Appendix D

FINDINGS OF EFFECT (FOEs) – OREGON & WASHINGTON

Appendix D1

OREGON FOEs

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Columbia Slough Drainage Districts Historic District (OR 2)	SHPO Resource ID: 663154
Street Address: N/A	City, County, State: Portland, Multnomah County, Oregon

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:

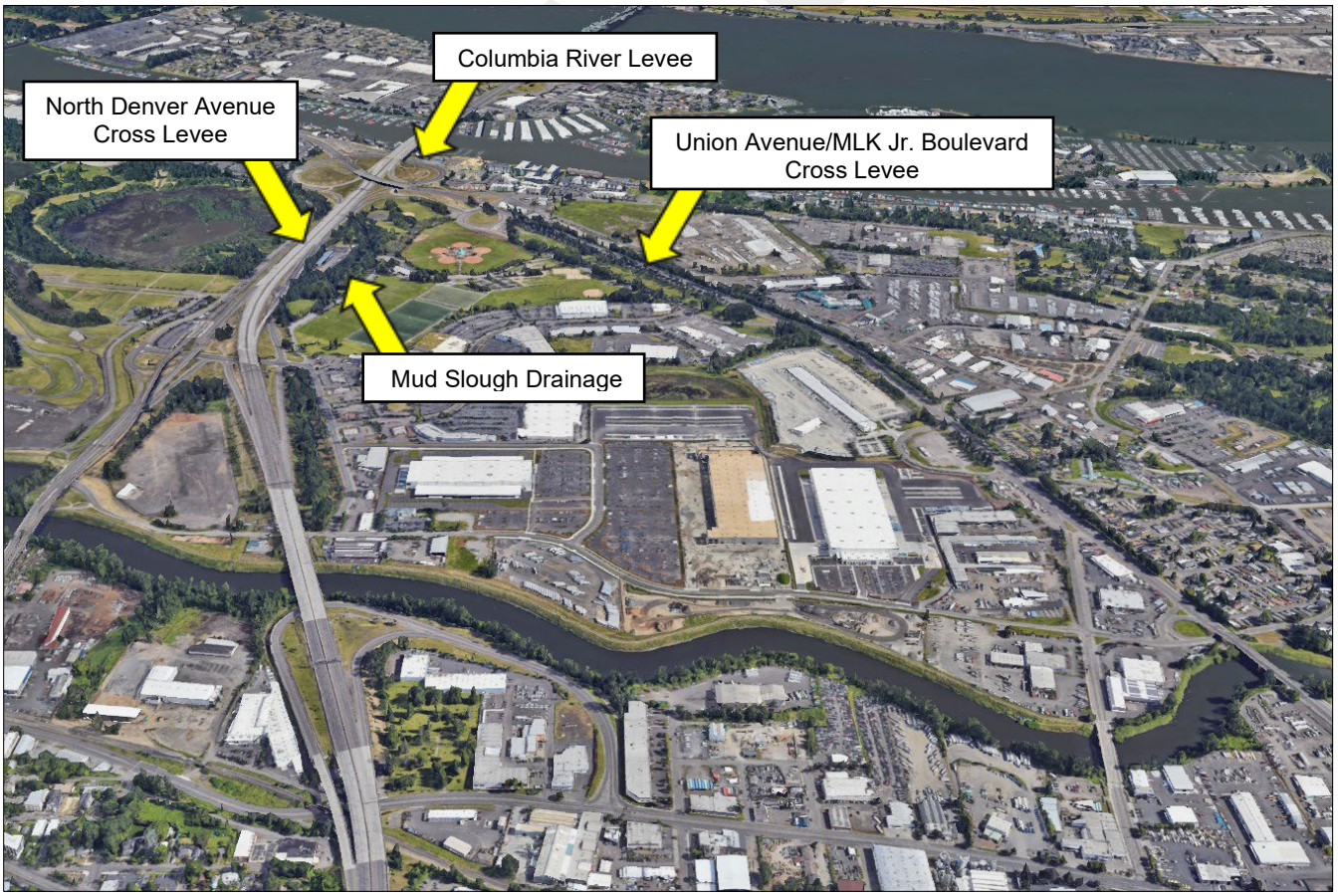


Figure 1. Oblique aerial photograph of Columbia River Levee, North Denver Avenue Cross Levee, Union Avenue/MLK Jr. Boulevard Cross Levee, and Mud Slough Drainage, view northwest (Google Earth, accessed June 30, 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Columbia Slough Drainage Districts Historic District (CSDDHD), a collection of four drainage districts in Multnomah County, Oregon (Figures 1 and 3). The district, which is within the southern part of the Columbia River floodplain between the Willamette River and the Sandy River, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in a draft NRHP nomination prepared for the U.S. Army Corps of Engineers (USACE) in 2019.[1]

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the CSDDHD. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[2]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] Elizabeth O'Brien and David V. Ellis (Willamette Cultural Resources Associates, Ltd.), "The Columbia Slough Drainage Districts Historic District," National Register of Historic Places Nomination Form (Draft, 2019).
[2] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

DRAFT

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The CSDDHD is located in the Columbia Slough, within the south side of the Columbia River floodplain between the Willamette River to the west and the Sandy River to the east (Figure 3). It is located entirely within Multnomah, County, Oregon. The historic district contains four distinct drainage districts spanning approximately 12,550 acres. Peninsula District No. 1 (PEN 1), the westernmost drainage district, comprises approximately 995 acres bounded by the Oregon Washington Railroad & Navigation Company (OWR&N) Levee to the west, Columbia Slough Levee to the south, N Denver Cross Levee to the east, and the Columbia River Levee to the north. Peninsula District No. 2 (PEN 2), which is east of PEN 1, comprises approximately 1,611 acres bounded by the N Denver Cross Levee to the west, the Columbia Slough Levee to the south, the Peninsula Drainage Canal to the east, and the Columbia River Levee to the north. The Multnomah County Drainage District (MCDD), to the east of PEN 2, comprises approximately 8,590 acres bounded by the Peninsula Drainage Canal to the west, NE Sandy Boulevard and NE Columbia Boulevard to the south, the NE 223rd Avenue Cross Levee to the east, and the Columbia River Levee to the north. Finally, the Sandy Drainage Improvement Company (SDIC), which is the easternmost drainage district, comprises approximately 1,556 acres bounded by the NE 223rd Avenue Cross Levee to the west, the Union Pacific Railroad to the south, and the SDIC Levee to the north and east. The four

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drainage districts include varied agricultural, commercial, recreational, industrial, and residential development, and contain elements including levees and cross levees, pump stations, weirs/dams, canals, sloughs, and drainage ditch systems and flood walls.

According to a draft NRHP nomination prepared by Willamette Cultural Resources Associates for the US Army Corps of Engineers in 2019, the CSDDHD is significant under Criterion A for its association with early drainage district development in Oregon, which reflected the national reclamation movement that began in the 1880s. Landowners in the Columbia Slough, in what would become the Sandy Drainage Improvement Company (SDIC), began building experimental levee segments for agricultural purposes in 1915–1916. Their efforts encouraged the establishment of drainage districts PEN 1 in 1916, PEN 2 in 1917, and Multnomah County Drainage District in 1917, with most initial levee construction completed by the early 1920s. The drainage districts' levee network contained and protected the Columbia Slough bottomland from the seasonal Columbia River freshets, allowing for agricultural development initially and for commercial, recreational, industrial, and residential development in later decades. The CSDDHD is also significant under Criterion C as a major engineered drainage system that was initially constructed in the early twentieth century. The drainage districts have been in continuous operation since their development, serving to control floods and to move water through the districts. Although originally designed to drain agricultural fields, the drainage districts now primarily manage stormwater produced by the impervious surfaces associated with industrial, commercial, and residential development as well as paved roads and highways.[3]

The period of significance for the CSDDHD begins in 1916 with the construction of a levee that became part of the SDIC; successful completion of this levee led to the establishment of drainage districts PEN 1, PEN 2, and MCDD in 1916 and 1917. The period of significance concludes in 1961, which is the year that significant developments within the drainage districts were completed following the 1948 Vanport Flood. Despite modifications since 1961, including minor reconfiguration and structural strengthening of the levees, the historic district retains sufficient integrity to communicate its significance. The district boundary is delineated by the levees, major drainages evaluated to be contributing, as well as reasonable immediate areas surrounding pump stations, weirs, and dams. The interior areas within the four drainage districts (SDIC, PEN 1, PEN 2, and MCDD) are not included within the boundaries. Contributing resources include ten earthen levees; several pump stations; a concrete floodwall within PEN 1 atop the Columbia River Levee; and ten sloughs or drainage ditch sections. According to the draft NRHP nomination, character-defining features of the contributing levees and drainage ditch sections are their alignments, and character-defining features of the pump stations and flood wall are their historic design, massing, and materials.[4]

ALTERNATIVES CONSIDERED

Because the CSDDHD has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased

[3] O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 25–26.
[4] O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 7–11, 25–26, 48.

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congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible CSDDHD, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. It is anticipated that the Modified LPA would have an effect on the NRHP-eligible CSDDHD, but that effect would not be adverse.

As currently proposed, the Area of Potential Effect (APE) for the Modified LPA straddles the boundary between PEN 1 and PEN 2 and includes portions of four resources that are contributing to the CSDDHD: the Columbia River Levee, the Union Avenue/Martin Luther King Jr. Boulevard Cross Levee, the N Denver Avenue Cross Levee, and the Mud Slough Drainage (Figure 4). These resources are described as follows:

- The Columbia River Levee, initially constructed in 1919, generally follows the south bank of the Columbia River from the OWR&N embankment (approximately 1 mile northwest of the I-5 alignment) to the NE 223rd Avenue Cross Levee in Troutdale, Oregon (approximately 12.5 miles southeast of the I-5 alignment).[5]
- The N Denver Avenue Cross Levee, initially constructed between ca. 1912 and 1917, carries a portion of I-5 between the Columbia River Levee and the Columbia Slough.[6]
- The Union Avenue/Martin Luther King Jr. Boulevard Cross Levee, initially constructed ca. 1916, carries NE Martin Luther King Jr. Boulevard (formerly Union Avenue) from the north bank of the Columbia Slough to the junction of NE Martin Luther King Jr. Boulevard with N Marine Drive and N Union Court.[7]
- The Mud Slough Drainage, which is interrupted by the N Denver Avenue Cross Levee between W Delta Park and N Victory Boulevard, meanders diagonally across the western portion of the CSDDHD. Vanport City was built around the western part of the slough in the early 1940s; the city was destroyed in the 1948 Vanport Flood. In 1969, the western part of the Mud Slough Drainage was incorporated into the Heron Lakes Golf Course (West Delta Golf Course).[8]

[5] O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 9.
[6] O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 9.
[7] O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 9.
[8] O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 12–13.

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Program activities that would occur within or adjacent to the boundaries of the CSDDHD are concentrated around the I-5/Marine Drive interchange (Figure 5), at the south shore of the Columbia River, and would include the following:

- Reconstruction and widening of I-5 between N Victory Boulevard and the Columbia River, on and over portions of the N Denver Avenue Cross Levee, the Mud Slough Drainage, and the Columbia River Levee.
- Construction of new LRT alignment, new Columbia River bridges, and a new arterial bridge across the North Portland Harbor over the Columbia River Levee.
- Roadway improvements and a new shared use path along N Marine Drive to the west of I-5, on the Columbia River Levee.
- Roadway improvements and new shared use paths along N Martin Luther King Jr. Boulevard, NE Union Court, and N Vancouver Way to the east of I-5, on and beside the Union Avenue/Martin Luther King Jr. Boulevard Cross Levee.
- Roadway improvements and a new shared use path along N Expo Road, at the west side of the N Denver Avenue Cross Levee.
- Roadway improvements along N Denver Avenue to the north of N Victory Boulevard, on the N Denver Avenue Cross Levee.
- Creation of new stormwater facilities near N Victory Boulevard and N Denver Avenue and around the I-5 Martin Luther King Jr. Boulevard overpass.

Temporary construction easements within the CSDDHD, paralleling and including portions of the N Denver Avenue Cross Levee, the Union Avenue/Martin Luther King Jr. Boulevard Cross Levee, and the Columbia River Levee, would be used for construction staging and other activities supporting the proposed construction and road improvements described above (Figure 5). Contractors would ultimately determine the nature of specific activities within any temporary construction easements.

As currently proposed, the IBR Program would not require the removal or displacement of any levees or the infill of the Mud Slough Drainage. The extreme northern portion of the N Denver Avenue Cross Levee, the extreme western portion of the Union Avenue/Martin Luther King Jr. Boulevard Cross Levee, and a small portion of the Columbia River Levee near I-5 would be modified and potentially shifted from their present alignments. These modifications would include the following: alteration of a portion of the Columbia River Levee, to accommodate a transit bridge abutment comprising walls and fill approximately two feet above the existing levee's floodwall and riverward slope; potential widening of the western portion of the Union Avenue/Martin Luther King Jr. Boulevard Cross Levee, to support the reconstruction and widening of Martin Luther King Jr. Boulevard along Delta Park; and potential widening of the northern portion of the N Denver Avenue Cross Levee, to support the reconstruction and widening of I-5 between N Victory Boulevard and the Columbia River. These modifications would be localized, and the total area of each levee that would be altered is relatively small in comparison to the overall extent of the structures: a majority of each levee's alignment and massing would remain relatively constant both during and after construction. Work on the levees themselves would generally be completed using earthen construction similar to that of the existing structures, and in some cases new improvements would be built above

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the levees, thereby minimizing their disturbance; for example, the proposed Columbia River bridges (including ramp bridges) and arterial bridge across the North Portland Harbor would have between approximately 7 and 16 feet of vertical clearance above the Columbia River Levee. With regard to the Mud Slough Drainage, alterations would be limited to a very small portion of the structure at the east side of I-5; the majority of the structure would not be affected by the Program and would retain its existing features. As such, the Modified LPA would not destroy the character-defining features of the contributing levees and slough, and it would therefore not diminish the CSDDHD's integrity of location, materials, design, or workmanship such that the district could no longer convey its significant development history and engineering merit.

Program activities would also alter the current setting of the CSDDHD by constructing infrastructure improvements on and near contributing resources and within the boundaries of the historic district. However, the area surrounding the Columbia River Levee, the Union Avenue/Martin Luther King Jr. Boulevard Cross Levee, the N Denver Avenue Cross Levee, and the Mud Slough Drainage has already experienced extensive changes due to recreational, industrial, commercial, and residential development since the end of the CSDDHD's period of significance in 1961. While the undertaking would alter the infrastructure within and around the historic district, it would not change the relative location of contributing resources or the overall character of the surrounding wetland setting. The permanent cut/fill line of the Modified LPA would impact approximately 0.58 acres of wetlands in the Columbia Slough, while temporary activities would disturb wetland vegetation on approximately 2.56 acres due to construction activities (i.e., disturbances to vegetation and soil, temporary placement of fill) and proximity; these areas represent less than one percent of the overall area of the historic district, which covers approximately 12,550 acres and includes a total of 27 linear miles of levees, fills, and cross levees.[9] The CSDDHD would, overall, retain integrity of setting, feeling, and association during construction and after the undertaking is completed.

In conclusion, the Modified LPA would have an effect on the NRHP-eligible CSDDHD, but that effect would not be adverse. The undertaking would not diminish the historic district's integrity of location, setting, materials, design, workmanship, feeling, or association in a manner that would diminish the district's ability to convey its significance under Criteria A and C; the district would maintain its ability to convey an association with early drainage district development in Oregon and its character as a major early-twentieth century engineered drainage system, both during and after project construction. Therefore, it is anticipated that the Modified LPA would have No Adverse Effect on the NRHP-eligible district.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible CSDDHD.

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[9] IBR Program, "Draft Wetlands and Waters Technical Report" (April 2023), 4-9 and 5-2; O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 5, 8.

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Interstate Bridge Replacement Program. “2. Description of Alternatives.” In “Final Supplemental Environmental Impact Statement.” 2025.

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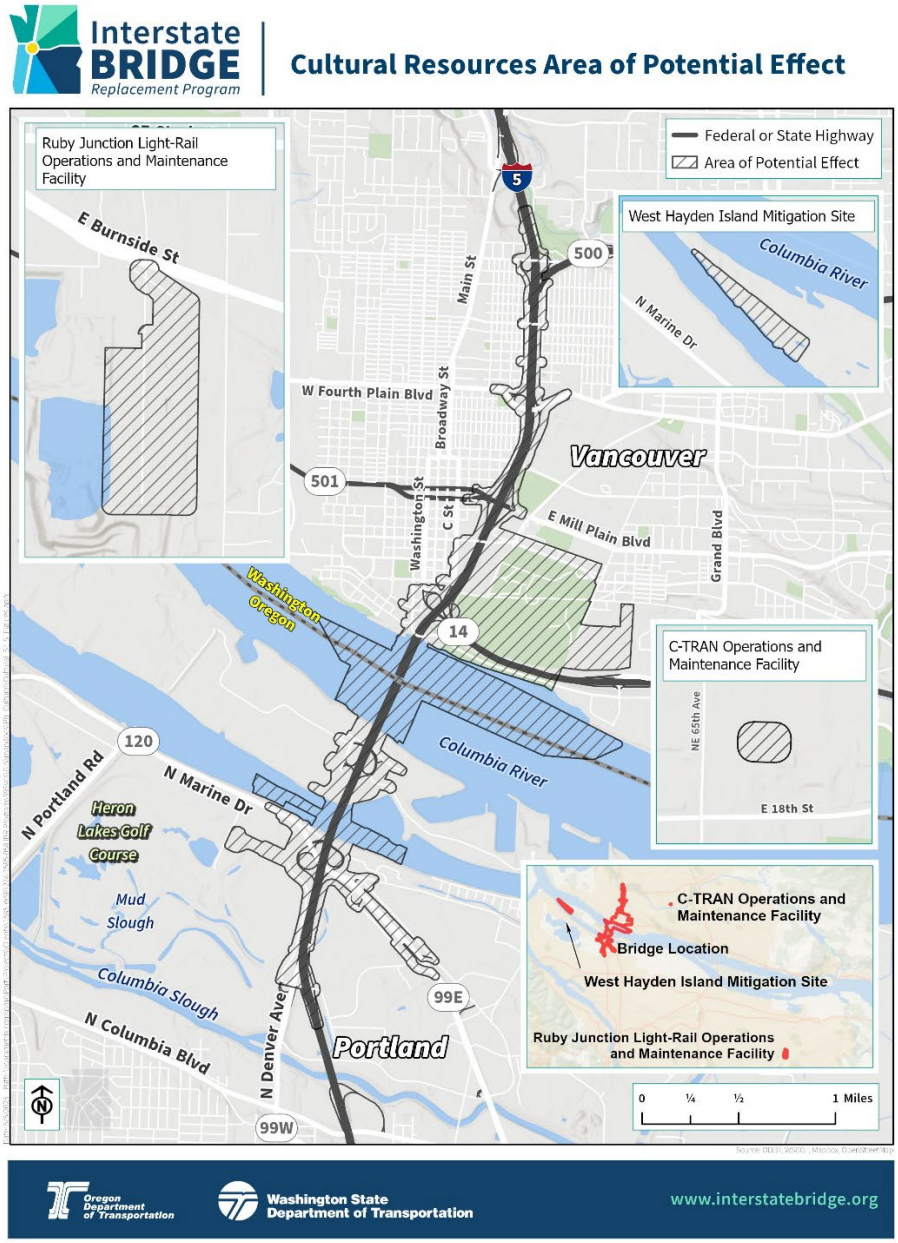


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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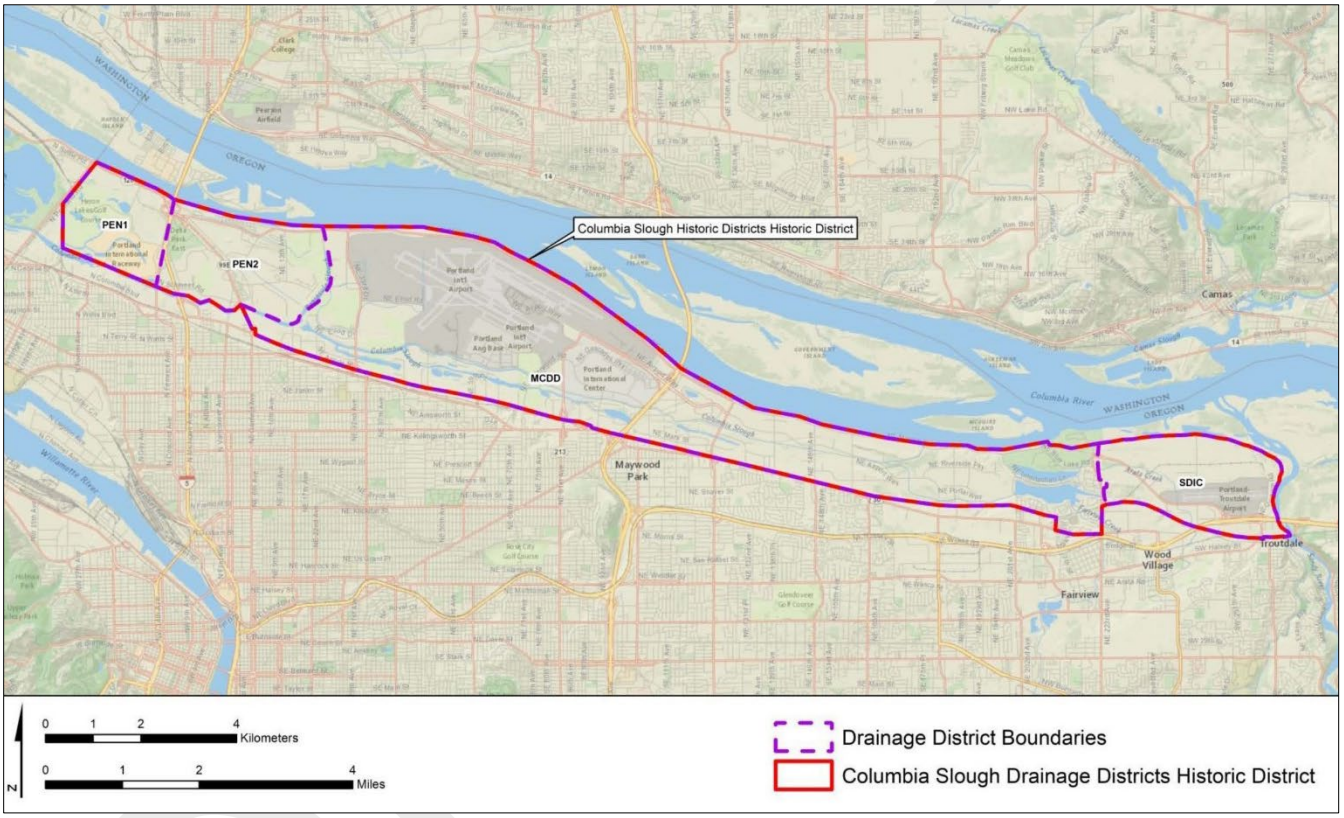


Figure 3. CSDDHD, Portland, Multnomah County, Oregon. Note that the boundary of the historic district is delineated by the levees, major drainages evaluated to be contributing, and reasonable immediate areas surrounding pump stations, weirs, and dams; the interior areas within the drainage districts are not included within the boundaries (O'Brien and Ellis, "The Columbia Slough Drainage Districts Historic District," 73).

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Figure 4. Aerial map of the western portion of the CSDDHD, showing contributing resources outlined in white.

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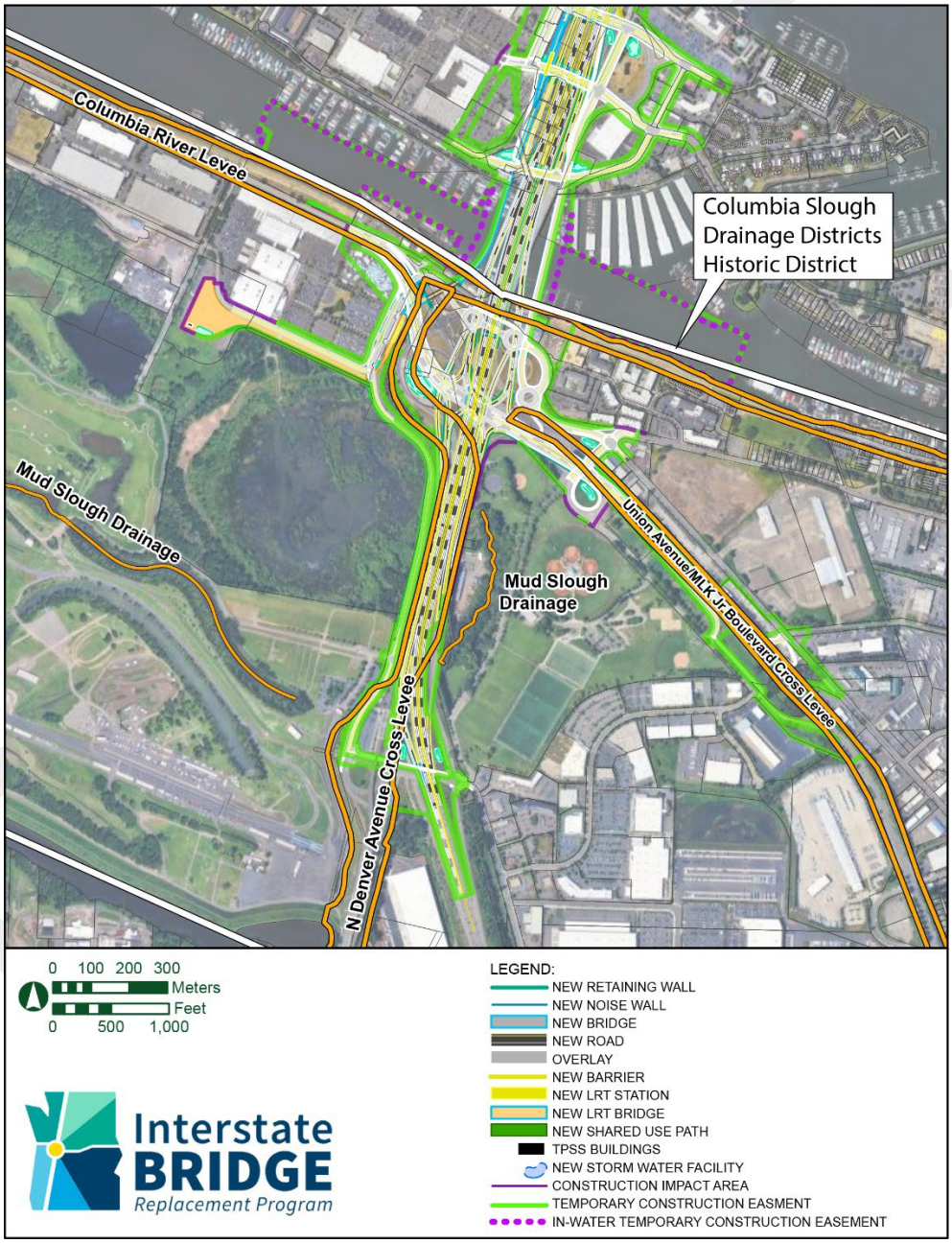


Figure 5. GIS map with proposed Program activities in and within the vicinity of the CSDDHD, contributing resources labeled and shown in orange.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Columbia Slough Drainage Districts Historic District (OR 2)		SHPO Resource ID: 663154
Street Address: N/A	City, County, State: Portland, Multnomah County, Oregon	



Figure 6. View of Columbia River Levee, north side, view facing south (WillametteCRA, January 13, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Columbia Slough Drainage Districts Historic District (OR 2)		SHPO Resource ID: 663154
Street Address: N/A	City, County, State: Portland, Multnomah County, Oregon	



Figure 7. View of Columbia River Levee, south side, view facing northeast (WillametteCRA, June 10, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Columbia Slough Drainage Districts Historic District (OR 2)		SHPO Resource ID: 663154
Street Address: N/A	City, County, State: Portland, Multnomah County, Oregon	



Figure 8. View of the Union Avenue/MLK Jr. Blvd Cross Levee, south side, view facing north (WillametteCRA, March 8, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Northbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1E, OR No. 1377A (OR 50 / WA 381a)		WISAARD Property ID: 18781
Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Northbound Interstate 5 Columbia River Bridge, view north (WillametteCRA, June 14, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Northbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1E, OR No. 1377A (OR 50 / WA 381a)		WISAARD Property ID: 18781
Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program (Program) on Northbound Interstate 5 (I-5) Columbia River Bridge, a steel truss bridge which crosses the Columbia River between Portland, Multnomah County, Oregon and Vancouver, Clark County, Washington (Figure 1). The subject property was listed in the National Register of Historic Places (NRHP) in July 1982 under Criteria A and C.

Based on the following information, it is the recommendation of WillametteCRA to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect to the Northbound I-5 Columbia River Bridge. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Northbound I-5 Columbia River Bridge crosses the Columbia River between Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon (Figure 3). Completed in 1917 and modified in 1958, the bridge is composed of a span across the Columbia River that measures 3,538 feet in length. Starting at the north end of the northbound bridge in Vancouver, the main span is a steel through truss vertical lift span of the Pennsylvania-Petit type that measures 279 feet.[2] The vertical lift span, when fully raised, creates a waterway clearance channel that measures 250 feet laterally and 150 feet vertically (above ordinary high water), at right angles to the current of the river. It is of the Waddell and Harrington type, possessing inclined rear tower posts and a mechanism operated via reinforced concrete counterweights coupled to the lift span by steel cables

[2] Dwight A. Smith, James B. Norman, Pieter T. Dykman, *Historic Highway Bridges of Oregon*, 2nd ed. (Salem, OR: Oregon Department of Transportation, 1989), 209.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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suspended over cast steel sheaves (Figure 7).[3] The bridge is also composed of ten steel through Pennsylvania truss secondary spans, which range in length from 266 to 531 feet. The bridge was retrofitted in 1958 to mimic the distinctive "humpback" raised form in the middle of the adjacent, westerly, southbound bridge built in the same year (Figure 8). These later modifications replaced two original 265-foot spans with the extant 531-foot truss span.[4]

The Northbound I-5 Columbia River Bridge has been listed in the NRHP under Criterion A as a major engineering and financial accomplishment, being the first highway bridge across the Columbia River to connect between the states of Oregon and Washington. The property is also significant under Criterion C as an early example of vertical lift steel bridge and a significant example of a bridge built by the renowned engineering firm Harrington, Howard and Ash, leaders in the field of vertical lift bridge design during the twentieth century.[5]

The period of significance for the property under Criteria A and C begins in 1917 and concludes in 1958, encapsulating the two periods of construction. The Northbound I-5 Columbia River Bridge is in its original location crossing the Columbia River between Vancouver, Washington, and Portland, Oregon. The original design, materials, and workmanship of the bridge are still intact. The setting around the bridge has changed somewhat over the past several decades, but not to the extent that the bridge has lost its integrity of setting. The bridge is still used as a bridge and therefore maintains integrity of feeling and association. The identified boundary of the NRHP-listed property encapsulates the entirety of the northbound bridge structure across the Columbia River between Vancouver, Washington, and Portland, Oregon, including approach spans, sidewalks, and other appurtenances related to the transportation use of the bridge. Within this boundary, all features are contributing to the property's significance.

ALTERNATIVES CONSIDERED

Because the Northbound I-5 Columbia River Bridge is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-listed Northbound I-5 Columbia River Bridge, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would

[3] Jonathan Clarke, "Vancouver-Portland Interstate Bridge Historic American Engineering Record No. WA-86," (Washington DC: US Department of the Interior, National Park Service, 1993), 12.
[4] Clarke, "Historic American Engineering Record No. WA-86," 12.
[5] "Historic Bridges and Tunnels in Washington State Thematic Resources," National Register of Historic Places Inventory – Nomination Form, (Washington DC: US Department of the Interior, National Park Service, 1982), Section 7, Page 2.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would replace the Northbound I-5 Columbia River Bridge with a new bridge and subsequently remove the existing bridge (Figures 5 and 6).

The "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect presented in 36 CFR 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA would therefore have an Adverse Effect on the Northbound I-5 Columbia River Bridge.

CONCLUSION

It is the recommendation of WillametteCRA to FHWA and FTA that the Program would affect the NRHP-listed Northbound I-5 Columbia River Bridge, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

Clarke, Jonathan. "Vancouver-Portland Interstate Bridge Historic American Engineering Record No. WA-86." Washington DC: US Department of the Interior, National Park Service, 1993.

"Historic Bridges and Tunnels in Washington State Thematic Resources." National Register of Historic Places Inventory – Nomination Form. Washington DC: US Department of the Interior, National Park Service, 1984.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

Smith, Dwight A., James B. Norman, and Pieter T. Dykman. Historic Highway Bridges of Oregon. 2nd ed. Salem, OR: Oregon Department of Transportation, 1989.

DRAFT

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	

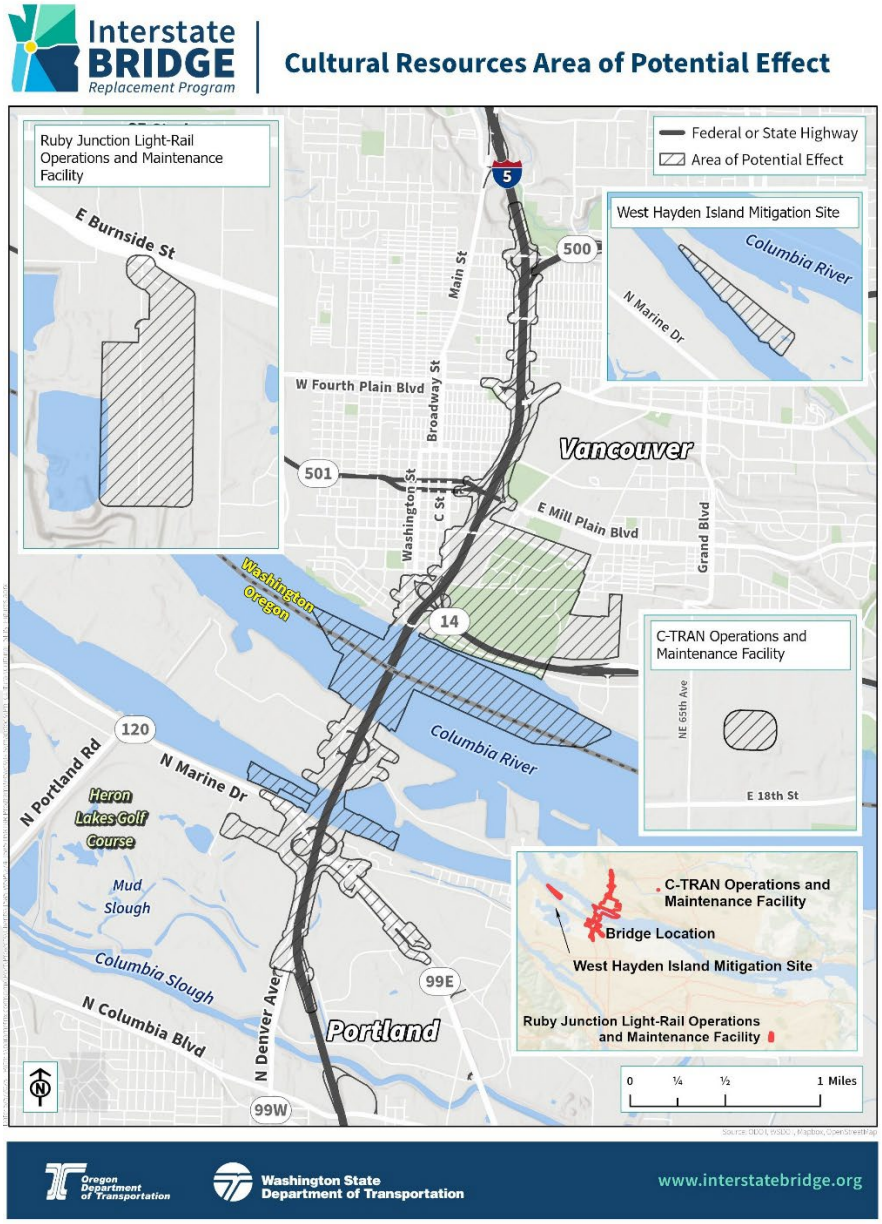


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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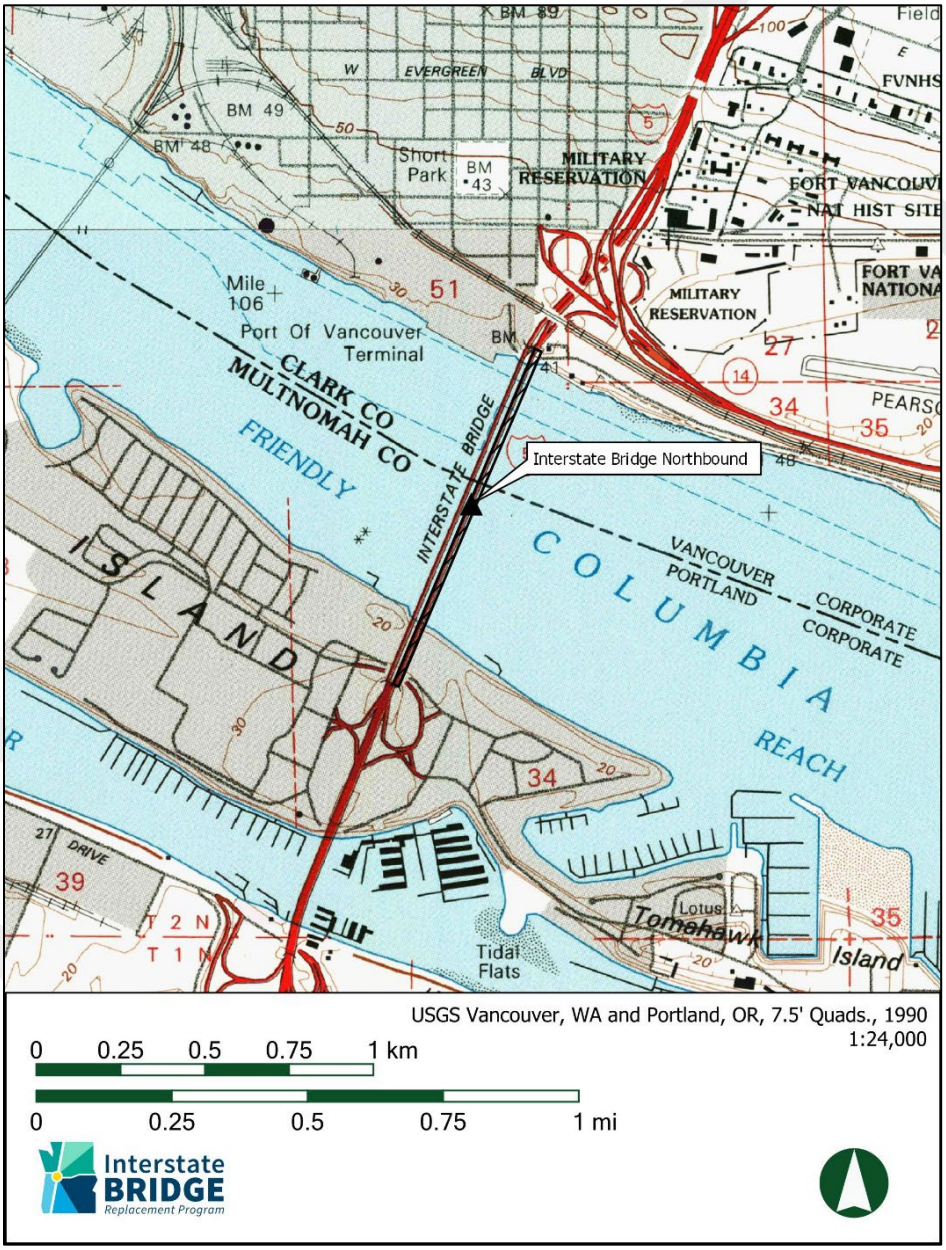


Figure 3. Location map of Northbound I-5 Columbia River Bridge, Portland, Multnomah County, Oregon, and Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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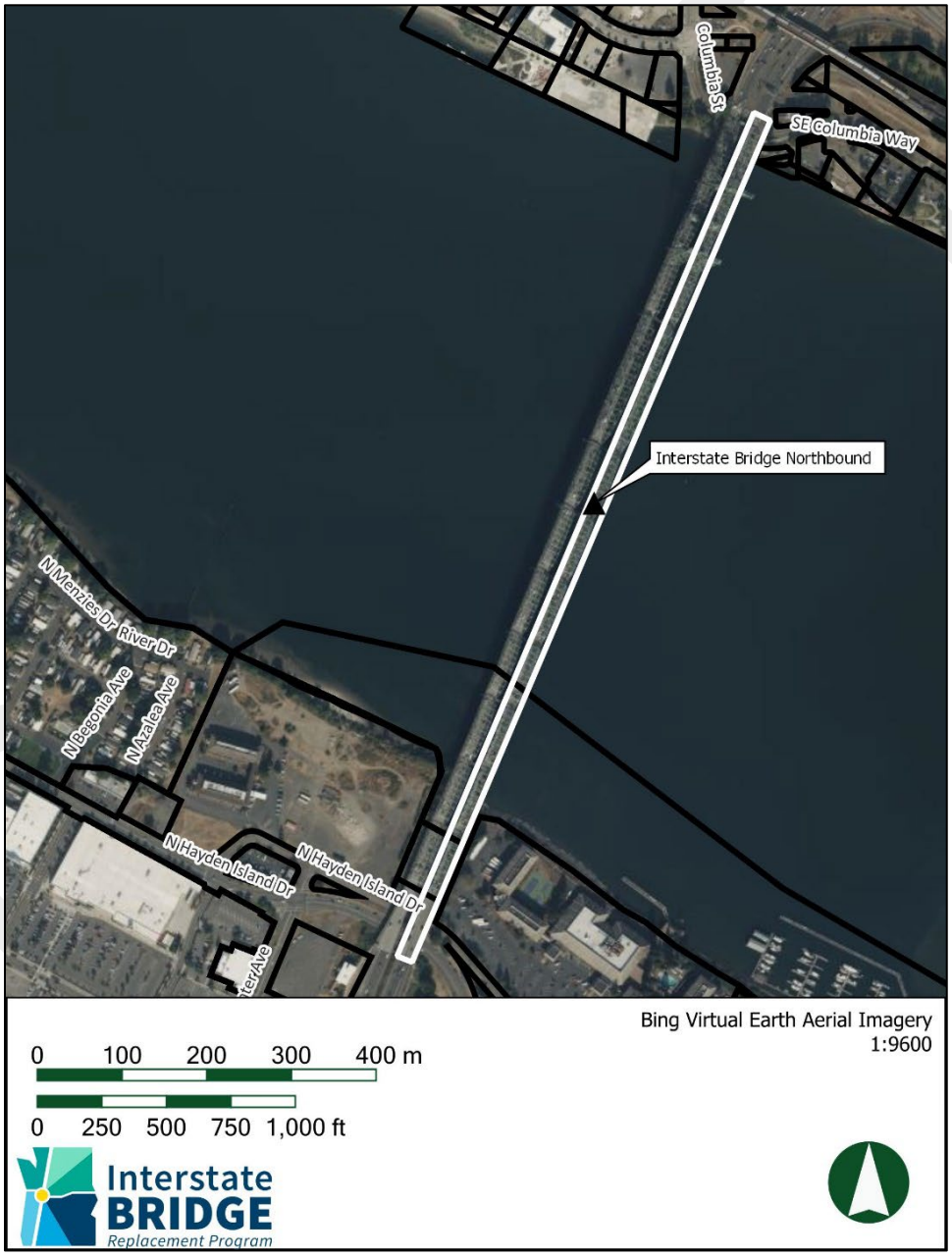


Figure 4. Aerial photograph showing identified boundary of the NRHP-eligible Northbound I-5 Columbia River Bridge in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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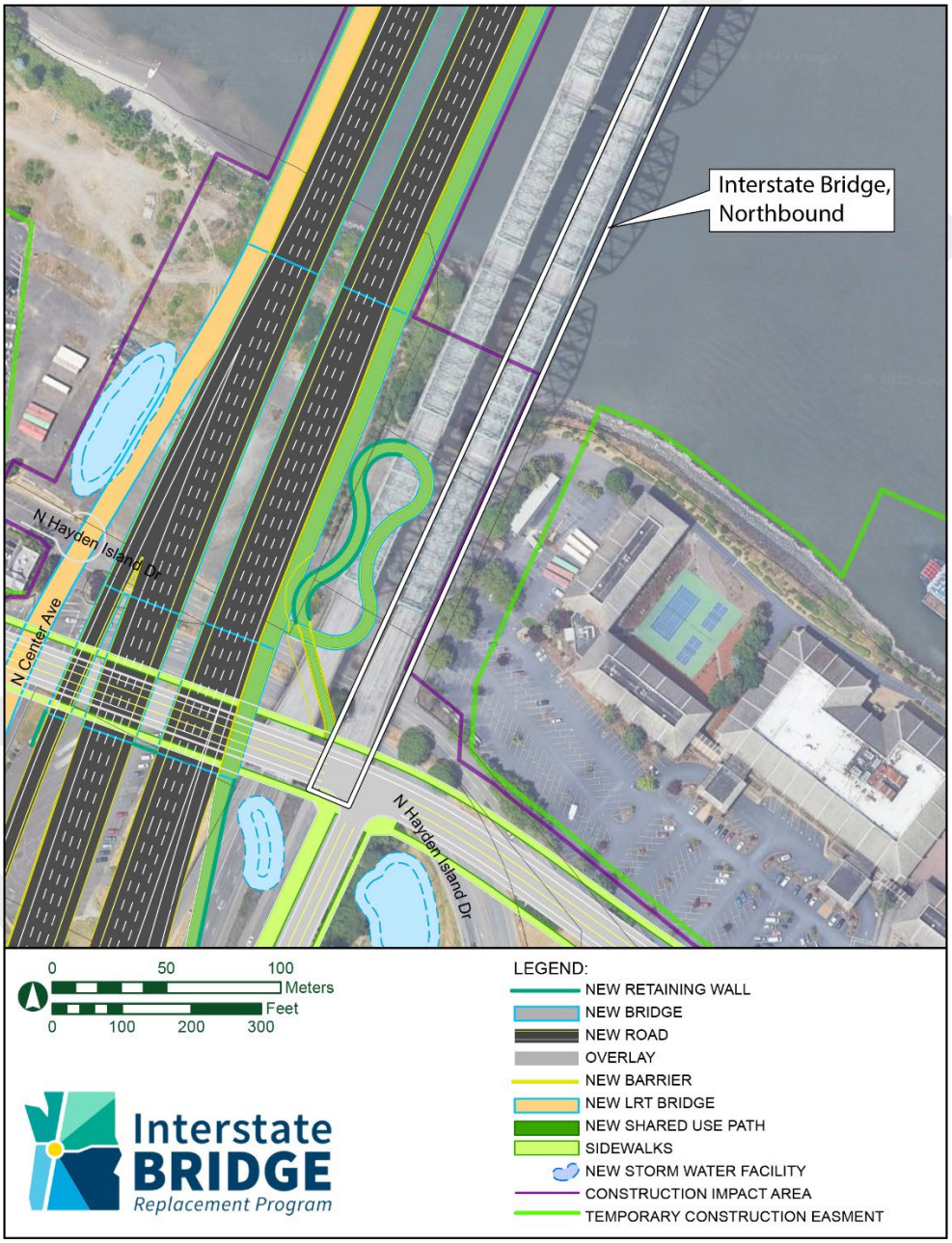


Figure 5. The white rectangle indicates the location of the northbound Interstate 5 Columbia River Bridge in relation to the IBR program Modified LPA.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	



Figure 7. The north portal of the Northbound I-5 Columbia River Bridge (left) and north portal of the Southbound I-5 Columbia River Bridge (right). View facing south (WillametteCRA, December 9, 2021).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	



Figure 8. Northbound I-5 Columbia River Bridge. View facing southwest (WillametteCRA, June 8, 2022).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Southbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1W, OR No. 07333 (OR 51 / WA 381b)		SHPO Resource ID: TBD WISAARD Property ID: 18781
Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Southbound I-5 Columbia River Bridge, view south (WillametteCRA, June 14, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Southbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1W, OR No. 07333 (OR 51 / WA 381b)		SHPO Resource ID: TBD WISAARD Property ID: 18781
Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program (Program) on the Southbound Interstate 5 (I-5) Columbia River Bridge, a steel truss bridge that crosses the Columbia River between Portland, Multnomah County, Oregon and Vancouver, Clark County, Washington (Figure 1). The subject property was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of WillametteCRA to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect to the Southbound I-5 Columbia River Bridge. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Southbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1W, OR No. 07333 (OR 51 / WA 381b)		SHPO Resource ID: TBD WISAARD Property ID: 18781
Street Address: Interstate 5 over the Columbia River	City, County, State: Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon	

highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Southbound I-5 Columbia River Bridge crosses the Columbia River between Vancouver, Clark County, Washington, and Portland, Multnomah County, Oregon (Figure 3). Completed in 1958, the steel bridge has an overall length of 3,538 feet. All through trusses are 45 feet 4-1/2 inches wide and have polygonal top chords. The bridge consists of sixteen spans, twelve piers, and five bents. The bridge has a distinctive "humpback" raised form in the middle to allow for an alternate shipping channel in addition to the channel through the lift spans (Figures 7 through 10).

