). Practicing architecture in the early Twentieth Century, Wilson was grandfathered in as a registered architect (Ritz 2002). He worked with both the D.P. Thompson Co. and Killgreen and Flynn on several construction projects in addition to the subject building. His work after this work in the 1920s, was not apparent in local news outlets although he maintained an office until his death in 1941 (Findagrave.com 2020).

J.G. Killgreen

John G. Killgreen was an active Portland building contractor from the late 1890s into the late 1930s. He also briefly operated a lumber mill near Milwaukie (Oregonian 1898:7; U.S. Bureau of Census 1920). He constructed a number of

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Description (continued)

houses, commercial buildings, churches, and schools in Portland (Morrison/Hayden 1986). Several of these were fairly substantial commercial projects for D.P. Thompson Co. during 1908-1909; similarly was the former D.P. Thompson Company Investment property built in the 1920s (Shellenbarger 1992). His two sons would carry on the contracting profession forming separate construction companies in the 1920s.

Killgreen hailed from Iowa, and his wife, Mabel Scott, emigrated from Canada in 1900 (U.S. Bureau of Census 1920). The family lived in northeast Portland and by 1920 lived in Milwaukie, in a home added onto in a Craftsman style circa 1910, perhaps by Killgreen (Morrison/Hayden 1984). The family later moved back to Portland in the late 1930s. Killgreen died in 1944 (Oregonian 1944:7).

Significance

The D.P. Thompson Company building complex is recommended to be eligible under Criteria A and C.

Criterion A, Significant: Under Criterion A, the D.P. Thompson Company building complex is recommended to be eligible for listing for its historical associations with the auto industry and the commercial enterprises that expanded Portland's east side as vehicular ownership increased. Constructed during the 1920s, the building reflects a time that auto ownership doubled in the Portland area.

Criterion B, Not Significant: Under Criterion B, the D.P. Thompson Company building complex has no associations with specific people as it was constructed and owned by a company made up of family members, although named for a significant deceased person, D.P. Thompson. As the building was not found to have associations with specific people important in history, it therefore is not considered eligible for listing in the NRHP under Criterion B.

Criterion C. Significant: Under Criterion C, the D. P. Thompson Company is representative of the auto dealership/garage type of building constructed in the 1920s. Constructed by J.G. Killgreen and designed by Portland architect John G. Wilson, the building complex is a good example of an auto-garage building of this period, as such the building is recommended for listing in the NRHP.

Criterion D, Not Significant: Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites and in the case of the D.P. Thompson Company Automobile garage information can be yielded through written documentation.

The building complex retains integrity of location, setting, feeling and association; there is some loss of integrity in its design and materials with door storefronts altered on the north and west segments, though the bays are left intact; overall the building complex is representative of historic period from 1921 to the 1960s.

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Property Name: The D.P. Thompson Co. Investment property/ Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah

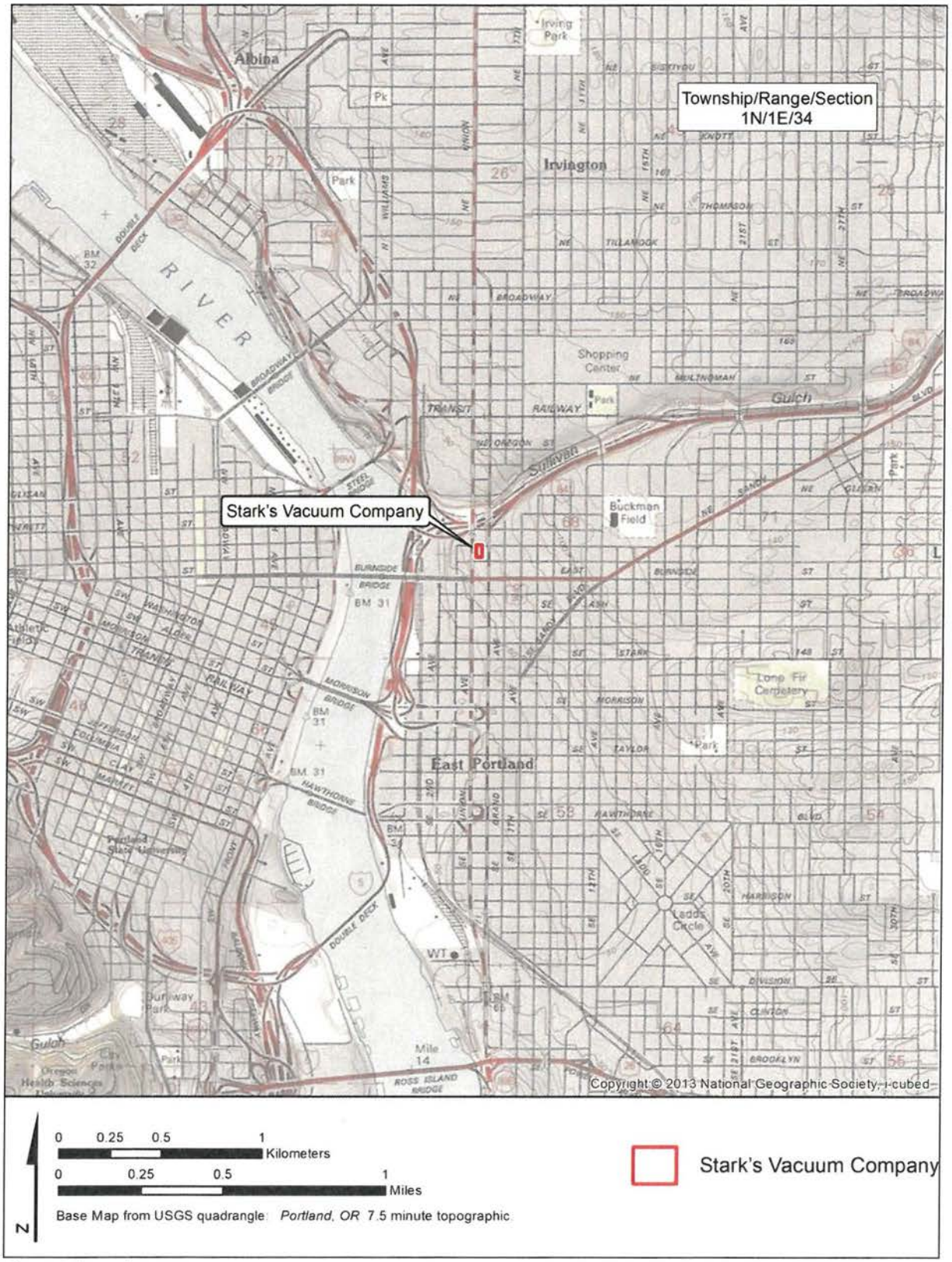


Figure 1. Location map.

Property Name: The D.P. Thompson Co. Investment property/ Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah

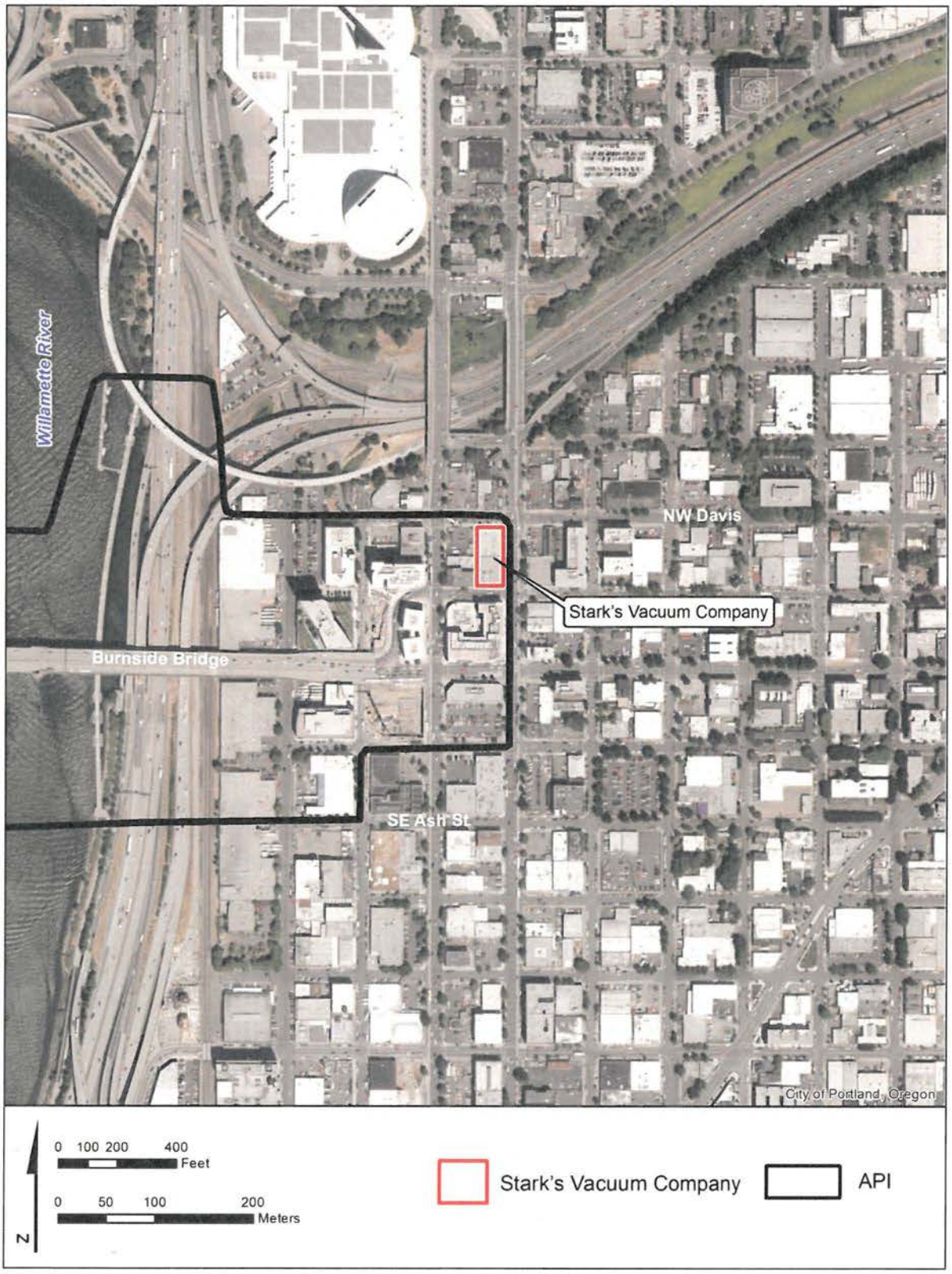


Figure 2. Current imagery of Stark's Vaccum Company building and API.