The Southbound I-5 Columbia River Bridge is eligible for inclusion in the NRHP under Criteria A and C at the state level of significance, in the areas of transportation and architecture. The property is significant under Criterion A as the second bridge to cross the Columbia River at this location between Vancouver, Washington, and Portland, Oregon. It is a tangible representation of productive cooperation between state and local governments in Washington and Oregon and embodies a crucial link in the interstate route between Mexico and Canada on the US West Coast. The property is also significant under Criterion C as a notable example of the

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bridge builder's art. The bridge was designed by several Oregon State Highway Department engineers and constructed by the Guy F. Atkinson Company with components fabricated by the American Bridge Division of United States Steel Corporation. The 1958 bridge has an overall length and "humpback" profile is unusual among bridges of this type; additionally, the resource embodies an unusual and rare example of the long Pennsylvania-Petit steel truss span, which was most often associated with the Pennsylvania Railroad and commonly used up to the 1920s.

The period of significance for the property under Criteria A and C begins in 1958, encapsulating the year of construction, and concludes in 1966, when the tolls were removed from the bridges.[2] The Southbound I-5 Columbia River Bridge is in its original location crossing the Columbia River between Vancouver, Washington, and Portland, Oregon. The original design, materials, and workmanship of the bridge are still intact. The setting around the bridge has changed somewhat over the past several decades, but not to the extent that the bridge has lost its integrity of setting. The bridge is still used as a bridge and therefore maintains integrity of feeling and association. The identified boundary for the NRHP-eligible property encapsulates the entirety of the southbound bridge structure across the Columbia River between Vancouver, Washington, and Portland, Oregon, including approach spans, sidewalks, and other appurtenances related to the transportation use of the bridge. Within this boundary, all features are contributing to the property's significance (Figure 4).

ALTERNATIVES CONSIDERED

Because the Southbound I-5 Columbia River Bridge has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Southbound I-5 Columbia River Bridge, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

[2] Adam Alsobrook, "Southbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1W, OR No. 07333," Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties), ODOT Key No. 21570, WSDOT Work Order No. 400519A, prepared by WillametteCRA, 2023.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. As currently proposed, the Modified LPA would replace the existing Southbound I-5 Columbia River Bridge with a new bridge and subsequently remove the existing bridge (Figures 5 and 6).

The "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect presented in 36 CFR 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA would therefore have an Adverse Effect on the Southbound I-5 Columbia River Bridge.

CONCLUSION

It is the recommendation of WillametteCRA to FHWA and FTA that the Program would affect the NRHP-eligible Southbound I-5 Columbia River Bridge, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

Alsobrook, Adam. "Southbound Interstate 5 Columbia River Bridge, Bridge WA No. 5/1W, OR No. 07333 (OR 51 / WA 381b)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

DRAFT

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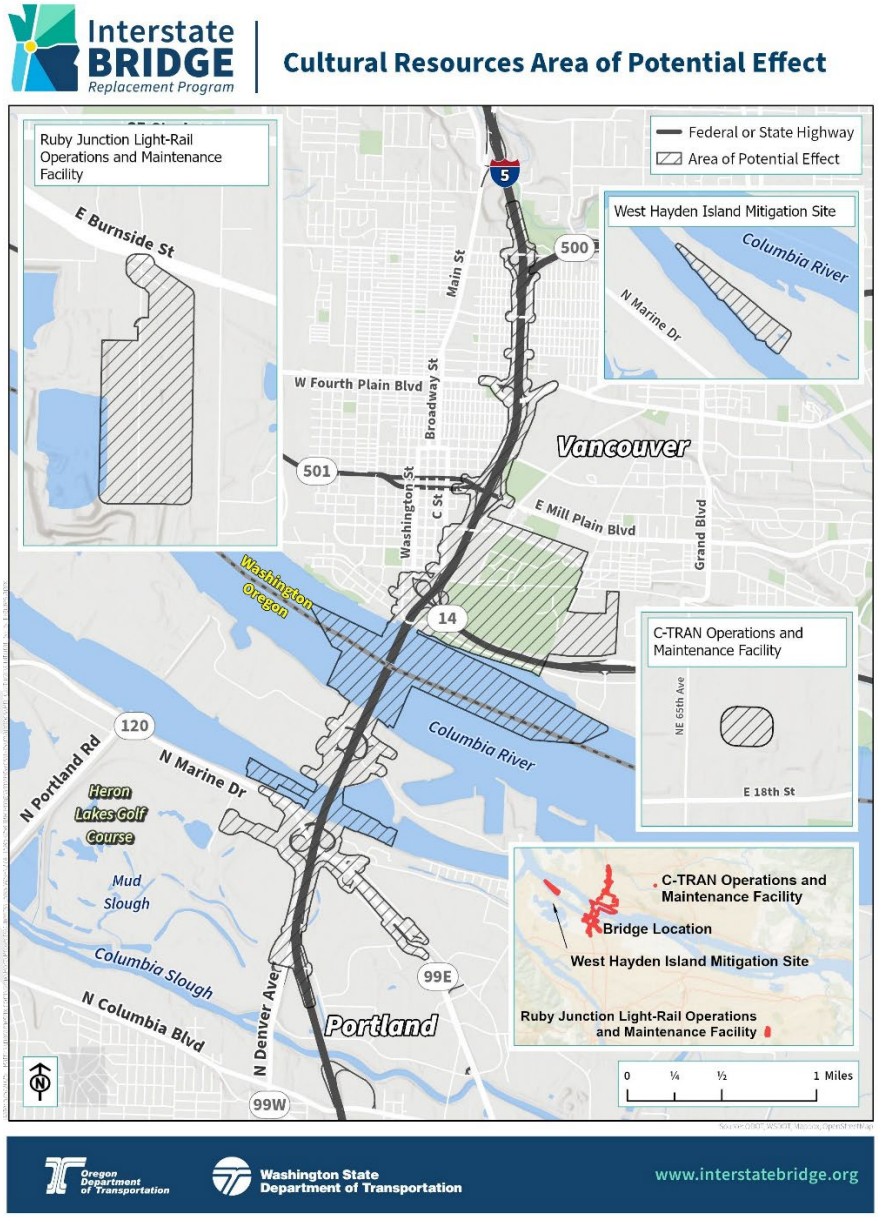


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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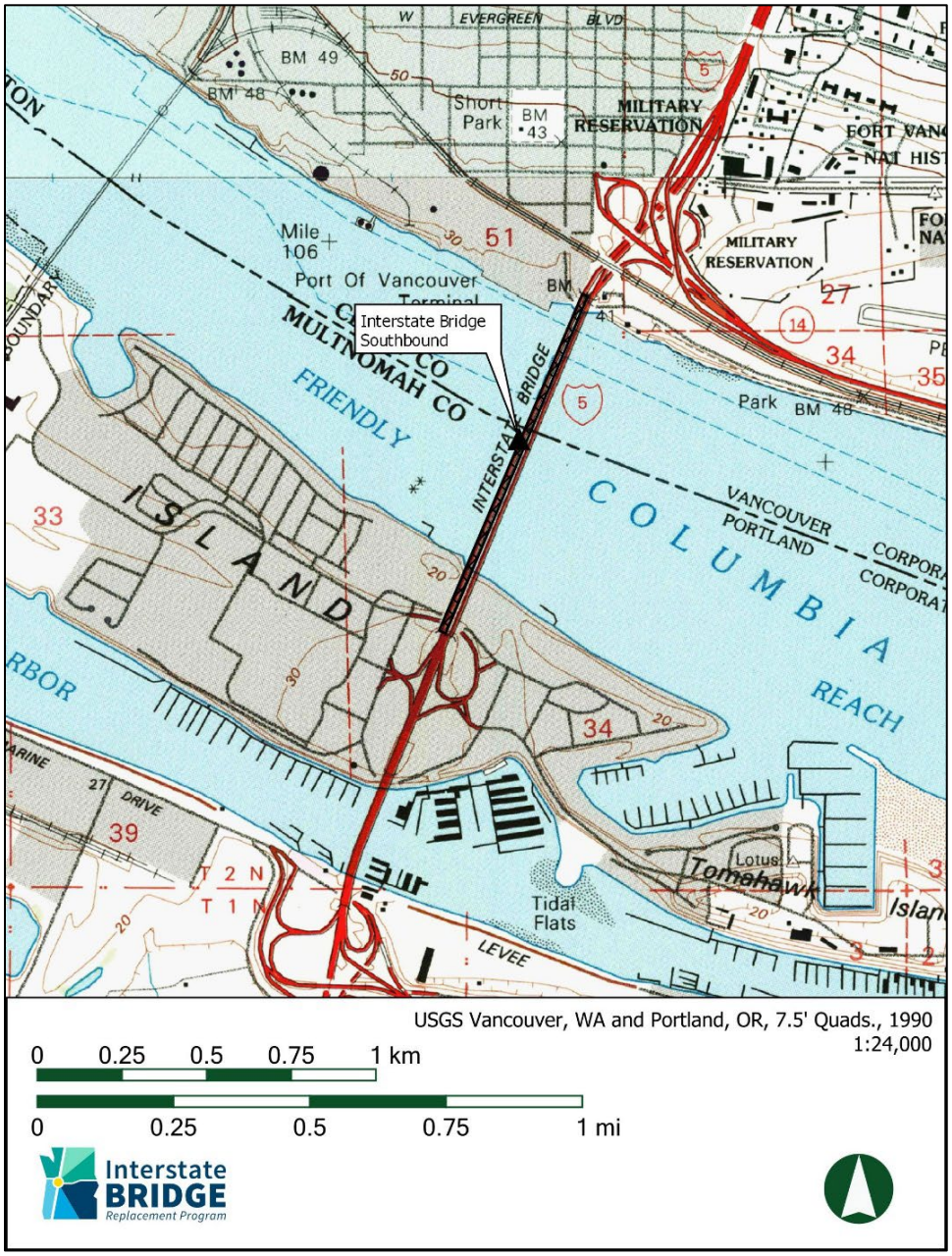


Figure 3. Location map of Southbound I-5 Columbia River Bridge, Portland, Multnomah County, Oregon, and Vancouver, Clark County, Washington.

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Figure 4. Aerial photograph showing identified boundary of the NRHP-eligible Southbound I-5 Columbia River Bridge in white.

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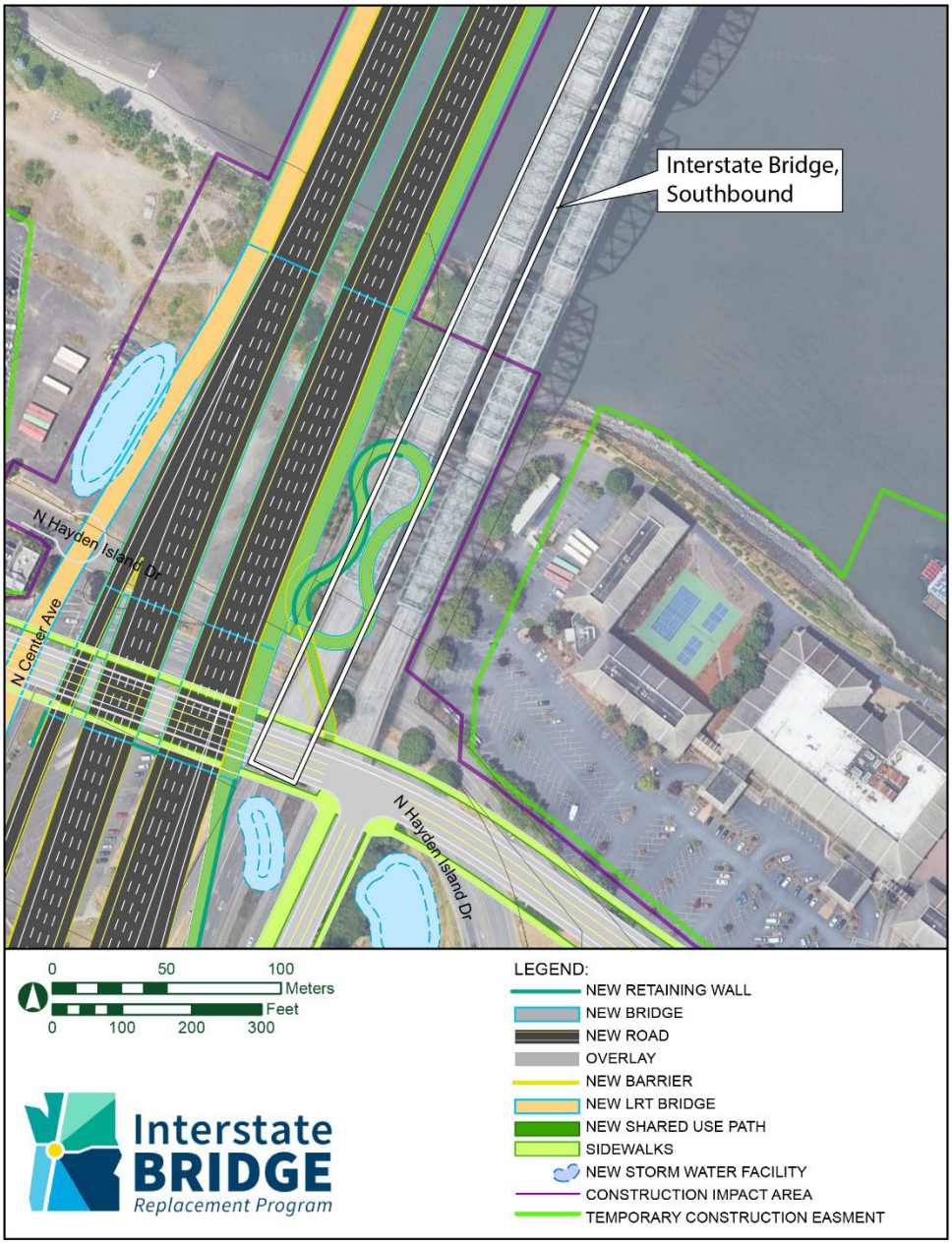


Figure 5. The white rectangle indicates the location of the southbound Interstate 5 Columbia River Bridge in relation to the IBR Program Modified LPA.

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Figure 6. The white rectangle indicates the location of the southbound Interstate 5 Columbia River Bridge in relation to the IBR Program Modified LPA.

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Figure 7. The Southbound I-5 Columbia River Bridge. View facing north (WillametteCRA, December 8, 2021).

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Figure 8. South portal of the Southbound I-5 Columbia River Bridge. View facing east (WillametteCRA, December 8, 2021).

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Figure 9. South approach of the Southbound I-5 Columbia River Bridge. View facing north (WillametteCRA, June 7, 2022).

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Figure 10. The north portal of the Northbound I-5 Columbia River Bridge (left) and north portal of the Southbound I-5 Columbia River Bridge (right). View facing south (WillametteCRA, December 9, 2021).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Portland Assembly Center (Portland Expo Center. Other Historic Names: Pacific International Livestock Association Building)[1] (OR 56)	SHPO Resource ID: 50293
Street Address: 2060 North Marine Drive	City, County, State: Portland, Multnomah County, Oregon

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Portland Assembly Center, Hall A, east elevation, view west (WillametteCRA, May 4, 2023).

[1] The National Park Service's National Register Bulletin *How to Complete the National Register Registration Form* notes that the name of a property should be that which "best reflects the property's historic importance or was commonly used for the property during the period of significance." Although the site at 2060 North Marine Drive possesses multiple areas of significance, the property's association with the incarceration of people of Japanese descent is found to be its strongest association. Therefore, the name applied to the site during this period has been used as the property name.

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Portland Assembly Center, a site including five interconnected exposition halls located at 2060 North Marine Drive in Portland, Multnomah County, Oregon (Figure 1). The subject property, which is located along the Columbia River at the southeast corner of the intersection of Marine Drive West and North Force Avenue, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of WillametteCRA to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect to the Portland Assembly Center. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[2]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

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[2] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configurations would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

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Street Address: 2060 North Marine Drive	City, County, State: Portland, Multnomah County, Oregon	

- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Portland Assembly Center site (2060 North Marine Drive) is located upon two adjacent tax lots which cover 48.81 acres (one 37.90 acres and the other 10.91 acres) along the Columbia River in the North Portland area of Portland, Multnomah County, Oregon (Figures 3 and 6–13). The site is located on the western portion of the tax lots, parallel to the wide slough of the North Portland Harbor (previously the Oregon Slough). It features a complex of five interconnected exposition halls given the contemporary names A through E and built between 1924 and 2001. The northernmost halls A, B, and C are located in what is both the northernmost and the earliest section of the complex, which was completed in 1924. They measure approximately 1,000 feet from east to west and 320 feet from north to south, with a T-shaped footprint centered off a double-height space topped by a low-pitched front-facing gable roof. Halls A and B, which flank the east and west side of the double-height space, are topped by similarly low-pitched side gable roofs. The complex's secondary public entry is located at the eastern end of Hall A and is articulated by a Midcentury Modern style portico. This is articulated by five square piers which project from the building wall and support a flat-topped covering and a large "EXPO" sign composed of a metal

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screen and neon-style lettering (possibly updated to LED lettering). Hall C, located to the south of the double-height space, rises to approximately three stories in height beneath a low-pitched gable roof. The hall is clad in vertically oriented metal panels and is accessed through both pedestrian entries composed of aluminum frame full glass doors, as well as metal roll-up vehicular doors (garage doors). Aerial imagery indicates that some original eight-over-eight double-hung wood sash windows may be located in the clerestory of Hall C beneath the gable roof; however, these windows could not be directly surveyed.[3] Halls D and E, constructed in 2001 and 1997 respectively, are located directly south of Hall C. Both rise three stories in height to low-pitched barrel-vaulted roofs and possess rectangular footprints: Hall D measures approximately 325 feet by 250 and Hall E measures approximately 388 by 321 feet.

The Portland Assembly Center site is eligible for inclusion in the NRHP under Criterion A, at the state level of significance, in the areas of ethnic heritage: Asian (state), military (state), politics/government (state), social history (state), and other: wartime internment camp (state). The site possesses substantial significance for its direct association with the World War II Homefront and the events of Japanese American incarceration. It is one of only 15 Temporary Assembly Centers originally designated by the Wartime Civil Control Administration and is the only such site in Oregon. All others were located in California; in Puyallup, Washington; and in Mayer, Arizona.[4] No other resources so directly associated with the events of Japanese exclusion are known within the state of Oregon, making the Portland Assembly Center distinctive in its ability to speak to this history.

The period of significance for the NRHP-eligible Portland Assembly Center is limited to 1942, corresponding to the period of Japanese American incarceration. The identified boundary of the site is limited to the area contained within the barbed wire fence of the 1942 facility (Figure 4). This boundary is contained within the larger tax lot (R323452). Within the boundary, character-defining features of the site include the essential physical features of Halls A, B, and C that date to the period of significance, including the halls' linear double-height massing, low-pitched gable roofs, open interior spaces, central street entry onto Marine Drive, and materials including exposed heavy timber framing, masonry and wood crib wall structures, and the intact multilight windows in the roof monitors. Additionally, character-defining features of the site include those aspects of setting and location that were conducive to its selection as an assembly center: namely the site's flat topography; orientation along the Columbia River; views of North Portland Harbor and the Columbia River Levee; proximity to nearby population centers and transportation infrastructure including the roadway, waterway, and rail lines; its semi-industrial land use, which allowed for immediate availability of energy and water; and its spatial arrangement including the open east half of the site and covered space for shelter and recreation.

ALTERNATIVES CONSIDERED

Because the Portland Assembly Center has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

[3] Estelle Weiss-Tisman, "Portland Assembly Center," Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties), ODOT Key No. 21570, WSDOT Work Order No. 400519A, prepared by WillametteCRA, 2023.
[4] Wyatt, *Japanese Americans in World War*, 61.

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No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Portland Assembly Center, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would require modifications to the existing Marine Drive West, along the eastern side of the Portland Assembly Center's historic boundary; construction of a new LRT station and bridge near the southeast corner of the site; and construction of a new LRV overnight facility to the southwest of the site's historic boundary. Marine Drive West would be expanded by approximately 60 feet and shifted south, further into the northeast portion of the historic site, while the proposed LRT station and bridge would be located just within the southeastern corner of the historic site (Figure 5). As a result of the Marine Drive West expansion, a two-acre temporary road detour area will also be located at the northeastern corner within the historic site boundary, stretching along the southern side of the Marine Drive West alignment. Retaining walls will also be constructed along the Marine Drive West alignment within the historic site boundary. Both the southwestern, southeastern, and northeastern areas have been substantially altered since the site's 1942 period of significance by the installation of a surface parking lot and various landscaping features such as sidewalks and vegetated islands.

As construction activities within the boundaries of the historic site would be limited to areas that have already experienced major alterations since the end of the period of significance, the Modified LPA would not alter any of the essential physical features that qualify the Portland Assembly Center for inclusion in the NRHP. The character-defining features of the property's setting and location would also remain unchanged: the site would continue to possess relatively flat topography and would maintain its orientation along the Columbia River, views of North Portland Harbor and the Columbia River Levee, proximity to nearby population centers and transportation infrastructure, and semi-industrial land use. Furthermore, despite the construction at the east edge of the site, its spatial arrangement would continue to be characterized by an open area to the east and covered spaces to the west. Finally, the nature of the proposed construction would cause a negligible increase to the existing levels of auditory exposure and visual intrusions to which the property is already exposed as a result of its

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adjacency to the existing LRT station, vehicle corridors, and industrial development to the north and east. Under the Modified LPA, noise levels are anticipated to increase from a range of 53–56 dBA to 57–60 dBA at the southeast corner of the historic site. This anticipated increase does not approach or exceed 67 dBA, which is the threshold set by FHWA's Noise Abatement Criteria (NAC) for Section 4(f) sites.[5]

In conclusion, the Modified LPA would have an effect on the NRHP-eligible Portland Assembly Center, but that effect would not be adverse. The undertaking would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association in a manner that would diminish its ability to convey its significance under Criterion A. The proposed acquisitions and construction activities are located at a distance from the property's contributing elements and would not alter any of its character-defining features. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Portland Assembly Center.

SOURCES/BIBLIOGRAPHY

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Wyatt, Barbara ed., *Japanese Americans in World War II*. Washington DC: US Department of the Interior, National Park Service, 2012.

[5] IBR Program, "Noise and Vibration Report" (June 2025), 4-21.

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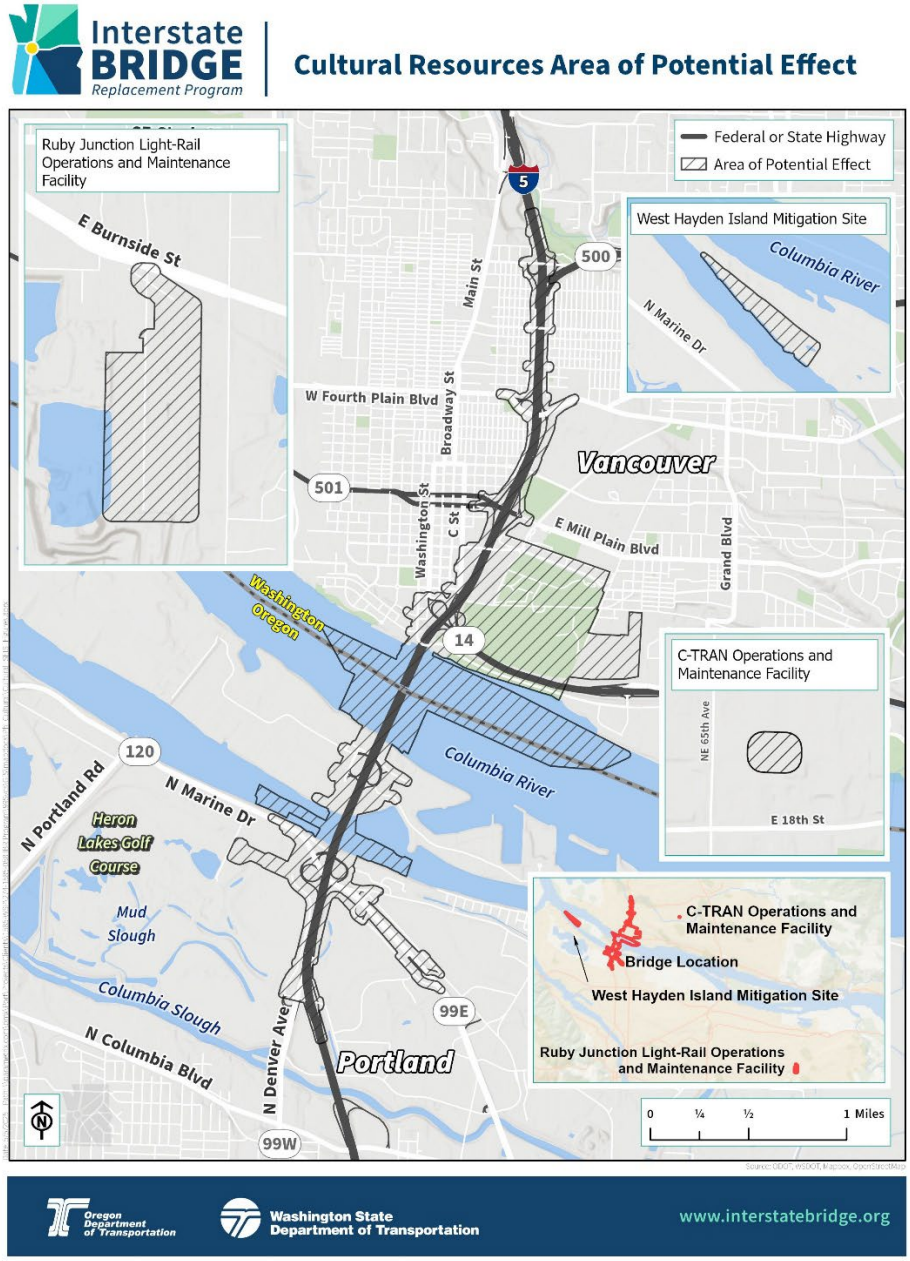


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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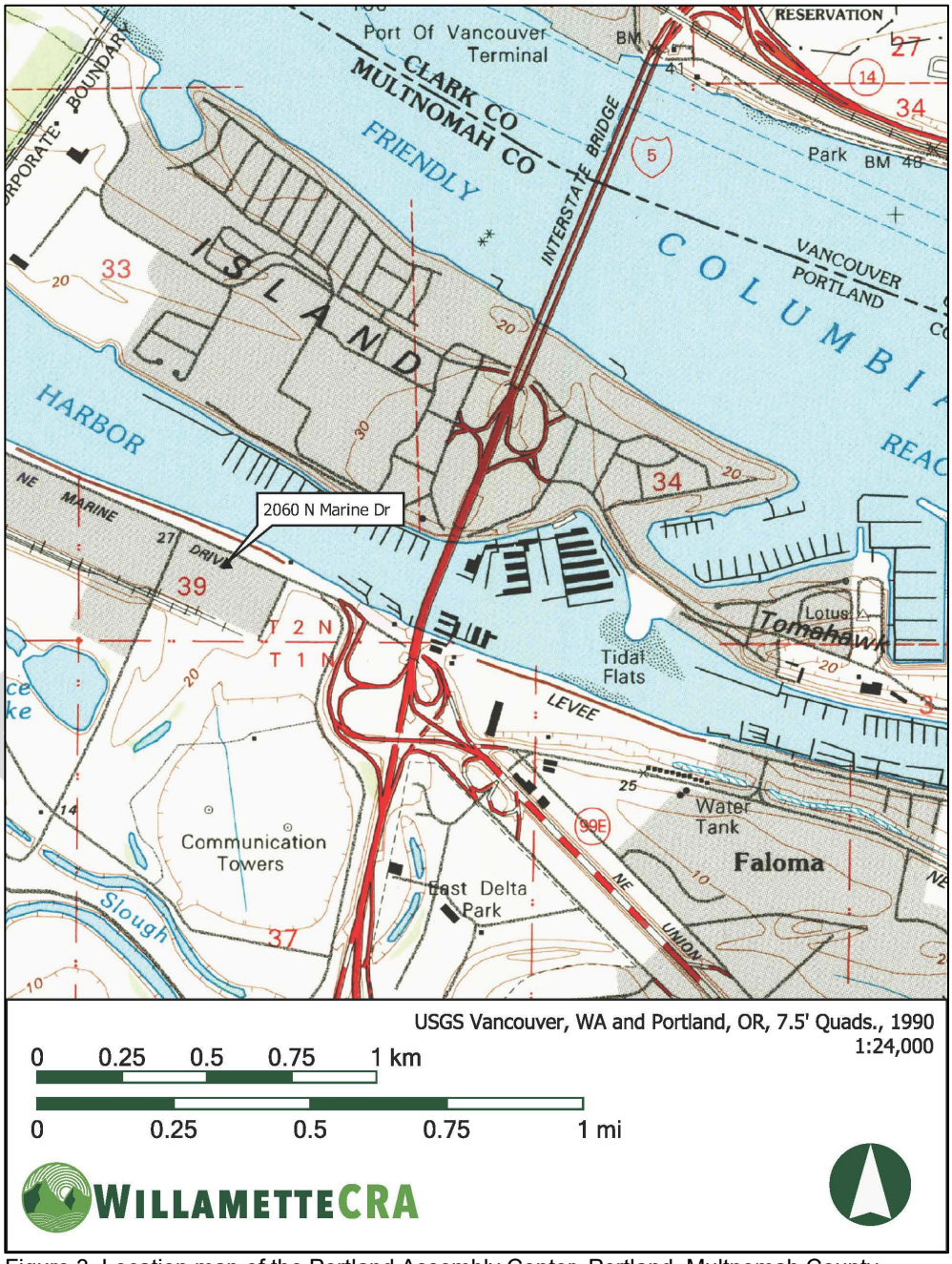


Figure 3. Location map of the Portland Assembly Center, Portland, Multnomah County, Oregon.

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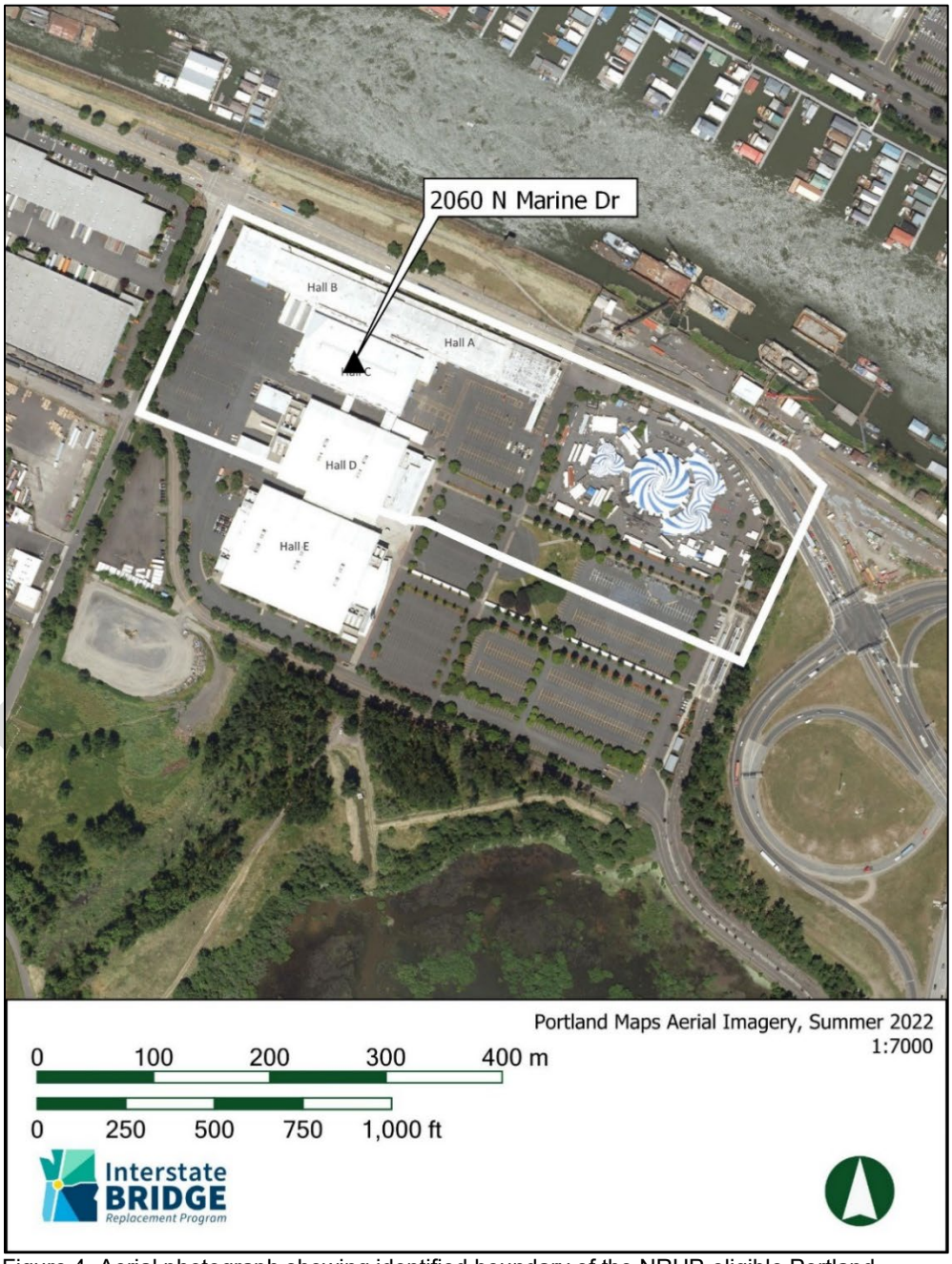


Figure 4. Aerial photograph showing identified boundary of the NRHP-eligible Portland Assembly Center (12060 North Marine Drive) in white.

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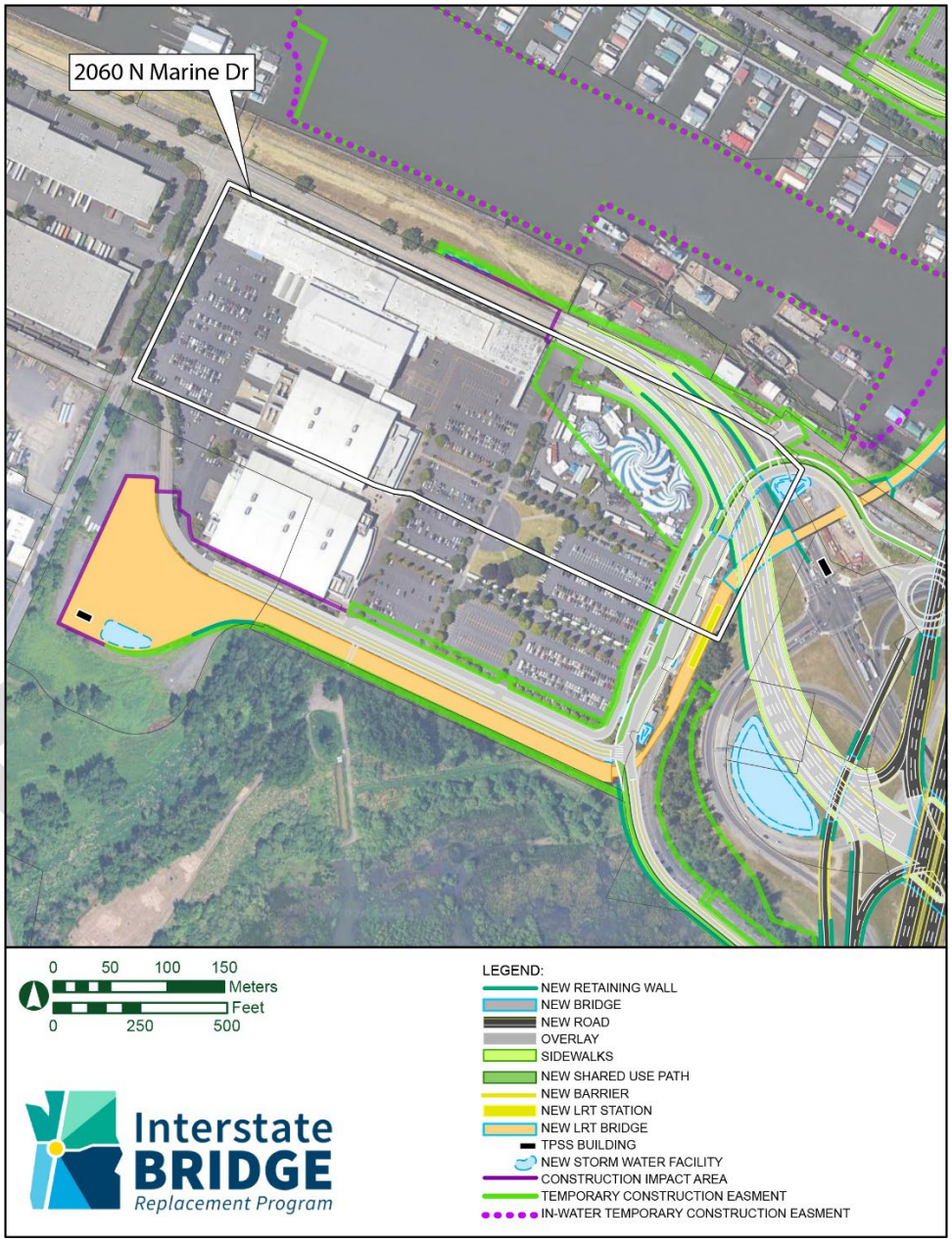


Figure 5. Aerial map showing the proximity of proposed Program activities to the Portland Assembly Center (2060 N Marine Drive), the identified boundary of the NRHP-eligible property outlined in white.

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Figure 6. Aerial view of Portland Assembly Center. View facing southeast. (IBR/Bentley Systems, May 26, 2022).

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Figure 7. Contemporary 3D model of Portland Assembly Center from aerial flyover, view facing west. View includes all halls (IBR/Bentley Systems, May 26, 2022).

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Figure 8. Contemporary 3D model of Portland Assembly Center from aerial flyover, view facing northeast. View of garage entrance to Hall C (IBR/Bentley Systems, May 26, 2022).

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Figure 9. Contemporary 3D model of Portland Assembly Center from aerial flyover, view facing southwest. View includes lobbies attached to Halls D and E (IBR/Bentley Systems, May 26, 2022).

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Figure 10. Portland Assembly Center, Hall B, west elevation. View facing southeast (WillametteCRA, May 4, 2023).

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Figure 11. Portland Assembly Center, Hall B, north elevation. View facing southwest (WillametteCRA, May 4, 2023).

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Figure 12. Portland Assembly Center, Hall A and C. View facing north (WillametteCRA, May 4, 2023).

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Figure 13. Portland Assembly Center, Hall D and E east elevations. View facing northwest (WillametteCRA, May 4, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Harbor Shops (OR 107)	SHPO Resource ID: TBD
Street Address: 11915 N Center Avenue	City, County, State: Portland, Multnomah County, Oregon

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The Harbor Shops building (11915 North Center Avenue), view northeast (WillametteCRA, January 16, 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Harbor Shops building, a Postmodern strip mall located at 11915 N Center Avenue in Portland, Multnomah County, Oregon (Figure 1). The subject property, which is on the north side of N Center Avenue and immediately west of Interstate 5 (I-5), was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect on the Harbor Shops building. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Harbor Shops building (11915 N Center Avenue) is a Postmodern strip mall located immediately west of I-5 on Hayden Island in Portland, Multnomah County, Oregon (Figure 3). Constructed in 1978, this one-story building features an irregular footprint with an elongated "zigzag" shape and a flat roof with a high parapet (Figure 5). The exterior walls are wood-framed and primarily clad in diagonally oriented channeled wood siding topped by standing seam metal flashing, with some sections of weatherproof plywood paneling on the east (rear) elevation. Along the building's west (principal) elevation runs a concrete walkway with faux tree-trunk columns and shed roof that shelters the entrances to various storefronts. Most of these entrances consist of a double- or single-entry full-glass aluminum door flanked by three or four vertically oriented fixed windows in anodized aluminum frames. Other details include illuminated signs on the shed roof over the covered walkway, neon signs behind tempered glazing on the principal elevation, and service entries along the rear elevation.

The Harbor Shops building is eligible for inclusion in the NRHP under Criterion A, at the local level of significance, in the areas of commerce and community planning and development. The strip mall is an excellent example of Hayden Island Inc.'s development strategy for Hayden Island in the later twentieth century, illustrating the island's transition from the leisure activity of a postwar amusement park to the leisure activity of shopping. The Harbor

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Shops building is also eligible, at the local level of significance, under Criterion C in the area of architecture as an intact example of a strip mall property type. It demonstrates characteristic features used to increase appeal to pedestrians and automotive users, including large areas for signage, the covered walkway, and ample parking, that have been adapted to the Pacific Northwest through the application of distinctive materials such as faux the tree-trunk columns. In this way, the Harbor Shops building is exemplary of the strip mall's use within the local region and the ways in which the type could be suited to its local environment through changes to materials, rather than basic form.

The period of significance for the Harbor Shops building under Criteria A and C is limited to 1978, the year of its construction. Although it has experienced minor alterations to its interior configuration and exterior signage related to tenant turnover, the strip mall generally retains integrity of location, setting, design, materials, workmanship, feeling, and association to this period. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot, which abuts the southbound lanes of I-5 to the east, adjacent tax lots in the same plat to the north and west, and the curvilinear alignment of North Center Avenue to the west and south (Figure 4). The boundary includes the Harbor Shops building as well as the associated parking lot and planted medians.

ALTERNATIVES CONSIDERED

Because the Harbor Shops building has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Harbor Shops building, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would involve the permanent right-of-way acquisition of the Harbor Shops building in order to construct the Columbia River bridges. Construction of the bridges would furthermore require the demolition of extant features on the NRHP-eligible property, including the primary commercial building, surface parking lots and circulation, and planted medians (Figures 5–6). As such, no features that date to the property's 1978 period of significance and that justify its NRHP eligibility under Criteria A and C would remain following the completion of construction.

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In conclusion, the Modified LPA would destroy the features that convey the property's significance under Criteria A and C and would eliminate the property's integrity of location, setting, design, materials, workmanship, feeling, and association. The "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect presented in 36 CFR § 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect as defined in 36 CFR § 800.5(a)(1), the Modified LPA is anticipated to have an Adverse Effect on the NRHP-eligible Harbor Shops building.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would affect the NRHP-eligible harbor Shops building, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

Boyle, Brigid. "Harbor Shops (OR 107)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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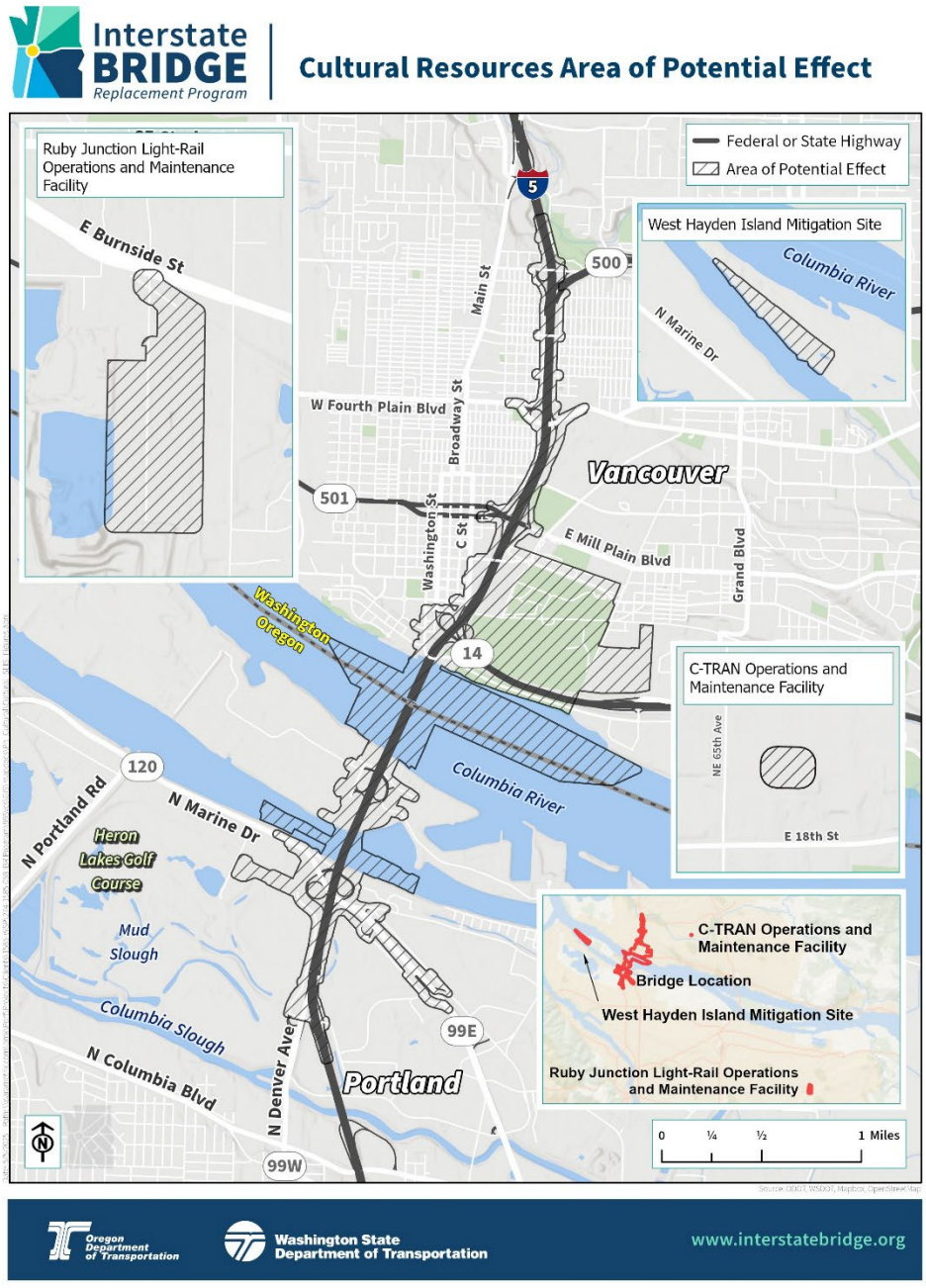


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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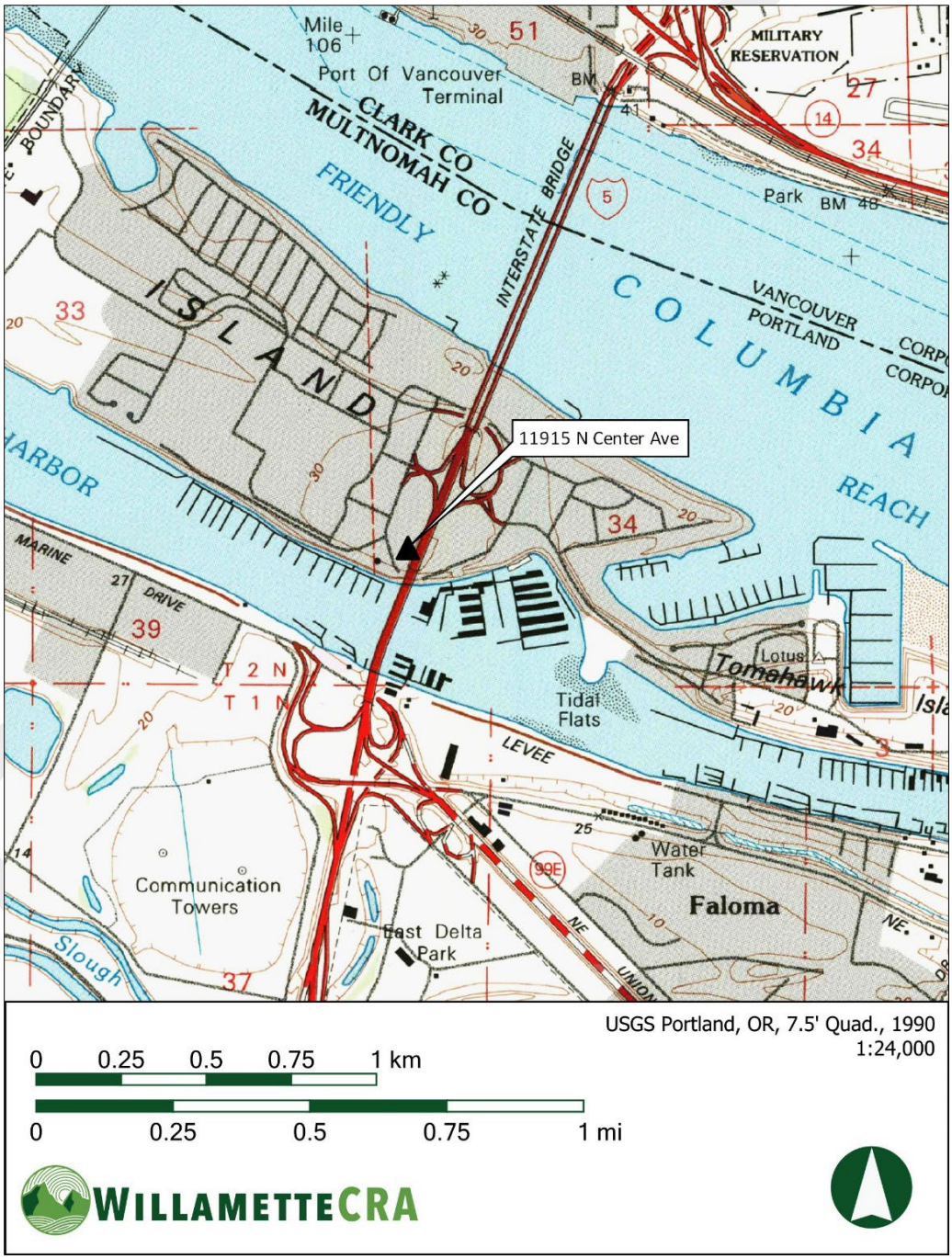


Figure 3. Location map of the Harbor Shops building (11915 North Center Avenue), Portland, Multnomah County, Oregon.

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Figure 4. Aerial map of the Harbor Shops building (11915 North Center Avenue), showing the identified boundary of the NRHP-eligible property in white.

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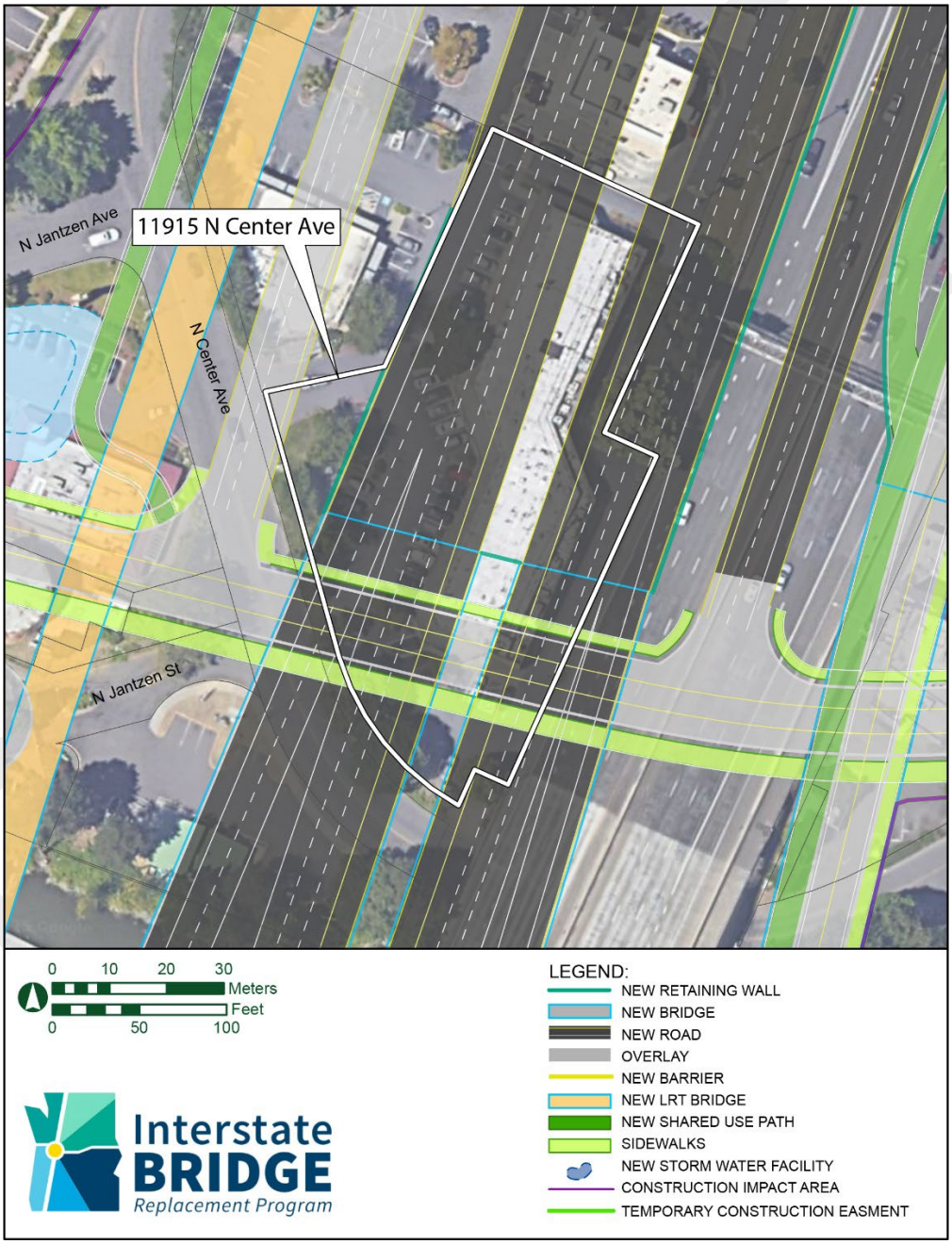


Figure 5. Aerial map showing the proximity of proposed Program activities to the Harbor Shops building (11915 North Center Avenue), with the identified boundary of the NRHP-eligible property in white. The property would be demolished for these activities.

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Figure 6. Partial west elevation of the Harbor Shops building (11915 North Center Avenue), view east (WillametteCRA, January 16, 2023).

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Figure 7. Oblique aerial view of the Harbor Shops building (11915 North Center Avenue) and surrounding development as it appeared in mid-2022, view northeast (IBR/Bentley Systems, May 26, 2022; screengrab captured June 13, 2023).

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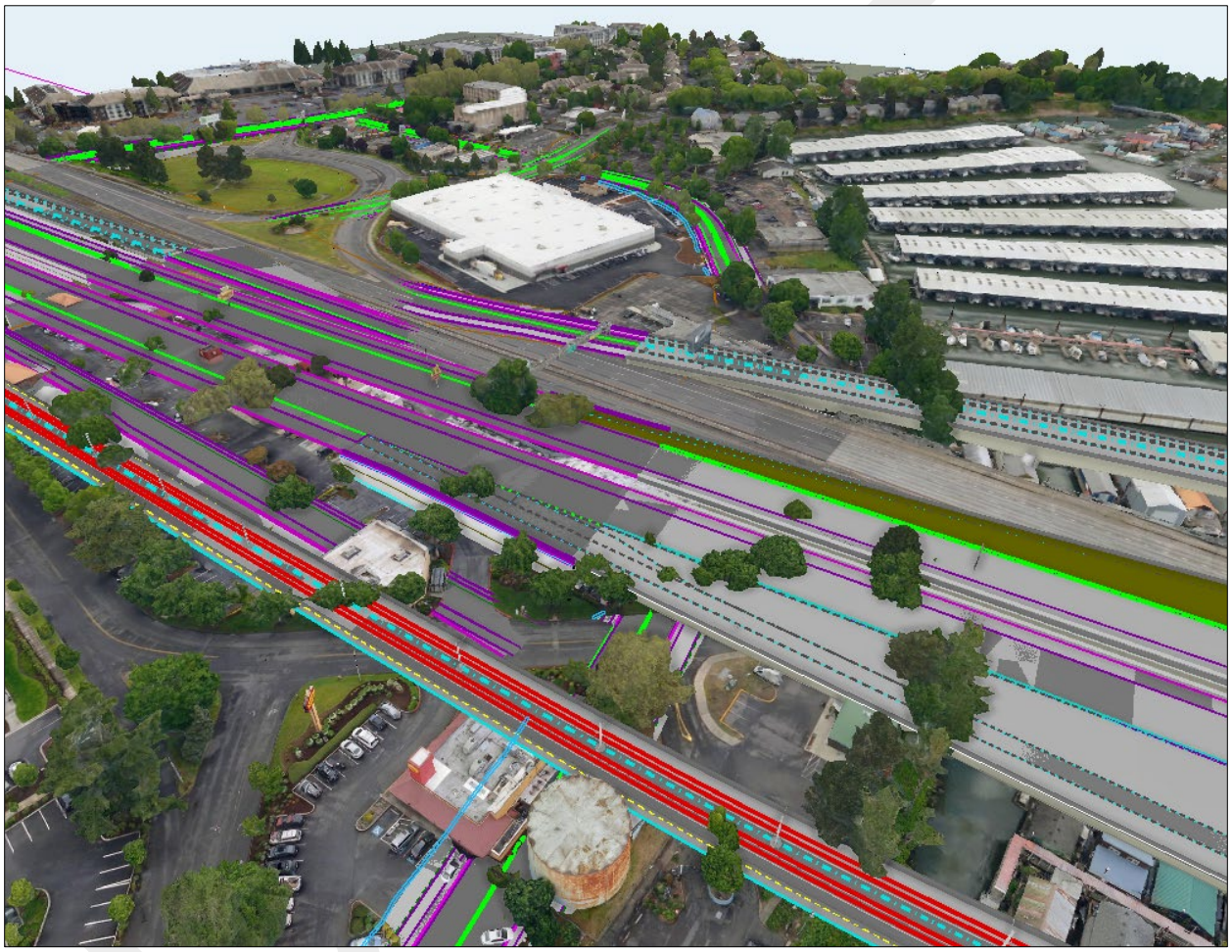


Figure 8. Oblique aerial view depicting the Modified LPA as it would affect the Harbor Shops building (11915 North Center Avenue) and its vicinity, view northeast. The property would be demolished for these activities (IBR/Bentley Systems, May 26, 2022; screengrab captured June 13, 2023).

5

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Jantzen Beach Water Tank and Pump House (OR 109)	SHPO Resource ID: TBD
Street Address: North Center Avenue & North Jantzen Street	City, County, State: Portland, Multnomah County, Oregon

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The Jantzen Beach Water Tank (background) and Pump House (foreground), view west (WillametteCRA, January 13, 2023).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Jantzen Beach Water Tank and Pump House, two utilitarian structures located near the southern edge of Hayden Island in Portland, Multnomah County, Oregon (Figure 1). The subject property was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect on the Jantzen Beach Water Tank and Pump House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Jantzen Beach Water Tank and Pump House near the intersection of North Center Avenue and North Jantzen Street are utilitarian structures located near the southern edge of Hayden Island in Portland, Multnomah County, Oregon (Figure 3). The two-story water tank has a circular plan measuring 50 feet in diameter, and it stands 32 feet tall. Its exterior is clad in several rows of welded steel panels, and it features a subtly pitched conical steel roof (Figures 6 and 7). A caged utility ladder is located on the north side, providing roof access. The one-story pump house, which is immediately east of the water tank, has an irregular plan consisting of three connected rectangular massing blocks. The exterior walls are constructed from concrete masonry units arranged in a running bond, and the roof is a combination of gable and shed forms clad in corrugated metal. The main entrance is a flush metal door on the north (principal) elevation, and a secondary entrance is near the southwest corner. The secondary entrance adjoins a concrete platform supporting a back-up diesel generator (Figure 7).

The Jantzen Beach Water Tank and Pump House are eligible for inclusion in the NRHP under Criterion A, at the local level of significance, in the area of community planning and development, and under Criterion C, at the local level of significance, in the area of engineering. Together, these two structures constitute a pivotal facility in

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Hayden Island Inc.'s major transformation of Hayden Island from an amusement park into a large-scale commercial and residential center between the early 1960s and 1980. The water tank and pump house supported these efforts by supplying water needs to the island's growing population during the company's redevelopment effort. The property is also a good example of a welded steel water tank that remains intact and continues to convey its original construction method and materials.

The property's period of significance under Criterion A begins in 1968, when initial construction of the water tank was completed, and ends in 1980, when Hayden Island Inc.'s planned redevelopment program concluded. The period of significance under Criterion C is limited to 1968, the date of construction. Although an addition was constructed at the east side of the pump house after this date, the addition is compatible in scale and material and the pump house maintains its expression of late midcentury construction techniques and materials. Overall, the property retains integrity of location, materials, workmanship, feeling, and association; however, its integrity of design has been diminished by the changes to the pump house, and its integrity of setting has been diminished by the addition of various site features (fencing, sidewalk, etc.) after the period of significance. Due to the changes to the setting, the identified boundary of the NRHP-eligible property is limited to the extent of the respective footprints of the water tank, pump house, and the associated back-up diesel generator (Figure 4).

ALTERNATIVES CONSIDERED

Because the Jantzen Beach Water Tank and Pump House has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Jantzen Beach Water Tank, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative therefore fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would involve the permanent right-of-way acquisition of the Jantzen Beach Water Tank and Pump House in order to construct a new road that would join the existing North Jantzen Street alignment west of the subject property (Figure 5). Construction of the new road would furthermore require

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the demolition of all extant features of the property, including the water tank, pump house, and the associated back-up diesel generator. As such, no features that date to the property's 1968 to 1980 period of significance and that justify its NRHP eligibility under Criteria A and C would remain following the completion of construction.

In conclusion, the Modified LPA would destroy the features that convey the property's significance under NRHP Criteria A and C and would eliminate the property's integrity of location, setting, design, materials, workmanship, feeling, and association. The "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect presented in 36 CFR 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA would therefore have an Adverse Effect on the NRHP-eligible Jantzen Beach Water Tank and Pump House.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would affect the NRHP-eligible Jantzen Beach Water Tank, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

Heuser, Tom. "Jantzen Beach Water Tank and Pump House (OR 109)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Jantzen Beach Water Tank and Pump House (OR 109)	SHPO Resource ID: TBD
Street Address: North Center Avenue & North Jantzen Street	City, County, State: Portland, Multnomah County, Oregon

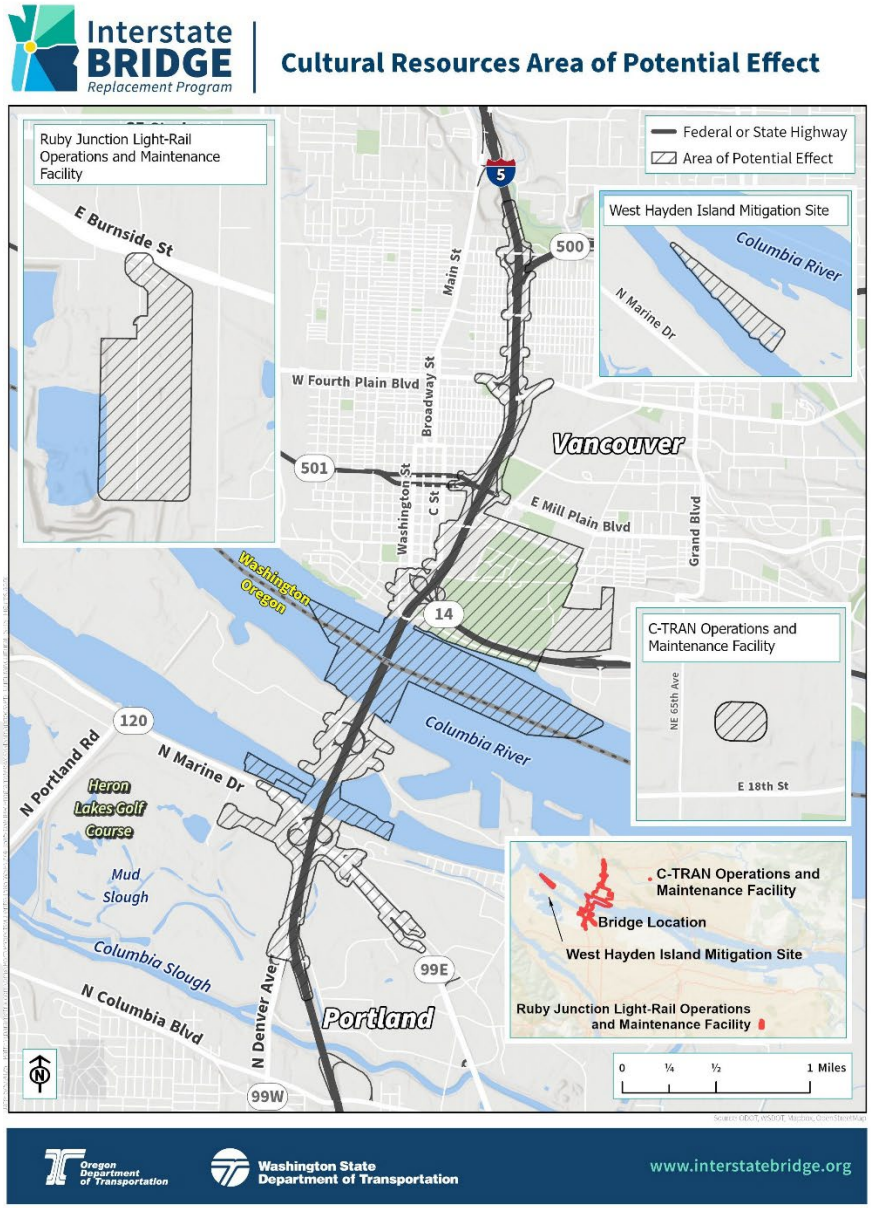


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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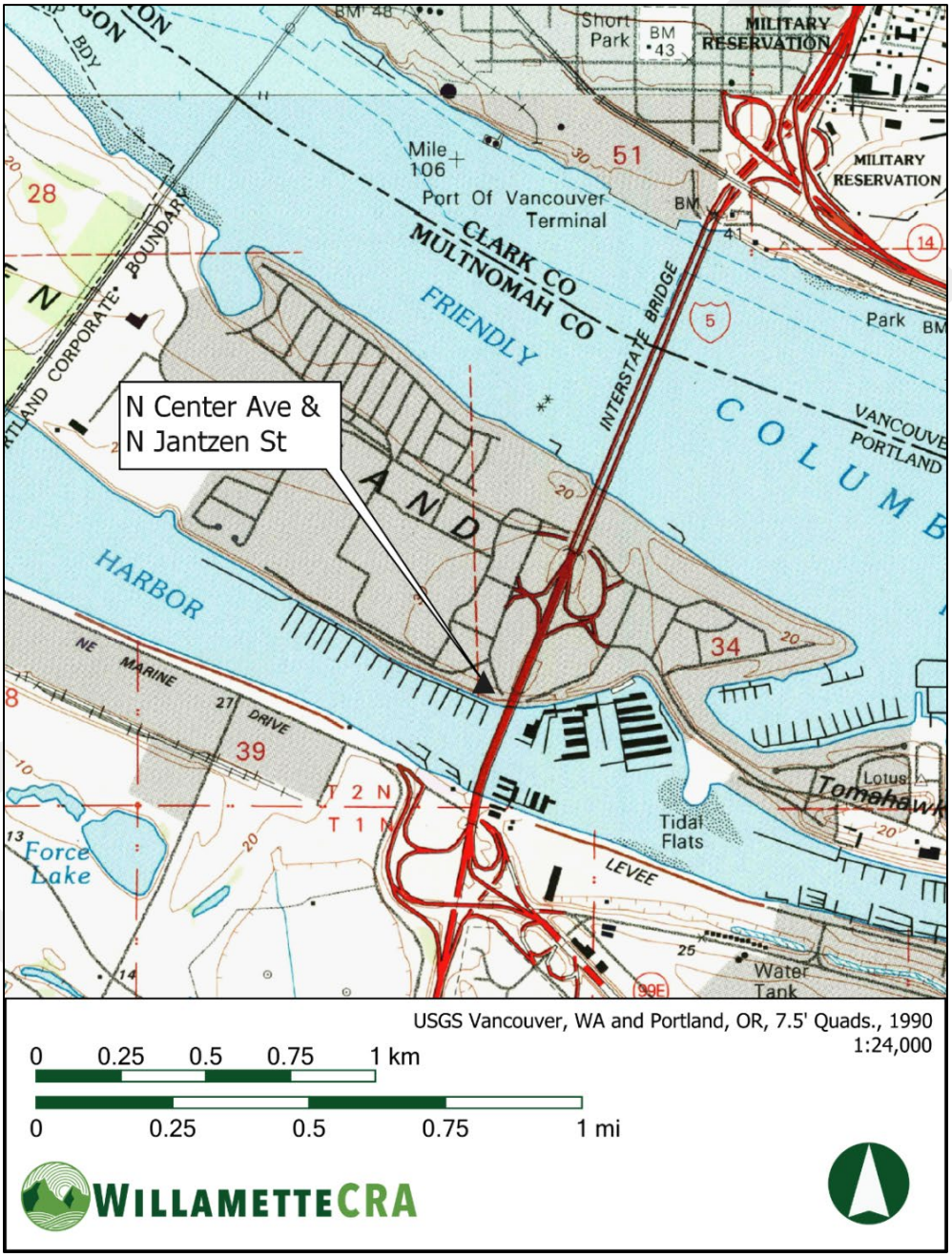


Figure 3. Location map of Jantzen Beach Water Tank and Pump House, Portland, Multnomah County, Oregon.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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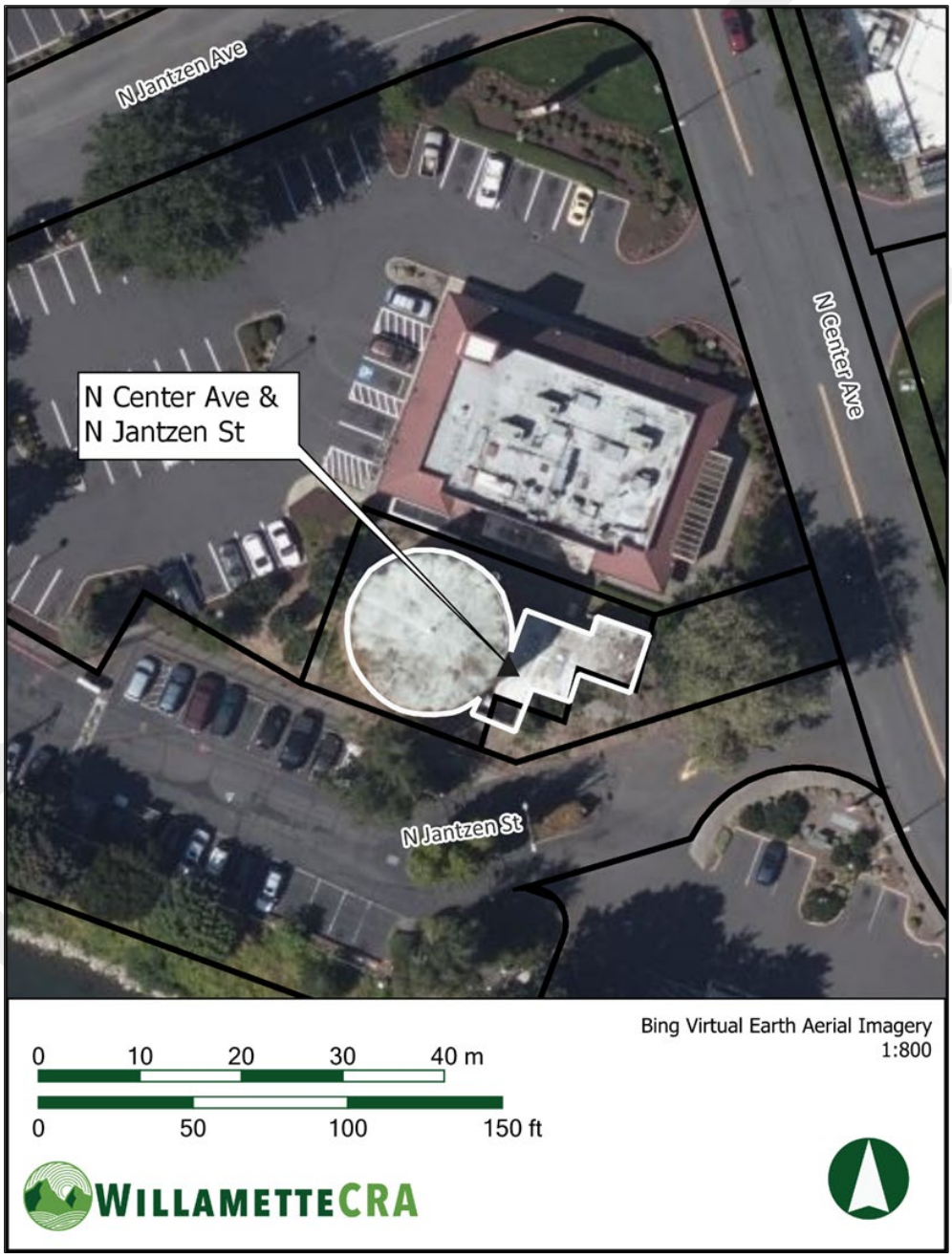


Figure 4. Aerial map of Jantzen Beach Water Tank and Pump House, showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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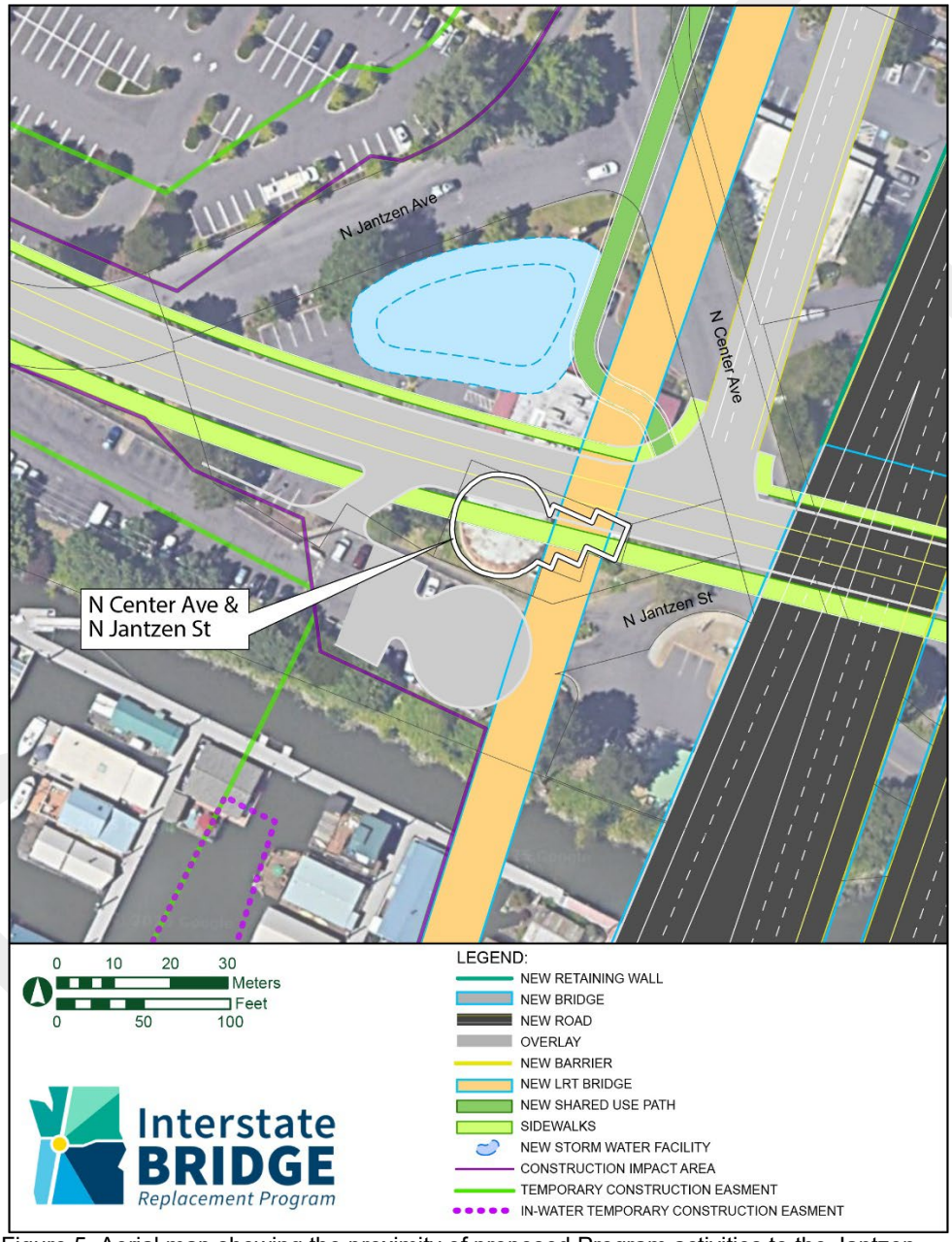


Figure 5. Aerial map showing the proximity of proposed Program activities to the Jantzen Beach Water Tank and Pump House, boundary in white. The property would be demolished for these activities.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Figure 6. The Jantzen Beach Water Tank (center) and Pump House (right), view northwest (WillametteCRA, January 13, 2023).

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Figure 7. Rendering of the Jantzen Beach Water Tank and Pump House (center), view facing northwest. Arrow points to back-up diesel generator (IBR/Bentley Systems, May 26, 2022; screengrab captured June 13, 2023).

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INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Jantzen Beach Moorage (OR 111)		SHPO Resource ID: TBD
Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon	

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Jantzen Beach Moorage. View facing northeast (Google Earth Pro 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Jantzen Beach Moorage, a collection of float homes located along the southern shore of Hayden Island in Portland, Multnomah County, Oregon (Figure 1). The site was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Willamette Cultural Resources Associates (WillametteCRA) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect to the Jantzen Beach Moorage. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.
  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.

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- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.

- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.

- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

- Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Jantzen Beach Moorage is a site on the North Portland Harbor in the Columbia River.[2] The site runs east to west along the southern shore of Hayden Island, in Portland, Multnomah County, Oregon (Figure 3). The moorage is bounded on the north by a metal fence on the curbs of North Jantzen Avenue and North Jantzen Street; the Interstate 5 (I-5) bridge to the east; a separate floating home moorage to the west; and the waters of Columbia River and North Portland Harbor to the south. The moorage is a site that is associated with the North Portland Harbor and the Columbia River; it covers approximately 27.3 acres and is comprised of a linear dock, multiple finger piers, a parking lot, and associated hardscaping and landscaping, and is host to approximately 175 floating homes.[3]

[2] This site, the Jantzen Beach Moorage, located at 1501 and 1525–2055 North Jantzen Avenue, was defined and evaluated herein as a "site." As defined in the National Park Service, National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation,* a site is "the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure." The Bulletin specifies that natural waterways or bodies of water are excluded from this category in favor of "the properties built in association with the waterways."

[3] The current number, based on a July 2023 aerial from Google Maps, is 176 floating shelters. Due to the inherent mobility of such shelters, the number has and will continue to fluctuate.

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The moorage is organized around a central dock that forms a linear spine that runs southeast to northwest (parallel to the shoreline) and measures approximately 3,200 feet in total length (Figure 4). The westernmost section of the dock, named M Walk West, is located approximately 150 feet to the south of the adjacent shoreline; it measures approximately 990 feet from east to west and provides moorage for approximately 42 floating shelters on both the north and south sides of the dock. The remaining length of the dock is positioned closer to the shore, approximately 25 feet, and is comprised of 16 finger piers, or secondary docks, running perpendicularly from the main dock, extending south (Figures 7 through 9). From east to west, the finger piers are named Rows A, B, C, D, E, F, G, H, I, J, K, L, N, O, P, and Q; they are arranged at variable distances, ranging between 100 and 200 feet apart (Figures 10 through 12).[4] The lengths of the finger piers also vary in size, measuring between 200 to 300 feet in length from north to south; the various lengths accommodate moorage sites for a range of six to nine, and in one case, 12, floating shelters on a given pier. The site is characterized by a linear distribution of its features. Carports are distributed at approximately even intervals along the roadway. Ramps are placed evenly along the moorage. Finger piers are regularly spaced along the main dock. The floating homes are located in a linear distribution throughout the site on the finger piers and along both sides of the M Walk West dock. Row A, the easternmost finger pier, has six floating homes moored at sites along both sides of its length; the remaining finger piers accommodate mooring sites only along their western sides. Single floating homes are moored at sites along the main dock in the spaces created by the empty eastern sides of each pier.

Circulation patterns within the site are characterized by a single-lane, paved, vehicle-access road, and seven pedestrian ramps of varying dimensions which connect to the central moorage dock. The road is fenced with multiple gated points of entry; it is named North Jantzen Street along Rows A through P, and transitions to North Janzen Avenue along the remainder of the roadway, culminating in a cul-de-sac at the western extent. Parking is provided in the form of perpendicular pull-in spaces along the south curb of the road, except for two areas with parking along the north curb as well—the section of North Jantzen Street aligned with Rows B, C, and D, and the section of North Jantzen Avenue aligned with Rows P and Q. Some of the parking spaces are underneath wood-framed carports that also have integrated storage units. The five carports measure 30 feet deep and are of varying lengths, ranging from 70 to 140 feet.

WillametteCRA recommended the site of Jantzen Beach Moorage eligible for listing on the NRHP under Criterion A for its significance at the local level in the area of community planning and development, and at the local level in the area of maritime history. The moorage demonstrates the evolution of how centrally the Columbia River functioned in the lives and mindsets of Pacific Northwesterners; it represents an alternative, community plan that combines housing regulation and building codes, innovative infrastructure, and recreation and leisure, in service of a unique lifestyle on the water. The period of significance of the Jantzen Beach Moorage is defined as 1958 to 1977, encapsulating the commencement of the site's use as a floating home moorage, and terminating with the sale of Hayden Island Inc. WillametteCRA also recommended that the Jantzen Beach Moorage possessed the requisite integrity to convey its significance under NRHP Criterion A.

[4] John P. Deppa, 2010. Construction drawing number 09-136114, 1523 N Jantzen Avenue, page 3. On file at the Portland Bureau of Development Services and obtained through Public Records Request.

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The Jantzen Beach Moorage possesses integrity to the period of significance. The resource remains in its original location along the southern shore of Hayden Island in North Portland Harbor. The site has undergone minimal changes to its overall form; alterations have been limited to small-scale component replacement and the removal and installation of new homes. The moorage site has retained its original commercial, industrial, and recreational setting of the surrounding North Portland Harbor; the resource has retained its character-defining features such as spatial organization, circulation patterns, and cluster arrangement, as well as views and vistas of the Columbia River. The changing nature of the floating homes is a continuation of the site's historic pattern of use; crucially,

the site continues to be utilized as a private moorage and, as such, continues to showcase the historic character of land use patterns and unique cultural traditions. The moorage site, therefore, also possesses integrity of feeling and association with the historic patterns of off-shore living along the Columbia River. As such, the resource possesses a fine degree of integrity of location, setting, design, materials, workmanship, feeling, and association.

The tax lots associated with the Jantzen Beach Moorage do not encapsulate the historic extent of the site. The identified boundary of the NRHP-eligible site, therefore, is not directly aligned with the tax lot boundary; it includes the footprint of the gated roadway along North Jantzen Avenue and North Jantzen Street and associated carport and ramp structures, as well as the footprint of the moorage docks and the mooring sites, all of which are contributing features to the site (Figure 4).

ALTERNATIVES CONSIDERED

Because the Jantzen Beach Moorage has been identified as a historically significant site that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Jantzen Beach Moorage, including no direct or indirect impacts on the site's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would replace the existing North Portland Harbor Bridge with a new bridge. A new light rail transit (LRT) bridge would also cross North Portland Harbor to the west of the new North Portland Harbor Bridge. Construction of these two structures would necessitate the removal of a section of dock, at least two finger piers (Rows A and B), and at most 20 floating shelters (Figures 5 and 6). The dock, finger piers, and floating shelters are contributing features to the significance of the NRHP-eligible Jantzen Beach Moorage; as such, removal of a portion of the site would reduce the integrity of design, materials, association, and feeling to the site's period of significance. Although the site would still be considered eligible, the historic integrity to its period of significance would be diminished such that the undertaking would constitute an Adverse Effect.

In conclusion, the Modified LPA would destroy part of the features that convey the site's significance under Criteria A, and it would negatively impact the site's integrity of design, materials, workmanship, feeling, and association. The "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect presented in 36 CFR 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA would therefore have an Adverse Effect on the Jantzen Beach Moorage.