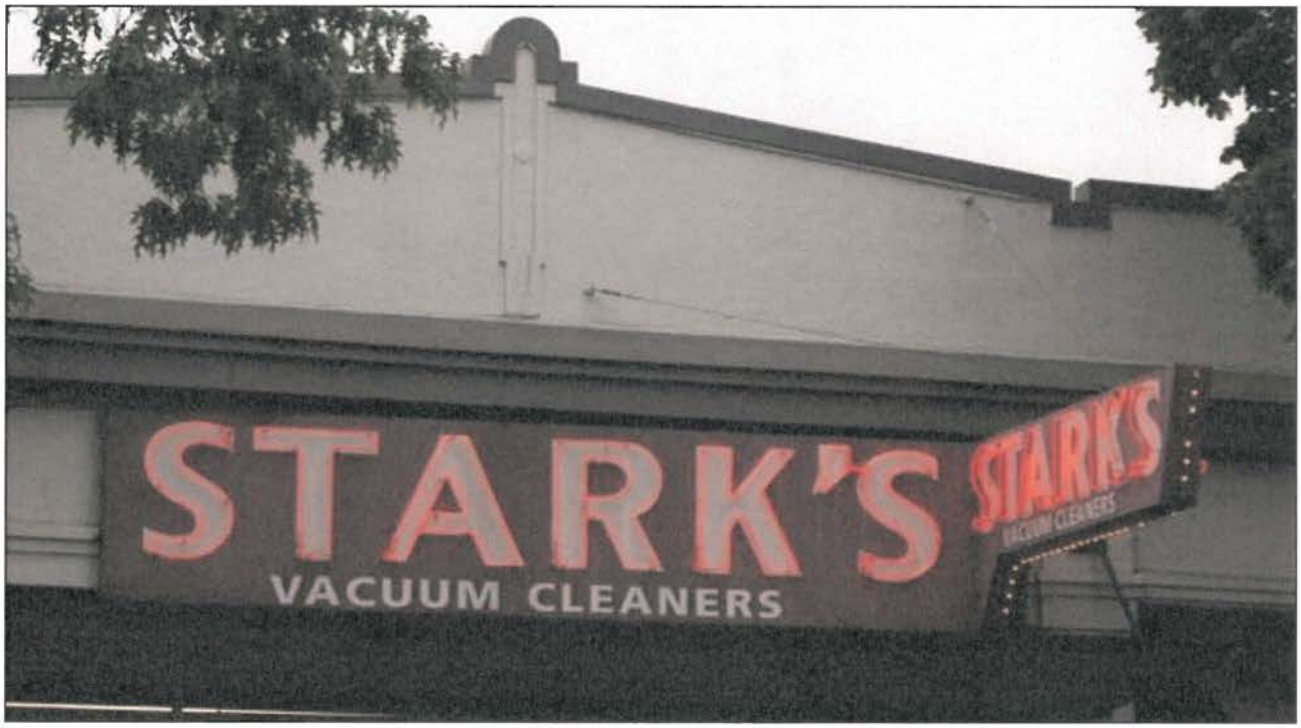
SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: The D.P. Thompson Co. Investment property/ Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah

View: The north building segment (1921) showing the east and north facades; view to the southwest.

View: The south building segment (1926) showing the south façade; the view is to the north-northwest.

Property Name: The D.P. Thompson Co. Investment property/ Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah

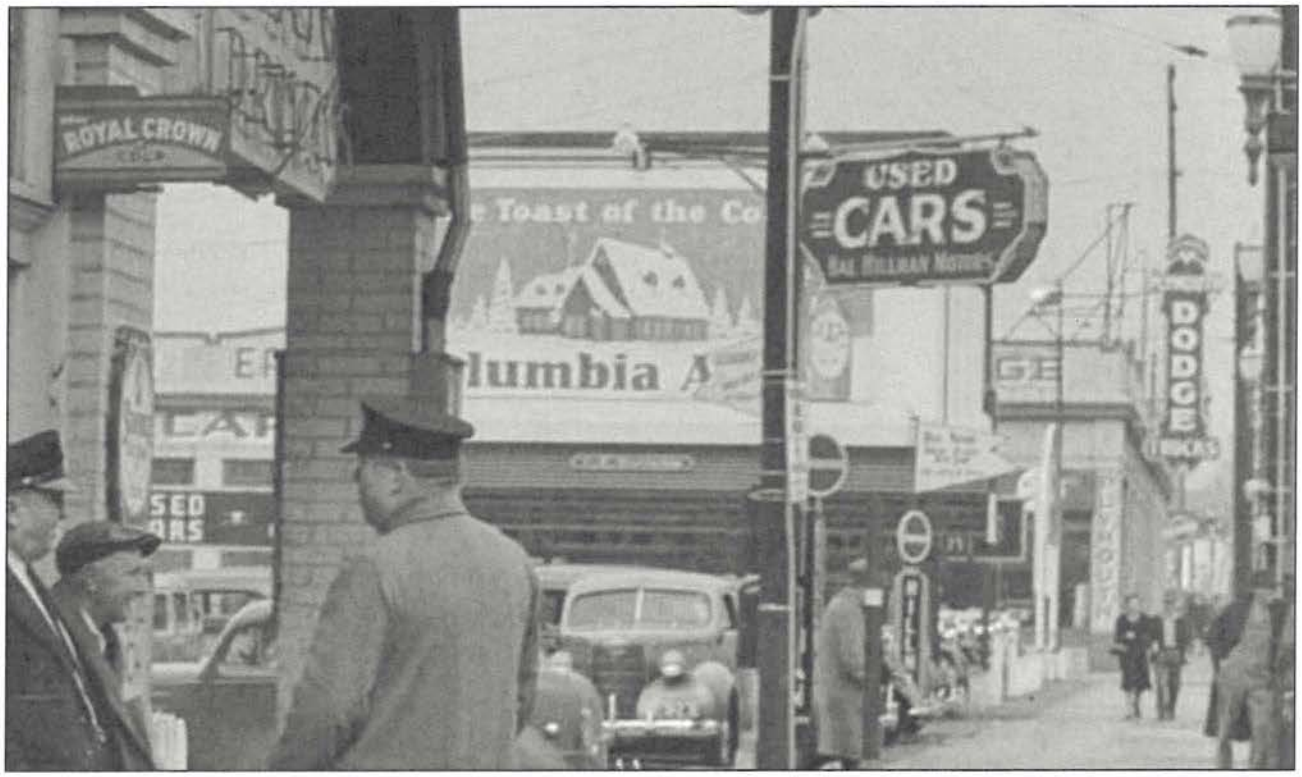


View: The Stark's Vacuum Company neon sign (ca. 1960s) that hangs above the east entrance; the view is towards the northwest.

View: The north building segment's west façade; the view is towards the southeast.

Property Name: The D.P. Thompson Co. Investment property/ Stark's Vacuum Co. Building	
Street Address: 107 NE Grand Avenue	City, County: Portland, Multnomah

View: Stark's before 2015 remodel. The building's east and north facades as it appeared prior to 2015 remodel (loopnet.com).



View: A 1941 photograph showing the southeast corner of the building in the distance (cropped). Source: OHS PhotoOrglot284_0276-13; Al Monner. Photographer.

SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Agency/Project: Federal Highway Administration/Burnside Bridge (Federal-Aid No. C051(111))	
Property Name: Jackson Apartments/Union Arms Apartments	
Street Address: 131 NE Martin Luther King, Jr. Blvd	City, County: Portland, Multnomah
USGS Quad Name: *Portland, Oregon*	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Apartment Building	Construction Date: 1911; 1930
Architectural Classification / Resource Type: Late 19th and Early Twentieth Century Commercial building	Alterations & Dates: 20 feet removed from east façade in 1930
Window Type & Material: 1-over-1, awning, single pane wood sashes, beveled glass at entry	Exterior Surface Materials: Primary: tan brick/painted brick Secondary: Decorative: Tile work
Roof Type & Material: Flat with parapet, unknown	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐Poor

A historic photo of the Jackson Apartments showing the commercial storefronts that faced Union Avenue (NE Martin Luther King Blvd.) The view is towards the southwest. (Photo from www.unionarmspdx.com).

Preliminary National Register Findings: ☐**National Register listed**

☐**Potentially Eligible:** ☐☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: December 13, 2019; revised 9/28/20

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

Property Name: Jackson Apartments/Union Arms Apartments		
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Claussen & Claussen Architects; G.W. Jackson (builder)	Owner: ☒Private ☐Local Government ☐State ☐Federal ☐Other	

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

Description

Union Arms Apartments, formerly Jackson Apartments, is a 1911 three-story Street-Car-era, Late 19th and Early Twentieth Century Commercial, tan pressed-brick building. The building sits at the southwest corner of the intersection of NE Martin Luther King Boulevard and NE Davis Street in Portland, Oregon. The neighborhood is a commercial/ industrial neighborhood that is rapidly being redeveloped with commercial and large-scale multi-family buildings. Local architects Claussen & Claussen designed the combination commercial/apartment building in 1911 for G.W. Jackson, a local contractor and investor. Claussen & Claussen Architects are historically a notable local architectural firm who built many Portland hotels, apartment buildings and residences, some of which are currently listed in the National Register of Historic Places.

Originally, the Jackson Apartments had four storefronts facing the street level along then, Union Avenue (NE Martin Luther King Blvd.). The windows on the second and third floors remain the original appearing one-over-one hung wood sashes, as well as the brickwork laid in a Common Bond that includes brick dentil bands at the second and third floor window lines, and an above Flemish bond (diamond patterned) frieze. The details along the east facade were rebuilt and the first floor reconfigured from storefronts to apartment units as a part of the 1930 Union Avenue widening project. The apartment building was constructed within a period of great expansion on Portland's eastside following the 1905 Lewis and Clark Exposition. The mixed-use apartment/commercial building was a popular choice on Portland's eastside for investors at this time as the living spaces filled more quickly allowing for a more immediate cash flow (Oregonian 1911a:8).

The Union Arms Apartment originally known as the Jackson Apartments was built as a mixed-use building with stores on the east half of the ground level (first floor) and apartment units.

The Jackson Apartments were designed for G.W. Jackson by Claussen & Claussen Architects and constructed in 1911 for an estimated cost of $45,000. The building was noted to be a "substantial" improvement for the east side (Oregonian 1911b:8). Four shops were housed on the ground level, apartments in the west half of the first floor, and the second and third floors designed for flats or offices. An entrance on the east façade provided access to the apartments on the second and third floors, and another entrance on the north façade provided access to the first floor apartments. Claussen and Claussen prepared two alternative plans for G.W. Jackson for either a two-story or three-story apartment building. The apartment building plan depicted a mix of two- and three-room units with wall beds that pulled out into the living room space. Each unit had a living room, kitchen, bathroom, and closet. The three-room units featured a dining room (Claussen & Claussen 1911).

Claussen & Claussen apparently promoted the compact two and three-room plan, which eliminated the bedroom. Locally, the concept was a fairly new trend in apartment design that Claussen and Claussen incorporated into their projects. An article by Walter [sic] Claussen written for a professional architect's journal, The American Architect in 1915, "Two and Three-Room Apartments of the Pacific Coast," demonstrated the architects' enthusiasm for the concept (Claussen 1915). In the article, Claussen explained the concept of eliminating the bedroom and using a pull out bed likely originated in Los Angeles for long-term visiting tourists and had gained acceptance for full-time residents. Claussen noted the design concept was trending on the West Coast since about 1910-11. About the time of his article, a 1914 Oregonian article noted that the two- and three-room apartment to be the prevailing apartment type under construction in Portland (Oregonian 1914:8). The compact room arrangements reduced the square footage of each unit, reducing the rent price and with more units per square footage, a greater return for the investor (Claussen 1915). Claussen further conveyed in the article that the level of architectural detailing should be based on the neighborhood in which that apartment is built, although always providing maximum light and ventilation (Claussen 1915). Claussen and Claussen designed several of these types of apartment buildings early in its career in Portland. One known example is the NRHP-listed Brown Apartments (1915) (Demuth and Mayfield 1991; Tess 1991). The Brown Apartments is an excellent example of this type with a higher level of architectural stylistic detailing. Other projects contemporary to the Brown Apartments included several by R.H. Wassell at Rex Arms and Royal Arms Apartments, and by John V. Bennes at Carlotta Court (Oregonian 1914:8). The Jackson Apartment/Union Arms Apartments is an excellent, modest example of this type and differ in that it also contained commercial spaces at the ground level. The Jackson Apartment is an early use of this concept, by Claussen & Claussen, but not the earliest.

The Jackson Apartments name was retained until circa 1947. The earliest noted use of Union Arms Apartment in the Oregonian was in 1948 near the deaths of the original owners, George W. and Edith C. Jackson (Oregonian 1948:11).

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: Jackson Apartments/Union Arms Apartments					
Street Address: 131 NE Martin Luther King Blvd.		City, County: Portland, Multnomah			
Architect, Builder or Designer (if known): Claussen & Claussen Architects; G.W. Jackson (builder)	Owner:	☒Private ☐Federal	☐Local Government ☐Other	☐State	

Description (continued)

Physical

The Jackson Apartments/Union Arms Apartments has an 80' x' 100' footprint and stands three stories tall on a poured-concrete basement. Tan pressed bricks, laid in a common bond, clad the east and north facades. The south and west façades are clad with a painted, utilitarian brick. The public east and north facades are subdivided by brick dentil belt courses at the second and third floor window lines and topped above the third floor windows by soldier brick course and above, a diamond-patterned frieze. The roof is essentially flat with a parapet with a centered sky-lit atrium.

The primary (east) entrance features polychrome tile work and beveled glass in the door, transom and sidelights, that would have been replaced at the time of the 1930 street widening. The original storefronts and shops were converted into apartments and opened up to Union Avenue with Chicago-type of windows with above transom lights. The wood-framed windows have center one-over-one hung sashes with single-light sidelights. The north façade features a second entrance at the ground level.

The south and west façades are modest in appearance, clad with utilitarian painted brick. The south and west facing windows of the three floors are topped by segmented brick arches with mostly paired and several single, wood-framed, one-over-one sashes. The third floor center south and west façade wall sections are slightly recessed and clad with sheet metal. Most of the windows appear to be the original one-over-one wood sashes.

Alterations

Several changes were apparently made to the plans prior to the building's construction, as the original inked elevations depict Classical detailing at the entry.

The Jackson Apartment building was extensively altered in 1930 for the widening of Union Avenue. Building Permit No. 209479 notes that twenty feet of the building's east end was removed and the apartments reconfigured (City of Portland 1930). At that time, Edith C. Jackson was listed as the apartment owner, and her husband, G.W. Jackson, as the building contractor. Reconstruction estimates totaled $10,000. The east façade's exterior, although modified during the 1930 widening of Union Avenue, was fairly well matched to the original detailing on the second and third floors, except for the ground level storefronts and interior shops that were converted into apartments. The new apartment units opened onto Union Avenue with Chicago-style windows and a recessed primary entrance in the same location. An arch and updated cable-detailed surround gave the building a modern look for that time period.

City of Portland Building permit records show that more recently, the atrium roof was rebuilt in 1990 and fire escapes repaired in 2012. Additional interior work has been done to improve the light within the public interior spaces. Online photos of one of the apartment units show that at least some of the units feature the original plan configuration and spare, wood trim work.

George W. Jackson

George Washington (G.W.) Jackson was a local businessman who overtime worked as an investor, building contractor, and apartment manager. Jackson commissioned Claussen and Claussen to provide the architectural plans for the apartment building on lots he acquired along Union Avenue in 1907. He and his wife, Edith C., lived in a nine-room cottage situated on the lots before replacing the cottage with the three-story apartment building in 1911 (Oregonian 1907:8; R.L. Polk & Co. 1909; Oregonian 1911:8). The Jacksons resided in and managed the apartment building, later relocating to an eastside residence circa 1920 (R.L. Polk & Co. 1914,1915,1917, 1921). When the building was subject to the 1930 Union Avenue widening project, Jackson acted as the building contractor for the removal of 20 feet from the east façade while Edith C. was recorded as the building owner. George and Edith died within a year of each other, George in 1948 and Edith in 1947 (Oregonian 1948:22). By this time, the apartment is noted in building permit records to be managed by trustee, David C. Watson of Tigard, Oregon. About this same time, the apartment building's name changed to Union Arms.

Claussen & Claussen

Claussen & Claussen were a respected Portland architectural firm composed of brothers H. (Hans) Fred Claussen and William E. (Emil) Claussen. The Claussen brothers ventured to Portland from Chicago in 1908 and set up an architectural practice. They worked together until Fred Claussen's death in 1942 (Ritz 2002). They completed a number of notable buildings in Portland, of which twenty-one have been previously recorded and are listed in the SHPO Oregon Historic Sites Database.