CONCLUSION

It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would affect the NRHP-eligible Jantzen Beach Moorage, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

Cottrell-Crawford, Penelope. "Jantzen Beach Moorage (OR 111)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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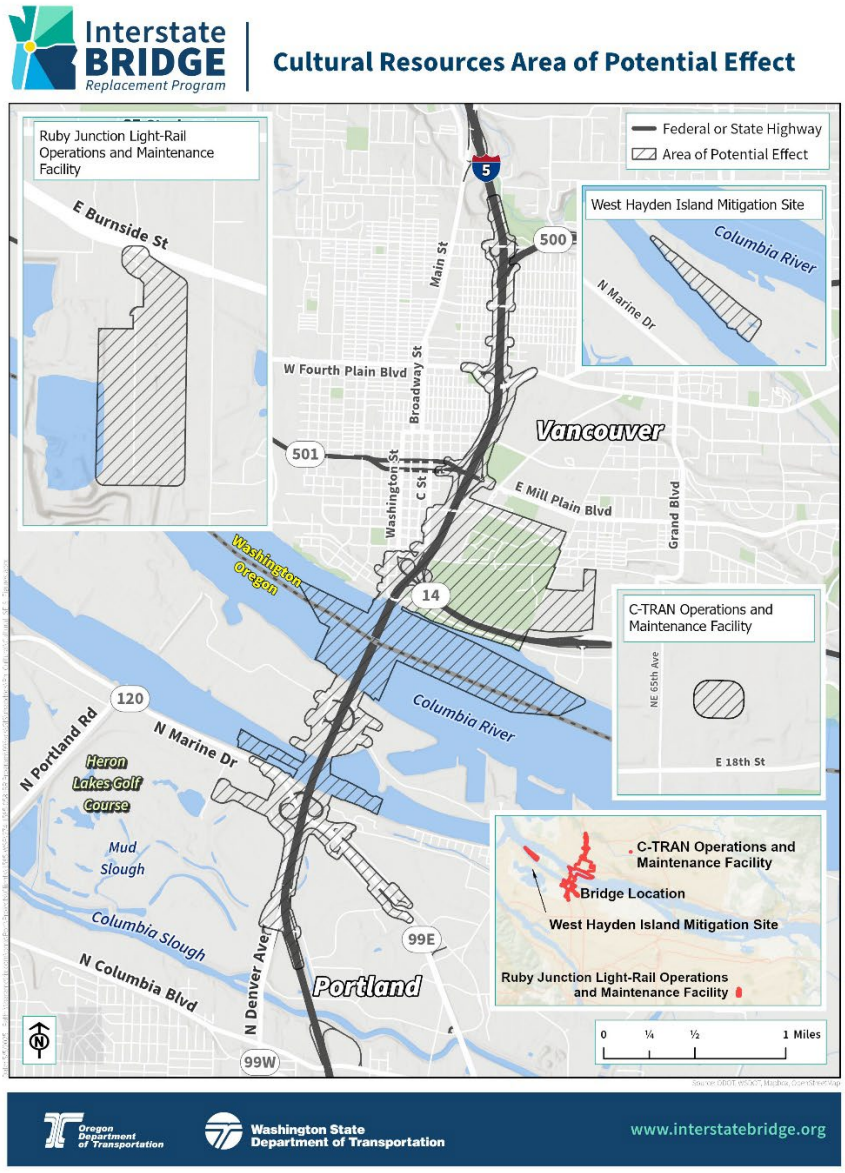


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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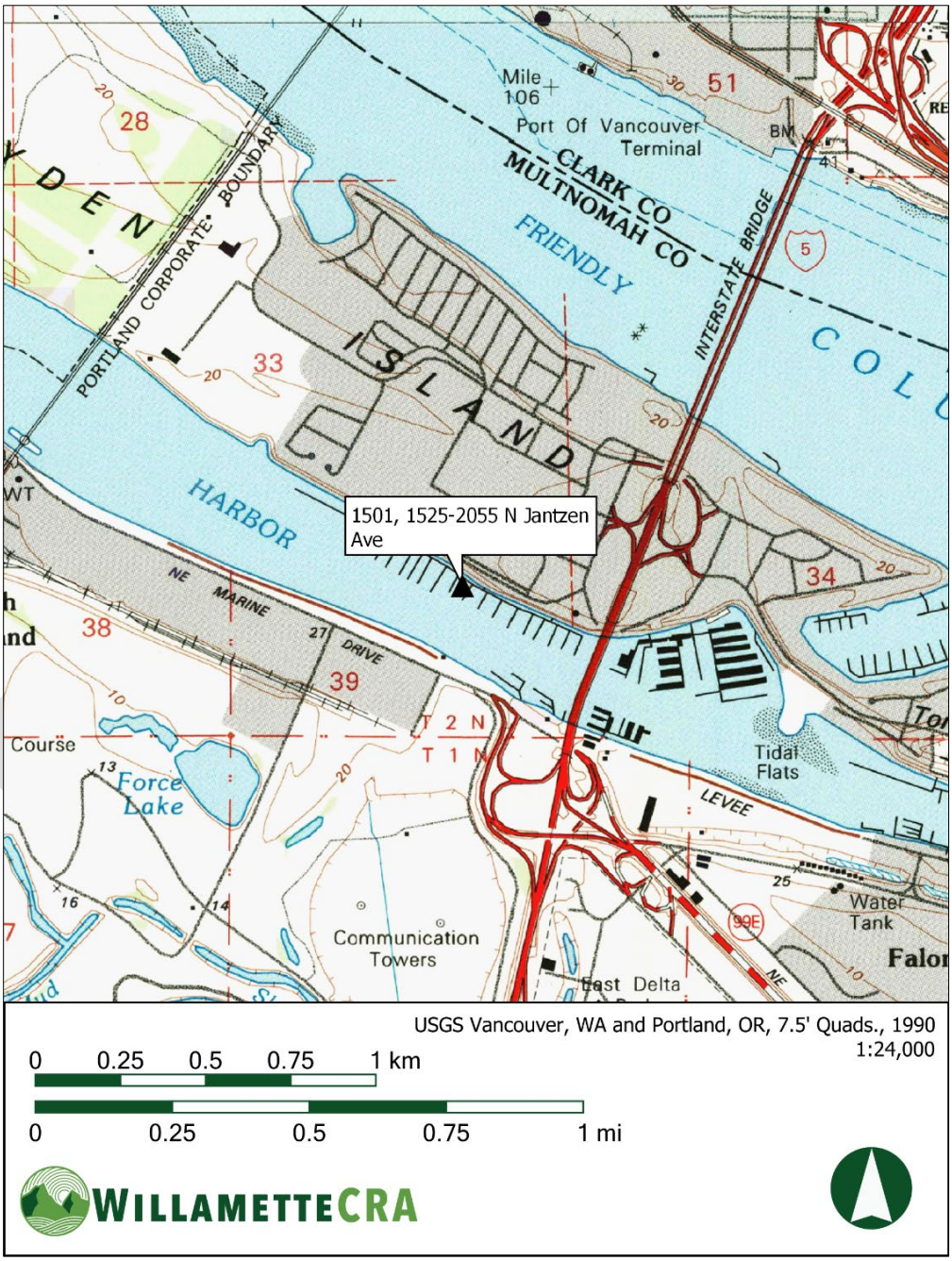


Figure 3. Location map of Jantzen Beach Moorage (1501, 1525-2055 North Jantzen Avenue), Portland, Multnomah County, Oregon.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Jantzen Beach Moorage (OR 111)		SHPO Resource ID: TBD
Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon	

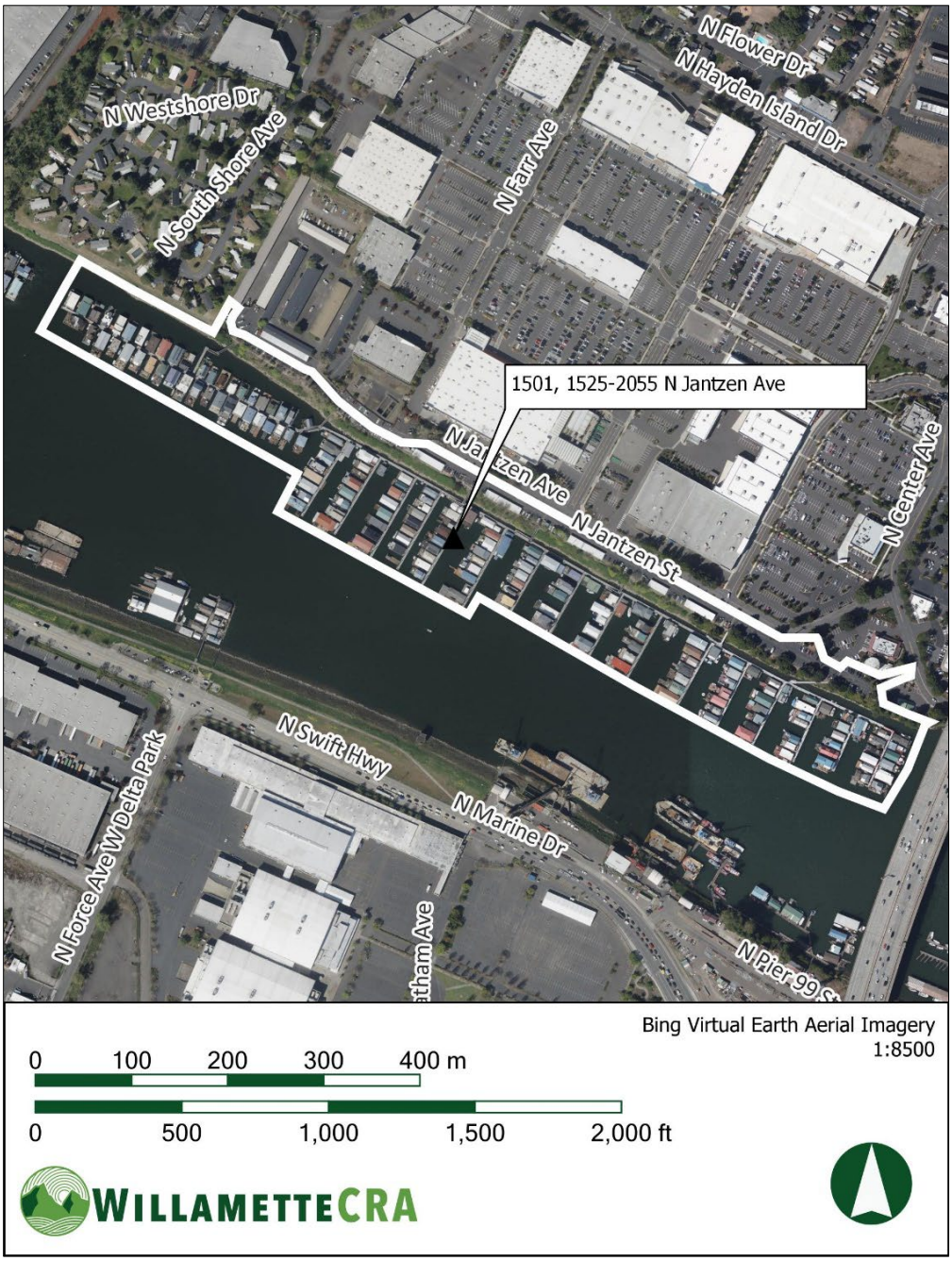


Figure 4. Aerial photograph showing identified boundary of the NRHP-eligible Jantzen Beach Moorage (1501, 1525-2055 North Jantzen Avenue) in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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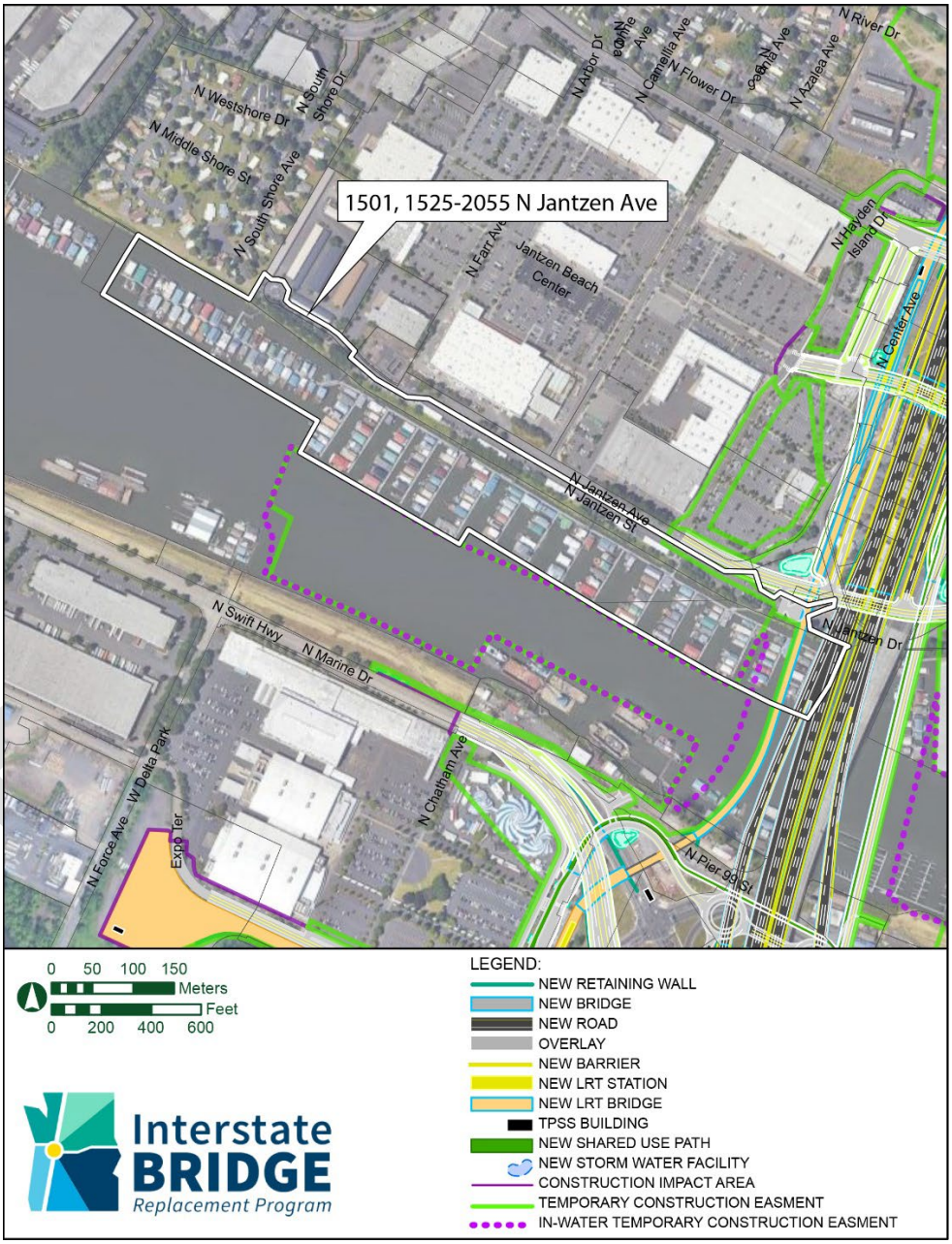


Figure 5. Aerial map showing the proximity of proposed Program activities to the Jantzen Beach Moorage (1501, 1525–2055 North Jantzen Avenue), with the identified boundary of the NRHP-eligible property shown in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Property Name: Jantzen Beach Moorage (OR 111)	SHPO Resource ID: TBD
Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon

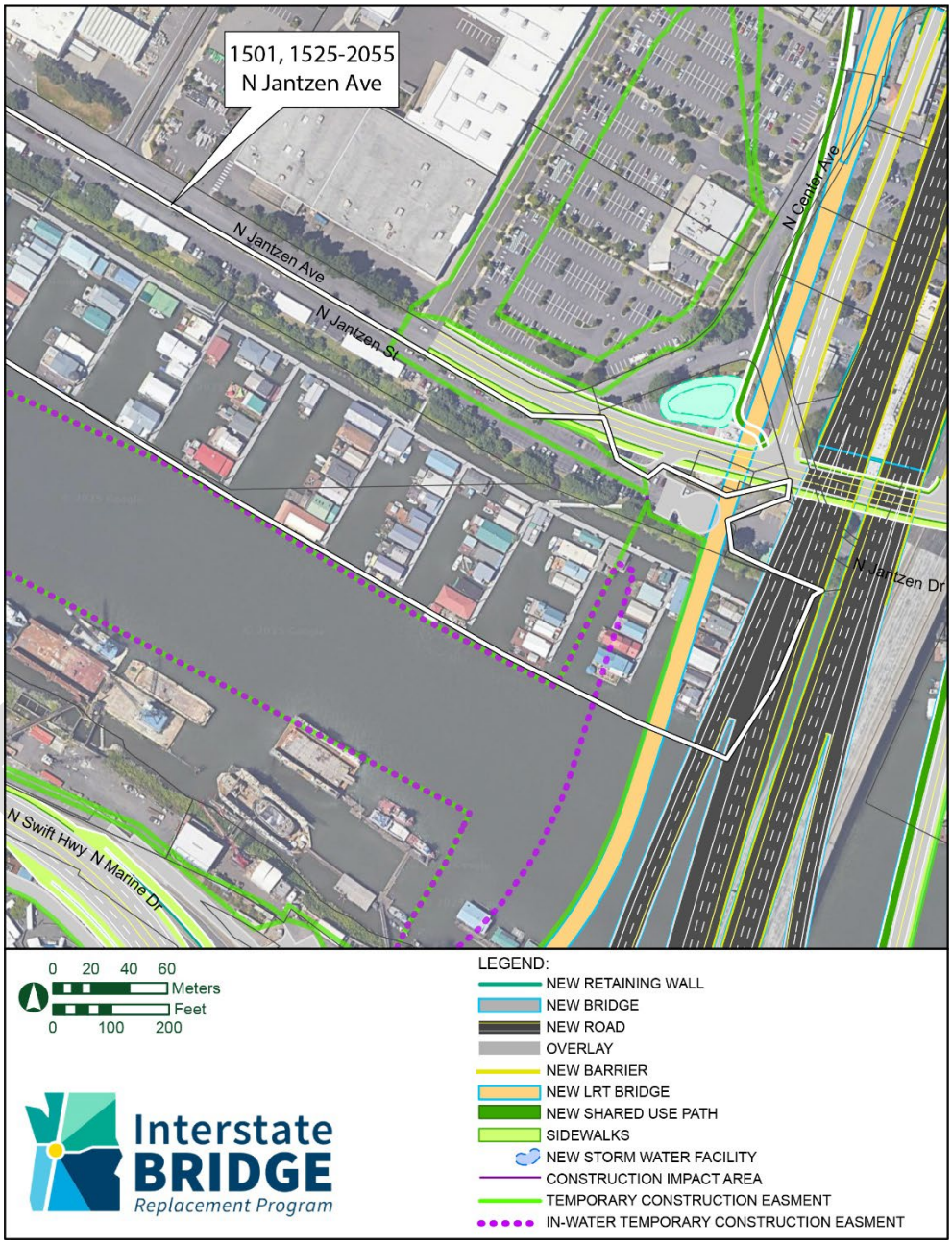


Figure 6. Detail of aerial map showing the proximity of proposed Program activities to the Jantzen Beach Moorage (1501, 1525–2055 North Jantzen Avenue, the identified boundary of the NRHP-eligible property outlined in white), including new bridge, new road, new LRT bridge, and temporary construction easement.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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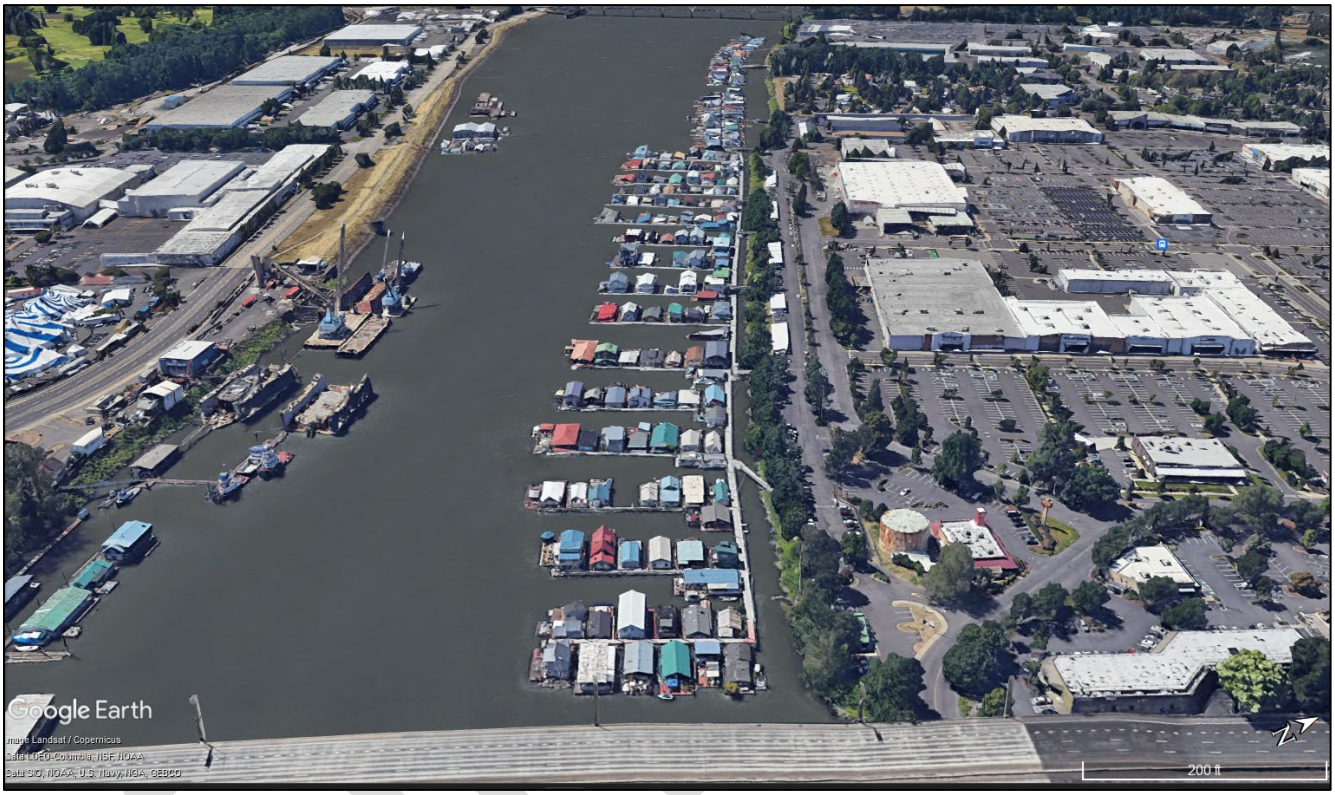


Figure 7. Jantzen Beach Moorage. View facing west (Google Earth 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Jantzen Beach Moorage (OR 111)		SHPO Resource ID: TBD
Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon	



Figure 8. Jantzen Beach Moorage. View facing east (Google Earth Pro 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Jantzen Beach Moorage (OR 111)		SHPO Resource ID: TBD
Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon	

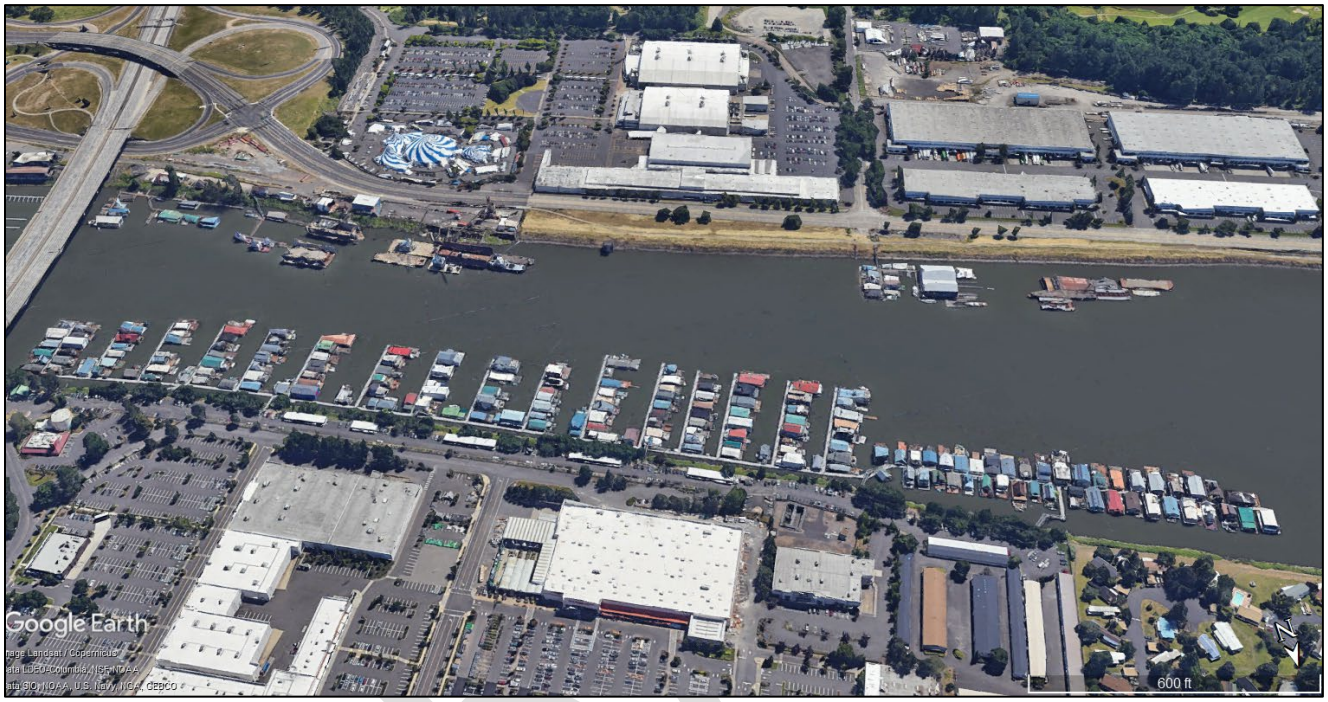


Figure 9. Jantzen Beach Moorage. View facing south (Google Earth Pro 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon	



Figure 10. Site Map of Jantzen Beach Moorage, M Walk West (Bing Aerial Imagery).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 11. Site Map of Jantzen Beach Moorage, Rows H through Q (Bing Aerial Imagery).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Jantzen Beach Moorage (OR 111)		SHPO Resource ID: TBD
Street Address: 1501, 1525-2055 North Jantzen Ave	City, County, State: Portland, Multnomah County, Oregon	



Figure 12. Site Map of Jantzen Beach Moorage, Rows A through G (Bing Aerial Imagery).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Hayden Island Yacht Club Clubhouse / The Clubhouse (OR 120)	SHPO Resource ID: TBD	
Street Address: 12050 North Jantzen Drive	City, County, State: Portland, Multnomah County, Oregon	

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Hayden Island Yacht Club Clubhouse (12050 North Jantzen Drive), view northwest (WillametteCRA, March 8, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Hayden Island Yacht Club Clubhouse, a Modern style clubhouse building located at 12050 North Jantzen Drive in Portland, Multnomah County, Oregon (Figure 1). The subject property, which is on the north shore of North Portland Harbor, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Hayden Island Yacht Club Clubhouse. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

DRAFT

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Hayden Island Yacht Club Clubhouse is a yacht club clubhouse constructed in 1972 and located on Hayden Island in Portland, Multnomah County, Oregon (Figure 3). The building has a rectangular footprint measuring approximately 75 feet from north to south and approximately 60 feet from east to west. It has a split-level form with the south two-thirds of the building composed of a single story, and the north one-third of the building comprised of one-and-one-half stories. The main level is capped with a symmetrical, side-gabled roof, while the taller north end of the building is capped with an asymmetrical, bi-directional shed roof form with a band of clerestory windows along the ridge line. The roofs are clad with asphalt composition shingles. Exterior cladding consists primarily of grey, painted plywood. A small porch with a shed roof extends from the west (principal) elevation and is supported by two square wood posts. Projecting wood-framed balconies are located along the east elevation, and roof overhangs are supported by exposed glulam beams. The building's principal entry is located on the west elevation and features a set of wood double doors, painted blue and flanked by clear glazed sidelights on each side. Additional fenestration consists of large picture windows, glass doors with wide sidelights, and metal slab egress doors.

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Street Address: 12050 North Jantzen Drive	City, County, State: Portland, Multnomah County, Oregon	

The Hayden Island Yacht Club Clubhouse building is eligible for listing in the NRHP under Criterion A at the local level in the areas of maritime history and social history. The building is indicative of the popularity of recreational boating in Oregon and Portland yacht clubs during the first three-quarters of the twentieth century, and it is a representative example of a building expressly constructed as a clubhouse associated with recreational boating. Its character-defining features include its general massing and split-level form, complex roof design, exposed glulam beams, projecting balconies, clerestory windows, and relationship with the north bank of the North Portland Harbor.

The building's period of significance under Criterion A is defined as 1972 to 1973, representing the dates when the former clubhouse was directly associated with peak activity at the Hayden Island Yacht Club. While the building's exterior cladding has been replaced and the front entry porch roof has been altered since this time, the building retains most of its character-defining features indicative of its Modern style. The setting has changed due to the loss of landscaping elements such as the "Hayden Island Yacht Club" signage and flagpole, but the setting is still consistent with the period of significance. Overall, the building retains its integrity of location, setting, design, and feeling, while its integrity of materials, workmanship, and association have been somewhat diminished. The tax lot includes three other buildings as well as multiple small-scale structures, asphalt-paved parking areas, and landscape features—none of which are associated with the significance of the resource. Because of this, the identified boundary of the NRHP-eligible Hayden Island Yacht Club Clubhouse is defined by its footprint (Figure 4).

ALTERNATIVES CONSIDERED

Because the Hayden Island Yacht Club Clubhouse has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Hayden Island Yacht Club Clubhouse, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible Hayden Island Yacht Club Clubhouse. Program activities within the vicinity of the property would include the widening of N Jantzen Street (to

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the northwest) and N Tomahawk Island Drive (to the northeast) as well as the construction of an arterial bridge across the North Portland Harbor (to the west) (Figures 5 and 6). All of these activities would be located more than 100 feet from the building footprint, which is the identified boundary of the NRHP-eligible property. The building's character-defining features, including its general massing and split-level form, complex roof design, exposed glulam beams, projecting balconies, and clerestory windows, would remain intact and unaltered. Additionally, its relationship with the north bank of the North Portland Harbor would be unchanged during and after construction.

The various infrastructure improvements proposed by the Modified LPA would alter the current setting of the Hayden Island Yacht Club Clubhouse through the introduction of new visual, atmospheric, and audible elements. However, these changes would be negligible and in some cases barely perceptible from the Hayden Island Yacht Club Clubhouse. Asphalt-paved parking lots distance the building from the proposed improvements from N Jantzen Street to the north and N Tomahawk Island Drive to the northeast. Additionally, planting beds and mature trees partially obstruct views toward both roads, and a one-and-a-half-story commercial building immediately northeast of the clubhouse building further obstructs views toward N Tomahawk Island Drive.

While the proposed arterial bridge across the North Portland Harbor would be clearly visible from the Hayden Island Yacht Club Clubhouse, it would be only marginally closer to the building than the existing bridge across the North Portland Harbor. Where it meets the shoreline, the existing bridge is located approximately 900 feet from the southwest corner of the Hayden Island Yacht Club Clubhouse; the proposed arterial bridge would be located approximately 800 feet from the same point. Ultimately, Program activities would alter only minor and distant features of the building's setting, and the visual and spatial relationships that contribute to the clubhouse building's significance—namely, views of the North Portland Harbor to the south and access to its marina infrastructure—would not be affected. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would not diminish the Hayden Island Yacht Club Clubhouse's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under NRHP Criterion A. The building would maintain its ability to convey its association with recreational boating and Portland yacht clubs during the 1970s. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Hayden Island Yacht Club Clubhouse.

SOURCES/BIBLIOGRAPHY

Alsobrook, Adam S. "Hayden Island Yacht Club Clubhouse / The Clubhouse (OR 120)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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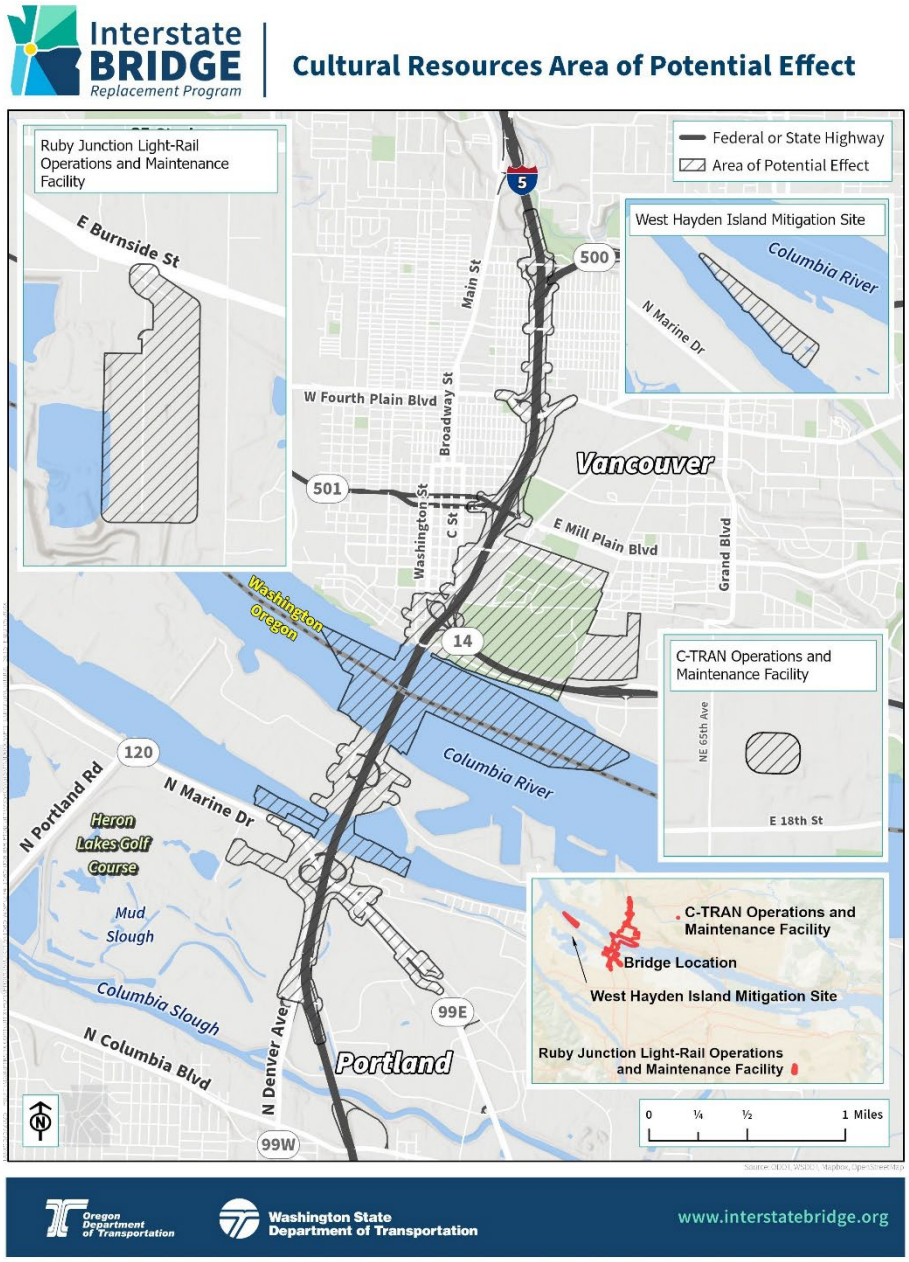


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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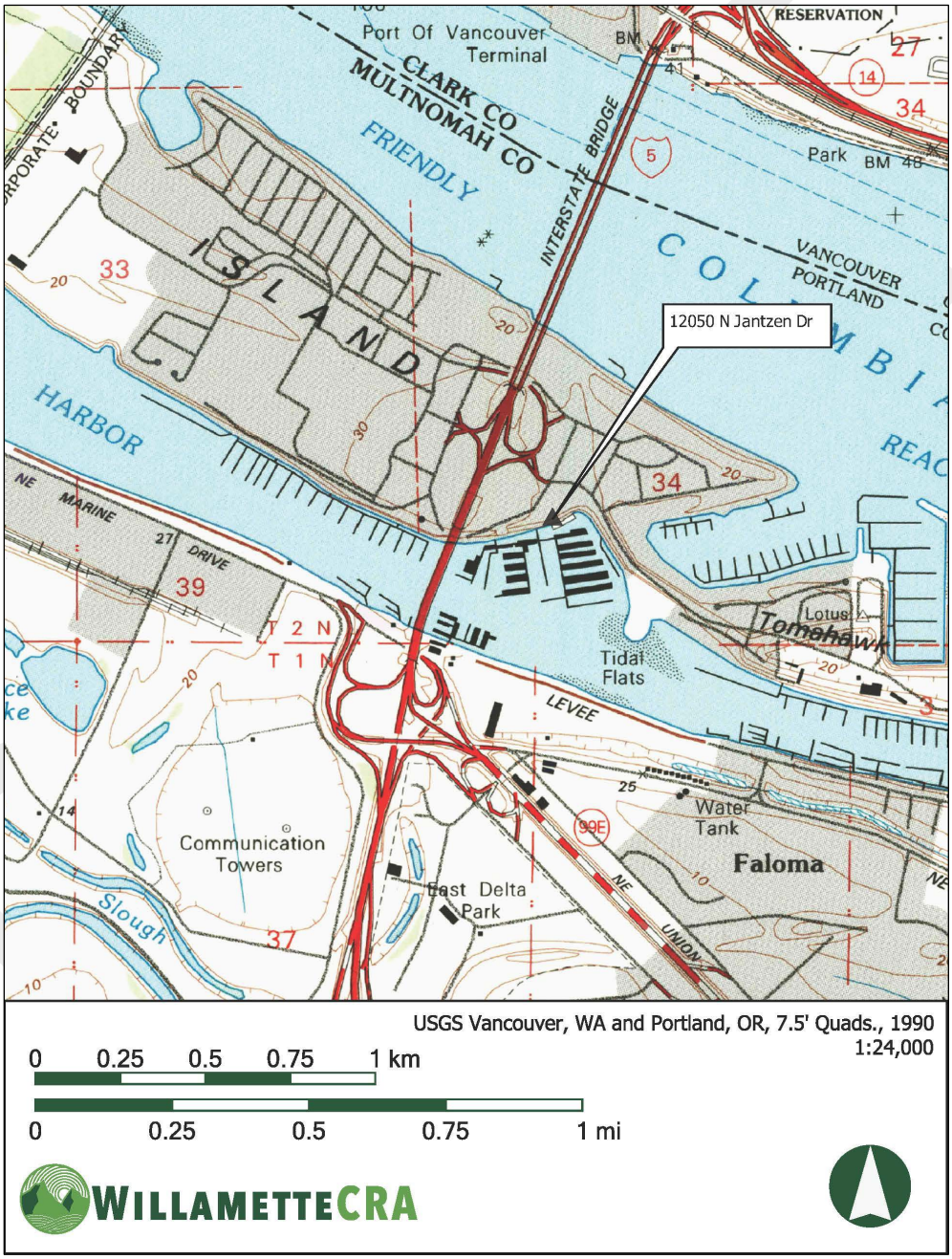


Figure 3. Location map of Hayden Island Yacht Club Clubhouse (12050 North Jantzen Drive), Portland, Multnomah County, Oregon.

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Street Address: 12050 North Jantzen Drive	City, County, State: Portland, Multnomah County, Oregon

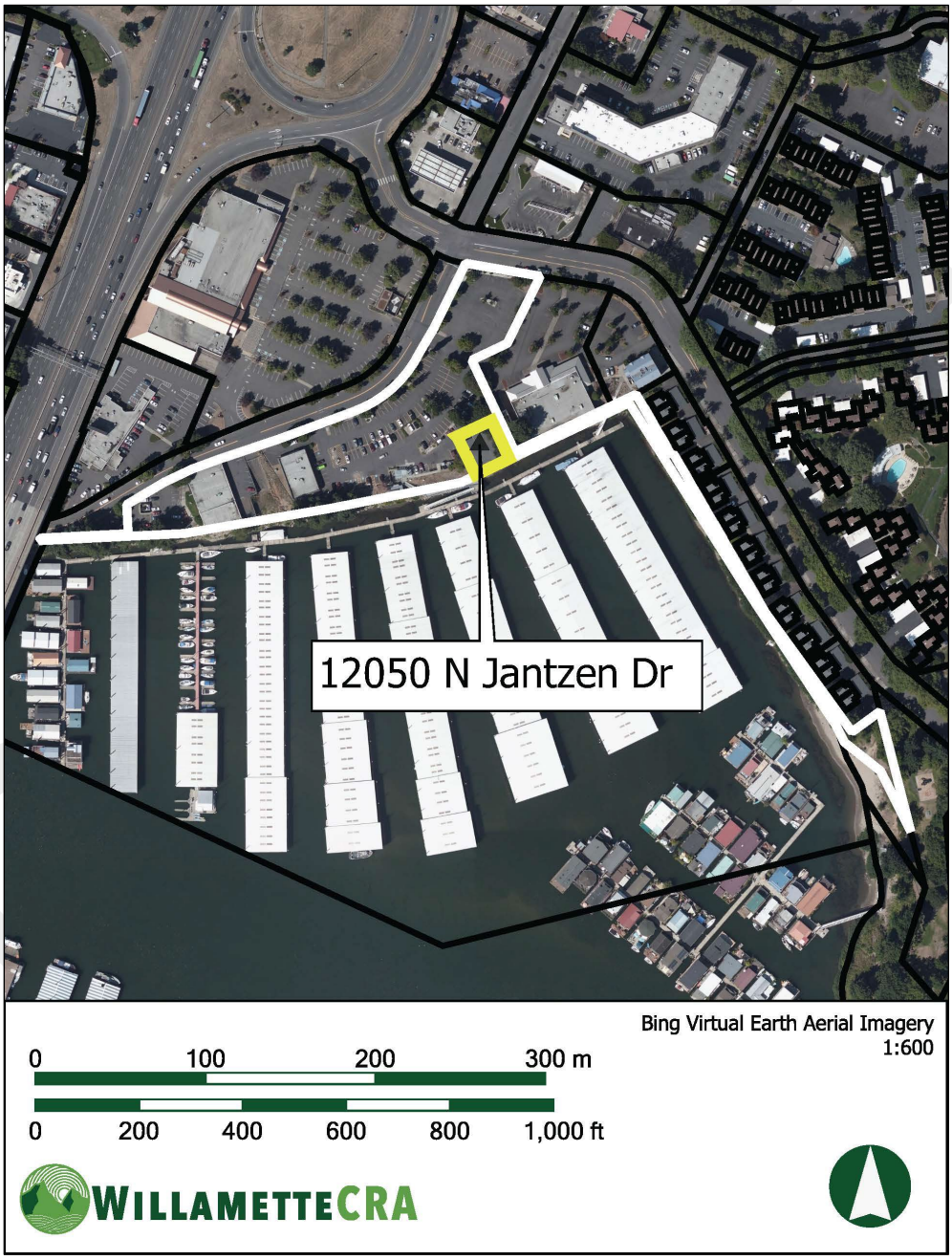


Figure 4. Aerial map of Hayden Island Yacht Club Clubhouse (12050 North Jantzen Drive), showing property boundary in white and identified boundary of the NRHP-eligible property in yellow.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Hayden Island Yacht Club Clubhouse / The Clubhouse (OR 120)	SHPO Resource ID: TBD
Street Address: 12050 North Jantzen Drive	City, County, State: Portland, Multnomah County, Oregon



Figure 5. Aerial map showing the proximity of proposed Program activities to the Hayden Island Yacht Club Clubhouse (12050 North Jantzen Drive), with the identified boundary of the NRHP-eligible property shown in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Hayden Island Yacht Club Clubhouse / The Clubhouse (OR 120)		SHPO Resource ID: TBD
Street Address: 12050 North Jantzen Drive	City, County, State: Portland, Multnomah County, Oregon	



Figure 6. View from the Hayden Island Yacht Club Clubhouse west toward proposed arterial bridge over North Portland Harbor; the bridge (indicated by yellow arrow) is just visible in the distance over the intervening marina infrastructure (IBR/Bentley Systems, May 26, 2022; screenshot captured June 14, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)	SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Northeast and southeast elevations of East Vanport Commercial Center (10850 North Denver Avenue), view west (WillametteCRA, December 8, 2021).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)		SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the East Vanport Commercial Center, a Northwest Regional style commercial building located at 10850 North Denver Avenue in Portland, Multnomah County, Oregon (Figure 1). The subject property was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the East Vanport Commercial Center. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)		SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon	

highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)		SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon	

- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The East Vanport Commercial Center at 10850 North Denver Avenue was constructed in 1943 in the commercial core for the wartime housing project of East Vanport in the East Columbia neighborhood of Portland, Multnomah County, Oregon (Figure 3). The one-story building features a concrete slab foundation and a generally rectangular footprint measuring approximately 216 feet from northwest to southeast by approximately 64 feet from northeast to southwest. The exterior walls, which are constructed from oversized bricks, are clad in lapped wood siding and rise to a low-pitched shed roof with projecting eaves and exposed raftertails and purlins. The principal entrance is located within a wide, covered recess at the center of the northeast elevation, and a secondary entrance is located in a shopfront window wall at the west end of the same elevation (Figure 6). Additional fenestration consists of fixed wood windows in the entrance recess, ribbon windows near the top of the northeast elevation, steel flush doors, and a roll-up steel garage door at the center of the southeast elevation. Decorative brick masonry is used to accent portions of the northeast elevation and the recessed entry.

The East Vanport Commercial Center is eligible for inclusion in the NRHP under Criterion A at the local level in the areas of community planning and social history. As one of the last vestiges of the city of East Vanport, the commercial building is among very few extant properties associated with the significant history of Portland's World

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)		SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon	

War II-era housing projects and subsequent postwar residential housing crisis. After the war, redlining and other racialized housing practices restricted African Americans' access to housing, and the Black population of wartime housing projects rose rapidly in comparison to the overall population of Portland. Despite the number of people who continued to occupy these projects in the early postwar period, Portland moved to vacate many of the buildings and industrialize the area; in 1946, residents of the city of East Vanport were relocated to other housing projects. In 1948, following unusually heavy rains, the dike that protected East Vanport and its neighboring project, Vanport City, from the Columbia River broke, and the cities were left uninhabitable. The Vanport Commercial Center was one of a few buildings that emerged from the flood relatively intact, though stains from the high-water mark remain visible on an interior wall.

The period of significance for the East Vanport Commercial Center begins in 1943, the year the building was constructed, and ends in 1960, when the City of Portland annexed the former East Vanport site. Its setting was subsequently altered by midcentury highway planning and the construction of I-5 between 1962 and 1964, and later by the development of the Delta Park sports complex in the 1970s; however, some important setting features remain extant, including the vegetated slough to the west of the building and the paved road alignments near the building. Additionally, the building retains character-defining features including its low-pitched shed roof, wide eaves, wood siding, fixed wood windows, and decorative brick masonry. The East Vanport Commercial Center therefore maintains a high degree of integrity of location, materials, design, workmanship, and feeling, and a reduced degree of integrity of setting and feeling. Due to the extensive alterations to its immediate setting since 1960, the identified boundary of the NRHP-eligible property is limited to the building footprint and does not include any site features (Figure 4).

ALTERNATIVES CONSIDERED

Because the East Vanport Commercial Center has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible East Vanport Commercial Center, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)		SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon	

As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible East Vanport Commercial Center. Program activities would include the construction of additional freeway lanes at the west side of Delta Park; reconstruction of the interchange between I-5 and NE Martin Luther King Jr Boulevard, to northwest; and the installation of a new shared use path paralleling NE Union Court, to the north. All of these activities would be located more than 500 feet from the building footprint, which is the identified boundary of the NRHP-eligible property. The building's character-defining features, including its low-pitched shed roof, wide eaves, wood siding, fixed wood windows, and decorative brick masonry, would remain intact and unaltered. Program activities would change the current setting of the East Vanport Commercial Center by constructing infrastructure improvements within the vicinity of the building. However, the building is largely insulated from these changes by distance as well as intervening trees (Figures 7 through 9). Furthermore, the property's integrity of setting has already been considerably diminished since the end of its period of significance in 1960, both by the construction of I-5 in the early 1960s and by the development of the Delta Park sports complex in the 1970s. The setting features that do remain extant from the building's period of significance, including the vegetated slough and the paved alignment of N Denver Avenue to the west of the building, would not be altered by Program activities. The setting features that would be altered, including I-5, NE Martin Luther King Jr Boulevard, and the western and northern edges of Delta Park, do not contribute to the building's ability to convey its association with East Vanport or the significant history of Portland's World War II-era housing projects. Finally, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would not diminish the East Vanport Commercial Center's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criterion A. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible East Vanport Commercial Center.