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

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Description (continued)

The Jackson Apartments/Union Arms Apartments, one of their earlier works, although listed in the Oregon Historic Sites database, was not previously attributed to Claussen & Claussen. Five of the brothers' apartment/hotels are currently listed on the National Register of Historic Places and the Oregon Historic Sites database; the NRHP-listed properties are all located on Portland's west side; they include:

1. Brown Apartments - 807 SW 14th Ave., 1915
2. Brentnor Apartments - 931 NW 20th Ave., 1912
3. Palace Court Apartments – 2207 NW Flanders St., 1926
4. Roosevelt Hotel – 1005 SW Park Ave., 1924
5. The Heathman Hotel – 723 SW Salmon St., 1926

The Brown Apartments included the two and three-room design concept and was one of the Claussens' most prominent projects of this type as it was the example selected for William Claussen's 1915 article on the subject. Claussen & Claussen designed at least one other mixed-use commercial/apartments building with the two- and three-room design in 1910 prior to designing the Jackson Apartment. L.R. Fairchild commissioned Claussen & Claussen to build a no longer standing three-story brick building at the SW corner of SE 11th and Hawthorne (Oregonian 1910:6). Where most of the above Claussens' buildings are noted for their exuberance in detailing and style, the Jackson Apartment is a more modest Claussen & Claussen building design, using belt courses and a frieze pattern to subdivide the public east and north facades. A small flourish of geometric patterns surrounded the Union Avenue entry was not a part of original more Classical elevation and was updated during the 1930 Union Avenue widening project. The Jackson Apartment is an excellent representative example of a more modest Claussen and Claussen design, representing their work on Portland's eastside.

Significance

Criterion A –*Significant*

Under Criterion A, the Jackson Apartment/Union Arms Apartment is recommended eligible for listing to the NRHP as it has significant historical associations with the development of apartments on Portland's Eastside and is representative of a new apartment building type in Portland promoted by architects Claussen and Claussen. Façade and first floor modifications made during the 1930 Union Avenue widening project demonstrate the types of adaptations necessary during this period of growth in Portland's major transportation routes.

Criterion B – *Not Significant*

Under Criterion B, the Jackson Apartments/Union Arms Apartments was not found to have associations with specific people important in history, and therefore it is not considered eligible for listing in the NRHP under Criterion B.

Criterion C – *Significant*

Under Criterion C, the Jackson Apartments/Union Arms Apartments is an excellent early example of a two- and three-room unit apartment building type promoted at the national level by the architects Claussen & Claussen. The building is also an excellent representative example of Claussen & Claussens' work on the Portland's Eastside. For these reasons, the Jackson Apartment/ Union Arms Apartment is recommended to be eligible for listing under Criterion C.

Criterion D – *Not Significant*

Under Criterion D, properties may be eligible for the National Register if they have yielded, or are likely to yield information to contribute to our understanding of human history. This criterion is most commonly associated with archaeological sites and in the case of Jackson Apartments/ Union Arms Apartments important information can be yielded through written documentation.

Integrity

The Jackson Apartments/Union Arms Apartments retains historical integrity of location, design, setting, materials, workmanship, feeling, and association from the historic period from 1911 and the 1930 widening project. Although the building has lost historic integrity from its original design and association as a 1911 commercial/apartment building it retains the modifications made to its design during the historic period and as such is recommended to be eligible for listing in the NRHP.

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106 DOCUMENTATION FORM

Individual Properties

Property Name: Jackson Apartments/Union Arms Apartments		
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Claussen & Claussen Architects; G.W. Jackson (builder)	Owner: ☒Private ☐Local Government ☐State ☐Federal ☐Other	

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1948 Mail Rifled. 3 May:11.
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OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: SUPPLEMENTAL MAPS

Property Name: Jackson Apartments/Union Arms Apartments	
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

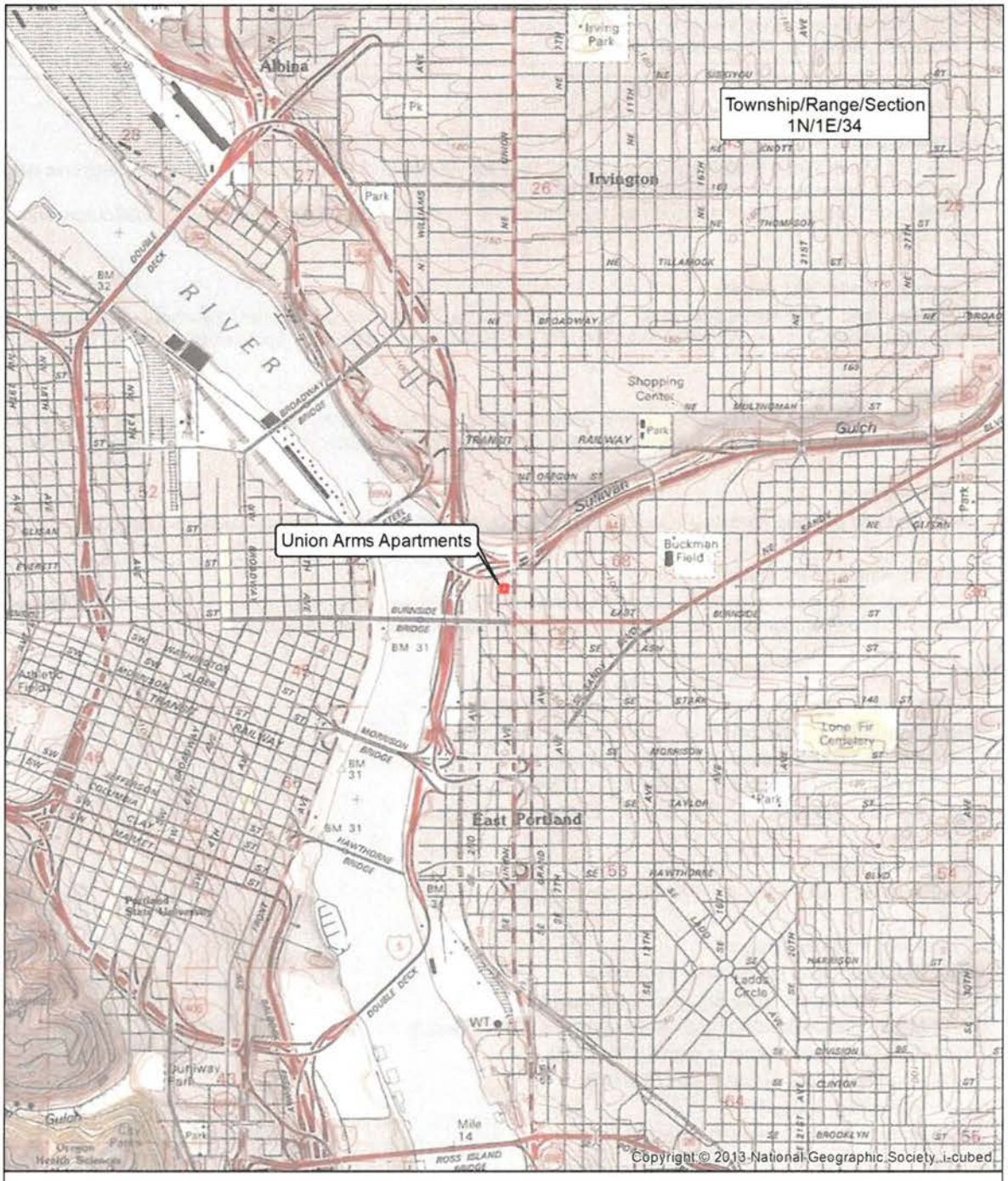


Figure 1. Jackson Apartments/Union Arms Apartments location.

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: December 13, 2019; revised 9/28/20

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: SUPPLEMENTAL MAPS

Property Name: Jackson Apartments/Union Arms Apartments	
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

Figure 2. Current imagery depicting Jackson Apartments/Union Arms Apartments and API.

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: December 13, 2019; revised 9/28/20

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Jackson Apartments/Union Arms Apartments	
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

View: The east façade of the present Union Arms Apartments showing the 1930 modifications that removed 20 feet the building's east end replacing the storefronts with apartments. The view is towards the west.

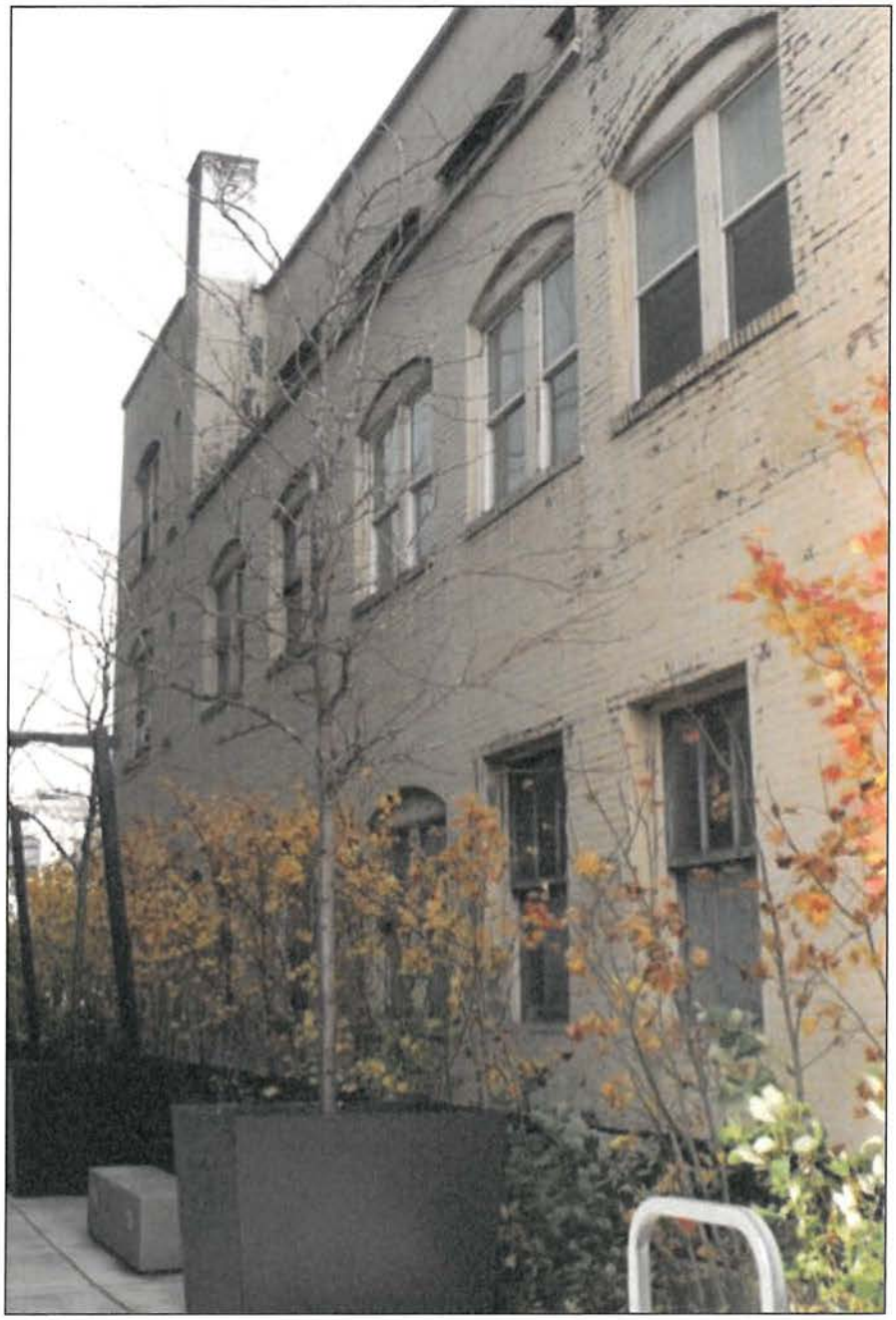
View: The north and west facades showing the differences from the detailed north façade and the utilitarian west façade. The view is towards the southeast.

Surveyor/Agency: Elizabeth O'Brien, WillametteCRA Date Recorded: December 13, 2019; revised 9/28/20

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Jackson Apartments/Union Arms Apartments	
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah



View: The north and west facades showing the differences from the detailed north façade and the utilitarian west façade. The view is towards the southeast.

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: Jackson Apartments/Union Arms Apartments	
Street Address: 131 NE Martin Luther King Blvd.	City, County: Portland, Multnomah

View: A detail of the main entry on the east façade showing the cable surround, colorful tile, and leaded glass sidelights and transom. The view is towards the west.

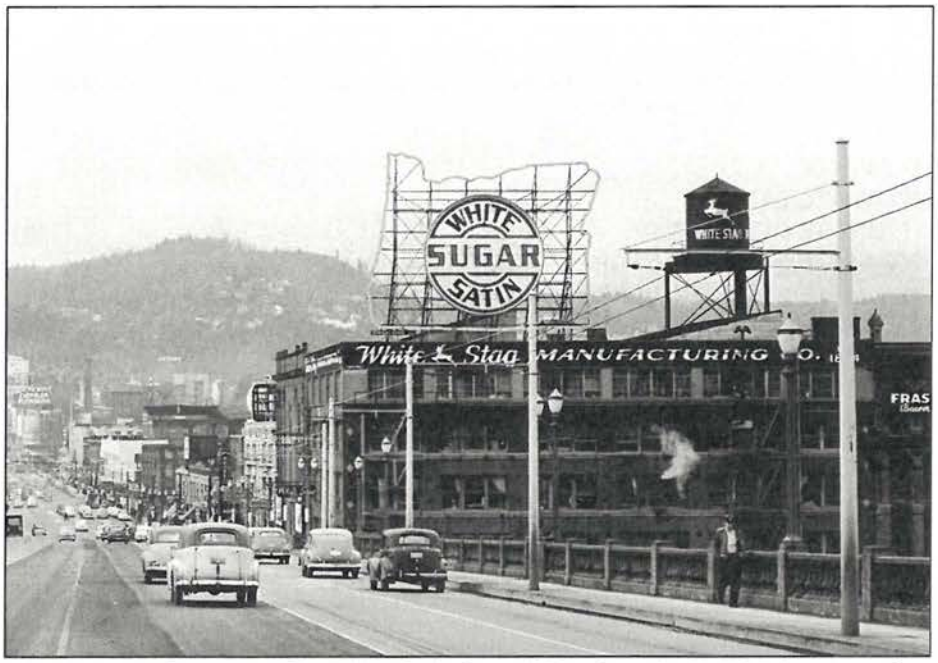
SHPO Case# 18-1479

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Agency/Project: Federal Highway Administration/ Burnside Bridge	
Property Name: White Satin Sugar/White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah
USGS Quad Name: Portland, Oregon	Township: 1 North Range: 1 East Section: 34
This property is part of a ☐District ☐Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble: Skidmore/Old Town Landmark Historic District	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: Sign	Construction Date: 1940
Architectural Classification / Resource Type: /Object	Alterations & Dates: 1951; 1957; 1959; 1997; 2011
Window Type & Material: N/A	Exterior Surface Materials: Primary: angle iron frame Secondary: Neon and light bulbs Decorative:
Roof Type & Material: N/A	
Condition: ☒Excellent ☐Good ☐Fair ☐Poor	Integrity: ☐Excellent ☒Good ☐Fair ☐ Poor



The original configuration of the White Satin Sugar/White Stag sign in 1947 (courtesy of Jeff Kunkle of Vintage Roadside, Portland, Oregon).

Preliminary National Register Findings: ☐**National Register listed**

☒**Potentially Eligible:** ☒Individually ☐As part of District

☐**Not Eligible:** ☐In current state ☐Irretrievable integrity loss ☐Lacks Distinction ☐Not 50 Years

State Historic Preservation Office Comments:

☒**Concur** ☐**Do Not Concur:** ☐Potentially Eligible Individually ☐Potentially Eligible as part of District ☐Not Eligible

Signed _____ Date 12/21/2020

Comments:

OREGON INVENTORY OF HISTORIC PROPERTIES

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Property Name: White Satin Sugar/White Stag Sign		
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Ramsay Sign Co. and A. Young and Sons, Inc. (1940)	Owner: ☐Private ☐Federal ☒Local Government ☐Other ☐State	

Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):

The White Stag Sign is a metal-framed neon rooftop sign that sits atop the present White Stag Block building at 5 NW Naito Parkway on tax lot 1N1E34DB -00600 Portland, Multnomah County, Oregon in Section 34, Township 1 North, Range 1 East, Willamette Meridian.

The White Stag sign is approximately 50 feet by 50 feet and faces east at the Burnside Bridge's west approach. The sign is classified as a standing roof type sign. The sign design is composed of neon and lamps and is supported on "angle iron framing." The graphics include the original 1940 neon-lit state of Oregon outline, the 1957 leaping stag, and 1959 seasonal neon-lit red nose. More recent additions include the 1997 "OLD TOWN" graphic at the base from its days of representing the Made in Oregon stores, and the newest graphic heading installed in 2011, "Portland, Oregon," lit by neon and bulbs.

The original sign was constructed for White Satin Sugar under Permit No. 253709, issued in September 1940 and completed in February 1941. A. Young and Son, Inc. constructed the sign for the owner, Ramsay Sign Co. The sign's total cost was $4000.00.

Alterations

White Satin Sugar Co. replaced the older circular sign logo and added new animation in 1951 keeping only the neon-lit Oregon state outline (City of Portland, 1951). The new graphic consisted of letters that read out: "IT'S WHITE SATIN SUGAR OREGON'S OWN AND ONLY." The phrase was animated in a five-part sequence as described in the 1951 Ramsay Sign, Inc. sign order (Davis 1951):

1. IT'S WHITE
2. IT'S WHITE SATIN
3. IT'S WHITE SATIN SUGAR
4. IT'S WHITE STAIN SUGAR OREGON'S OWN AND ONLY
5. IT'S WHITE STAIN SUGAR OREGON'S OWN AND ONLY, additionally animated with "sparkling lamps and lights to flash on"

White Stag Co. transformed the rooftop sign into the White Stag sign in 1957. It was officially lit July 5, 1957. The White Stag sign design was outlined in white neon and filled with white light bulbs "flashing in sequence" (Signs of the Times 1957). Ramsay Sign Company's neon artist Gordie Hays and another created the neon sign modifications (Mayer 2010). The state of Oregon outline was maintained while adding the leaping white stag, "HOME OF WHITE STAG" and at the base of the sign "SPORTSWEAR." The famous red nose became a tradition when it was added in 1959. Early 1980s photos show that "Home of" lettering was removed from the White Stag sign. In 1997, the sign graphic changed to advertise the Made in Oregon Company, a subsidiary of the H. Naito Corp. The sign retained the leaping white stag and the Oregon state outline, while replacing the White Stag logo with the "Made in Oregon" graphic and "Old Town" replacing the "SPORTSWEAR" graphic at the sign's base (Levenson 1997). The "Made in Oregon" and "Old Town" lettering was constructed to match what was replaced. The new letters matched by using open pan letters of double tube neon and chasing incandescent bulbs (City of Portland 1997). When the sign ownership was transferred, the sign was rehabilitated and the main sign graphic of "Made in Oregon" was changed in 2011 to read "Portland, Oregon."