SOURCES/BIBLIOGRAPHY

Cottrell-Crawford, Penelope. "East Vanport Commercial Center (Delta Park Sports Office) (OR 155)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

DRAFT

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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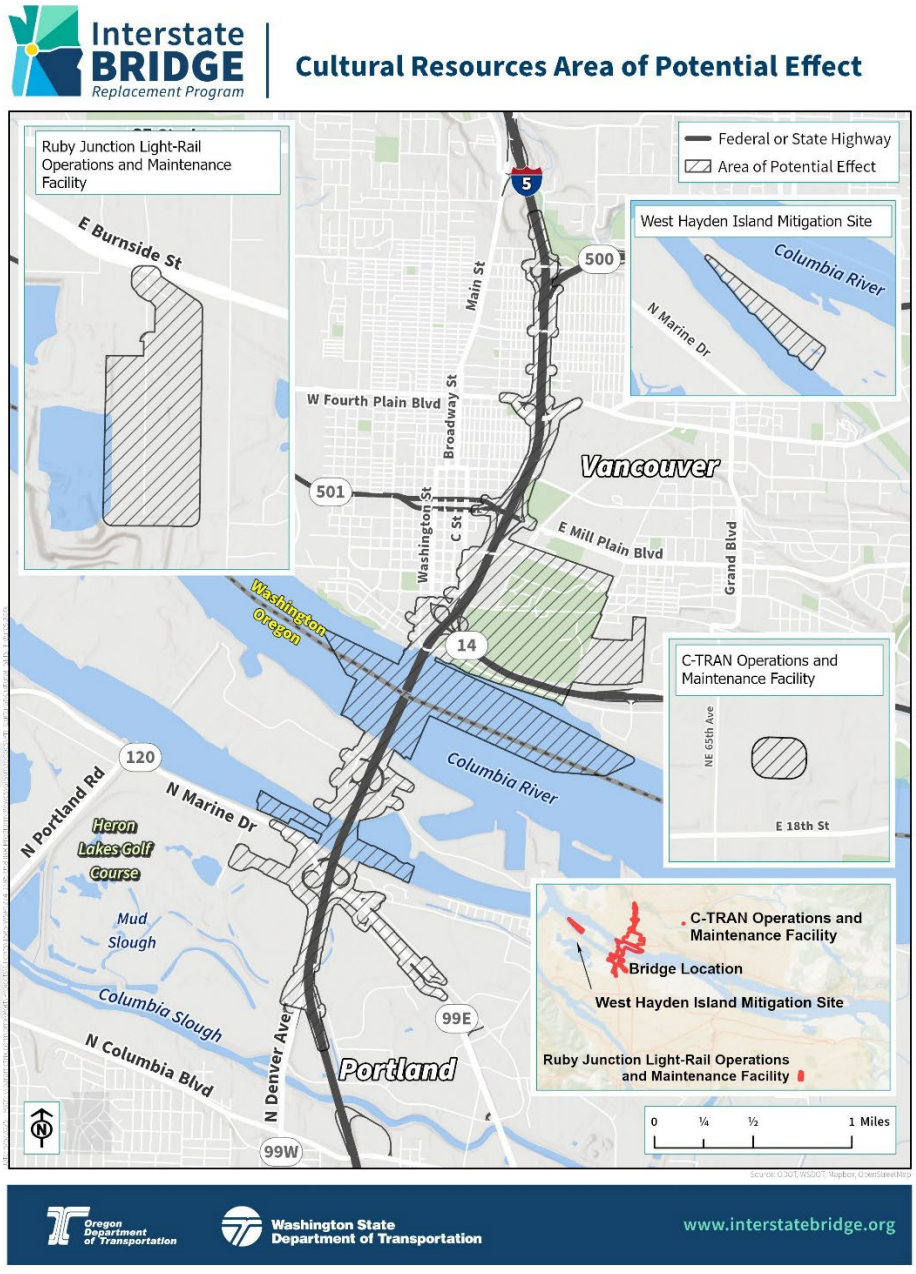


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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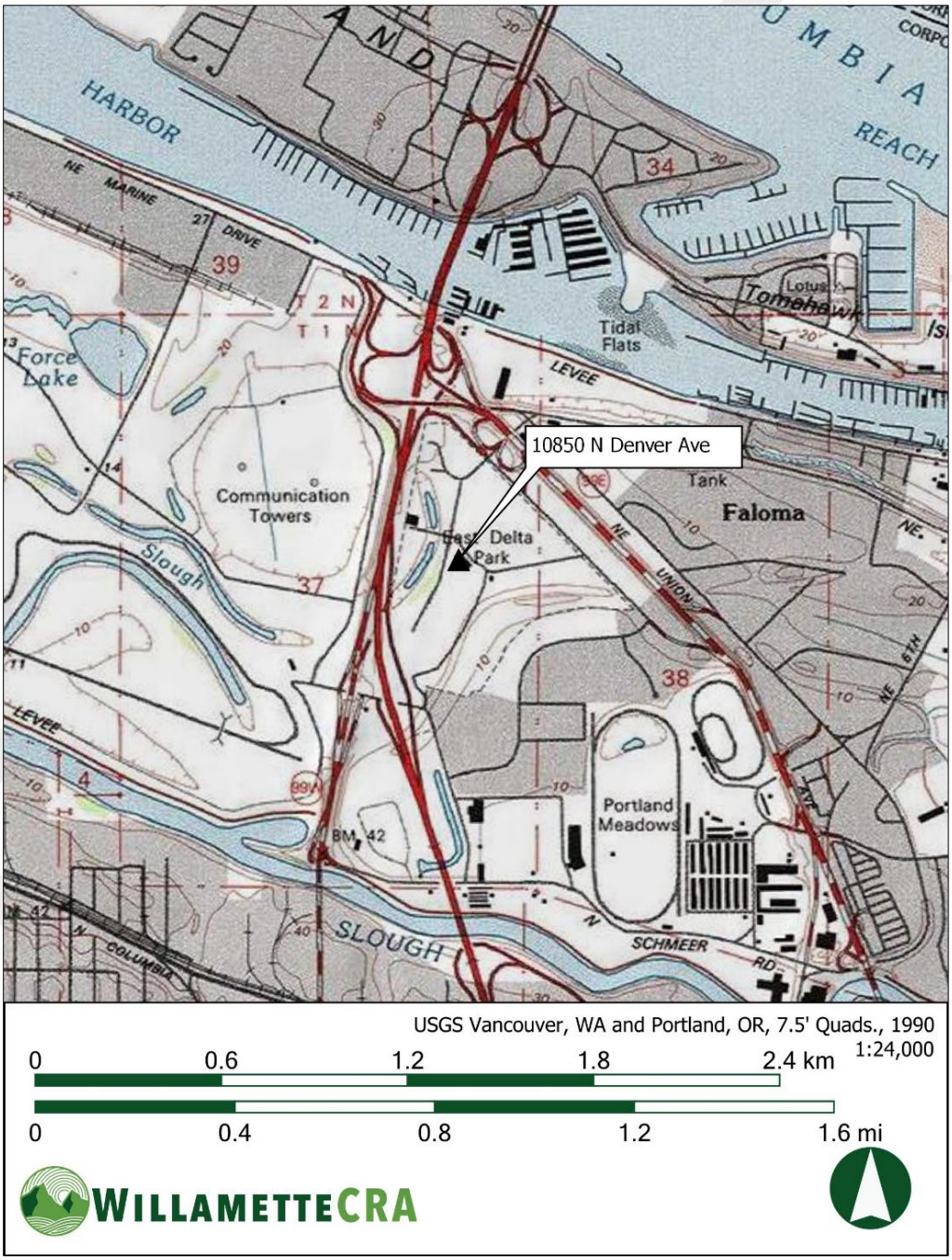


Figure 3. Topographic map showing location of East Vanport Commercial Center, Portland, Multnomah County, Oregon.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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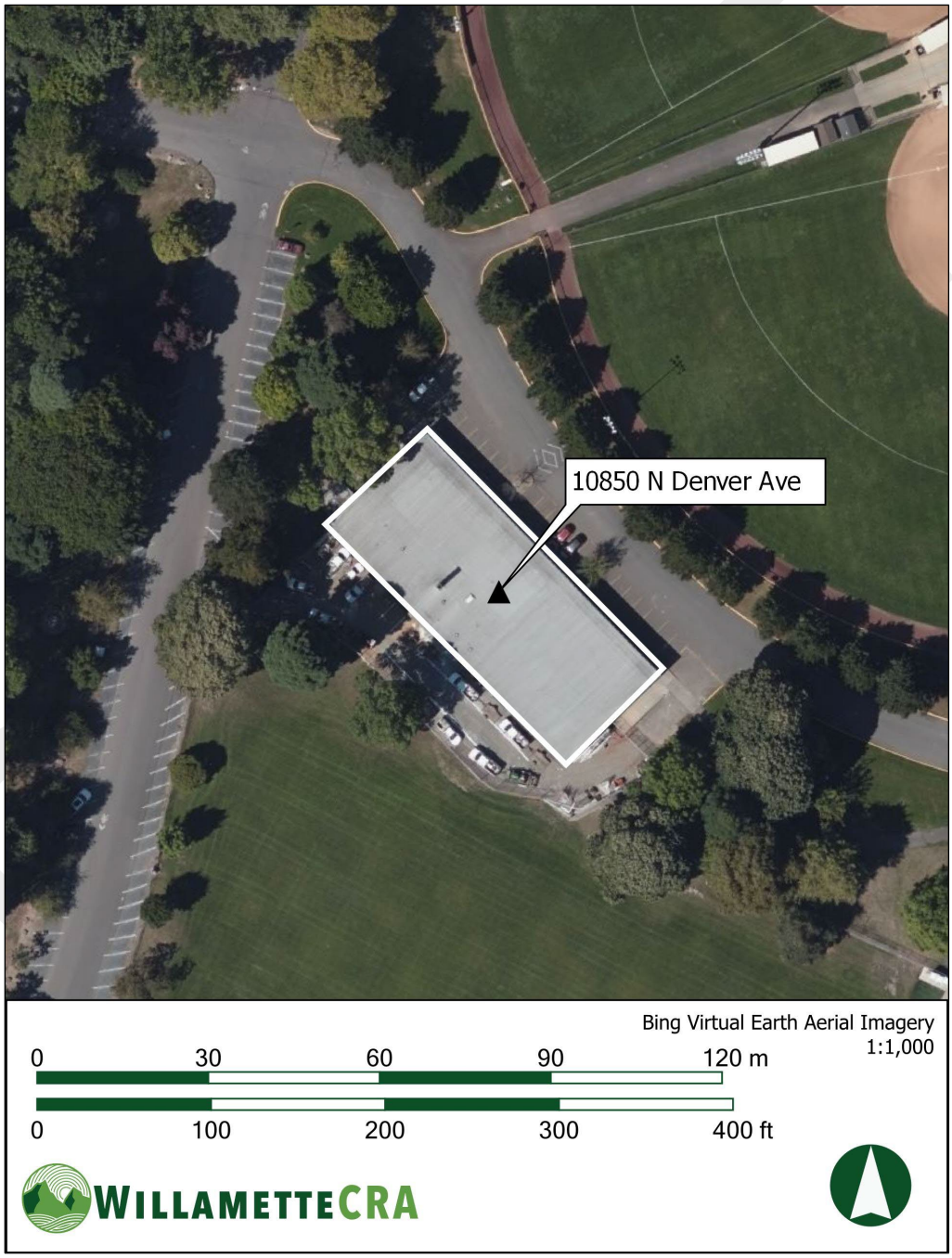


Figure 4. Aerial map of East Vanport Commercial Center showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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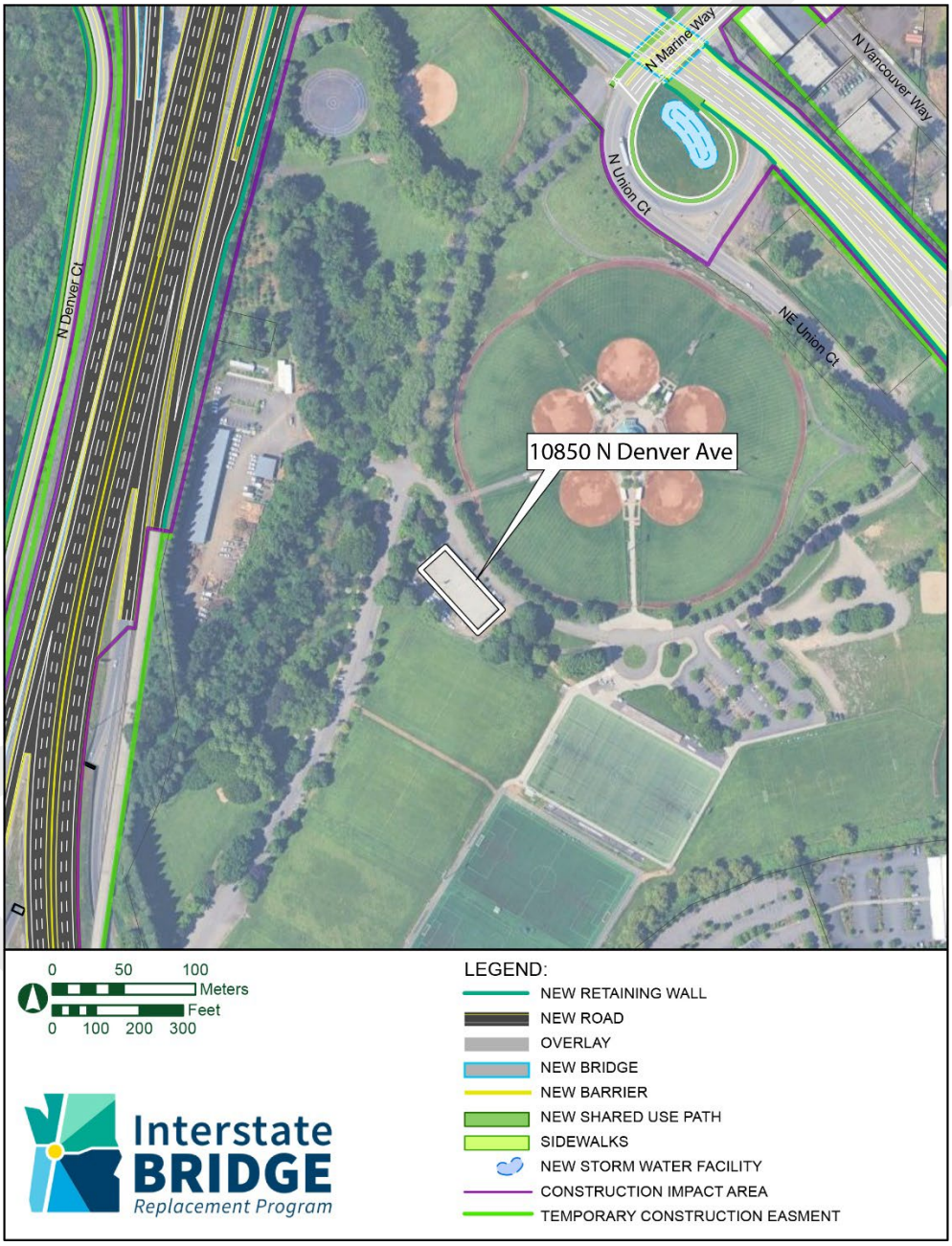


Figure 5. Aerial map showing the proximity of proposed Program activities to the East Vanport Commercial Center, with the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: East Vanport Commercial Center (Delta Park Sports Office) (OR 155)	SHPO Resource ID: TBD
Street Address: 10850 North Denver Avenue	City, County, State: Portland, Multnomah County, Oregon



Figure 6. Northeast and northwest elevations of East Vanport Commercial Center, view south (WillametteCRA, September 6, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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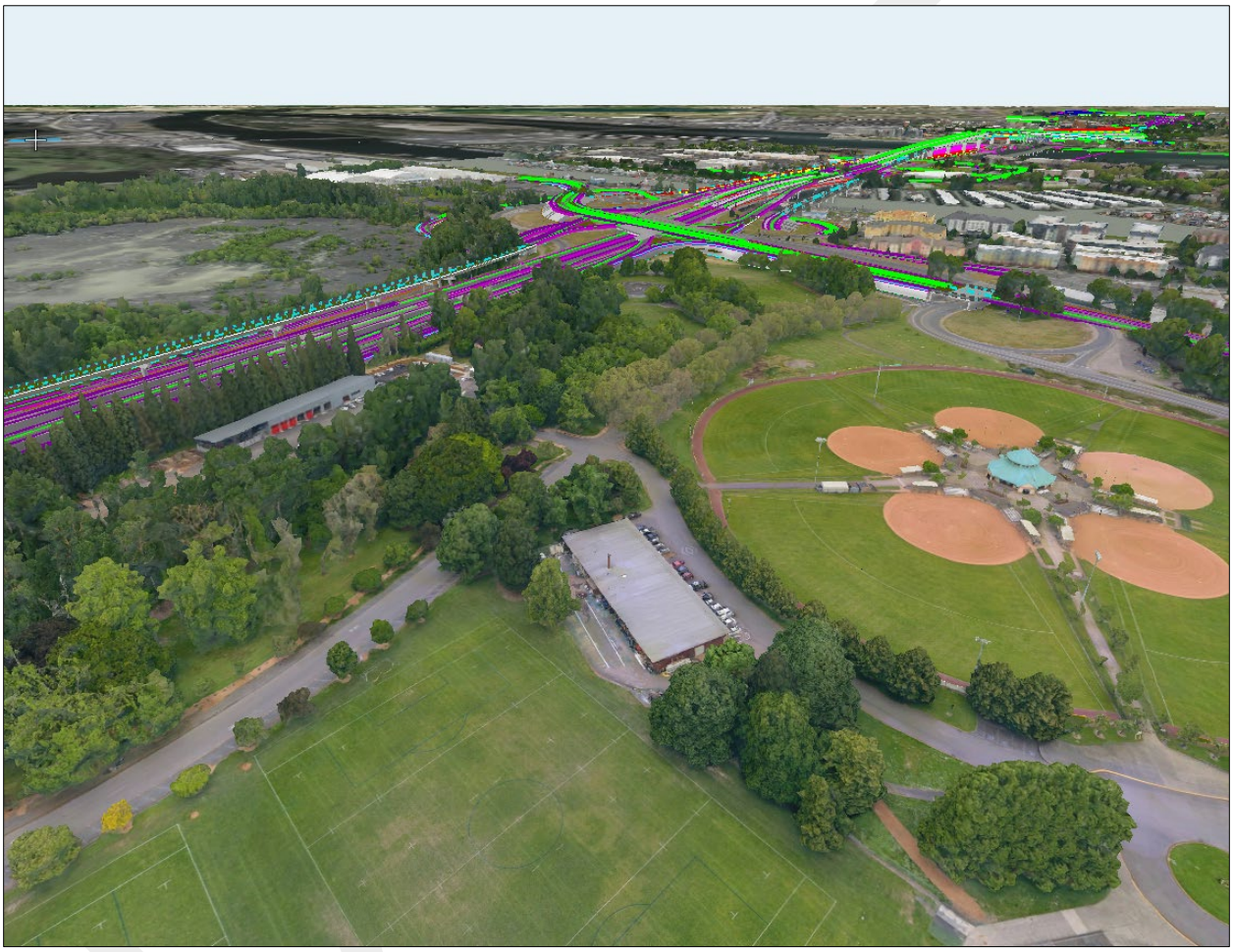


Figure 7. East Vanport Commercial Center, view northwest toward Program area showing intervening trees (IBR/Bentley Systems, May 26, 2022; screengrab captured June 12, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 8. East Vanport Commercial Center, view from top of building north toward shared-use path; note intervening trees (IBR/Bentley Systems, May 26, 2022; screengrab captured June 12, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 9. East Vanport Commercial Center, view west toward I-5; view is obstructed by intervening trees (IBR/Bentley Systems, May 26, 2022; screengrab captured June 12, 2023).

Appendix D2

WASHINGTON FOEs

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Rendered oblique aerial of the Vancouver National Historic Reserve, view facing northeast (WillametteCRA, February 21, 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Vancouver National Historic Reserve (VNHR), a National Park Service (NPS) unit with a collection of interrelated historic properties located in Vancouver, Clark County, Washington (Figure 1).

The VNHR encompasses a total of five historic properties including four historic districts and one site that have all been listed in or determined eligible for listing in the National Register of Historic Places (NRHP; Table 1; Figure 2). The historic districts were listed between 1974 and 2007 and many of the resources within them contribute to the significance of more than one of the historic districts. In total, there are seventy-four individual discrete contributing resources that include buildings, structures, sites, and objects.

Table 1. Listed or determined eligible properties within the VNHR ordered according to listing date.

DAHP Resource ID	Name	Alternate Name	Designation	Contributing Resources
674732	Vancouver National Historic Reserve Historic District (WA 1357)		District (6001216)	74
674448	Pearson Field Historic District (WA 369)		Determined NRHP-Eligible	3
674435	Vancouver Barracks Historic District (WA 1358)		Determined NRHP-Eligible District	23
674654	Officers Row Historic District (WA 918)		District (74001948)	21
674436	Fort Vancouver National Historic Site (WA 1359)	Fort Vancouver	Site (66000370)	N/A

Vancouver National Historic Reserve Historic District

The Vancouver National Historic Reserve Historic District covers 252 acres within the VNHR (Figures 3 and 4).[1] The district includes seventy-four contributing historic built environment resources, as well as additional contributing archaeological sites that are discussed elsewhere by the IBR Program (see Table 2).[2] The district is roughly bounded by the alleyway behind Officers Row to the north, Interstate 5 (I-5) to the west, the north shore of the Columbia River to the south, and a boundary corresponding to the alignment of East Reserve Street to the east. The district was listed in the NRHP in 2007 under Criteria A, C, and D with a period of significance beginning in 2,500 BP and ending in 1966.

[1] Erica Owens et al., "Vancouver National Historic Reserve Historic District," National Register of Historic Places Nomination Form (Washington, DC: U.S. Department of the Interior, National Park Service, 2007).
[2] See the Archaeology Technical Report.

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Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

Based on the following information, it is the recommendation of Willamette Cultural Resources Associates (WillametteCRA) to the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) that the Program would result in an Adverse Effect to the Vancouver National Historic Reserve Historic District. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

Pearson Field Historic District

The Pearson Field Historic District covers approximately 6.5 acres within the VNHR (Figures 5 and 6).[3] The district includes three contributing historic built environment resources and is bounded by East 5th Street to the north, the grounds of the Fort Vancouver National Historic Site to the west and south, and East Reserve Street to the east (see Table 2). The district was determined eligible for listing in the NRHP in 1990 under Criterion A with a period of significance of 1905 to 1941.

Based on the following information, it is the recommendation of WillametteCRA to the FHWA and the FTA that the Program would result in an Adverse Effect to the Pearson Field Historic District Historic District. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 CFR 800).

Vancouver Barracks Historic District

The Vancouver Barracks Historic District covers approximately 55 acres within the VNHR (Figures 7 and 8).[4] The district includes twenty-three contributing historic built environment resources and is bounded by McClellan Road and an unnamed alley to the north, I-5 to the west, Hatheway Road and East 5th Street to the south, and an open parkland to the east (see Table 2).[5] The district was determined eligible for listing in the NRHP in ca. 1984 and, although NRHP evaluation standards have changed since that time, would today be considered eligible under Criterion A with a period of significance of 1846 to 1918.[6]

Based on the following information, it is the recommendation of WillametteCRA to the FHWA and the FTA that the Program would result in an Adverse Effect to the Vancouver Barracks Historic District. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 CFR 800).

[3] L. Garfield, "Pearson Field Historic District," National Register of Historic Places Nomination Form (Washington, DC: U.S. Department of the Interior, National Park Service, 1990).
[4] Robert E. Kavanaugh, "Vancouver Barracks Historic District," National Register of Historic Places Nomination Form (Washington, DC: U.S. Department of the Interior, National Park Service, ca. 1984).
[5] Note that the Vancouver Barracks Historic District originally included twenty-five contributing resources, however, two have been demolished.
[6] The criterion noted here was surmised from the eligible district's "Areas of Significance" which include exploration/settlement and military. The period of significance was surmised from the Statement of Significance discussion.

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Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

Officers Row Historic District

The Officers Row Historic District covers approximately 18 acres within the VNHR (Figures 9 and 10).[7] The district includes twenty-one contributing historic built environment resources and is bounded by the Officers Row alleyway to the north, the alignment of I-5 to the west, East Evergreen Boulevard (sometimes referred to as Officers Row) to the south, and East Reserve Street to the east (see Table 2). The district was listed in the NRHP in 1974 and, although NRHP evaluation standards have changed since that time, would today be considered eligible under Criteria A and C with a period of significance from 1867 to 1906.[8]

Based on the following information, it is the recommendation of WillametteCRA to the FHWA and FTA that the Program would result in an Adverse Effect to the Officers Row Historic District. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 CFR 800).

Fort Vancouver National Historic Site

Fort Vancouver National Historic Site covers approximately 207 acres within the VNHR (Figures 11 and 12).[9] The site is bounded by East Evergreen Boulevard (sometimes Officers Row) and East 5th Street to the north, Fort Vancouver Way and I-5 to the west, the north shore of the Columbia River to the south, and East Reserve Street to the east. Portions of the site including the alignment of Highway 14, the alignment of the Spokane, Portland & Seattle Railway (today the BNSF), and the alignment of SE Columbia Way are cut out from the area of the site. The Fort Vancouver National Historic Site was authorized as a National Monument by congressional action in 1948 but re-designated as a National Historic Site in 1961.[10] The site is listed on the NRHP under the authority of the National Historic Preservation Act of 1966, as amended, through "[t]hose Acts of Congress and Executive orders which create historic areas of the National Park System administered by the NPS, all or portions of which may be determined to be of historic significance consistent with the intent of Congress" (36 CFR Part 60.1(b)). The formal nomination for the site was prepared in 1972 and, although NRHP evaluation standards have changed since that time, the site would today be considered eligible under Criterion A with a period of significance ca. 1844–1846. Many of the site's historic built environment resources including the stockade and gardens are historical reconstructions on the original site.[11] The national historic site's boundaries have been expanded repeatedly since its initial creation.

[7] Robert Hidden and Anita Chiera, "Officers Row Historic District," National Register of Historic Places Nomination Form (Washington, DC: U.S. Department of the Interior, National Park Service, 1974).
[8] The criteria noted here were surmised from the eligible district's "Areas of Significance" which include architecture, military, and social/humanitarian. The period of significance was surmised from the Statement of Significance discussion.
[9] Robert E. S. Clark, "Fort Vancouver National Historic District," National Register of Historic Places Inventory – Nomination Form (Washington, DC: U.S. Department of the Interior, National Park Service, 1972). Note that this finding of effect does not discuss or include the discontiguous McLoughlin House Unit of the Fort Vancouver National Historic Site in Oregon City, Oregon.
[10] National Park Service, "Foundation Document, Fort Vancouver National Historic Site, Washington, Oregon," Foundation Document (Washington, DC: U.S. Department of the Interior, National Park Service, 2017), 27.
[11] The criteria noted here were surmised from the eligible district's "Areas of Significance" which include arcagriculture, commerce, education, industry, military, political, and transportation. The period of significance was surmised from the Statement of Significance discussion.

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Based on the following information, it is the recommendation of WillametteCRA to the FHWA and FTA that the Program would result in an Adverse Effect to the Fort Vancouver National Historic Site. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 CFR 800).

PROGRAM DESCRIPTION

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve I-5 corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through-lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers more space and time to merge, diverge, and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.
    - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configurations would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
    - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

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- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as a reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
    - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.
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    - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
    - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.
- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- v
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

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Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

Vancouver National Historic Reserve Historic District

The Vancouver National Historic Reserve Historic District is roughly bounded by the alleyway behind Officers Row to the north, I-5 to the west, the north shore of the Columbia River to the south, and a boundary corresponding to the alignment of East Reserve Street to the east within Vancouver, Clark County, Washington (see Figures 3–4).

Within these bounds, the district encompasses 252 acres which includes the westernmost two-thirds of the VNHR. The district is defined by the gently sloping river terraces of the Columbia River's north shore which originally included a mix of open prairie and forestlands. Over time, this landscape has been overlaid by a paved network of vehicular and pedestrian circulation paths and developed with a wide variety of improvements. These improvements include buildings constructed in multiple late Victorian, revivalist, and modern architectural styles to suit the district's succession of post-contact occupants including the Hudson's Bay Company, US Armed Forces, and NPS. In all, the district contains seventy-four contributing historic built environment resources including buildings, sites, structures, and objects (Figure 13).

These resources are divided into four "character areas" each pertaining to a different historic era in the district's growth and historic significance. Character areas include the Prehistoric/Contact-Period Native American Character Area, the Hudson's Bay Company Fort Vancouver Character Area, the U.S. [US] Army Vancouver Barracks Character Area, and the National Park Service Mission 66 Character Area.[12] Of these, the Prehistoric/Contact-Period Native American Character Area contains no contributing historic built environment resources, the Hudson's Bay Company Fort Vancouver Character Area contains two historic built environment resources—the Old Apple Tree and

[12] Owens et al., "Vancouver National Historic Reserve Historic District," 7-2–7-47. Note that "National Park Service" is not abbreviated when used as part of a geographic name.

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the Well, the U.S. [US] Army Vancouver Barracks Character Area contains fifty resources, and the National Park Service Mission 66 Character Area contains eight historic built environment resources.[13] Character-defining features are discussed through the landscape characteristics recognized by the NPS which include natural systems and features, spatial organization, land use, circulation, cultural traditions, topography, vegetation, cluster arrangements, buildings and structures, views and vistas, constructed water features, archaeological sites, and small-scale features.[14]

Each of the character areas within the Vancouver National Historic Reserve Historic District possesses its own discussion of significance. The Prehistoric/Contact-Period Native American Character Area is significant at the local level of significance under Criterion D in the area of archaeology – prehistoric. The Hudson's Bay Company Fort Vancouver Character Area is significant at the national level of significance under Criterion A in the areas of agriculture, commerce, education, exploration/settlement, industry, and politics/government, as well as Criterion D in the area of archaeology – historic-aboriginal and archaeology – historic non-aboriginal. The U.S. [US] Army Vancouver Barracks Character Area is significant at the national level of significance under Criterion A in the areas of exploration/settlement, industry, military, and politics/government, Criterion C in the area of architecture, and Criterion D in the area of archaeology – historic non-aboriginal. The National Park Service Mission 66 Character Area is significant at the state level of significance under Criterion A in the area of other: park master planning and Criterion C in the area of architecture. Overall, the historic district is significant under Criteria A, C, and D and employs Criterion Consideration G to nominate several buildings associated with the NPS Mission 66 development period that were less than fifty years of age at the time of listing. Under all its criteria, the district has a period of significance beginning in 2500 BP and ending in 1966 AD. Since the end of the period of significance, additional buildings have been constructed within the boundaries of the district and new construction around it has had some effects on its integrity of setting. In spite of these changes, the district retained sufficient historic integrity for listing in the NRHP and continues to retain sufficient integrity into the present day.[15] When originally listed, the district contained eighty-eight contributing resources (including archaeological sites not discussed here) and fifty-two non-contributing resources (including archaeological sites not discussed here).

Pearson Field Historic District

The Pearson Field Historic District is bounded by East 5th Street to the north, an unmarked boundary some 80 feet west of the westernmost contributing building to the west, an unmarked boundary some 50 feet south of the southernmost contributing building to the south, and East Reserve Street to the east in within Vancouver, Clark County, Washington (see Figures 5–6). Within these bounds, the district encompasses 6.5 acres which are located near the eastern half of the VNHR. The district is defined by a slight gradient descending from East 5th Street towards the Columbia River and is predominantly covered by paved roads and parking areas and landscaped grass lawns. Mature vegetation is located along south side of East 5th Street and west side of East

[13] Note that although the first Old Apple Tree died in June 2020, the tree's trunk has been left in place as a testament to its life and young rootsuckers are now superseding the progenitor tree. As such, this resource is considered to be extant and intact. Douglas Wilson and Theresa Langford, conversation with the Hayli Reff, January Tavel, and Langston Emerson Guettinger, June 29, 2023.
[14] National Park Service, "Cultural Landscapes 101," *National Park Service*, last updated July 12, 2023, https://www.nps.gov/articles/cultural-landscapes-101.htm.
[15] Note that individual aspects of integrity are not discussed in the NRHP nomination. Instead, the document discusses the integrity of each character area and only mentions individual aspects in conjunction some contributing resources and the National Park Service Mission 66 Character Area.

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Reserve Street, however, the district otherwise possesses open views to the south and west that showcase the historic location of the original airstrip, as well as the current non-historic paved landing strip and buildings of the still-functioning Pearson Field Airport. Aside from the roadways and landscaping, other improvements within the district include four buildings (two of which are part of an interconnected museum) and various small-scale features including monuments and interpretive signs. The buildings include a 1904 storehouse, a 1921 hangar moved to its current site in 1925, a 1918 field office moved to its current site in 1929, and a reconstructed hangar used as a museum building. All of these buildings rise only one to one-and-a-half stories in height and are defined by their wood frame construction and utilitarian style. Only the three historic-age buildings contribute to the district's significance; the reconstructed hangar, as well as all other small-scale structures and objects are non-contributing (Figure 14).

The Pearson Field Historic District is eligible for inclusion in the NRHP under Criterion A, at the local level of significance, in the area of transportation. The district possesses a strong association with the development of aviation in the Vancouver and Portland metropolitan area and is the site of multiple significant historic events in the history of manned flight.[16] Although the district's character-defining features are not explicitly discussed, its "historic character" is defined by the extant cluster of historic-age buildings located near the northeastern corner of the original landing field. The landing strip itself has been lengthened, paved, and relocated to the south but the district continues to possess views to the south and southwest of the wayfinding Interstate Bridge towers and the open grassy landing field "which accommodated the region's early 'birdmen."[17]

The Pearson Field Historic District's period of significance under Criterion A begins in 1905 when a self-propelled dirigible touched down in its grassy field and ends in 1941 when its last military squadron was called to active duty. Since that time, the area around the district has been marked by the reconstruction of Fort Vancouver, as well as the accretion and removal of commercial airplane hangars. These hangars were notable to the southwest and south in original maps prepared for the district's determination of eligibility, however, have since been removed restoring portions of the historic viewshed. Although much of the larger original Pearson Field site has been altered, the cluster of buildings contained within the district boundaries retains its integrity and the reconstructed hangar is compatible with the earlier resources.[18]

Vancouver Barracks Historic District

The Vancouver Barracks Historic District is roughly bounded by McClellan Road and an unnamed alley to the north, I-5 to the west, Hatheway Road and East 5th Street to the south, and an open parkland to the east within Vancouver, Clark County, Washington (see Figures 7–8). Within these bounds, the district encompasses approximately 55 acres which are located along the western edge of the VNHR. The district is topographically defined by a slight gradient descending south from McClellan Road towards the Columbia River. Its vegetation includes open grassy lawns and mature trees. This landscape is overlain with a network of paved roadways that provide access to thirty-three institutional and residential buildings. The buildings are constructed in utilitarian and Colonial Revival styles and range in construction date from 1881 to 1978. The buildings vary in scale and include modest single-story shops, as well as substantial two- and two-and-a-half-story brick buildings with detailed ornamentation. In all, the district originally contained thirty-five buildings; twenty-five of which contributed to its significance (Figure 15).

[16] Garfield, "Pearson Field Historic District," 8-1.
[17] Garfield, "Pearson Field Historic District," 7-1.
[18] Note that individual aspects of integrity are not discussed in the original 1990 determination of eligibility.

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The Vancouver Barracks Historic District is eligible for inclusion in the NRHP, however, since the original publication of the determination of eligibility, changes to the format of nominations mean that the current district does not possess a criterion for evaluation or a level of significance. Instead, it is recommended eligible in areas of exploration/settlement, and military for its role as a US military post in the development of the Pacific Northwest. Although its character-defining features are not explicitly defined, the property's discussion of significance indicates that its location, its contributing buildings, the spatial arrangement and cluster orientations of these buildings, the views of the parade grounds, the views of the surrounding landscape to the south and southeast all contribute to its significance.[19]

As the determination of eligibility makes no mention of significant associations with historic personages, significant architecture, or significant sources of informational potential, it can be concluded that by present evaluation standards, the district is eligible for inclusion in the NRHP under Criterion A at the state level of significance. Although also not explicitly stated, the district's period of significance can be inferred from nomination's statement of significance with its beginning in 1879 corresponding to the installation's renaming as the Vancouver Barracks and ending in 1918 with the conclusion of the World War I and the closure of the Spruce Production Division.[20] Since 1918, the area within the district's boundaries has been affected by some new construction in the 1930s, 1940s, and 1970s. Other changes include the construction and later expansion of I-5 which has considerably altered the district's western edge, as well as the construction of a new Washington State Patrol building to the north (today a Vancouver Police Department facility). Although no discussion of the district's historic integrity is made anywhere in its determination of eligibility, its resources and surroundings have changed little since the document's completion ca. 1984 and its integrity remains unchanged since that time.

Officers Row Historic District

The Officers Row Historic District is bounded by the Officers Row alleyway to the north, the alignment of I-5 to the west, East Evergreen Boulevard (sometimes referred to as Officers Row) to the south, and East Reserve Street to the east within Vancouver, Clark County, Washington (Figures 9–10). Within these bounds, the district encompasses approximately 18 acres which are located along the northern edge of the VNHR. The district is laid out along the alignment of East Evergreen Boulevard where the roadway passes from west to east through the VNHR. It is relatively flat along its course but is located on the uplands of the gently sloping river terraces that make up the topography of the VNHR and select buildings possess open southerly views across the parade grounds. The district itself is landscaped in manicured grass lawns with a mature allée of deciduous trees along East Evergreen Boulevard and additional mature trees located throughout the grounds. Within the grounds, twenty-one residential buildings are arranged along the north side of East Evergreen Boulevard with small clusters of buildings to the east and west accessible from narrower cul-de-sac roadways. These buildings include what were originally single- and multi-family residences constructed between 1846 and 1906 in a variety of late Victorian styles. The buildings vary in scale and include modest one-and-a-half story homes along with elaborate two-and-a-half story residences. In all, every one of the district's twenty-one buildings contribute to its significance.

[19] Kavanaugh, "Vancouver Barracks Historic District," 7-1.
[20] Kavanaugh, "Vancouver Barracks Historic District," 4–5. Note that these dates are corroborated by the construction dates of contributing buildings within the district.

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The Officers Row Historic District is listed in the NRHP, however, since its original nomination, changes to the format of the nomination form mean that the current district does not possess a criterion for evaluation or a level of significance. Instead, it is nominated in the areas architecture, military, and social/humanitarian for its representative architecture of the late nineteenth century, as well as its role in the development of US military history.[21] Although its character-defining features are not explicitly defined, the nomination's discussion of the property's appearance and significance indicates that its location, its contributing buildings, the design and construction methods of these buildings, their spatial arrangement, and their viewshed south to the Columbia River all contribute to the property's significance.

As the nomination makes no mention of any *strong* association with significant personages, or significant sources of informational potential, it can be concluded that by present evaluation standards, the district is listed under Criteria A and C at the local of significance.[22] Although also not explicitly stated, the district's period of significance can be inferred from the construction dates of its buildings beginning ca. 1846 with the construction of Grant House and ending in 1906 with the erection of Building 802.[23] Since 1906, the property has been altered by some changes to East Evergreen Boulevard, as well as changes to the landscaping including the removal of small-scale features such as fencing and rear wells. Other changes include the addition of rear trash yards along the northern alley, the addition of interpretive signage, and limited changes to the contributing buildings. These alterations include the full or partial enclosure of original basements, the blinding or removal of interior fireplaces, the loss of some masonry chimneys, and the loss of some interior decorative features. Other changes have occurred around the district including the construction of I-5 along the district's west end, ongoing improvements to the Vancouver Barracks, and the construction of various NPS facilities. Although no discussion of the district's historic integrity is made anywhere in its nomination, its surroundings have changed little since the document's completion in 1974 and its contributing resources have been mostly restored leaving them closer to their historic appearance than they were when nominated.

Fort Vancouver National Historic Site

Fort Vancouver National Historic Site is bounded by East Evergreen Boulevard (sometimes Officers Row) and East 5th Street to the north, Fort Vancouver Way and I-5 to the west, the north shore of the Columbia River to the south, and East Reserve Street to the east within Vancouver, Clark County, Washington (see Figures 11–12). Within these bounds, the site encompasses approximately 207 acres within the VNHR in three discontiguous sections. The sections are divided by the alignment of SR 14 and the SE Columbia Way creating a large northern section and two elongated narrow sections to the south (Figure 16). The boundary is generally defined by existing linear features including roadways or extant property lines, however, its southwest corner runs into the alignment of the I-5 and SR 14 interchange and includes over four acres of property owned and managed by WSDOT.

The site is laid out across the gently sloping river terraces of the Columbia River's north shore and is predominated by open prairielands, manicured lawns, and more limited clusters of mature trees. In addition to its landscape features, the site includes numerous structures, objects, and buildings that are informally organized by

[21] Hidden and Chiera, "Officers Row Historic District," 7–0.
[22] Note that the local level is concluded through an absence of serious discussion of this property in a state or national context.
[23] Hidden and Chiera, "Officers Row Historic District,"

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

use and construction period. Near the center of these groupings is the reconstructed Hudson's Bay Company stockade and replanted gardens immediately surrounding it. Further out from this central grouping is the historic parade ground associated with Vancouver Barracks to the north, various improvements associated with Vancouver Barracks to the northwest, a set of 1980s warehouses to the west, the archaeological sites and reconstructed portions of Kanaka Village also to the west, the Land Confluence Bridge to the southwest, half of the modern Pearson Airport runway to the south and southeast, and the historic grouping of Pearson Field buildings to the east. These disparate groupings are united by a shared road network and are thematically united through their common association with the ongoing development of the Fort Vancouver site.

The Fort Vancouver National Historic Site is listed in the NRHP, however, since the original publication of the nomination, changes to the format of nominations mean that the current site does not possess a criterion for evaluation or a level of significance. Instead, the site is nominated in the areas of agriculture, commerce, education, industry, military, political, and transportation. These areas are derived from the site's association with the original Fort Vancouver constructed by the Hudson's Bay Company, its overall importance in the development of the Pacific Northwest, and the ongoing archaeological work within the site's boundaries. Character-defining features are not explicitly defined by the nomination.

As the nomination makes no mention of significant associations with historic personages or significant architecture, it can be concluded that by present evaluation standards, it is eligible for inclusion in the NRHP under Criteria A and D. The level of significance for the property is left undetermined while the period of significance corresponds to the height of Fort Vancouver's prosperity from 1844 to 1846.[24] Since the end of the period of significance, the site has been heavily altered through the loss and later reconstruction of the original fort buildings, the loss of various support buildings and landscape features around the fort, and the substantial development of additional facilities within the boundary of the NHS and on all sides of it.

ALTERNATIVES CONSIDERED

Because the four districts and one site within the VNHR are listed or determined eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-listed and -eligible properties within the VNHR, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

[24] Note that the nomination form check marks the eighteenth century as the period of significance but describes it in text as the mid-nineteenth century. As no Hudson's Bay Company activity occurred on the site in the eighteenth century, the check mark is likely an error.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

To evaluate the Program's potential to diminish a property's historic integrity, this study considered effects including demolition, incompatible alterations, subterranean impacts, vibration impacts, temporary construction easements, permanent construction easements, air quality (atmospheric) impacts, noise impacts, and visual impacts. An analysis of these impacts was undertaken using data gathered in the field, as well as the technical reports prepared by various disciplines of the IBR Program.[25] These effects were analyzed in relation to a no-build alternative, the Modified LPA, and its various design options. The results of this analysis are shown in Table 1 and effects on individual properties are discussed below. Elements of this analysis are depicted graphically with the Modified LPA superimposed over the boundaries of the VNHR properties (Figures 14–24). In all, these effects were analyzed in relation to a no-build alternative, the Modified LPA, and its various design options.

The results of this analysis are shown in Table 1 and effects on individual contributing resources are discussed thereafter.

Table 2. Summary of Effects

The following table includes a summary of effects on contributing resources within the VNHR. These properties are organized in reverse chronology by listing date beginning with the 2007 VNHR Historic District nomination. Resources are repeated when they contribute to the significance of more than one property, however, only their first appearance includes a summary of effects and subsequent appearances are shaded gray. This summary is meant to apply to the contributing resource, regardless of which property it is within. Entries with a dash (-) indicate that no effect was found. Entries with a checkmark (✓) indicate that an effect was found. Entries filled with "N/A" ("Not Applicable") indicate that no data was found about the effect.

[25] IBR Program, *Land Use Technical Report*, Interstate Bridge Replacement Program, April 2023; Interstate Bridge Replacement Program, *Noise and Vibration Technical Report*, Interstate Bridge Replacement Program, March 2023; John A. Volpe National Transportation System Center, *Transit Noise and Vibration Impact Assessment Manual* (Washington, DC: Office of Planning and Environment, Federal Transit Administration, 2018); Interstate Bridge Replacement Program, *Air Quality Technical Report*, Interstate Bridge Replacement Program, March 2023; Interstate Bridge Replacement Program, *Visual and Aesthetics Technical Report*, Interstate Bridge Replacement Program, May 2023.

Table 2. Summary of Effects.