Despite periodic changes, the sign retains from the period of significance (1940-1970): the Oregon state outline (1940), the leaping white stag (1957), and the tradition of transforming the white stag during the holidays into Rudolph the Red Nose Reindeer by adding a red nose (1959). These character-defining design features retained from the period of significance convey the White Stag sign's historic significance.

History

The iconic Portland sign originally advertised White Satin Sugar bearing the graphic outline of the state of Oregon and the Amalgamated Sugar Company's circular White Satin Sugar logo. A 1940 Sunday Oregonian article noted the sign "tells its story in five separate changes, the purport of which is "White Satin Sugar, Oregon's Own and Only", in the animation depicting a pouring sugar sack (Sunday Oregonian 1940:59). A sketch submitted for review in 1940 depicts a sack of sugar

Property Name: White Satin Sugar/White Stag Sign		
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Ramsay Sign Co. and A. Young and Sons, Inc. (1940)	Owner: ☐Private ☐Federal ☒Local Government ☐Other	☐State

History (cont.)

that pours, although a 1947 photograph shows the circular White Satin Sugar logo. It is not clear if the pouring sugar element is present. Erected by Ramsay Sign Co. in 1940, the sign was noted to be "the largest sign of its kind" constructed within the last five years (Sunday Oregonian 1940:59). The sign was modified in 1951 for Amalgamated Sugar Co. with an updated logo and modified neon animation while maintaining the original Oregon state outline.

White Satin Sugar is a brand name of the Amalgamated Sugar Co. that began in Ogden, Utah in 1897 as Ogden Sugar Company. In 1902, several sugar companies formed the Amalgamated Sugar Company. The company expanded by building manufacturing plants in Utah and Idaho in the next two decades. In the mid -1930s the company acquired the White Satin Sugar trademark for marketing their product. The name White Satin Sugar was important for branding, ensuring the consumer that beet sugar was no different than cane sugar. A manufacturing plant was constructed in Nyssa, Oregon in 1938 for the eastern Oregon sugar beet growers. The White Satin Sugar brand was marketed to Oregonians as a local state product and promoted through newspaper recipes and food preparation seminars. Ramsay Sign Co. installed the original sign in 1940; a 1947 photograph depicts the original design with the Oregon state outline and the original circular White Satin Sugar logo. In 1950, a warehouse and distribution depot was constructed on NE Columbia Boulevard Portland and the sign modified in 1951 with an updated logo and neon animation while keeping the Oregon state graphic (Amalgamated Sugar Company 2019; The Sunday Oregonian 1950:67).

Hirsch-Weiss/White Stag Co. took over the sign situated on the top of their building in 1957. The local sportswear clothing company occupied the building from 1924 to 1973. The White Stag Co. was a respected local sportswear manufacturing company recognized internationally. Displaying the White Stag logo on the sign on the city's skyline was a demonstration of the company's success (Sign of the Times 1957). The Oregon state outline remained the same adding the White Stag lettering, the leaping white stag, and SPORTWEAR at the base. Rudolph's red nose became a Portland holiday fixture when it was first added in 1959 to the white stag. The red nose appeared each and every holiday season at the suggestion of Harold Hirsch's wife Elizabeth Blair Hirsch (Rose 2019).

The sign's survival has meant several rounds of negotiating over time. When the White Stag parent company moved its location in the early 1970s, it agreed to maintain the sign and the stag's familiar red nose during the holidays. The sign's survival was again jeopardized in the mid-1990s with disagreements over maintenance. An agreement was reached in 1996 between Ramsay Sign Co. and building owner for its maintenance (Statesman Journal 1996:18). H. Naito Corp., another well-respected local company, had taken over the Hirsch-Weiss Co. building and reinvented the sign with one of their companies' name, "Made In Oregon" in 1997, retaining the leaping white stag and adding "Old Town" at the bottom of the sign (Levenson 1997). The building's occupants have changed in recent years and the building extensively improved by its then new owner, Art DeMuro. When the University of Oregon took over the building, they planned to change the sign graphic to read "University of Oregon" or a big "O." City Commissioner Randy Leonard and other local citizens were against associating the sign with the Eugene-based educational institution. Ultimately, the sign is graced with "Portland, Oregon" while keeping the state outline, white stag, the seasonal red nose and "OLD TOWN" at its base (Hallman 2010a).

Ramsay Sign Company constructed and owned the sign from when it was originally constructed in 1940 until it was donated to the City of Portland in 2010. Ramsay Sign Company has been responsible for the sign designs and construction since the White Stag sign was first constructed in 1940. The Portland-based company was established by A.G. (Arch Gibson) Ramsay in 1911 and continues its operation through a succession of owners. In order to survive the Great Depression, the company initiated a lease program to assist businesses in building signs (Ramsay Signs 2020). The White Satin Sugar/White Stag Sign is one example of this business model.

Ramsay Sign Company donated the sign to the City of Portland in 2010 and historic preservationist Art DeMuro and then owner of the building donated $200,000 for the new design reading Portland, Oregon (Hallman 2010a). The City retains control of how the sign is used commercially. As a Portland icon and the recent uptick in Portland's national identity, the sign has gained national attention and recognition.

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Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Ramsay Sign Co. and A. Young and Sons, Inc. (1940)	Owner: ☐Private ☐Federal ☒Local Government ☐Other	☐State

Significance

The White Stag Sign was designated a Portland City Landmark in 1978. When adopted as a Portland City Landmark, the neon-lit sign was recognized to be "one of a few remaining examples of a type and scale which are no longer utilized for outdoor advertising (Bellinger 1978). From its beginning in 1940 in the heyday of neon signs, the sign has been a graphic beacon at Burnside Bridge's west approach visible as far as the Portland's eastside.

The White Stag sign has undergone several transformations since it was installed in 1940 and yet continues to be recognized as a Portland city icon. Constructed and owned by the Ramsay Sign Co., the sign has advertised several important local Oregon companies including White Satin Sugar, White Stag (Hirsch-Weiss Co.), and Made in Oregon (a subsidiary of H. Naito Corp.). Most recently the sign is emblazoned with "Portland, Oregon" while retaining the 1940 Oregon outline and the leaping white stag installed in 1957. Each company has played an important role in preserving the heritage of the sign throughout its alterations.

It is noted in National Park Service's Preservation Brief 25 that some signs become more important to the community than the commercial entity it represents over time; "they accumulate rich layers of meaning (Auer 1991). Portland's White Stag Sign, while serving over time as a beacon for several important local businesses, it has also become a local holiday tradition retaining the leaping white stag that is lit up as Rudolph the Red Nose Reindeer for the holidays. The sign remains a familiar icon to those crossing Portland's bridges or traveling along Interstate 5. The sign is a significant feature of Portland's cultural landscape.

The White Stag Sign is recommended to be eligible for listing in the NRHP under Criterion A and C. The sign's period of significance ranges from its construction in 1940 to the 50-year threshold of 1970.

Criterion A – *Significant*

The White Stag sign is recommended eligible for listing at the local level for its continued associations with important local Oregon companies of White Satin Sugar, White Stag (Hirsch-Weiss Co.), Made in Oregon (a subsidiary of H. Naito Corp.), as well as sign's former longtime owner Ramsay Sign Company. Most recently, the sign is emblazoned with "Portland, Oregon" while retaining the 1940 Oregon outline and the leaping white stag installed in 1957. Each company has played an important role in preserving the heritage of the sign retaining certain features, while adapting it for its own uses.

Criterion B – *Not Significant*

The White Stag Sign is not associated with specific people important to history, or are otherwise best represented by other property types.

Criterion C – *Significant*

The sign is recommended eligible under Criterion C for its distinctive characteristics of a type representing the period of rooftop neon signs that have grown rare with the passage of time. Although the company logo has been modified over the time, the sign retains recognizable historic elements and the original neon aesthetic.

Criterion D – *Not Significant*

Under Criterion D the sign would not yield any interpretative information not already available in other forms of media.

Integrity

The White Stag sign retains historical integrity of location, setting, materials, feeling and association. Although the design has been altered over time, it continues to retain the overall type of metal angled framework, materials of neon and white bulbs, and the recognizable design elements of the neon-lit Oregon state outline and leaping stag, and seasonal red nose. The sign remains a significant cultural landmark of Portland's waterfront, retaining character-defining features while adapting to the City's evolving culture and economy.

Sources

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2019 History. Electronic document, http://amalgamatedsugar.com/about-us/history.html, accessed October 16, 2019.

Property Name: White Satin Sugar/White Stag Sign		
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah	
Architect, Builder or Designer (if known): Ramsay Sign Co. and A. Young and Sons, Inc. (1940)	Owner: ☐Private ☐Federal ☒Local Government ☐Other	☐State

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Sunday Oregonian
1940 Huge Sign Sugar Ad. 3 Nov: 59. Portland, Oregon.
1950 Utah Company Acquires Site. 7 May: 67. Portland, Oregon.

Warner, Mike
2014 You know Christmas is here when they add the red nose to the deer on the Portland sign! Happy Holidays! #LiveOnK2. November 28, 2014, 5:43 am. https://twitter.com/mikekatu/status/538327197648310272.

SECTION 106: DETERMINATION OF ELIGIBILITY FORM

Property Name: White Satin Sugar/ White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

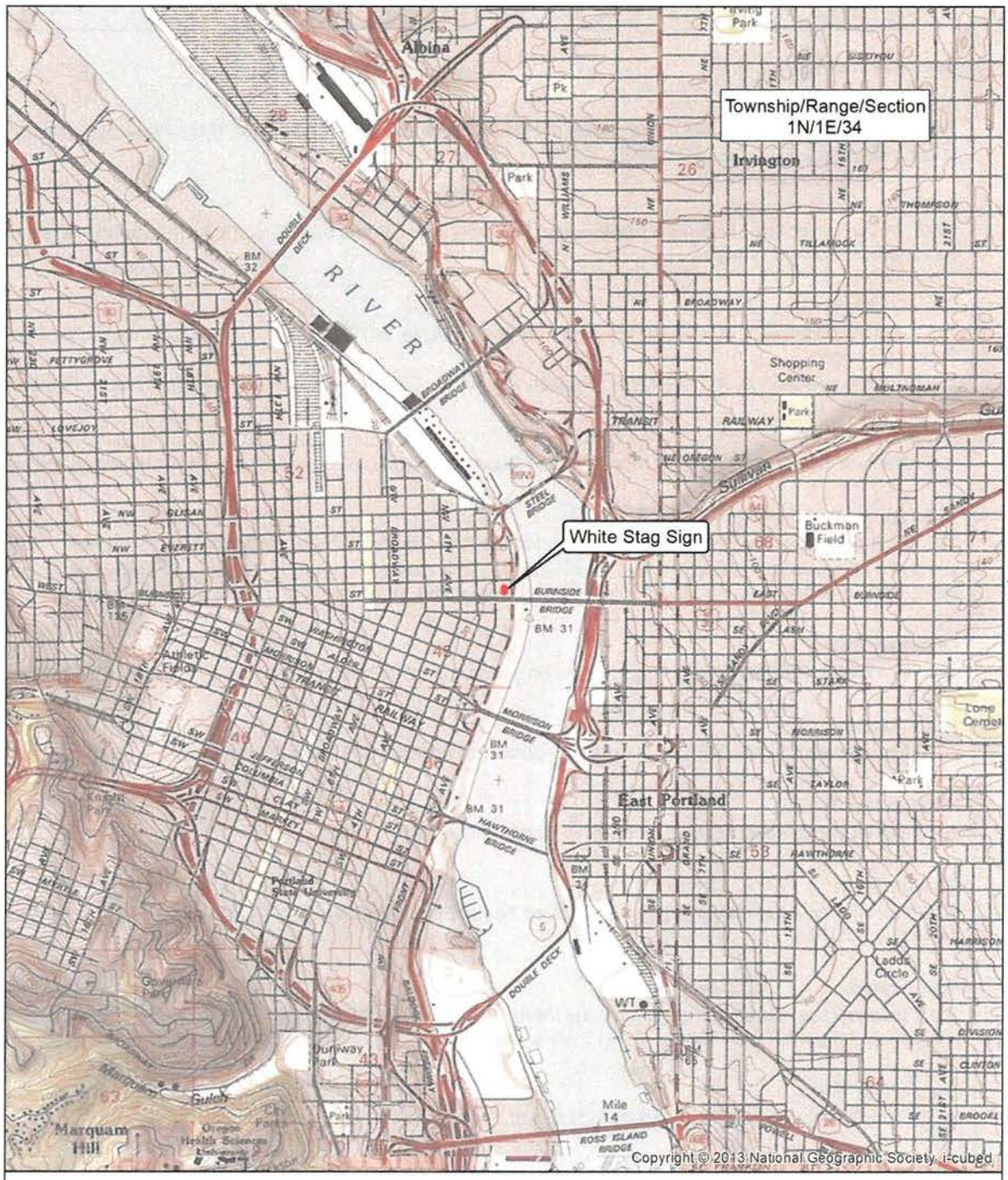


Figure 1. Location map.

Property Name: White Satin Sugar/ White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

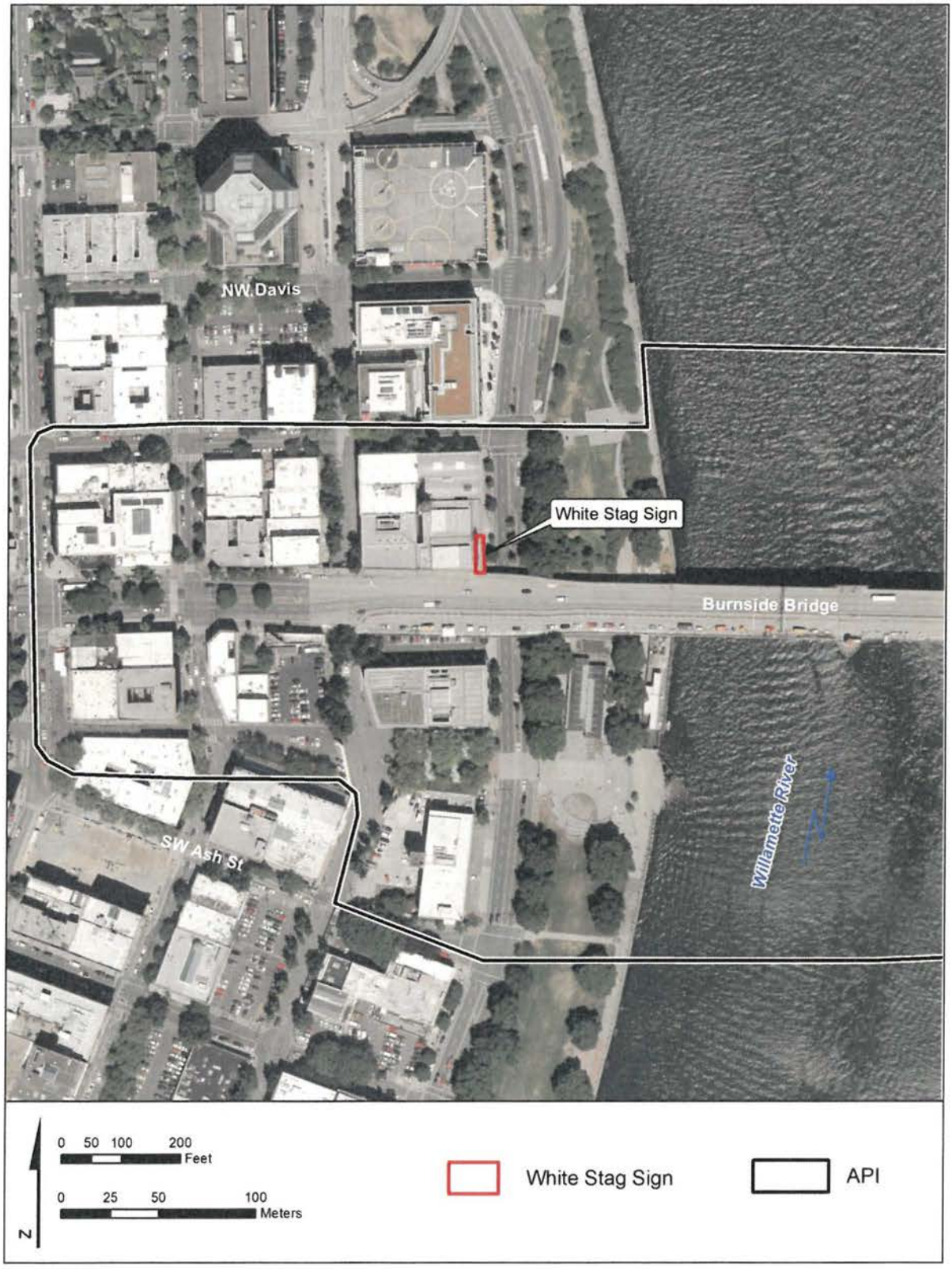
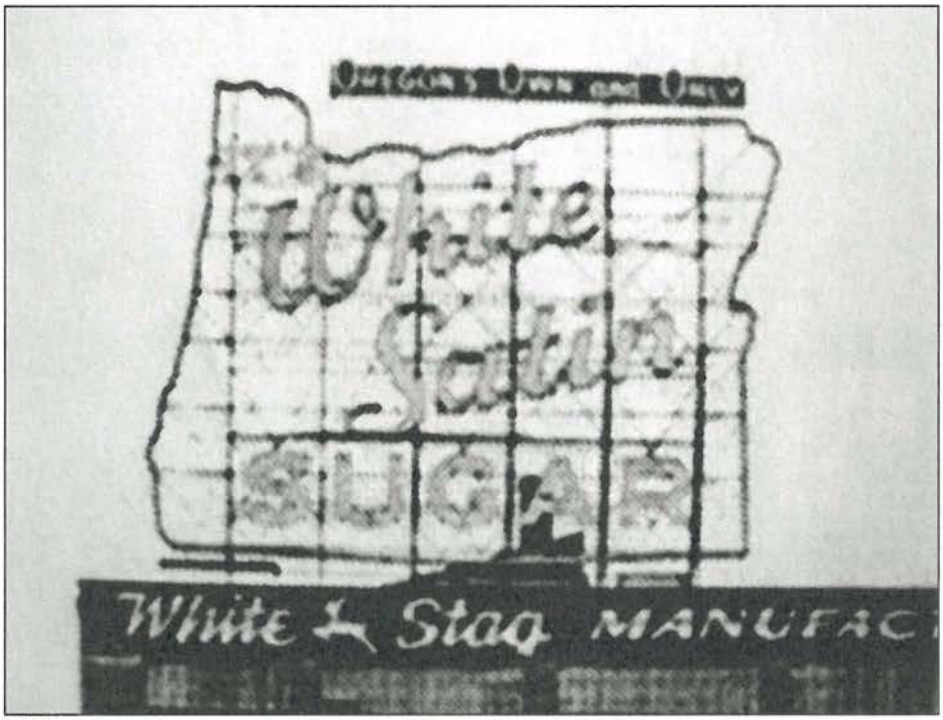


Figure 2. Aerial imagery of White Stage Sign.