Resource Information							Effects								
Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
WA 1357	**674732**	**-**	**Vancouver National Historic Reserve Historic District**		**District (6001216)**	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	✓	-	✓	-	✓	✓	-	✓	✓
						Second Auxiliary lanes	✓	-	✓	-	✓	✓	-	✓	✓
						Different Bridge Types	✓	-	✓	-	✓	✓	-	✓	✓
						I-5 Westward Shift	-	-	-	-	✓	✓	-	✓	✓
						Eliminate C Street ramps	✓	-	✓	-	✓	✓	-	✓	✓
						Park & Ride Options	✓	-	✓	-	✓	✓	-	✓	✓
WA 918c	89678	701, 703 E Evergreen Blvd	House	Building 1	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (66)	-
						MLPA	-	-	-	-	-	-	-	✓ (72)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (74)	-
						Different Bridge Types	-	-	-	-	-	-	-	✓ (72)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	✓ (70)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	✓ (70)	-
						Park & Ride Options	-	-	-	-	-	-	-	✓ (72)	-
WA 918a	722233	601, 603 E Evergreen Blvd	House	Building 2	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (63)	-
						MLPA	-	-	-	-	-	-	-	✓ (71)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (73)	-
						Different Bridge Types	-	-	-	-	-	-	-	✓ (71)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	✓ (69)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	✓ (69)	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Park & Ride Options	-	-	-	-	-	-	-	✓ (71)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (61)	-
						MLPA	-	-	-	-	-	-	-	✓ (66)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (68)	-
						Different Bridge Types	-	-	-	-	-	-	-	✓ (66)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (64)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (64)	-
WA 918b	722236	650, 652, 656 E Evergreen Blvd	Duplex	Building 3		Park & Ride Options	-	-	-	-	-	-	-	✓ (66)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (64)	-
						MLPA	-	-	-	-	-	-	-	✓ (66)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (68)	-
						Different Bridge Types	-	-	-	-	-	-	-	✓ (66)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (64)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (64)	-
WA 918d	-	750, 754, 756 E Evergreen Blvd	Duplex	Building 4		Park & Ride Options	-	-	-	-	-	-	-	✓ (66)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (57)	-
						MLPA	-	-	-	-	-	-	-	- (60)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (62)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (60)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (58)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (58)	-
WA 918e	-	800 A-D, 802 A-C, 804, 806 E Evergreen Blvd	Duplex	Building 5		Park & Ride Options	-	-	-	-	-	-	-	- (60)	-
WA 918f	-		Duplex	Building 6		No-Build Alternative	-	-	-	-	-	-	-	- (55)	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
		850 E Evergreen Blvd			Contributing Building to Listed District (6001216)	MLPA	-	-	-	-	-	-	-	- (57)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (59)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (57)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (55)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (55)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (57)	-
WA 918g	-	901, 903, 905 E Evergreen Blvd	House	Building 7	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
WA 918h	-	951, 953, 955 E Evergreen Blvd	House	Building 8	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
WA 918i	717526	1001, 1003, 1005, 1007, 1009 E Evergreen Blvd	Duplex	Building 9	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
		1051, 1053, 1055, 1057, 1059 E			Contributing Building to Listed District	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918j	718982	Evergreen Blvd	Duplex	Building 10	(6001216)	Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
		1106 E													
WA 918k	-	Evergreen Blvd	Grant House	Building 11	(6001216)	Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
		1151, 1153, 1155, 1157, 1161, 1163, 1165, 1167 E			Contributing Building to Listed District	Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
WA 918l	-	Evergreen Blvd	Duplex	Building 12	(6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918m	-	1201, 1203, 1205, 1207 E Evergreen Blvd	Duplex	Building 13		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918n	-	1251, 1253, 1255 E Evergreen Blvd	House	Building 14		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918o	-	1310, 1321, 1323, 1325 E Evergreen Blvd	Marshall House	Building 15		Park & Ride Options	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918p	-	1351 E Evergreen Blvd	House	Building 16		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918q	-	1401, 1403, 1405, 1407 E Evergreen Blvd	House	Building 17		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
WA 918r	-	1451, 1453, 1455, 1457 E Evergreen Blvd	House	Building 18		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
WA 918s	-		Duplex	Building 19	Contributing Building to	MLPA	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
		1501, 1503, 1505, 1507 E Evergreen Blvd			Listed District (6001216)	Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
WA 918t	-	1551, 1553, 1555, 1557, 1559, 1561, 1563, 1565, 1567 E Evergreen Blvd	Duplex	Building 20	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
WA 918u	720862	1601, 1603, 1605, 1607 E Evergreen Blvd	Duplex	Building 21	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
WA 369a	-	1105 E 5th St	Munitions Storehouse	Building 102	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓
						Different Bridge Types	-	-	-	-	-	-	-	N/A	✓

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓
						Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓
						Different Bridge Types	-	-	-	-	-	-	-	N/A	✓
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓
WA 369c	89316/20553	1105 E 5th St	Original Pearson Hangar	Building 189		Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓
						Different Bridge Types	-	-	-	-	-	-	-	N/A	✓
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓
WA 369b	-	1105 E 5th St	Pearson Field Office	Building 194		Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓
					Contributing Building to Listed District (6001216)	Different Bridge Types	-	-	-	-	-	-	-	N/A	✓
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
-	-	-	Automotive Repair Shop	Building 410		Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
						No-Build Alternative	-	-	-	-	-	-	-	- (61)	-
						MLPA	-	-	-	-	-	-	-	- (61)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (63)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (61)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (59)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (59)	-
-	-	-	Infantry Barracks (currently 45th Station Hospital)	Building 607		Park & Ride Options	-	-	-	-	-	-	-	- (61)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (58)	-
						MLPA	-	-	-	-	-	-	-	- (56)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (58)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (56)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (54)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (54)	-
WA 368	89315	610 E 5th St	Post Hospital	Building 614		Park & Ride Options	-	-	-	-	-	-	-	- (56)	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Hospital Corps Sergeant's Quarters (currently Senior NCO Quarters)	Building 621		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-		Building 626		No-Build Alternative	-	-	-	-	-	-	-	- (55)	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
			Dental Surgeon's Office (currently Chaplain's and Judge Advocate's Offices)		Contributing Building to Listed District (6001216)	MLPA	-	-	-	-	-	-	-	- (59)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (61)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (59)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (57)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (57)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (59)	-
-	-	-	Mess Hall (currently Barracks)	Building 628	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (54)	-
						MLPA	-	-	-	-	-	-	-	- (53)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (55)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (53)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (51)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (51)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (53)	-
-	-	-	Quartermaster Storehouse (currently Barracks)	Building 630	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Hospital Steward's Quarters (currently Commanding Officer's Quarters	Building 631	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	NCO Family Quarters	Building 635	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (61)	-
						MLPA	-	-	-	-	-	-	-	✓ (65)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (67)	-
						Different Bridge Types	-	-	-	-	-	-	-	✓ (65)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (63)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	✓ (63)	-
						Park & Ride Options	-	-	-	-	-	-	-	✓ (65)	-
-	-	-	Red Cross Building/Service Club	Building 636	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (59)	-
						MLPA	-	-	-	-	-	-	-	- (61)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (59)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (59)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (57)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (57)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (59)	-
-	-	-	Artillery Barracks (currently Post Headquarters)	Building 638	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (53)	-
						MLPA	-	-	-	-	-	-	-	- (56)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (58)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (56)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (54)	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (54)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (56)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (59)	-
						MLPA	-	-	-	-	-	-	-	- (62)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (64)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (62)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (60)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (60)	-
-	-	-	NCO Family Quarters	Building 641		Park & Ride Options	-	-	-	-	-	-	-	- (62)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (55)	-
						MLPA	-	-	-	-	-	-	-	- (59)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (61)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (59)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (57)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (57)	-
-	-	-	NCO Family Quarters	Building 642		Park & Ride Options	-	-	-	-	-	-	-	- (55)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (60)	-
						MLPA	-	-	-	-	-	-	-	- (63)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (65)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (63)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (61)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (61)	-
-	-	-	NCO Family Quarters	Building 643		Park & Ride Options	-	-	-	-	-	-	-	- (63)	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
-	-	-	NCO Family Quarters	Building 644	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (62)	-
						MLPA	-	-	-	-	-	-	-	- (64)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (66)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (64)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (62)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (62)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (64)	-
-	-	-	NCO Family Quarters	Building 664	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (54)	-
						MLPA	-	-	-	-	-	-	-	- (57)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (59)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (57)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (55)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (55)	-
						Park & Ride Options	-	-	-	-	-	-	-	- (57)	-
-	-	-	NCO Family Quarters	Building 665	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	- (62)	-
						MLPA	-	-	-	-	-	-	-	✓ (66)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (68)	-
						Different Bridge Types	-	-	-	-	-	-	-	✓ (66)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- (64)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (64)	-
						Park & Ride Options	-	-	-	-	-	-	-	✓ (66)	-
-	-	-	Barber Shop (currently Offices)	Building 704	Contributing Building to	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
					Listed District (6001216)	Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Gymnasium (currently Auditorium)	Building 721	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Mess Hall (currently Army Reserve Recruiting Office)	Building 722	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Post Exchange Restaurant	Building 725	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
			Finance Office (currently Explosive Ordinance Disposal Unit Building)			Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-		Building 728		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Mess Hall	Building 733		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
			Barracks (currently 104th Division Band Training Building)			Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-		Building 746											

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Motor Repair Shop (currently Storage and Vehicle Parking)	Building 748		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	N/A
						MLPA	-	-	-	-	-	-	-	N/A	N/A
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	N/A
						Different Bridge Types	-	-	-	-	-	-	-	N/A	N/A
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	N/A
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	N/A
-	-	-	Storage	Building 749		Park & Ride Options	-	-	-	-	-	-	-	N/A	N/A
						No-Build Alternative	-	-	-	-	-	-	-	-	N/A
						MLPA	-	-	-	-	-	-	-	N/A	N/A
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	N/A
						Different Bridge Types	-	-	-	-	-	-	-	N/A	N/A
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	N/A
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	N/A
-	-	-	Storage	Building 750		Park & Ride Options	-	-	-	-	-	-	-	N/A	N/A
-	-	-		Building 752		No-Build Alternative	-	-	-	-	-	-	-	-	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
			Quartermaster Storehouse (currently Post Exchange)		Contributing Building to Listed District (6001216)	MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Storage (currently Storage)	Building 753	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Quartermaster Storehouse (currently Shopette)	Building 754	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	-	-	Work Shop (currently Wood Shop, Red Cross)	Building 786	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Different Bridge Types	-	-	-	-	-	-	-	N/A	✓
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓
						Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
						No-Build Alternative	-	-	-	-	-	-	-	- (55)	-
						MLPA	-	-	-	-	-	-	-	- (56)	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (58)	-
						Different Bridge Types	-	-	-	-	-	-	-	- (56)	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (54)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (54)	-
-	550852	-	General O.O. Howard House	Building 875		Park & Ride Options	-	-	-	-	-	-	-	- (56)	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Barracks (currently Offices)	Building 987		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
-	-	-	Barracks (currently Offices)	Building 989											

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Post Headquarters (Headquarters 1st Brigade 104th Training Division)	Building 991		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Barracks (currently Offices)	Building 993		Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	N/A
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	N/A
						Different Bridge Types	-	-	-	-	-	-	-	N/A	N/A
					Contributing Structure to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	N/A
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	N/A
-	-	-	Well #2			Park & Ride Options	-	-	-	-	-	-	-	N/A	N/A

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						No-Build Alternative	-	-	-	-	-	-	-	✓ (65)	-
						MLPA	-	-	-	-	-	-	-	- (62)	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	- (64)	✓
						Different Bridge Types	-	-	-	-	-	-	-	- (62)	✓
					Contributing Object to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	- (60)	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	- (60)	✓
WA 109	89132	112 SE Columbia Way	Old Apple Tree	Heritage Apple Tree		Park & Ride Options	-	-	-	-	-	-	-	- (62)	✓
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Site to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Parade Ground			Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	- (61)	-
						MLPA	✓	-	-	-	✓	✓	-	- (61)	-
						Second Auxiliary lanes	✓	-	-	-	✓	✓	-	- (63)	-
						Different Bridge Types	✓	-	-	-	✓	✓	-	- (61)	-
					Contributing Structure to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	✓	✓	-	- (59)	-
						Eliminate C Street ramps	✓	-	-	-	✓	✓	-	- (59)	-
-	-	-	Army Road System			Park & Ride Options	✓	-	-	-	✓	✓	-	- (61)	-
						No-Build Alternative	-	-	-	-	-	-	-	- (63)	-
-	-	-	Allee along Evergreen Boulevard		Contributing Structure to	MLPA	-	-	-	-	-	-	-	✓ (71)	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
					Listed District (6001216)	Second Auxiliary lanes	-	-	-	-	-	-	-	✓ (73)	-
						Different Bridge Types	-	-	-	-	-	-	-	- ✓ (71)	-
						I-5 Westward Shift	-	-	-	-	-	-	-	- ✓ (69)	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	- ✓ (69)	-
						Park & Ride Options	-	-	-	-	-	-	-	- ✓ (71)	-
WA 1211a	18657	610 E 5th St	Old Mule Barn	Artillery Stable	Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
-	717383	-	Fort Vancouver National Historic Site Visitor Center		Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓
						Different Bridge Types	-	-	-	-	-	-	-	N/A	✓
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓
						Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
-	727976	-	Residence (currently Park Headquarters/Administration)		Contributing Building to Listed District (6001216)	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	727976	-	Residence (currently an NPS residence)			Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Building to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	Maintenance Shop			Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Structure to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
-	-	-	Mission 66 Circulation System			Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	N/A
						MLPA	-	-	-	-	-	-	-	N/A	N/A
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	N/A
						Different Bridge Types	-	-	-	-	-	-	-	N/A	N/A
					Contributing Structure to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	N/A
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	N/A
-	-	-	Visitor Center flagpole			Park & Ride Options	-	-	-	-	-	-	-	N/A	N/A
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Structure to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
			Park sign located at the northern entrance to the Visitor Center parking lot			Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-				Park & Ride Options	-	-	-	-	-	-	-	N/A	-
						No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	-
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	-
						Different Bridge Types	-	-	-	-	-	-	-	N/A	-
					Contributing Structure to Listed District (6001216)	I-5 Westward Shift	-	-	-	-	-	-	-	N/A	-
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	-
-	-	-	British anchor exhibit adjacent to the Visitor Center parking lot			Park & Ride Options	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
WA 369	**674448**		**Pearson Field Historic District**		**Determined NRHP-Eligible District**	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	-	-	-	-	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	-	-	-	N/A	✓
						Different Bridge Types	-	-	-	-	-	-	-	N/A	✓
						I-5 Westward Shift	-	-	-	-	-	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	-	-	-	N/A	✓
						Park & Ride Options	-	-	-	-	-	-	-	N/A	✓
WA 369a	-	1105 E 5th St	Munitions Storehouse	Building 102	Contributing Building to Eligible District (Pearson Field)										
WA 369c	89316/20553	1105 E 5th St	Original Pearson Hangar	Building 189	Contributing Building to Eligible District (Pearson Field)										
WA 369b	-	1105 E 5th St	Pearson Field Office	Building 194	Contributing Building to Eligible District (Pearson Field)										
WA 1358	**674435**	-				No-Build Alternative	-	-	-	-	-	-	-	N/A	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
			Vancouver Barracks Historic District		**Determined NRHP-Eligible District**	MLPA	-	-	-	-	✓	✓	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	✓	✓	-	N/A	✓
						Different Bridge Types	-	-	-	-	✓	✓	-	N/A	✓
						I-5 Westward Shift	-	-	-	-	✓	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	✓	✓	-	N/A	✓
						Park & Ride Options	-	-	-	-	✓	✓	-	N/A	✓
-	-	-	Infantry Barracks (currently 45th Station Hospital)	Building 607	Contributing Building to Eligible District (Vancouver Barracks)										
WA 368	89315	610 E 5th St	Post Hospital	Building 614	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Hospital Corps Sergeant's Quarters (currently Senior NCO Quarters)	Building 621	Contributing Building to Eligible District (Vancouver Barracks)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
-	-	-	Dental Surgeon's Office (currently Chaplain's and Judge Advocate's Offices)	Building 626	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Mess Hall (currently Barracks)	Building 628	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Quartermaster Storehouse (currently Barracks)	Building 630	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Hospital Steward's Quarters (currently Commanding Officer's Quarters	Building 631	Contributing Building to Eligible District (Vancouver Barracks)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
-	-	-	Red Cross Building/Service Club	Building 636	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Artillery Barracks (currently Post Headquarters)	Building 638	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Gymnasium (currently Auditorium)	Building 721	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Mess Hall (currently Army Reserve Recruiting Office)	Building 722	Contributing Building to Eligible District (Vancouver Barracks)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
-	-	-	Post Exchange Restaurant	Building 725	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Mess Hall	Building 733	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Motor Repair Shop (currently Storage and Vehicle Parking)	Building 748	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Quartermaster Storehouse (currently Post Exchange)	Building 752	Contributing Building to Eligible District (Vancouver Barracks)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
-	-	-	Storage (currently Storage)	Building 753	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Quartermaster Storehouse (currently Shopette)	Building 754	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Work Shop (currently Wood Shop, Red Cross)	Building 786	Contributing Building to Eligible District (Vancouver Barracks)										
-	550852	-	General O.O. Howard House	Building 875	Contributing Building to Eligible District (Vancouver Barracks)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
-	-	-	Barracks (currently Offices)	Building 987	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Barracks (currently Offices)	Building 989	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Post Headquarters (Headquarters 1st Brigade 104th Training Division)	Building 991	Contributing Building to Eligible District (Vancouver Barracks)										
-	-	-	Barracks (currently Offices)	Building 993	Contributing Building to Eligible District (Vancouver Barracks)										
WA 918	-	-	**Officers Row Historic District**		**District (74001948)**	No-Build Alternative	-	-	-	-	-	-	-	-	-
						MLPA	-	-	✓	-	✓	✓	-	✓	-
						Second Auxiliary lanes	-	-	✓	-	✓	✓	-	✓	-
						Different Bridge Types	-	-	✓	-	✓	✓	-	✓	-

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
						I-5 Westward Shift	-	-	-	-	✓	-	-	✓	-
						Eliminate C Street ramps	-	-	✓	-	✓	✓	-	✓	-
						Park & Ride Options	-	-	✓	-	✓	✓	-	✓	-
WA 918c	89678	701, 703 E Evergreen Blvd	House	Building 1	Contributing Building to Listed District (74001948)										
WA 918a	722233	601, 603 E Evergreen Blvd	House	Building 2	Contributing Building to Listed District (74001948)										
WA 918b	722236	650, 652, 656 E Evergreen Blvd	Duplex	Building 3	Contributing Building to Listed District (74001948)										
WA 918d	-	750, 754, 756 E Evergreen Blvd	Duplex	Building 4	Contributing Building to Listed District (74001948)										
WA 918e	-	800 A-D, 802 A-C, 804, 806 E Evergreen Blvd	Duplex	Building 5	Contributing Building to Listed District (74001948)										
WA 918f	-	850 E Evergreen Blvd	Duplex	Building 6	Contributing Building to Listed District (74001948)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
WA 918g	-	901, 903, 905 E Evergreen Blvd	House	Building 7	Contributing Building to Listed District (74001948)										
WA 918h	-	951, 953, 955 E Evergreen Blvd	House	Building 8	Contributing Building to Listed District (74001948)										
WA 918i	717526	1001, 1003, 1005, 1007, 1009 E Evergreen Blvd	Duplex	Building 9	Contributing Building to Listed District (74001948)										
WA 918j	718982	1051, 1053, 1055, 1057, 1059 E Evergreen Blvd	Duplex	Building 10	Contributing Building to Listed District (74001948)										
WA 918k	-	1106 E Evergreen Blvd	Grant House	Building 11	Contributing Building to Listed District (74001948)										
WA 918l	-	1151, 1153, 1155, 1157, 1161, 1163, 1165, 1167 E Evergreen Blvd	Duplex	Building 12	Contributing Building to Listed District (74001948)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
WA 918m	-	1201, 1203, 1205, 1207 E Evergreen Blvd	Duplex	Building 13	Contributing Building to Listed District (74001948)										
WA 918n	-	1251, 1253, 1255 E Evergreen Blvd	House	Building 14	Contributing Building to Listed District (74001948)										
WA 918o	-	1310, 1321, 1323, 1325 E Evergreen Blvd	Marshall House	Building 15	Contributing Building to Listed District (74001948)										
WA 918p	-	1351 E Evergreen Blvd	House	Building 16	Contributing Building to Listed District (74001948)										
WA 918q	-	1401, 1403, 1405, 1407 E Evergreen Blvd	House	Building 17	Contributing Building to Listed District (74001948)										
WA 918r	-	1451, 1453, 1455, 1457 E Evergreen Blvd	House	Building 18	Contributing Building to Listed District (74001948)										
WA 918s	-	1501, 1503, 1505, 1507 E Evergreen Blvd	Duplex	Building 19	Contributing Building to Listed District (74001948)										

Survey Number	DAHP Resource ID	Address	Name	Alternate Name	Designation	Design Alternative	Demolition	Incompatible Alterations	Subterranean Impacts	Vibration Impacts	Temporary Construction Easement	Permanent Construction Easement	Air Quality	Noise (dBA)	Visual
WA 918t	-	1551, 1553, 1555, 1557, 1559, 1561, 1563, 1565, 1567 E Evergreen Blvd	Duplex	Building 20	Contributing Building to Listed District (74001948)										
WA 918u	720862	1601, 1603, 1605, 1607 E Evergreen Blvd	Duplex	Building 21	Contributing Building to Listed District (74001948)										
WA 1359	**674436**	**-**	**Fort Vancouver National Historic Site**	**Fort Vancouver**	**Site (66000370)**	No-Build Alternative	-	-	-	-	-	-	-	N/A	-
						MLPA	-	-	-	-	✓	✓	-	N/A	✓
						Second Auxiliary lanes	-	-	-	-	✓	✓	-	N/A	✓
						Different Bridge Types	-	-	-	-	✓	✓	-	N/A	✓
						I-5 Westward Shift	-	-	-	-	✓	-	-	N/A	✓
						Eliminate C Street ramps	-	-	-	-	✓	✓	-	N/A	✓
						Park & Ride Options	-	-	-	-	✓	✓	-	N/A	✓

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ASSESSMENT OF EFFECTS, CONTINUED

Discussion of Effects on Contributing Resources

House (Building 1), 701, 703 East Evergreen Boulevard (Map ID WA918c; DAHP Property ID 89678)
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the residence at 701, 703 East Evergreen Boulevard. These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 66 dBA to 72 or 74 dBA depending upon the selected design option. These values are in exceedance of the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the house itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

No design option of the Modified LPA would remove the potential for this effect.

House (Building 2), 601–603 East Evergreen Boulevard (Map ID WA918a; DAHP Property ID 722233)
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the residence at 601, 603 East Evergreen Boulevard. These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 63 dBA to 71 or 73 dBA depending upon the selected design option. These values are in exceedance of the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the house itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

No design option of the Modified LPA would remove the potential for this effect.

Duplex (Building 3), 650–656 East Evergreen Boulevard (Map ID WA918b; DAHP Property ID 722236)
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the duplex residence at 650–656 East Evergreen Boulevard. These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 61 dBA to 66 or 68 dBA depending upon the selected design option. These values are in exceedance of the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the building itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

The Westward Shift and the Elimination of the C-Street Ramps design options of the Modified LPA would remove the potential for this risk by moving the source of noise intrusions further west and keeping noise levels below the noise criteria of 65 dBA at 64 dBA.

Duplex (Building 4), 750–756 East Evergreen Boulevard (Map ID WA918d; DAHP Property ID [TBD])
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the duplex residence at 750–756 East Evergreen Boulevard. These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 64 dBA to 66 or 68 dBA depending upon the selected design option. These values are in exceedance of the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the building itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's

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integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

The Westward Shift and the Elimination of the C-Street Ramps design options of the Modified LPA would remove the potential for this risk by moving the source of noise intrusions further west and keeping noise levels below the noise criteria of 65 dBA at 64 dBA.

Munitions Storehouse (Building 102), 1105 East 5th Street (Map ID WA369a; DAHP Property ID [TBD])
As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span bridge rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange which would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the historic viewshed of the Munitions Storehouse which extends southwest across the original open airfield and is similar to that used by pilots during the period of significance. Design options that would alter the visual impact of the Modified LPA are the removal of the elevated C Street ramps in the SR 14 interchange, and the use of a movable lift span. While these activities would not alter the Munitions Storehouse itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the contributing resource's integrity of setting, feeling, and association by altering the building's historic view across its original open airfield. These activities would alter the view in the following ways:

- The Modified LPA would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge (Figure 27). The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

- The Modified LPA with the design option for the removal of the C Street ramps would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge (Figure 28). The elevated SR 14 interchange would be less visible with the removal of the C Street ramps.

- The Modified LPA with the design option for a movable lift span would result in a modern intrusion into the historic view through an incompatible design that is more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

Under all other design options, the visual impact to the contributing resources would be the same as that created by the Modified LPA.

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Original Pearson Hangar (Building 189), 1105 East 5th Street (Map ID WA369c; DAHP Property ID 89316/20553)

As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span bridge rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange which would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the historic viewshed of the Original Pearson Hangar which extends southwest across the original open airfield and is similar to that used by pilots during the period of significance. Design options that would alter the visual impact of the Modified LPA are the removal of the elevated C Street ramps in the SR 14 interchange, and the use of a movable lift span. While these activities would not alter the Original Pearson Hangar itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the contributing resource's integrity of setting, feeling, and association by altering the building's historic view across its original open airfield. These activities would alter the view in the following ways:

- The Modified LPA would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge (Figure 27). The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

- The Modified LPA with the design option for the removal of the C Street ramps would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge (Figure 28). The elevated SR 14 interchange would be less visible with the removal of the C Street ramps.

- The Modified LPA with the design option for a movable lift span would result in a modern intrusion into the historic view through an incompatible design that is more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

Under all other design options, the visual impact to the contributing resources would be the same as that created by the Modified LPA.

Pearson Field Office (Building 194), 1105 East 5th Street (Map ID WA369b; DAHP Property ID [TBD])

As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span bridge rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange which would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the historic viewshed of the Original Pearson Hangar which extends southwest across the original open airfield and is similar to that used by pilots during the period of significance. Design options that would alter the visual impact of the Modified LPA are the removal of the elevated C Street ramps in the SR 14 interchange, and the use of a movable lift span. While these activities would not alter the

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Original Pearson Hangar itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the contributing resource's integrity of setting, feeling, and association by altering the building's historic view across its original open airfield. These activities would alter the view in the following ways:

- The Modified LPA would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge (Figure 27). The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

- The Modified LPA with the design option for the removal of the C Street ramps would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge (Figure 28). The elevated SR 14 interchange would be less visible with the removal of the C Street ramps.

- The Modified LPA with the design option for a movable lift span would result in a modern intrusion into the historic view through an incompatible design that is more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

Under all other design options, the visual impact to the contributing resources would be the same as that created by the Modified LPA.

Automotive Repair Shop (Building 410), unaddressed (DAHP Property ID [TBD])
As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span bridge rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange which would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the current viewshed of the Automotive Repair Shop which extends from the southeast to the southwest across the open prairie surrounding the reconstructed Fort Vancouver. Although the building's viewshed would be affected by the construction of the Modified LPA, this view was originally blocked by the presence of adjacent buildings which, like the Automotive Repair Shop, contributed to the significance of the Vancouver National Historic Reserve Historic District (see Figure 13). The removal of these buildings—numbers 406, 408 and 422—between 2009 and 2019 has resulted in a non-historic viewshed given to the building outside its period of significance. As such, this element of the building's integrity of setting has already been compromised and additional changes to the view would not affect it further.

Post Hospital (Building 614), 610 East 5th Street (Map ID WA368, DAHP Property ID 89315)
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the Post Hospital. Related activities would include the demolition of the retaining wall located approximately 46 feet from the building's west elevation and its reconstruction as close as approximately 6 feet from the building's northwest corner.

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Because the Post Hospital is within 100 feet of construction activities under the modified LPA and is constructed from unreinforced brick masonry, it is possible the building would be susceptible to damage from high levels of construction-related vibration. A worst-case scenario would assume the potential for structural damage to the building, which would render the Post Hospital unusable and its historical integrity would be lost. However, the IBR Program will implement monitoring to prevent excessive vibratory levels, and does not anticipate damages to the Post Hospital from construction-related vibration. As construction delivery methods are further defined and/or construction and monitoring implemented, vibratory effects to this resource will be re-evaluated. a worst-case scenario assumes the potential for structural damage to the building. Such damage would render the Post Hospital unusable and , as such, six aspects of the

NCO Family Quarters (Building 635), 602 Barnes Street (DAHP Property ID 727633)
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the NCO Family Quarters (Building 635). These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 61 dBA to 65 or 67 dBA depending upon the selected design option. These values are above the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the building itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

The Westward Shift and the Elimination of the C-Street Ramps design options of the Modified LPA would remove the potential for this risk by moving the source of noise intrusions further west and keeping noise levels below the noise criteria of 65 dBA at 63 dBA.

Related activities would also include the demolition of the retaining wall located approximately 125 feet from the building's west elevation and its reconstruction approximately 90 feet from the building's west elevation. Because the NCO Family Quarters (Building 635) is within 100 feet of potential construction activities under the Modified LPA and is constructed from unreinforced brick masonry, it is possible the building would be susceptible to damage from high levels of construction-related vibration. A worst-case scenario would assume the potential for structural damage to the building, which would render the NCO Family Quarters (Building 635) unusable and its historical integrity would be lost. However, the IBR Program will implement monitoring to prevent excessive vibratory levels and does not anticipate damage to the NCO Family Quarters (Building 635) from construction-related vibration. As construction delivery methods are further defined and/or construction and monitoring implemented, vibratory effects to this resource will be re-evaluated.

The Westward Shift design option of the Modified LPA would remove the potential for this risk by moving construction activities more than 100 feet from the building's footprint.

NCO Family Quarters (Building 644), 400 Hatheway Road (DAHP Property ID 727634)
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the NCO Family Quarters (Building 644). These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 62 dBA to 64 or 66 dBA depending upon the selected design option. The higher of these values is above the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the building itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

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This exceedance would only occur under the Second Auxiliary Lanes design option of the Modified LPA. All other design options would remove the potential for this risk by reducing or moving the source of noise intrusions further west and keeping noise levels below the noise criteria of 62 dBA at 64 dBA.

Related activities would include the demolition of the retaining wall located approximately 108 feet from the building's west elevation and its reconstruction approximately 80 feet from the building's west elevation. Because the NCO Family Quarters (Building 644) is within 100 feet of construction activities under the Modified LPA and is constructed from unreinforced brick masonry , it is possible the building would be susceptible to damage from high levels of construction-related vibration. A worst-case scenario would assume the potential for structural damage to the building, which would render the NCO Family Quarters (Building 644) unusable and its historical integrity would be lost. However, the IBR Program will implement monitoring to prevent excessive vibratory levels and does not anticipate damages to the NCO Family Quarters (Building 644) from construction-related vibration. As construction delivery methods are further defined and/or construction and monitoring implemented, vibratory effects to this resource will be re-evaluated.

The Westward Shift design option of the Modified LPA would remove the potential for this risk by moving construction activities more than 100 feet from the building's footprint.

NCO Family Quarters (Building 665), 409–411 Hatheway Road (DAHP Property ID [TBD])
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the duplex residence at 409–400 Hatheway Road. These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 62 dBA to 66 or 68 dBA depending upon the selected design option. These values are in exceedance of the noise criteria of 65 dBA which is the threshold set for the building's use as a Section 4(f) site (Activity Category C). While these activities would not alter the building itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

The Westward Shift and the Elimination of the C-Street Ramps design options of the Modified LPA would remove the potential for this risk by moving the source of noise intrusions further west and keeping noise levels below the noise criteria of 65 dBA at 64 dBA.

Work Shop (Building 786), unaddressed (DAHP Property ID [TBD])
As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span bridge rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange which would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the current viewshed of the Work Shop (Building 786) which extends to the southwest across the open prairie surrounding the reconstructed Fort Vancouver. Design options that would alter the visual impact of the Modified LPA are the removal of the elevated C Street ramps in the SR 14 interchange, and the use of a movable lift span. While these activities would not alter the Work Shop (Building 786) itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the contributing resource's integrity of setting, feeling, and association by altering its historic view of the Interstate Bridge. These activities would alter the view in the following ways:

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- The Modified LPA would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

- The Modified LPA with the design option for the removal of the C Street ramps would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange would be less visible with the removal of the C Street ramps.

- The Modified LPA with the design option for a movable lift span would result in a modern intrusion into the historic view through an incompatible design that is more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

Under all other design options, the visual impact to the contributing resource would be the same as that created by the Modified LPA.

Old Apple Tree (Heritage Apple Tree), 112 SE Columbia Way (Map ID WA 109; DAHP Property ID 89132)
As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span bridge rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange and would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the viewshed and surroundings of the Old Apple Tree which is located within a contemporary park between SR 14 and the embankment of the BNSF. Although the object's viewshed would be affected by the construction of the Modified LPA, this view has already been heavily compromised by alterations in the surrounding infrastructure that were completed in the 1970s and onwards. These changes postdate the period of significance for any of the historic district's that the Old Apple Tree contributes to and, as such, its integrity of setting and feeling have already been diminished. Because of this, continued alterations to the viewshed in the scale and type proposed by the Modified LPA and its design options would not further reduce the object's historic integrity.

Allee along Evergreen Boulevard, unaddressed (DAHP Property ID [TBD])
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the Allee along Evergreen Boulevard. These activities would increase the noise levels experienced by the resource from the No-Build Alternative value of 63 dBA to 69 or 73 dBA depending upon the selected design option. These values are in exceedance of the noise criteria of 65 dBA which is the threshold set for the site's use as a Section 4(f) site (Activity Category C). While these activities would not alter the site itself or diminish its integrity of location, materials, workmanship, and design, they would reduce the property's integrity of setting, feeling, and association by intensifying adverse ambient qualities upon the building's historic environment.

Under all design options, the impact to the contributing resource would be the same as that created by the Modified LPA.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Army Road System, unaddressed (DAHP Property ID [TBD])
As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the west of the Army Road System. Related activities would include the expansion of the northbound lanes of the roadway onto lands currently occupied by the west terminus of the contributing roadway East Fifth Street. All other sections of VNHR roadway altered by the Modified LPA are not part of the Army Road System or any other contributing linear feature (see Figure 13). These activities and additional design options include the temporary occupation of sections of roadway with a temporary construction easement, as well as the permanent removal of sections of

roadway. Design options that would alter the amount of roadway needed for temporary and permanent occupation include the westward shift of I-5. These activities would alter the Army Road System's integrity of design, materials, and workmanship, however, its integrity of location, setting, feeling, and association would remain unchanged. These activities would alter the Army Road System in the following ways:

- The Modified LPA would result in a small permanent acquisition of between 5 to 10 feet of roadway and a temporary construction easement of approximately 200 feet.

- The Modified LPA with the design option for the westward shift would result in a small permanent acquisition of between 1 and 7 feet of roadway and a temporary construction easement of approximately 200 feet.

Under all other design options, the impact to the contributing resources would be the same as that created by the Modified LPA.

Fort Vancouver National Historic Site Visitor Center, 1501 East Evergreen Boulevard (DAHP Property ID 717383)
As currently proposed, the Modified LPA would replace the present Interstate Bridge with a mid-level fixed span rising 163 feet above the surface of the Columbia River. This design would also restructure the SR 14 interchange which would include additional elevated sections to guide the roadway from the new bridge deck back to the grade-level alignments of both I-5 and SR 14 (Figures 25, 26). These changes and additional design options include varying modifications to the historic viewshed of the Fort Vancouver National Historic Site Visitor Center which extends to the south and southwest where it includes portions of the Interstate Bridge and SR 14. Design options that would alter the visual impact of the Modified LPA are the removal of the elevated C Street ramps in the SR 14 interchange, and the use of a movable lift span. While these activities would not alter the Fort Vancouver National Historic Site Visitor Center or diminish its integrity of location, materials, workmanship, design, or association, they would reduce the contributing resource's integrity of setting and feeling by altering its historic view from its primary interior lobby. These activities would alter the view in the following ways:

- The Modified LPA would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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- The Modified LPA with the design option for the removal of the C Street ramps would result in a modern intrusion into the historic view through an incompatible fixed span bridge that is taller and more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange would be less visible with the removal of the C Street ramps.

- The Modified LPA with the design option for a movable lift span would result in a modern intrusion into the historic view through an incompatible design that is more substantial than the historic northbound Interstate Bridge and the compatible 1958 southbound Interstate Bridge. The elevated SR 14 interchange and C Street ramps would also be visible during autumn and winter months when existing deciduous trees would lose their foliage.

Under all other design options, the visual impact to the contributing resources would be the same as that created by the Modified LPA.

Summary of Effects on Historic Properties

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. In summary, the IBR Program would affect fourteen of the contributing resources to NRHP-listed or NRHP-eligible properties within the boundaries of the VNHR, however, only thirteen of these effects are expected to diminish the aspects of the resources that allow them to be listed in or eligible for listing in the NRHP. These resources are:

- House (Building 1)
- House (Building 2)
- Duplex (Building 3)
- Duplex (Building 4)
- Munitions Storehouse (Building 102)
- Original Pearson Hangar (Building 189)
- Pearson Field Office (Building 194)
- NCO Family Quarters (Building 635)
- NCO Family Quarters (Building 644)
- NCO Family Quarters (Building 665)
- Work Shop (Building 786)
- Allee Along Evergreen Boulevard

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- Army Road System
- Fort Vancouver National Historic Site Visitor Center

Effects to these resources include partial demolition as well as auditory and visual effects. Additionally, the Modified LPA would involve construction activities occurring within a close enough distance to three of the contributing resources to NRHP-listed or NRHP-eligible properties within the boundaries of the VNHR and it remains possible the resource's physical features may be damaged by excessive vibration. However, vibration monitoring will occur and vibratory effects will be revisited as construction delivery methods are further defined and implemented. These resources are:

- Post Hospital (Building 614)
- NCO Family Quarters (Building 635)
- NCO Family Quarters (Building 644)

Discussion of Effects on Historic Properties

Vancouver National Historic Reserve Historic District

Within the Vancouver National Historic Reserve Historic District, the Modified LPA would require the permanent acquisition of a narrow strip of land (along the district's western edge, small segments along the alignment of SR 14, as well as additional segments in the district's southwestern corner near the Old Apple Tree and the embankment of the BNSF rail alignment (Table 3). The Modified LPA would further require a temporary construction easement in all of the same areas including a narrow strip of land along the district's western edge, small segments along the alignment of SR 14, as well as additional segments in the district's southwestern corner near the Old Apple Tree, the embankment of the BNSF rail alignment (Table 3). Finally, the Modified LPA would require a subsurface easement extending approximately 50 feet beneath the reserve's northwest corner to accommodate tie-back anchors for a new retaining wall.

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Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

Table 3. Permanent acquisitions and temporary construction easements required within the Vancouver National Historic Reserve Historic District.

Design Alternative	Permanent Acquisitions	Temporary Construction Easements
No-Build Alternative	0.00 acres	0.00 acres
MLPA	0.54 acres	1.59 acres
Second Auxiliary Lanes	0.54 acres	1.59 acres
Different Bridge Types	0.54 acres	1.59 acres
I-5 Westward Shift	0.37 acres	1.77 acres
Eliminate C Street Ramps	0.57 acres	1.57 acres
Park & Ride Options	0.54 acres	1.59 acres

Small portions of these easements along the district's western fringe would accommodate the east end of a constructed land bridge or the "Community Connector" that would cap approximately 310 feet of the I-5 right of way between Anderson Street and East Evergreen Boulevard to provide a pedestrian way across the highway. The permanent acquisition and temporary construction easement would require the demolition of a small portion of the Army Road System at the west end of East 5th Street. Otherwise, these acquisitions and easements would not affect any other contributing resources of the property. As the "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect as presented in 36 CFR 800.5(a)(1), the Modified LPA would have Adverse Effect on the Vancouver National Historic Reserve Historic District.

The Modified LPA would also result in adverse auditory effects to eight contributing resources, adverse visual effects to five contributing resources, and has the potential to result in unanticipated adverse vibratory effects to three contributing resources. Auditory impacts would negatively affect the district by diminishing its integrity of setting and association. Visual impacts would negatively affect the district by diminishing its integrity of setting and feeling. As the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" is an example of an Adverse Effect as presented in 36 CFR 800.5(a)(2)(v), the Modified LPA would have Adverse Effect on the Vancouver National Historic Reserve Historic District.

Pearson Field Historic District

Within the Pearson Field Historic District, the Modified LPA would result in adverse visual effects to three contributing resources through alterations to the district's historic viewshed with the construction of infrastructure improvements approximately 2,880 feet from the district's western NRHP-eligibility boundary. Although the district's integrity of setting has been diminished since the end of its period of significance in 1941, principally by the construction of I-5 and SR 14, the property's view of the historic Interstate Bridge remains a vital component of its historic integrity and ability to convey its significance. Finally, because the property does not rely upon a quiet setting to convey its significance, neither construction nor potential increases to vehicular and pedestrian

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Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
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traffic would reduce any significant atmospheric or audible qualities. As the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" is an example of an Adverse Effect as presented in 36 CFR 800.5(a)(2)(v), the Modified LPA would have Adverse Effect on the Vancouver National Historic Reserve Historic District.

Vancouver Barracks Historic District

Within the Vancouver Barracks Historic District, the Modified LPA would require the permanent acquisition of a narrow strip of land along the district's western edge (Table 4). The Modified LPA would further require a temporary construction easement in the same area (Table 4). No subsurface easements are required. As these activities would not directly affect any of the contributing resources to the historic district, they are not considered to be adverse.

Table 4. Permanent acquisitions and temporary construction easements required within the Vancouver Barracks Historic District.

Design Alternative	Permanent Acquisitions	Temporary Construction Easements
No-Build Alternative	0.00 acres	0.00 acres
MLPA	0.21 acres	0.03 acres
Second Auxiliary Lanes	0.21 acres	0.03 acres
Different Bridge Types	0.21 acres	0.03 acres
I-5 Westward Shift	0.21 acres	0.03 acres
Eliminate C Street Ramps	0.21 acres	0.03 acres
Park & Ride Options	0.21 acres	0.03 acres

The Modified LPA would also result in adverse visual effects to one contributing resource and potential unanticipated adverse vibratory effects to one contributing resource. Visual impacts would also negatively affect the district by diminishing its integrity of setting and feeling. As the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" is an example of an Adverse Effect as presented in 36 CFR 800.5(a)(2)(v), the Modified LPA would have Adverse Effect on the Vancouver Barracks Historic District.

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Officers Row Historic District

Within the Officers Row Historic District, the Modified LPA would require the permanent acquisition of a narrow strip of land (Table 5) along the district's western edge.[26] The Modified LPA would further require a temporary construction easement along East Evergreen Boulevard in its southwestern corner (Table 5). Finally, the Modified LPA would require a subsurface easement extending approximately 50 feet beneath the district's western edge to accommodate tie-back anchors for a new retaining wall. As these acquisitions and easements would not affect any of the contributing resources to the historic district, they are not considered to be adverse.

Table 5. Permanent acquisitions and temporary construction easements required within the Officers Row Historic District.

Design Alternative	Permanent Acquisitions	Temporary Construction Easements
No-Build Alternative	0.00 acres	0.00 acres
MLPA	<0.01 acres	0.01 acres
Second Auxiliary Lanes	<0.01 acres	0.01 acres
Different Bridge Types	<0.01 acres	0.01 acres
I-5 Westward Shift	<0.01 acres	0.01 acres
Eliminate C Street Ramps	<0.01 acres	0.01 acres
Park & Ride Options	<0.01 acres	0.01 acres

The Modified LPA would also result in adverse auditory effects to four contributing resources. Auditory impacts would negatively affect the district by diminishing its integrity of setting and association. As the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" is an example of an Adverse Effect as presented in 36 CFR 800.5(a)(2)(v), the Modified LPA would have Adverse Effect on the Officers Row Historic District.

Fort Vancouver National Historic Site

Within the Fort Vancouver National Historic Site, the Modified LPA would require the permanent acquisition of a small segments of land (Table 6) along the alignment of SR 14 and additional segments in the site's southwestern corner near the Old Apple Tree Park (Table 6) and the embankment of the BNSF rail alignment.[27] The Modified LPA would further require a temporary construction easement in all of the same areas including the small

[26] Note that this figure does not include sections of the property that are already incorporated into the I-5 right of way. See the boundary's west edge in Figure 17.
[27] Note that the Old Apple Tree Park is owned and managed by the City of Vancouver but abuts the Fort Vancouver National Historic Site. The Old Apple Tree is also a contributing resource to the Vancouver National Historic Reserve Historic District.

Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
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segments of land along the alignment of SR 14 and the embankment of the BNSF rail alignment. No subsurface easements are required. As a property categorized as a site "is the location of a significant event… where the location itself possesses historic, cultural, or archeological value…," any diminishment of that area may be considered the "[p]hysical destruction of or damage to all or part of the property" which is an example of an Adverse Effect presented in 36 CFR 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA would therefore have an Adverse Effect on the Fort Vancouver National Historic Site.

Table 6. Permanent acquisitions and temporary construction easements required within the Fort Vancouver National Historic Site.

Design Alternative	**Permanent Acquisitions**	**Temporary Construction Easements**
No-Build Alternative	0.00 acres	0.00 acres
MLPA	0.30 acres	0.95 acres
Second Auxiliary Lanes	0.30 acres	0.96 acres
Different Bridge Types	0.30 acres	0.95 acres
I-5 Westward Shift	0.30 acres	0.96 acres
Eliminate C Street Ramps	0.33 acres	0.93 acres
Park & Ride Options	0.30 acres	0.95 acres

The Modified LPA would also result in adverse visual effects to the site through the enlargement of existing transportation infrastructure around the site, and the replacement of the existing Interstate Bridge with an overall taller and more substantial structure. These changes would permanently alter the site's existing setting by introducing new visual elements. As the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" is an example of an Adverse Effect as presented in 36 CFR 800.5(a)(2)(v), the Modified LPA would have Adverse Effect on the Fort Vancouver National Historic Site.

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Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

CONCLUSION

Vancouver National Historic Reserve Historic District
It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would affect the NRHP-listed Vancouver National Historic Reserve Historic District, and the effect would be Adverse.

Pearson Field Historic District
It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would affect the NRHP-eligible Pearson Field Historic District, and the effect would be Adverse.

Vancouver Barracks Historic District
It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would affect the NRHP-eligible Vancouver Barracks Historic District, and the effect would be Adverse.

Officers Row Historic District
It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would affect the NRHP-listed Officers Row Historic Reserve Historic District, and the effect would be Adverse.

Fort Vancouver National Historic Site
It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would affect the NRHP-listed Vancouver National Historic Site, and the effect would be Adverse.

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

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Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

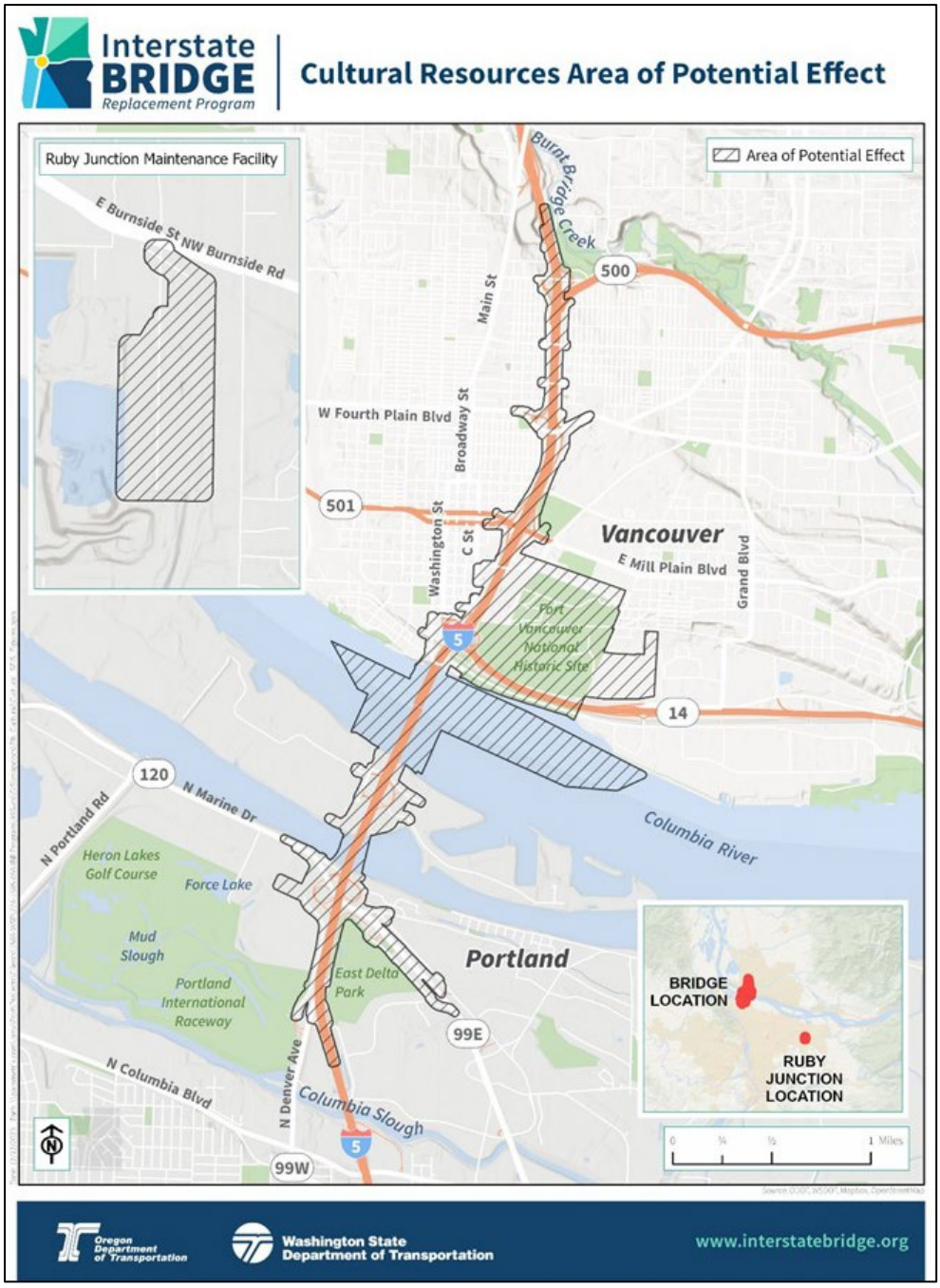


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, December 2023).