Property Name: White Satin Sugar/White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

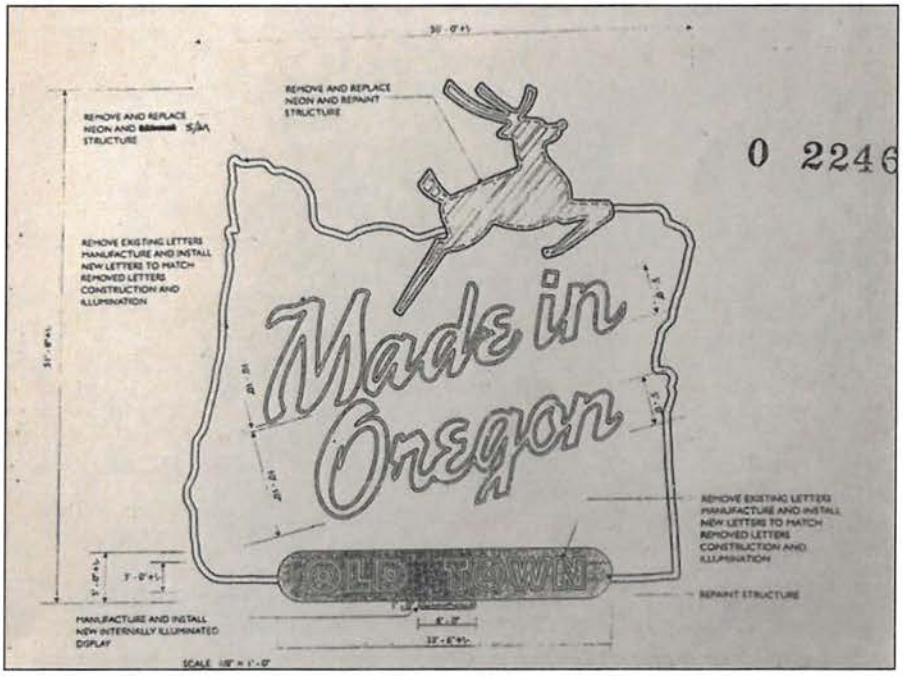


View: The 1951 version of the White Satin Sugar Sign (Courtesy of *Amalgamated Sugar Co.*).

View: The White Stag Sign as it was constructed in 1957 (*Sign of the Times* 1957).

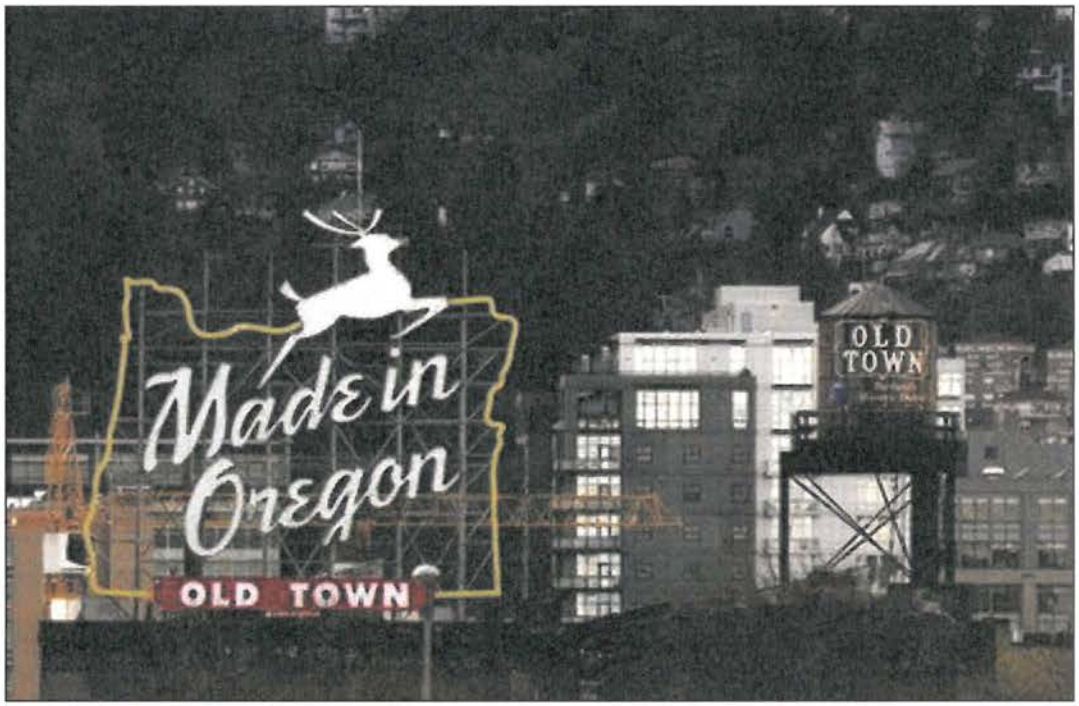
Property Name: White Satin Sugar/White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

View: A 1989 photo of the White Stag Sign depicting the sign without the "Home of" lettering (Oregon Historical Society Photo #1749).



View: A 1997 design drawing for the construction of the "Made in Oregon" sign (City of Portland Sign Permit Application SCN 97-00758).

Property Name: White Satin Sugar/White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah

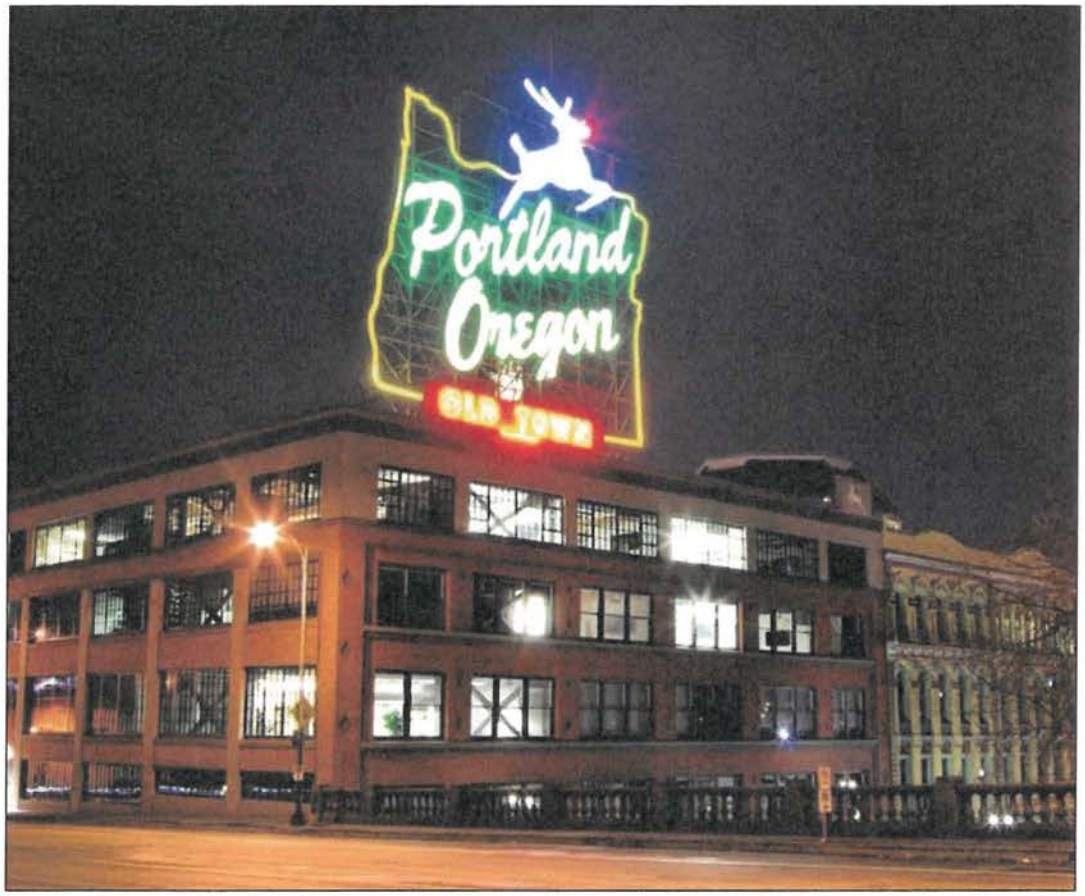


View: A 2010 photo of the "Made in Oregon" sign (from Hallman 2010b).

View: The White Stag sign in its current configuration that maintains the original 1940 Oregon state outline, the 1957 leaping stag, and the 1997 "Old Town" signage at its base.

SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

Property Name: White Satin Sugar/White Stag Sign	
Street Address: 5 NW Naito Parkway	City, County: Portland, Multnomah



View: A more recent photo of the white stag's nose lit for the holidays (from Warner 2014).