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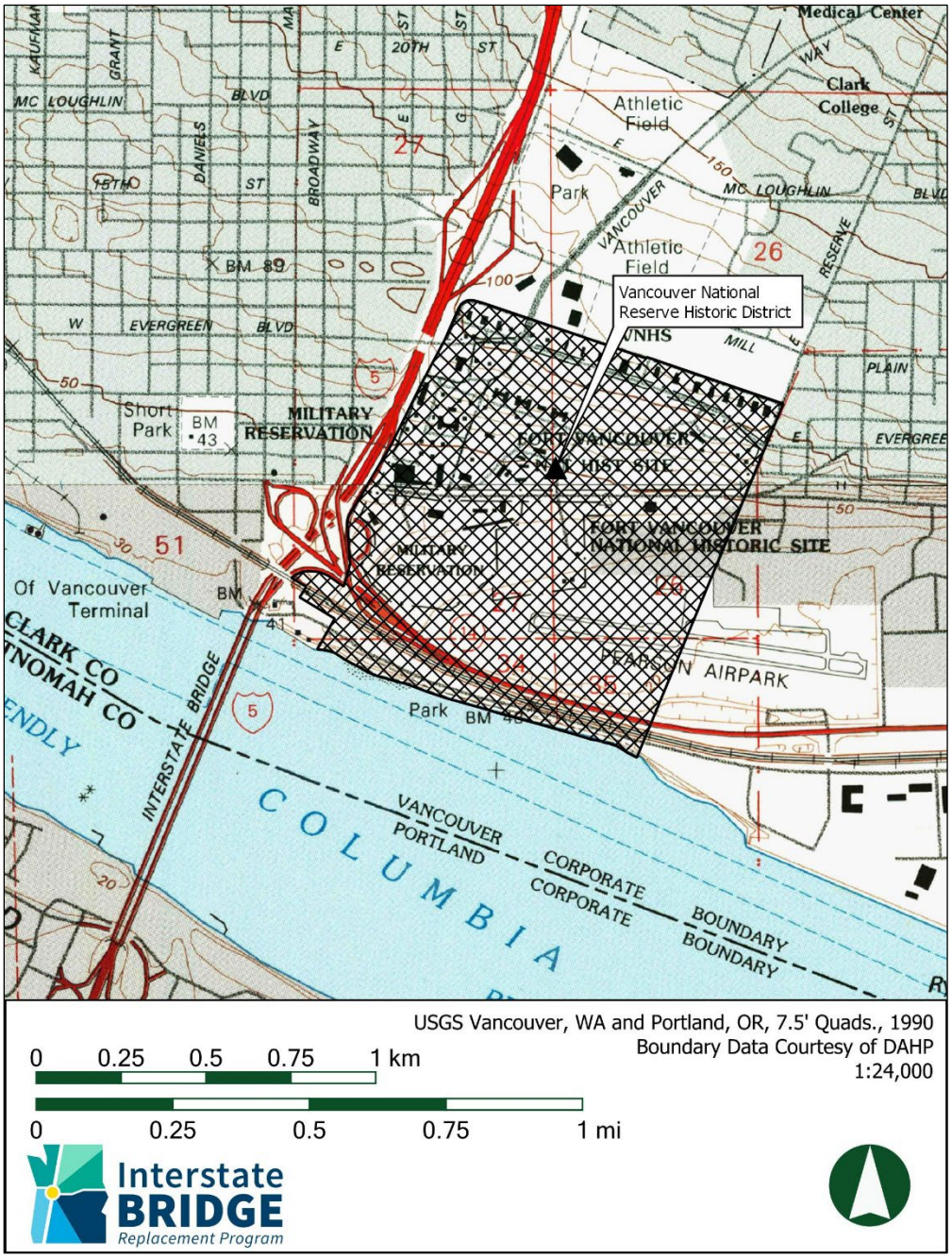


Figure 3. Location map of the Vancouver National Historic Reserve Historic District, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

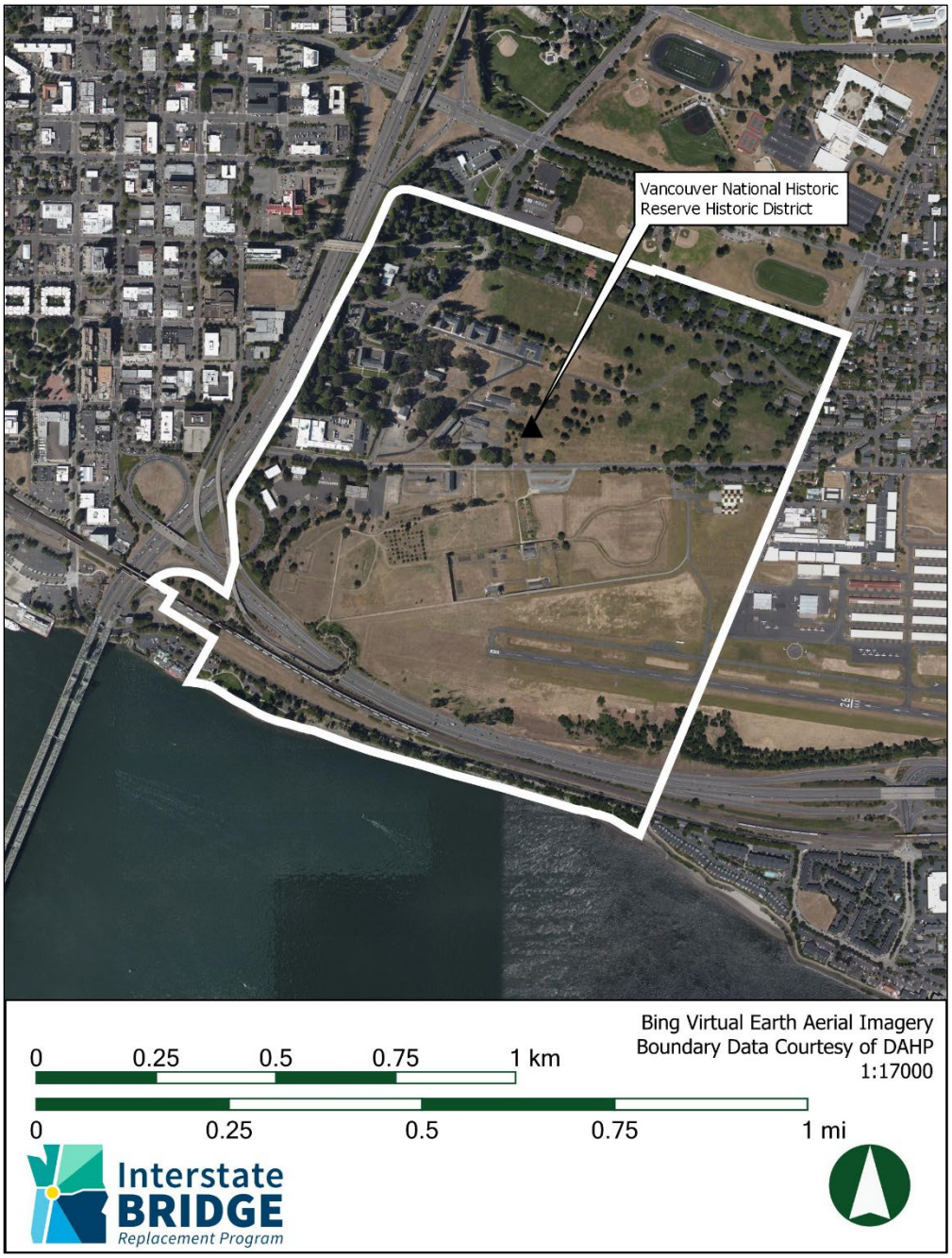


Figure 4. Aerial map of the Vancouver National Historic Reserve Historic District showing NRHP property boundary in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
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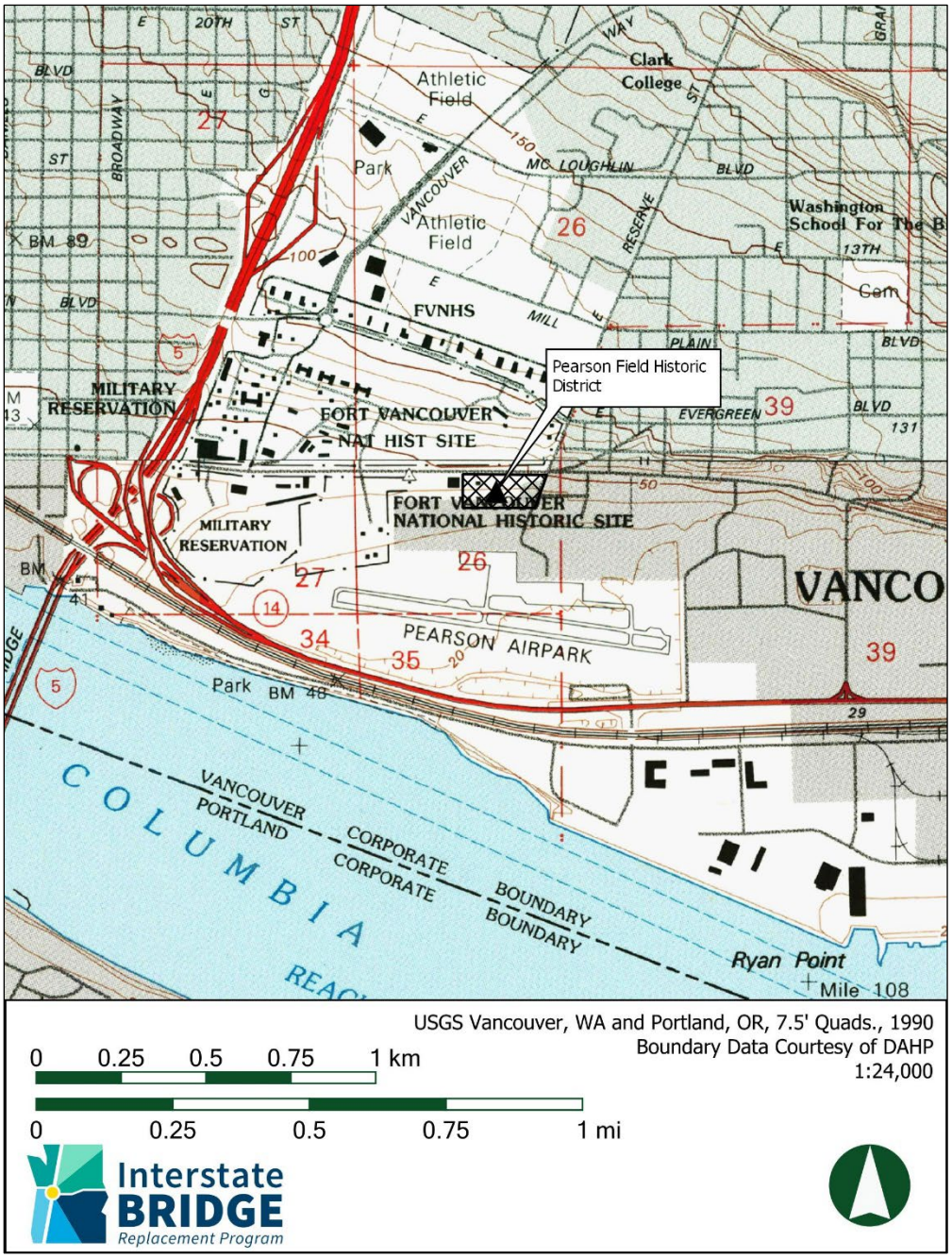


Figure 5. Location map of the Pearson Field Historic District, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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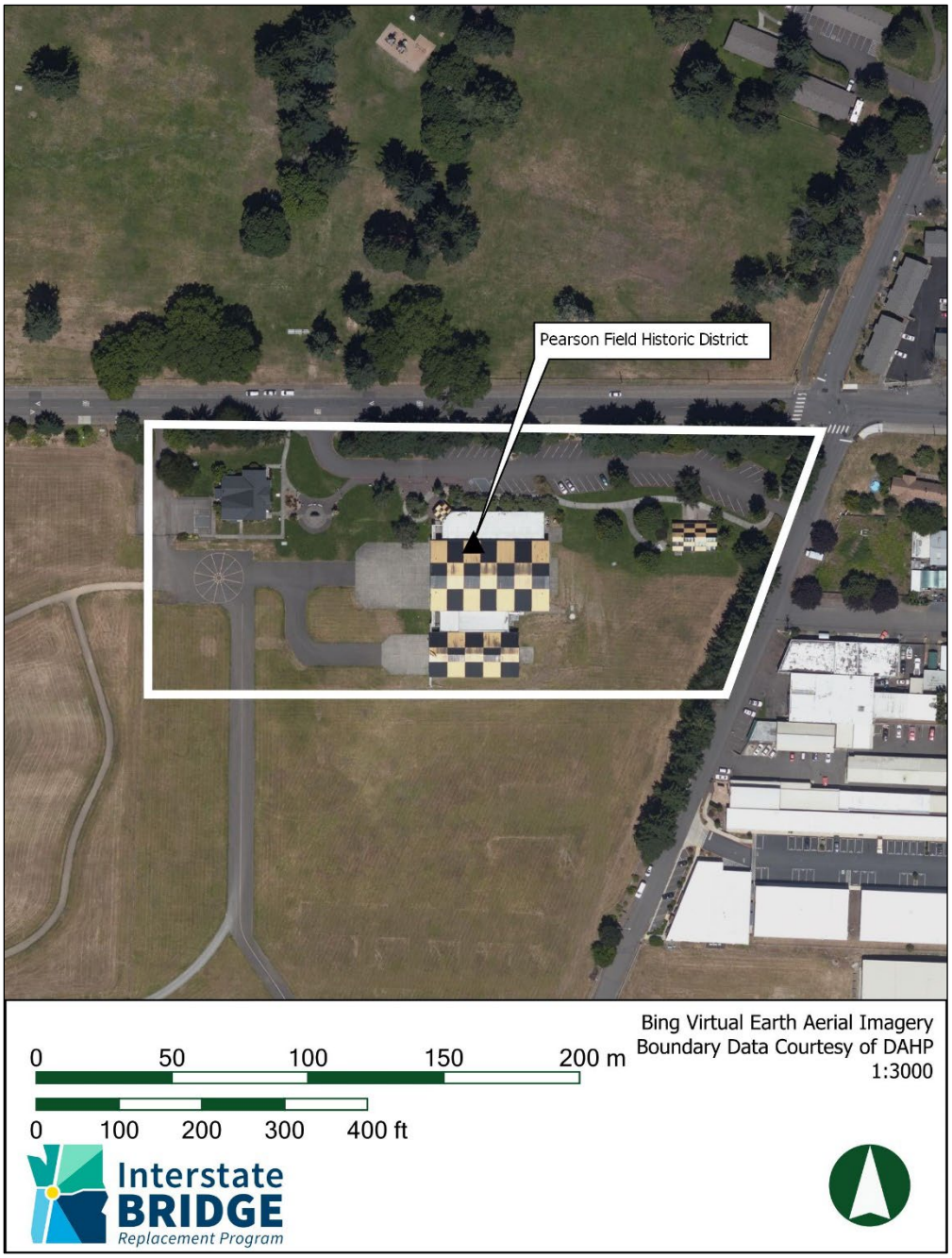


Figure 6. Aerial map of the Pearson Field Historic District showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

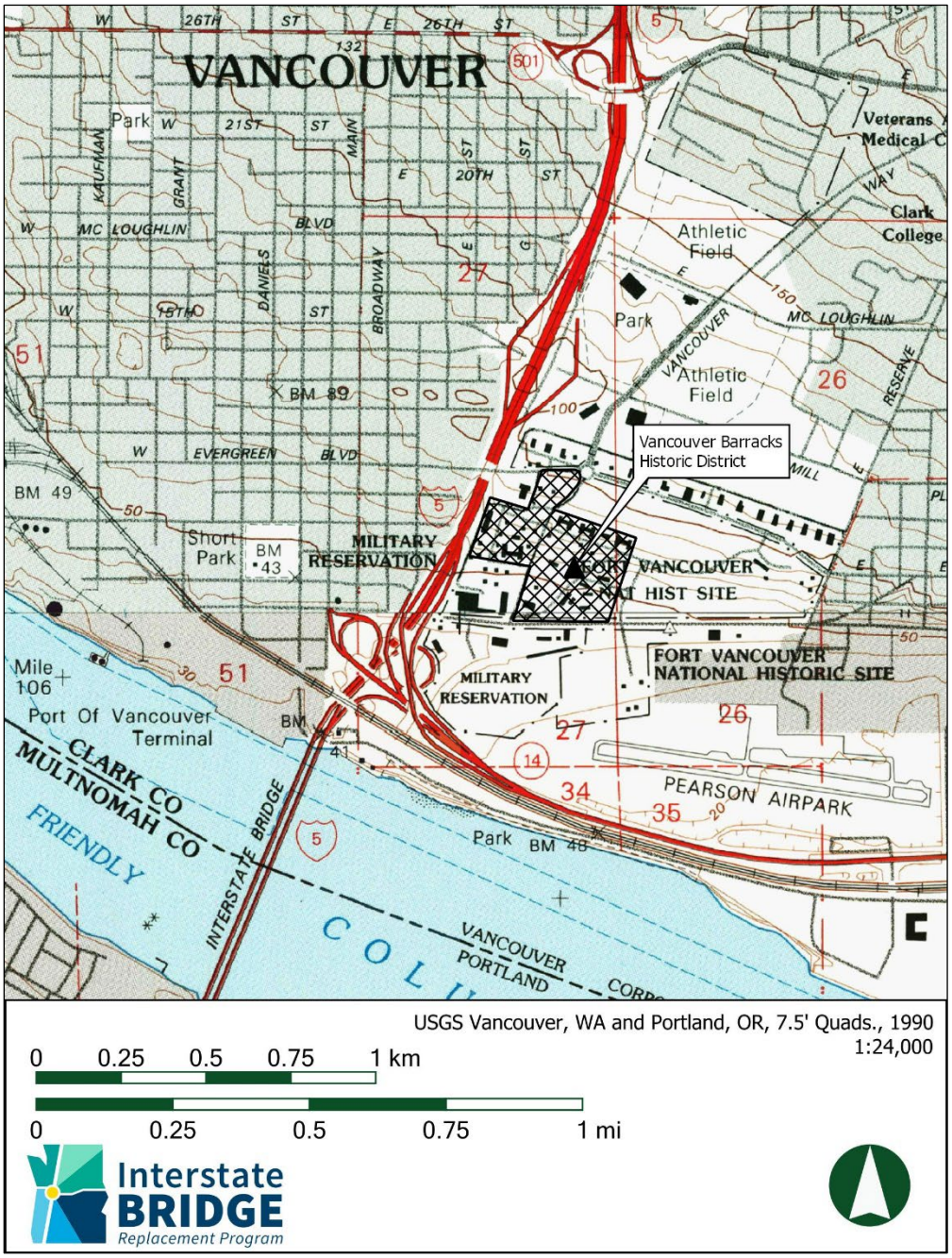


Figure 7. Location map of the Vancouver Barracks Historic District, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

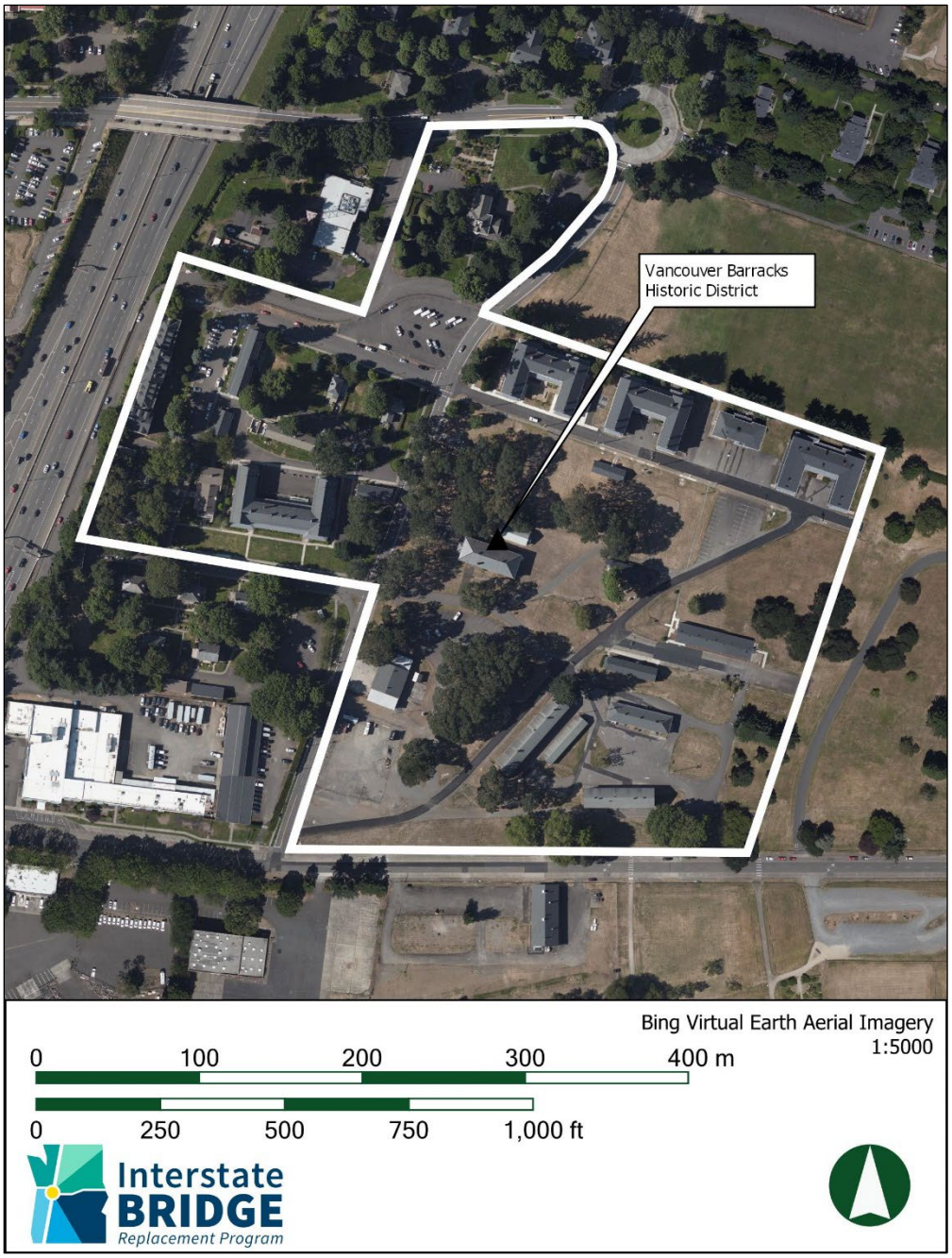


Figure 8. Aerial map of the Vancouver Barracks Historic District showing the identified boundary of the NRHP-eligible property in white.

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

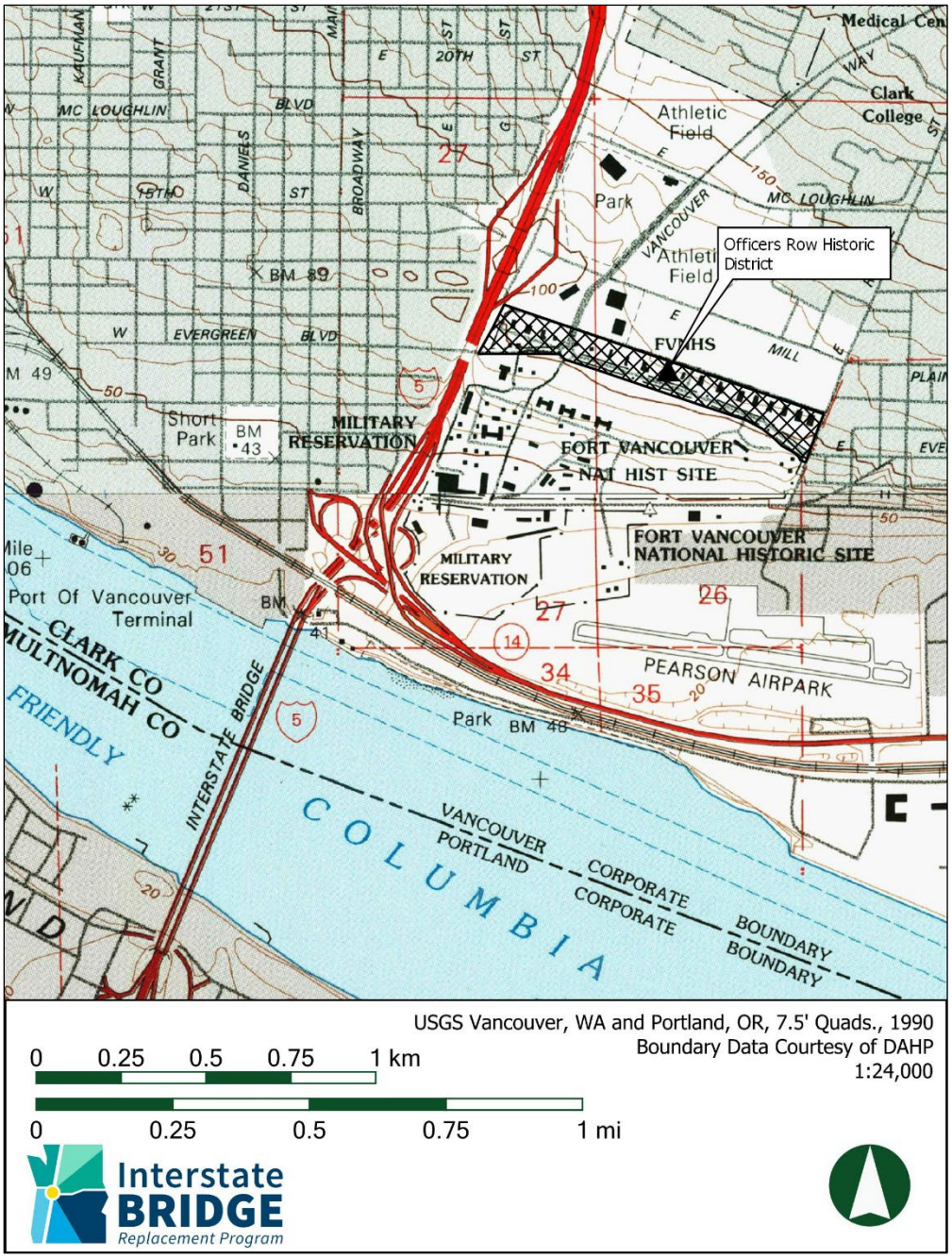


Figure 9. Location map of Officers Row Historic District, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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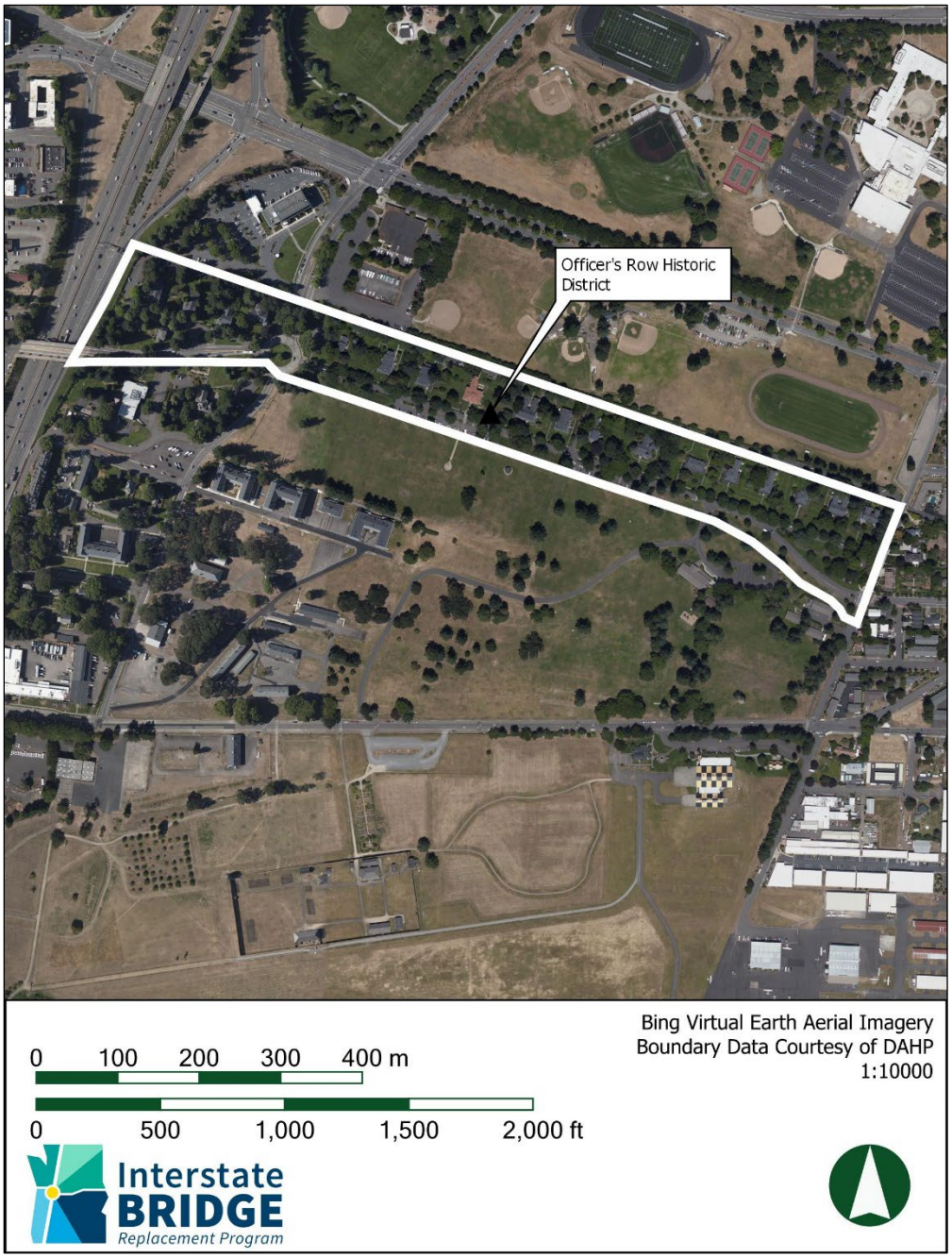


Figure 10. Aerial map of Officers Row Historic District showing NRHP property boundary in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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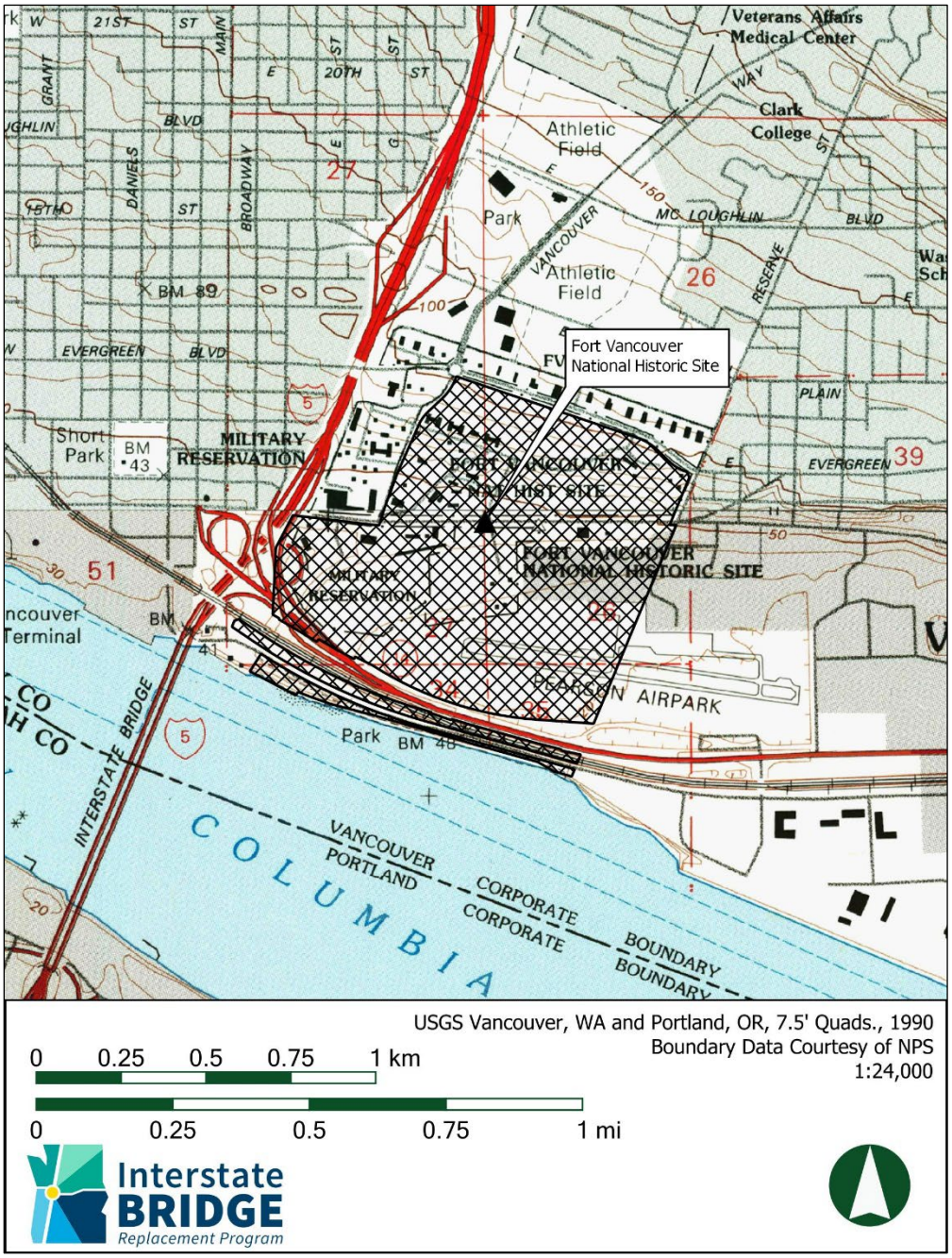


Figure 11. Location map of the Fort Vancouver National Historic Site, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	



Figure 12. Aerial map of the Fort Vancouver National Historic Site showing NRHP property boundary in white.

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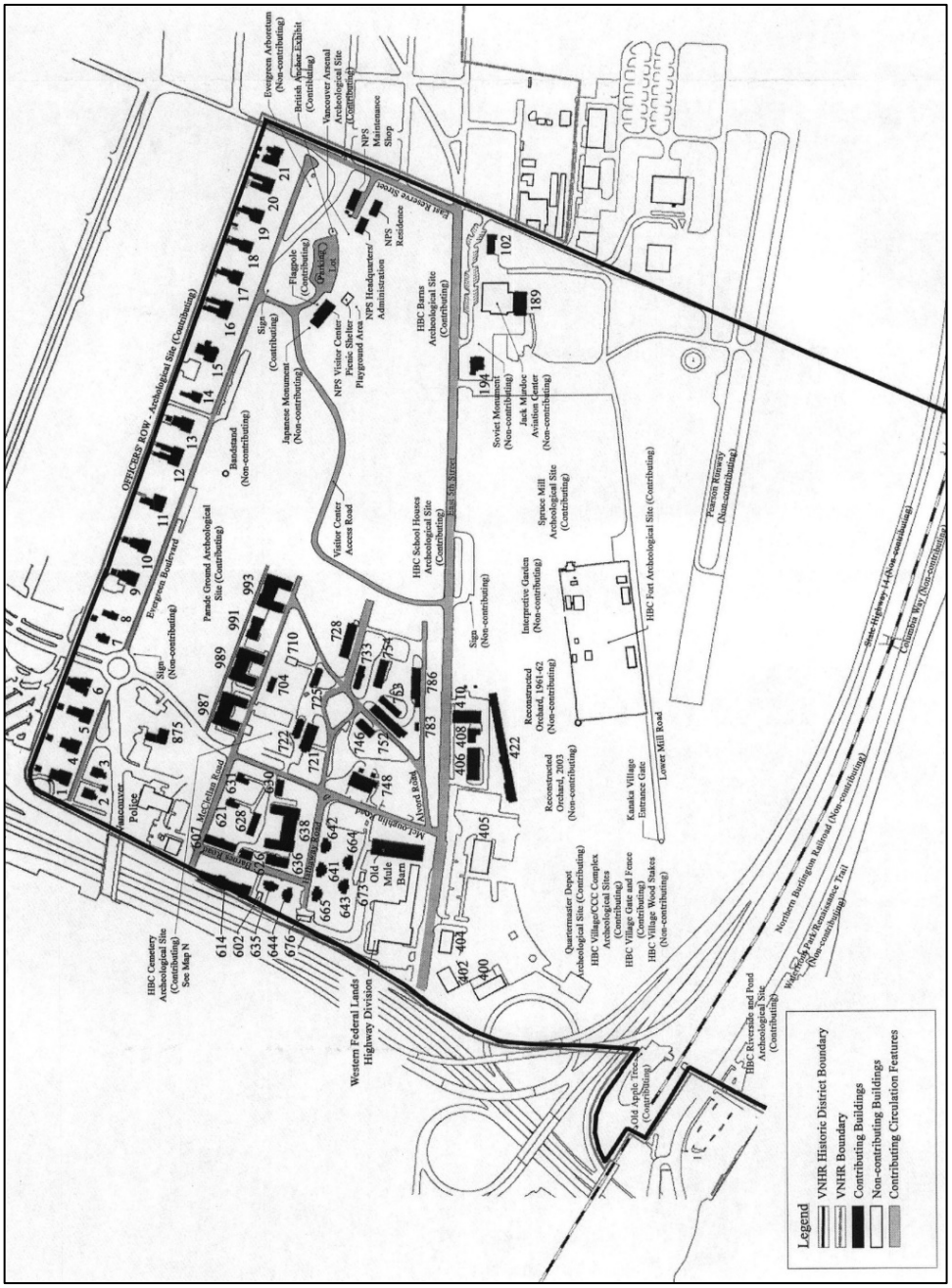


Figure 13. Map from the 2007 NRHP Vancouver National Historic Reserve Historic District nomination showing building numbers (Erica Owens et al., "Vancouver National Historic Reserve Historic District," 116).

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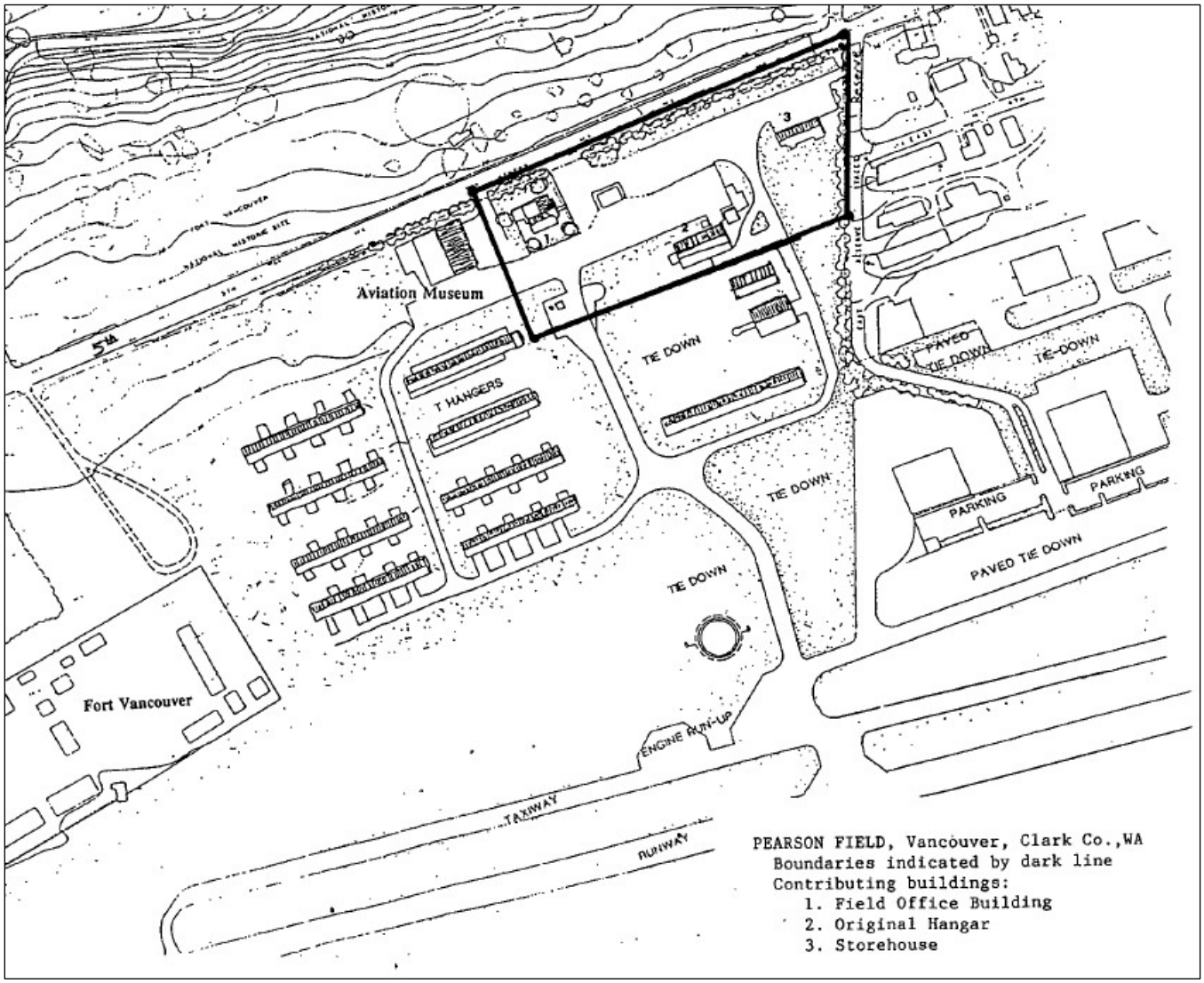


Figure 14. Original boundary map for the Pearson Field Historic District showing contributing resources and boundary. Note that up is northeast. Note to the presence of hangars to the south and southwest of the district boundary which have since been removed.

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

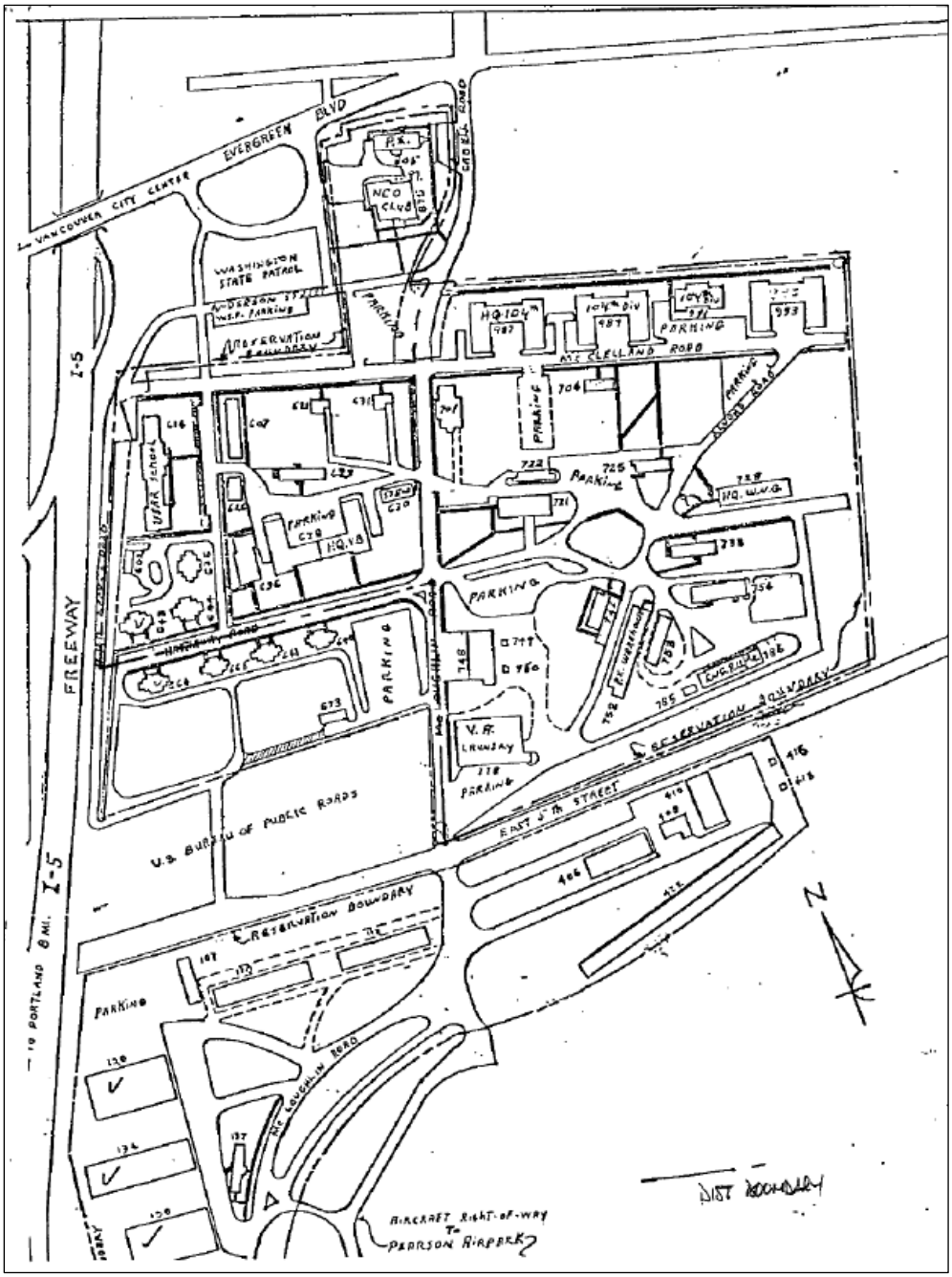


Figure 15. Original boundary map for the Vancouver Barracks Historic District showing contributing resources and boundary.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

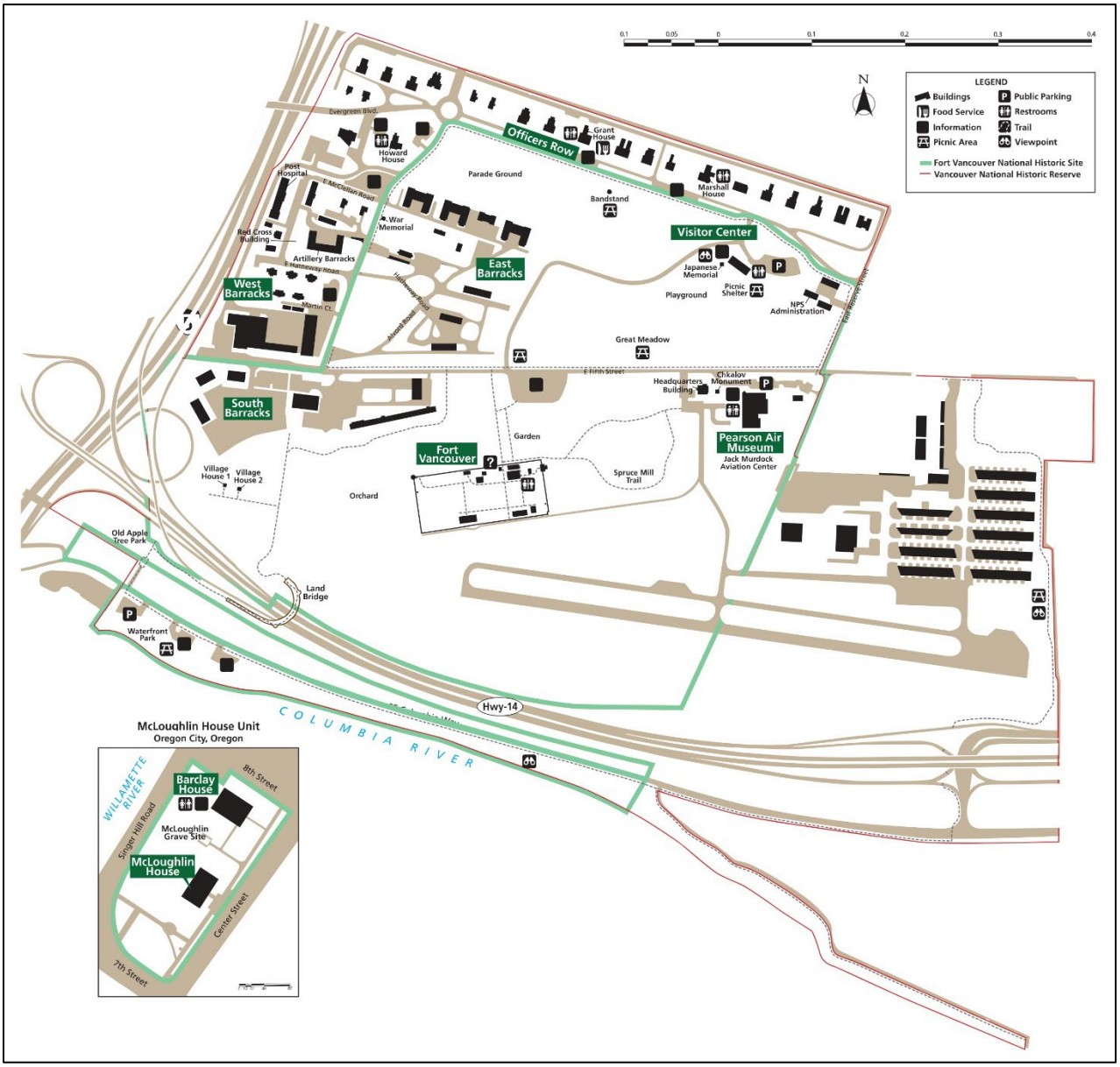


Figure 16. Official NPS map showing the boundary of the Fort Vancouver NHS (in green) and buildings within the boundary. Note that the McLoughlin House Unit (bottom left corner of figure) is located in Oregon City, Oregon and is not considered by this study.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

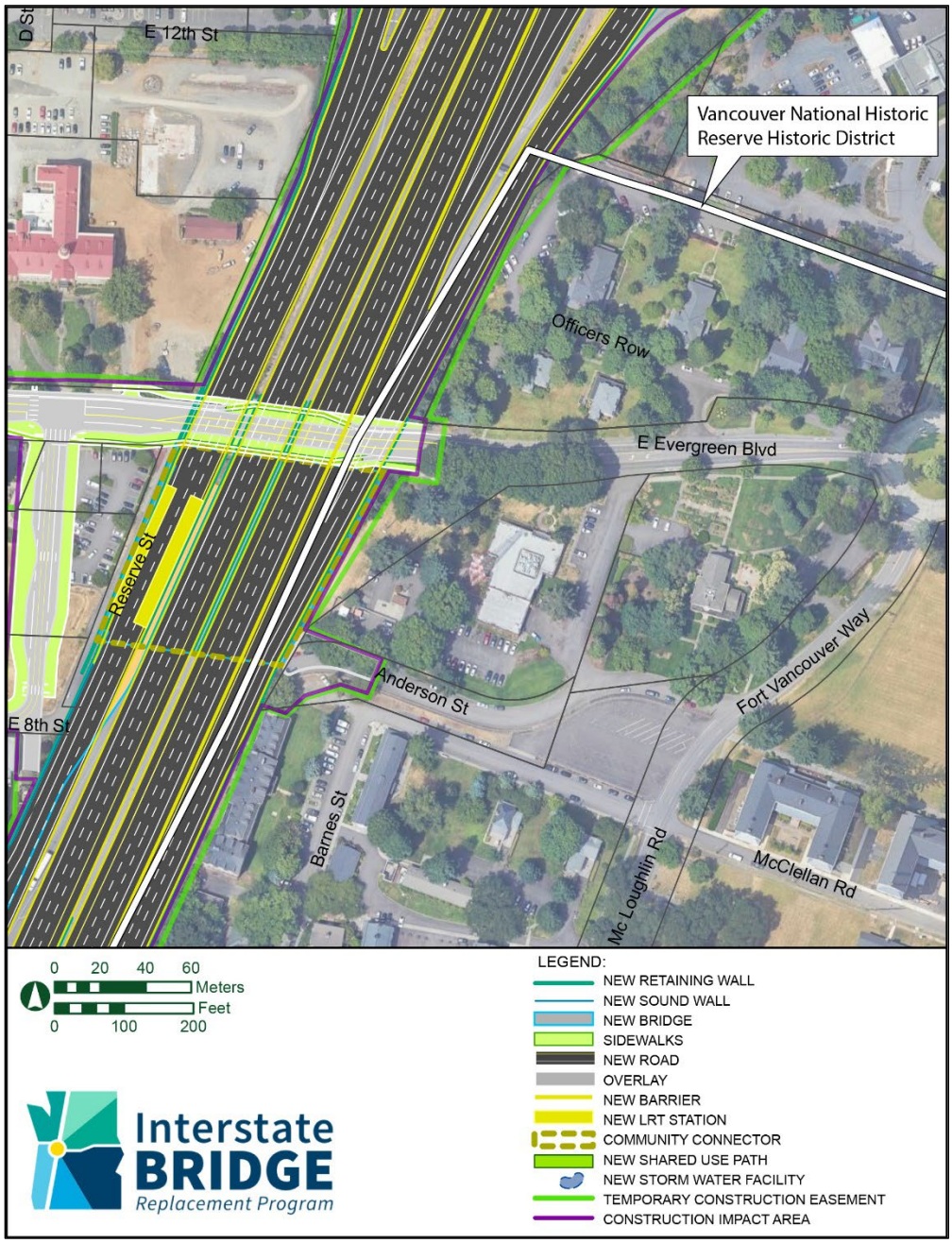


Figure 17. Vancouver National Historic Reserve Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 1 of 4. Note that only sections of the district that interact with the Modified LPA footprint are shown, not the whole district.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

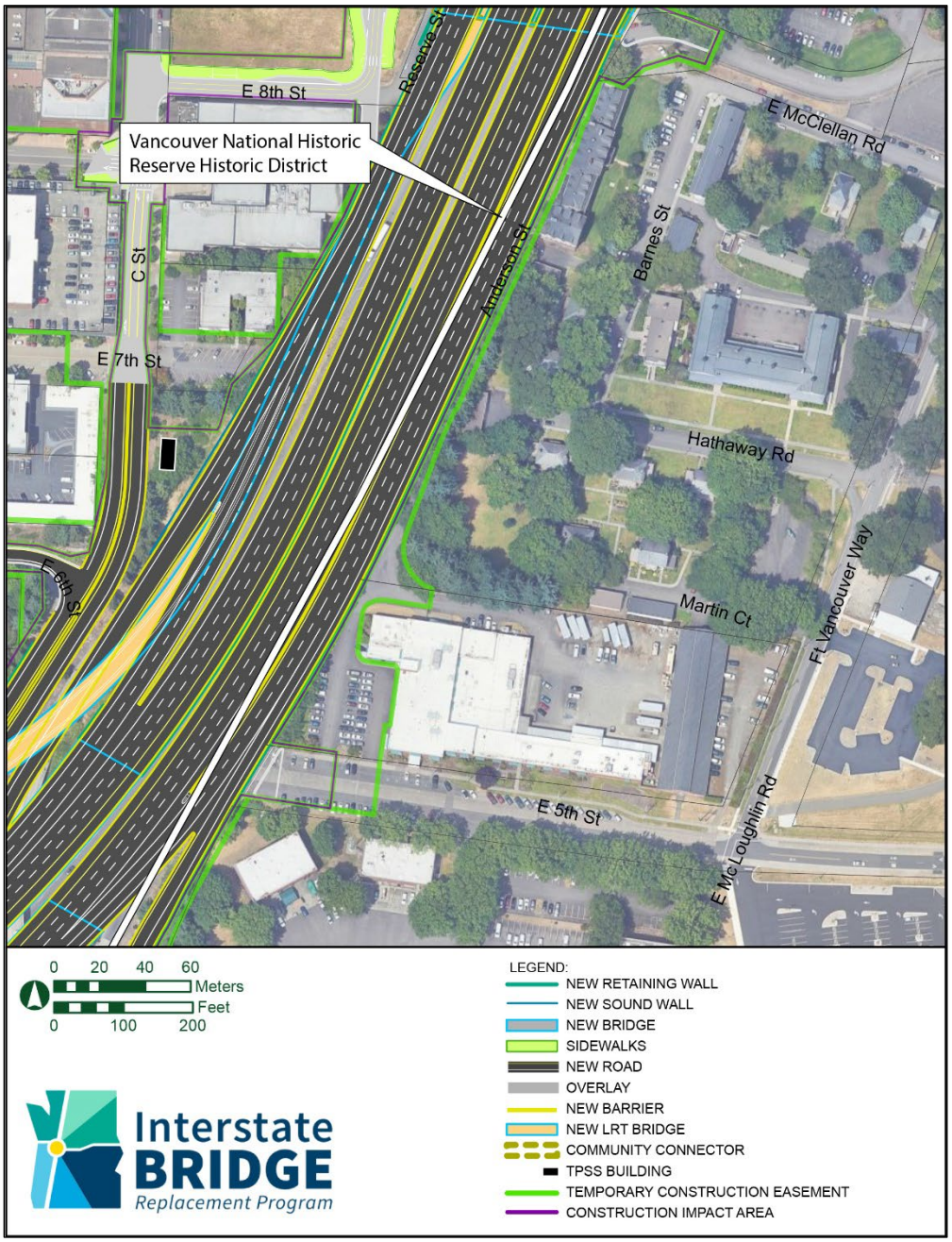


Figure 18. Vancouver National Historic Reserve Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 2 of 4. Note that only sections of the district that interact with the Modified LPA footprint are shown, not the whole district.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

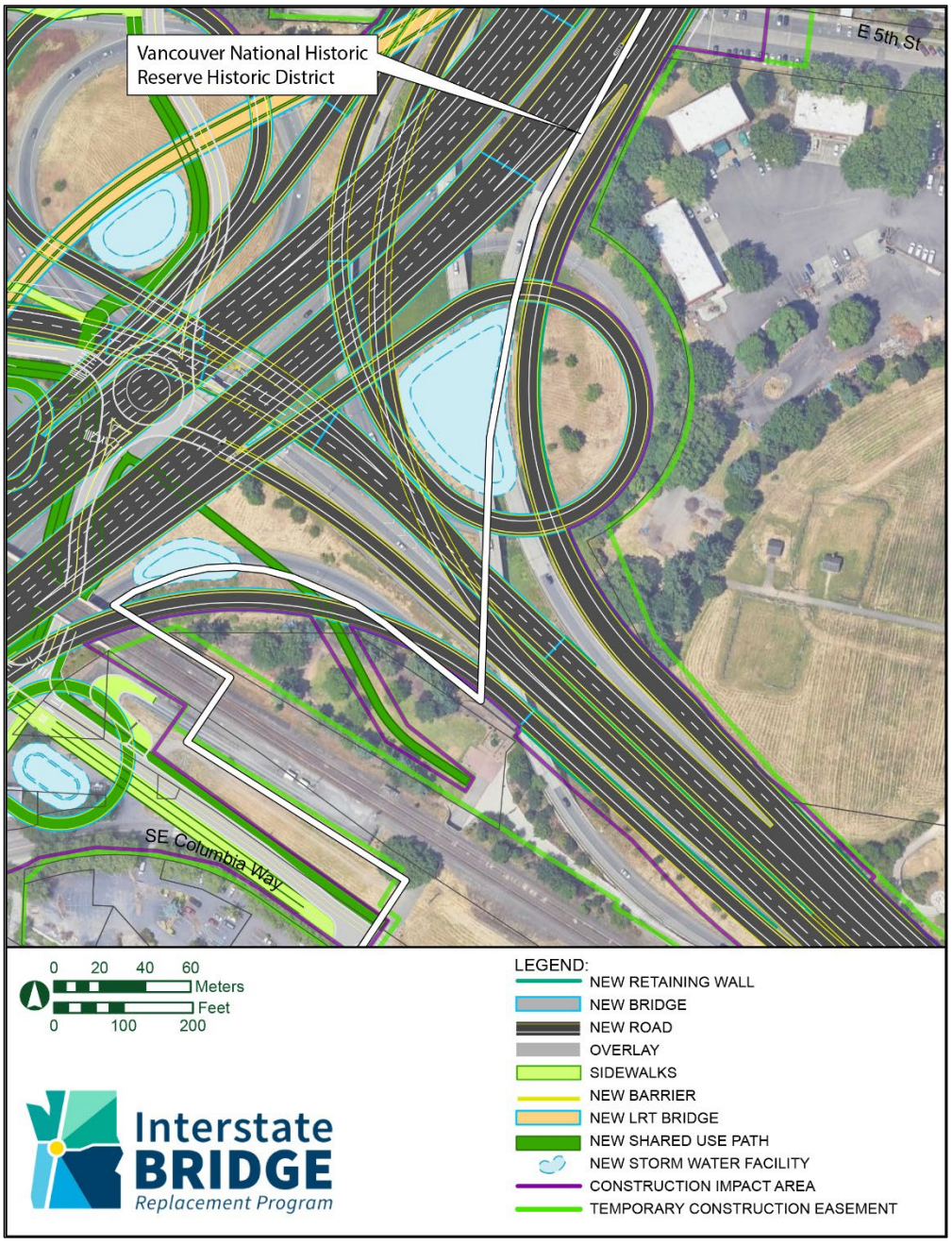


Figure 19. Vancouver National Historic Reserve Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 3 of 4. Note that only sections of the district that interact with the Modified LPA footprint are shown, not the whole district.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

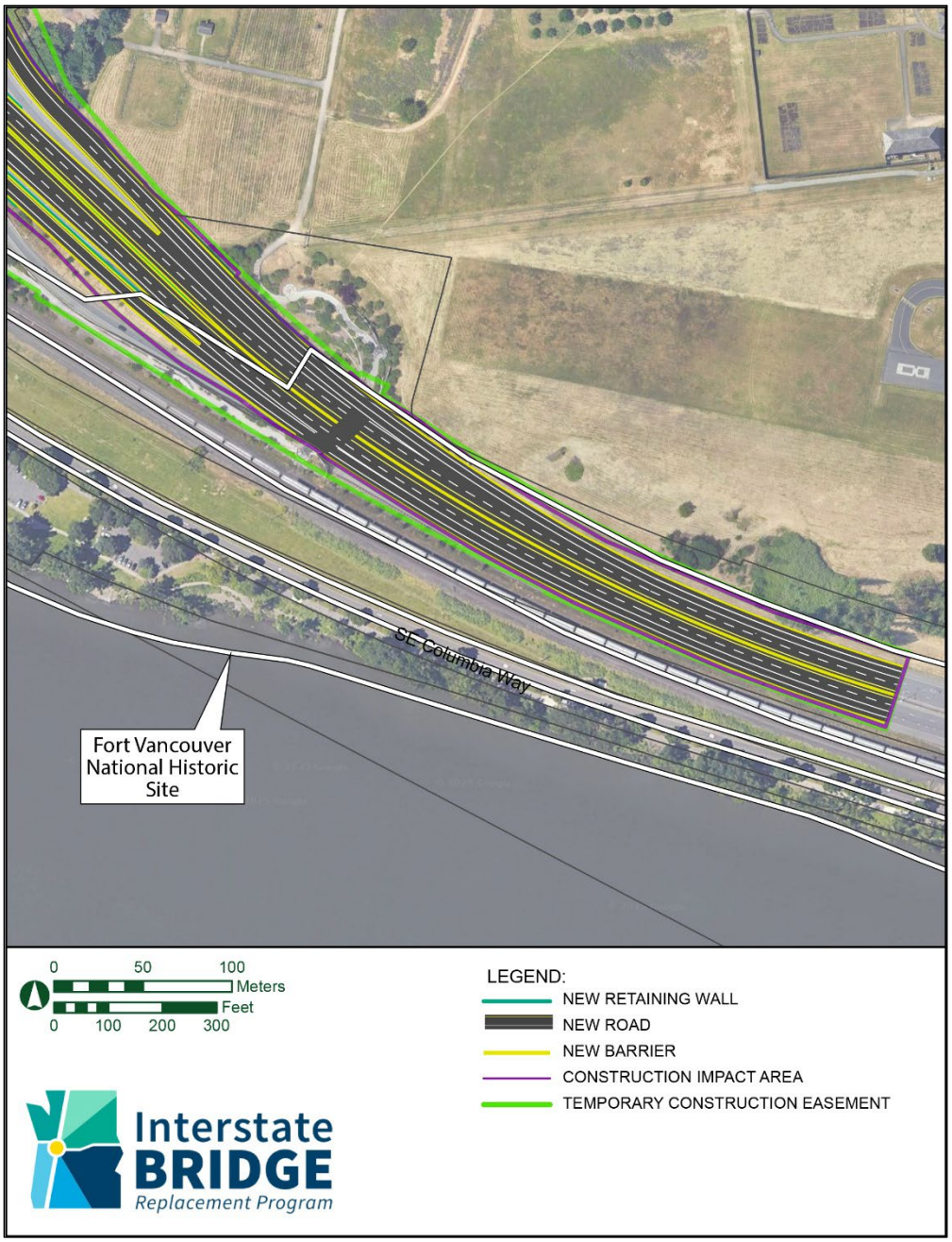


Figure 20. Vancouver National Historic Reserve Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 4 of 4. Note that only sections of the district that interact with the Modified LPA footprint are shown, not the whole district.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

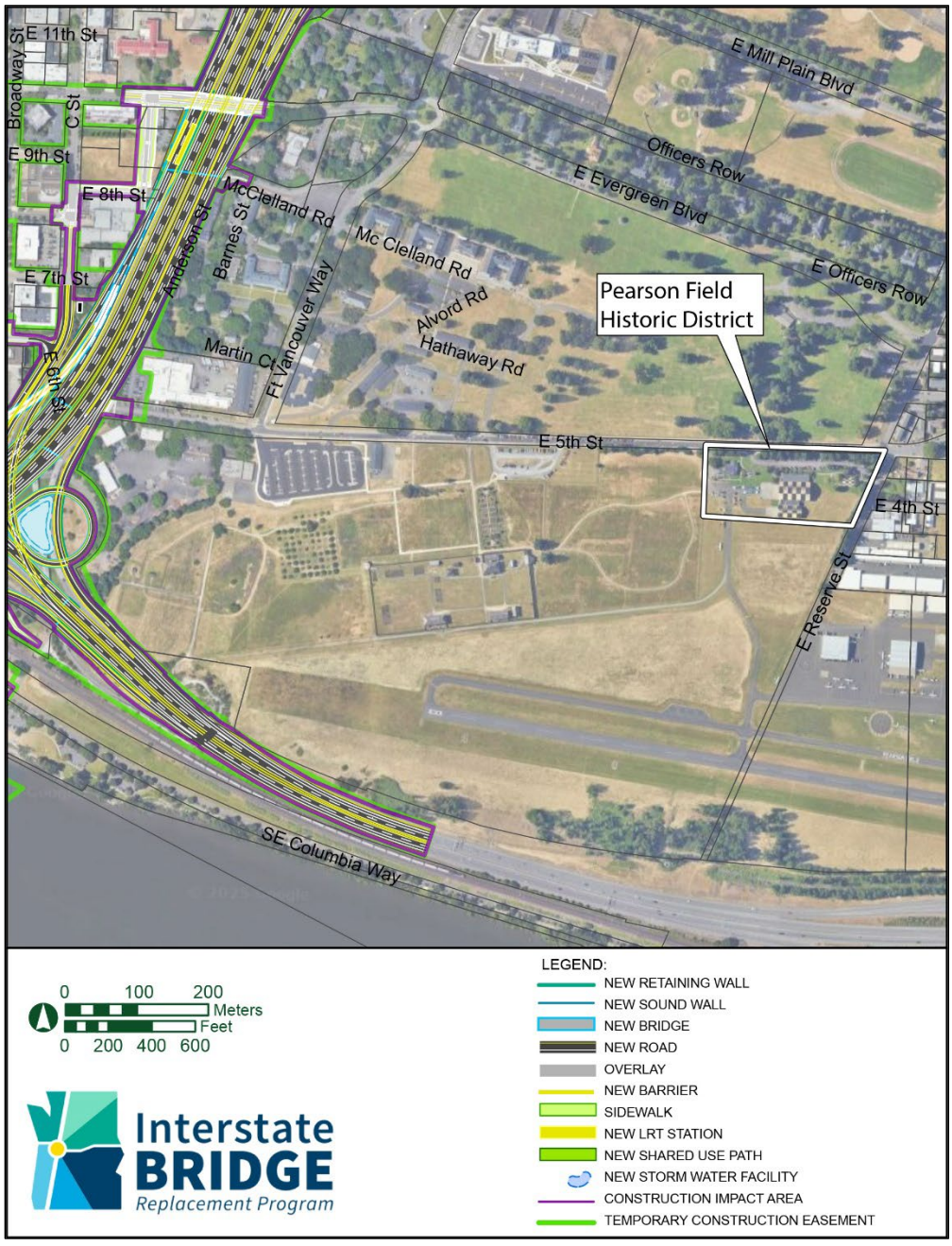


Figure 21. Pearson Field Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Note that no portion of the district directly interacts with the footprint of the Modified LPA.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

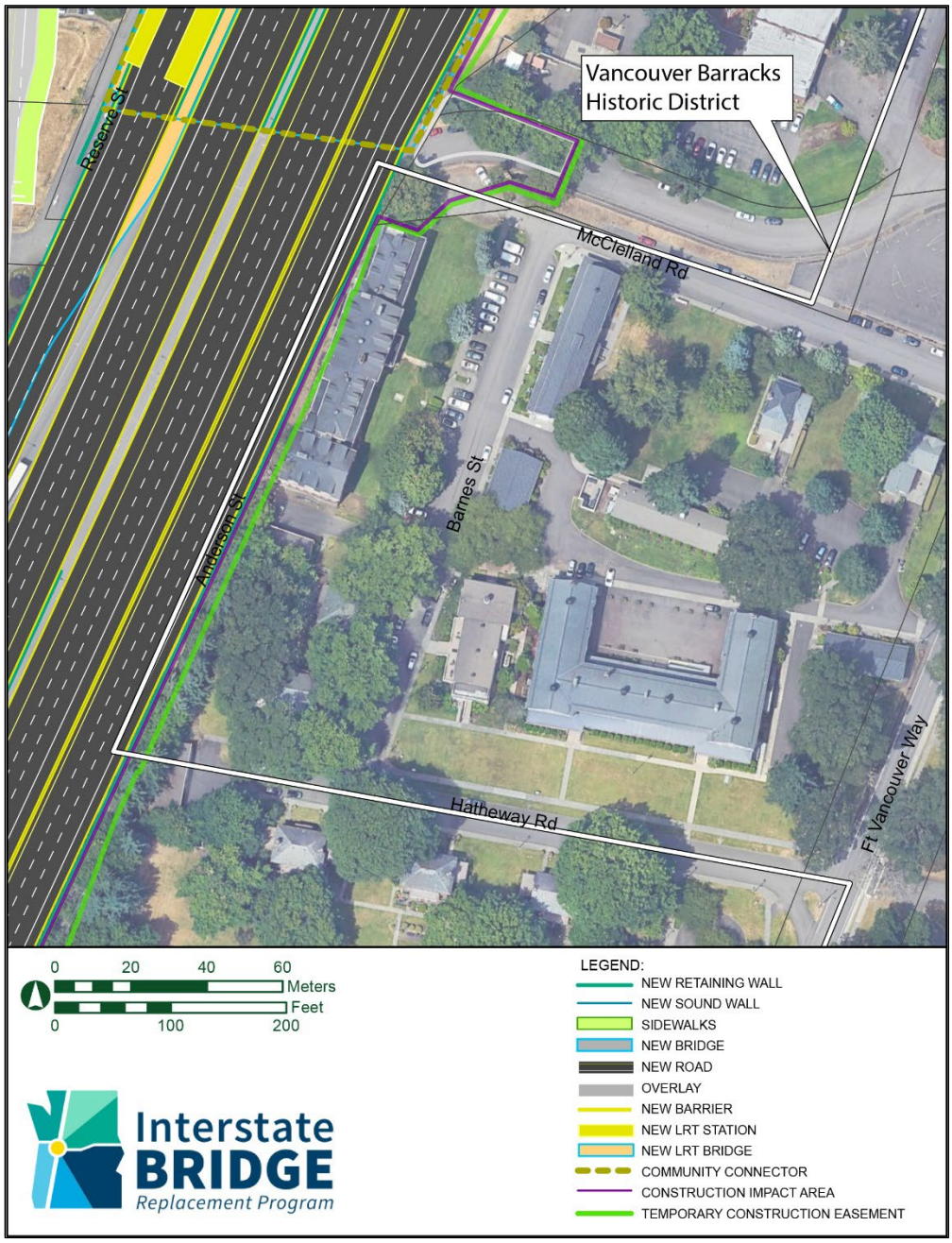


Figure 22. Vancouver Barracks Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Note that only sections of the district that interact with the Modified LPA footprint are shown, not the whole district.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

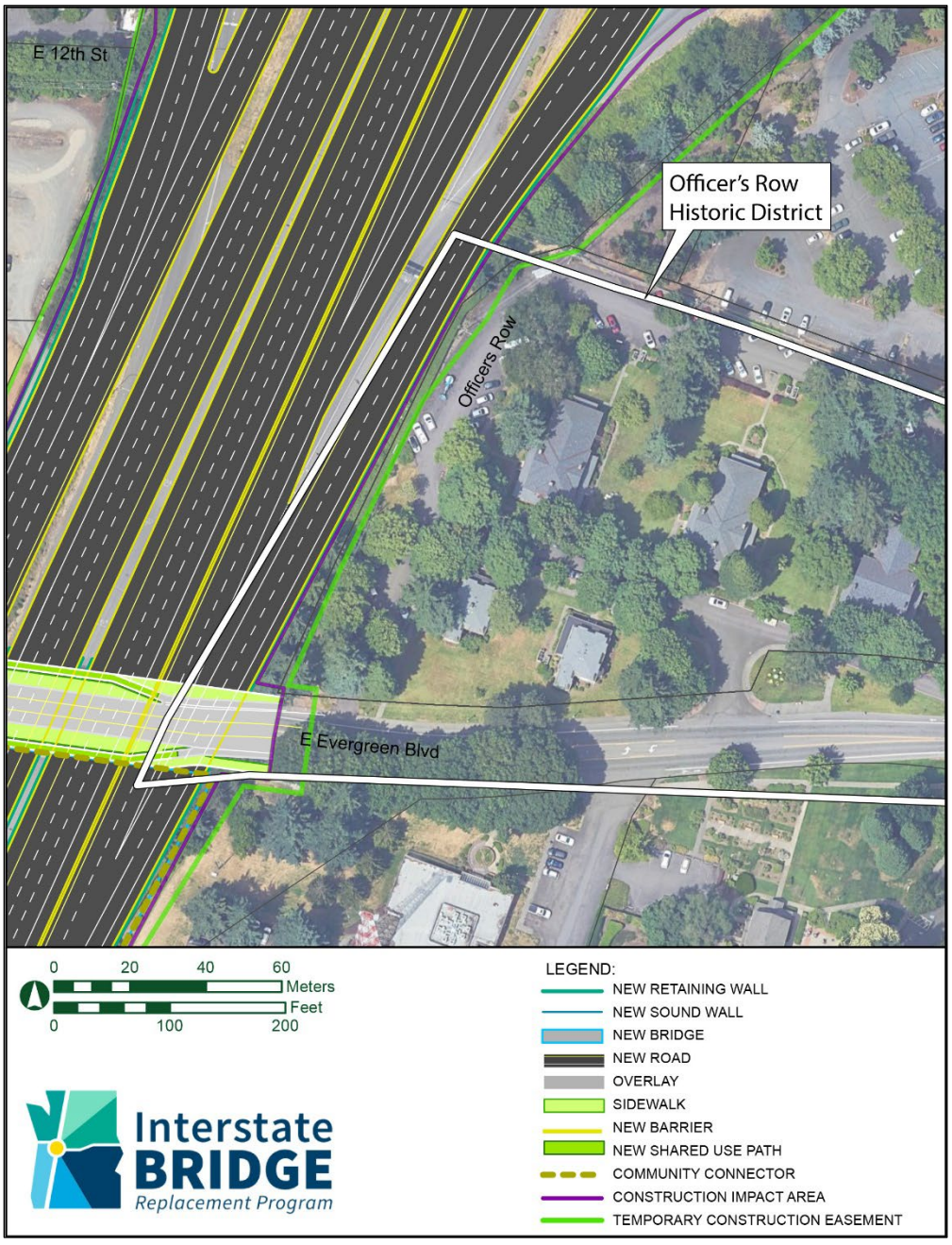


Figure 23. Officers Row Historic District overlaid with Modified LPA, Vancouver, Clark County, Washington. Note that only sections of the district that interact with the Modified LPA footprint are shown, not the whole district.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

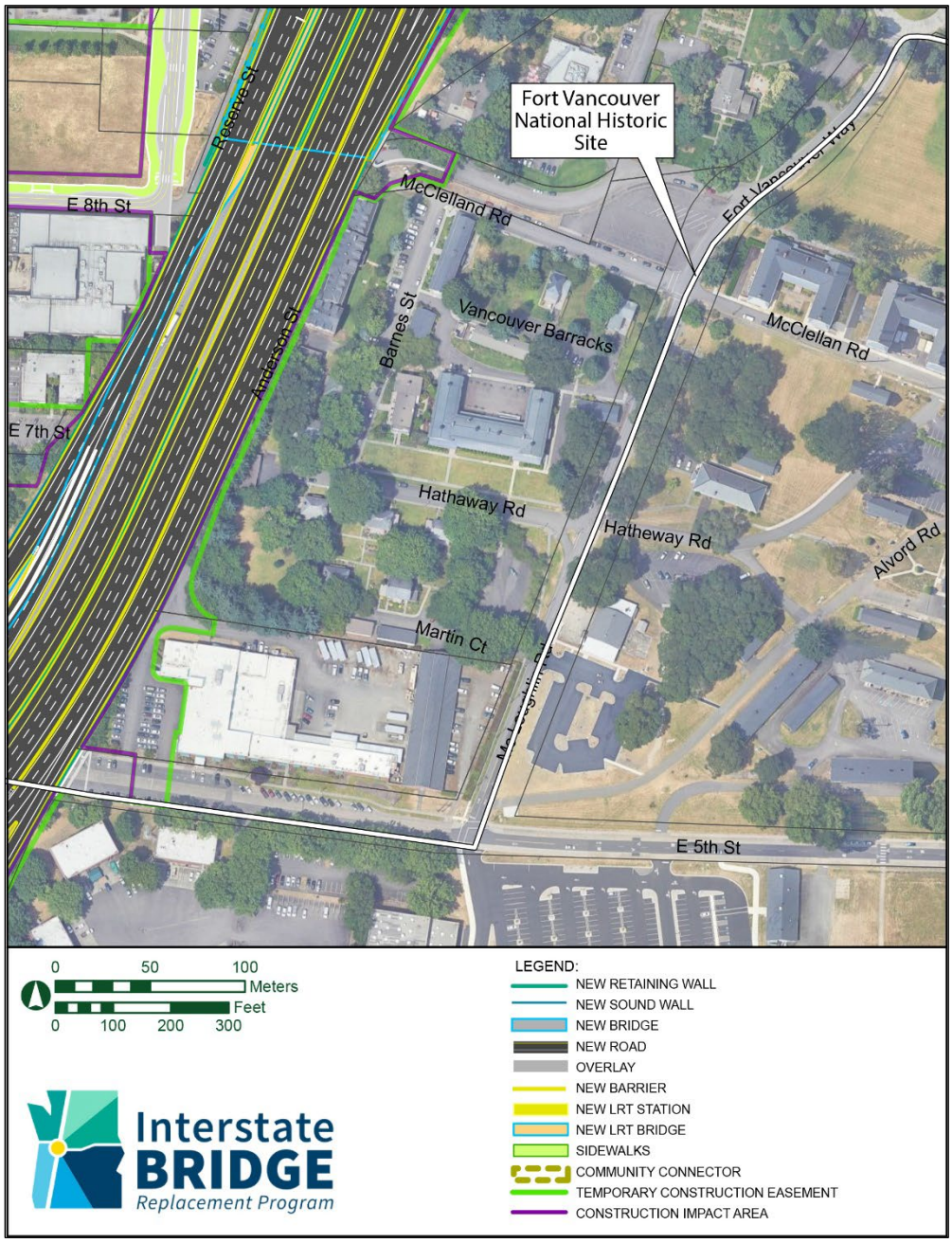


Figure 24. Fort Vancouver National Historic Site overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 1 of 3. Note that only sections of the site that interact with the Modified LPA footprint are shown, not the whole site.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

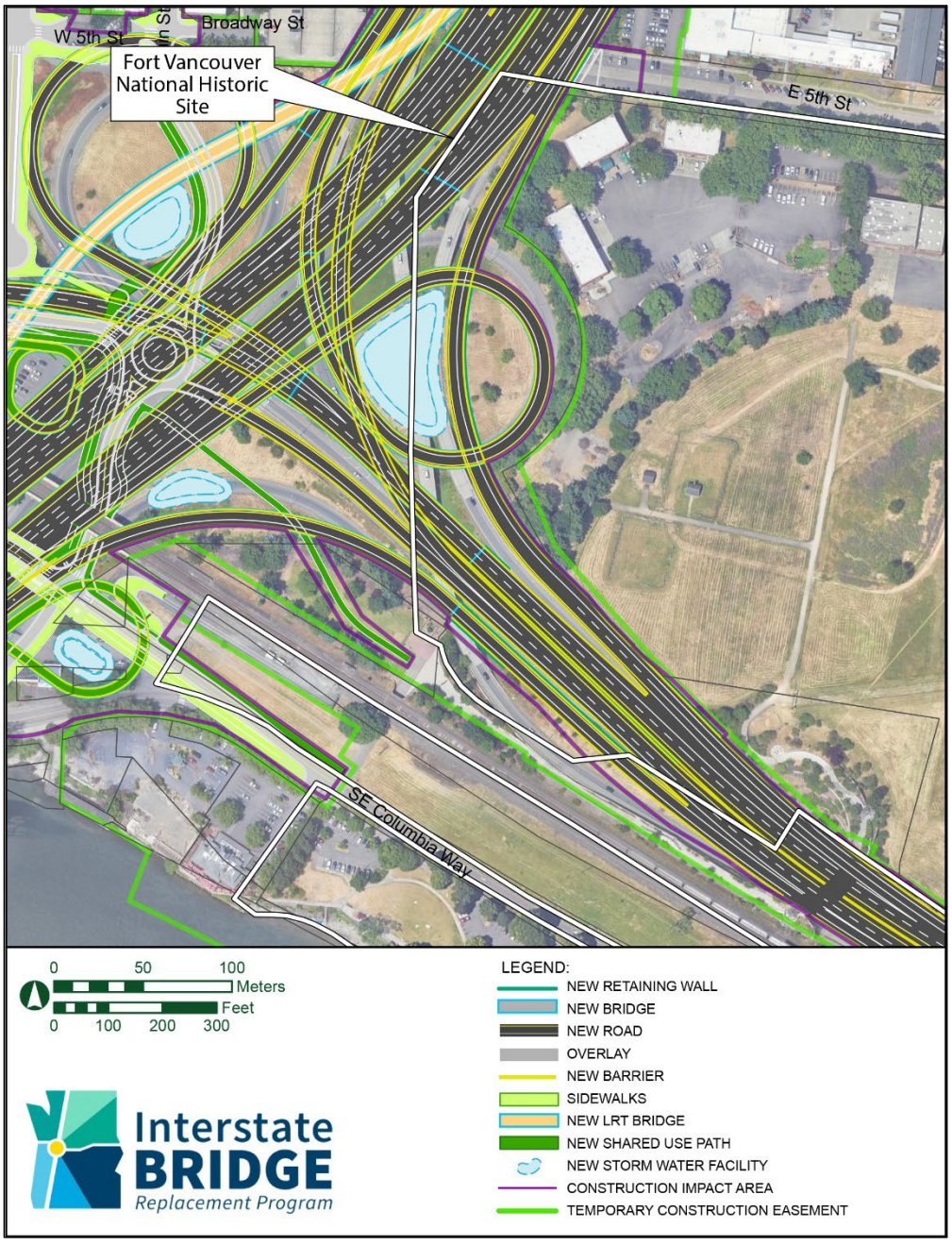


Figure 25. Fort Vancouver National Historic Site overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 2 of 3. Note that only sections of the site that interact with the Modified LPA footprint are shown, not the whole site.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

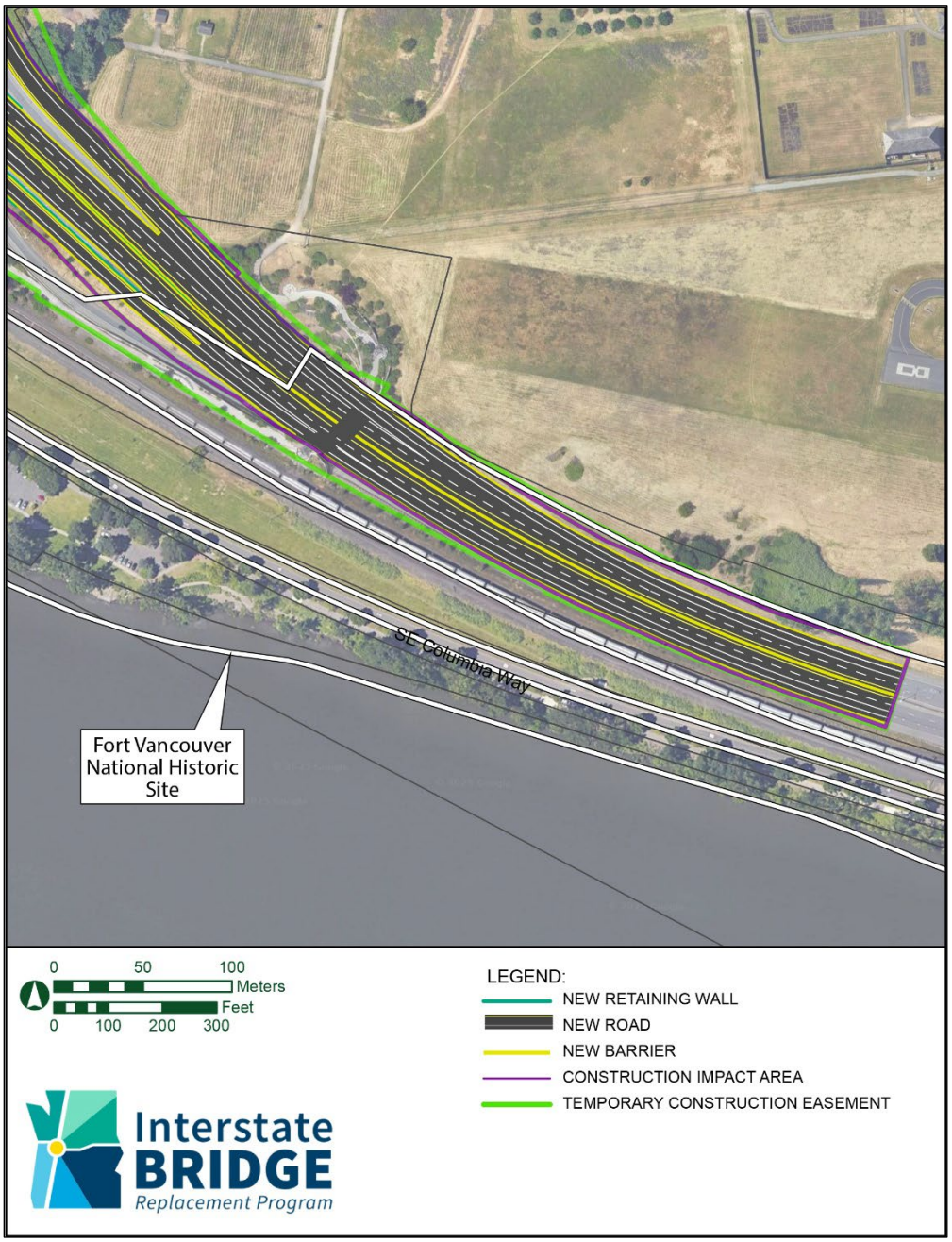


Figure 26. Fort Vancouver National Historic Site overlaid with Modified LPA, Vancouver, Clark County, Washington. Map 1 of 3. Note that only sections of the site that interact with the Modified LPA footprint are shown, not the whole site.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver National Historic Reserve	WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington

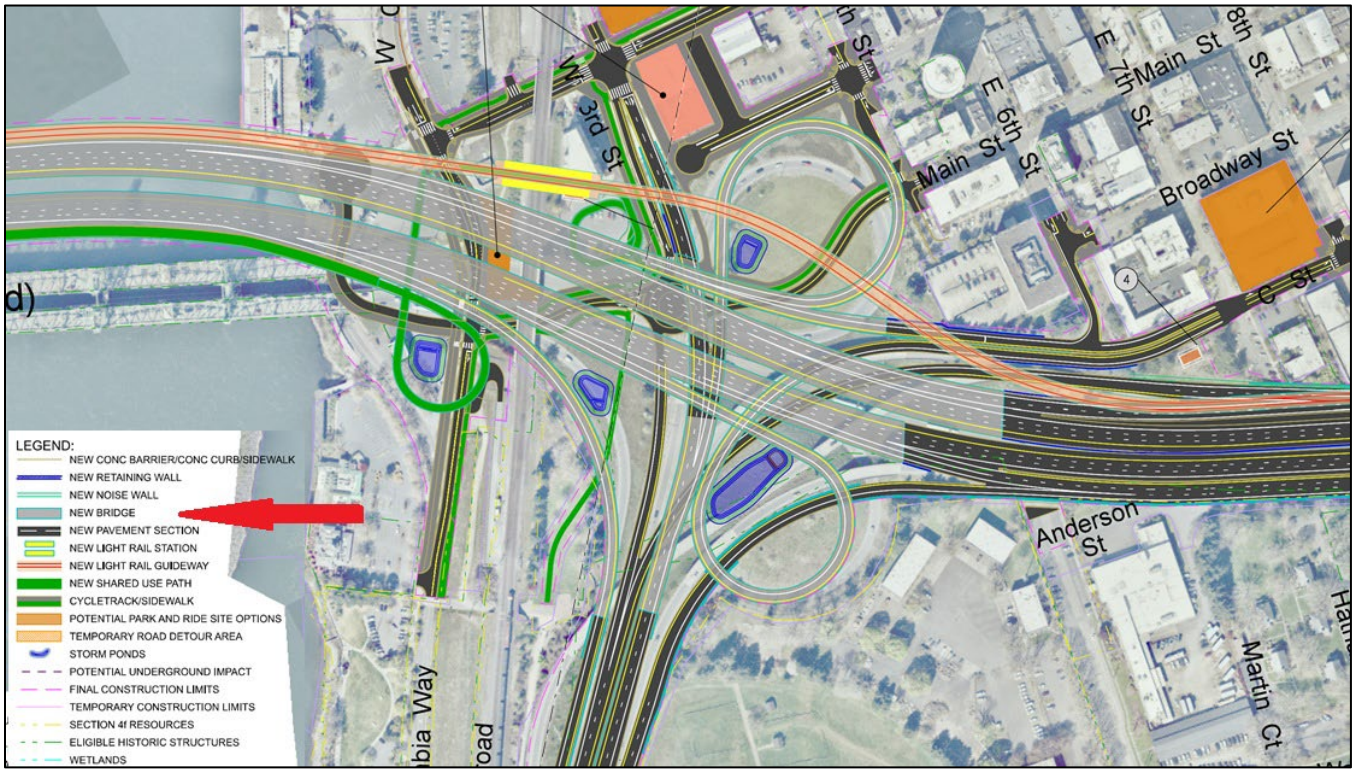


Figure 27. Detail of plan showing the Modified LPA SR 14 interchange in Downtown Vancouver. Note the areas of elevated roadway in translucent light gray (keyed as "New Bridge"; highlighted with red arrow).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

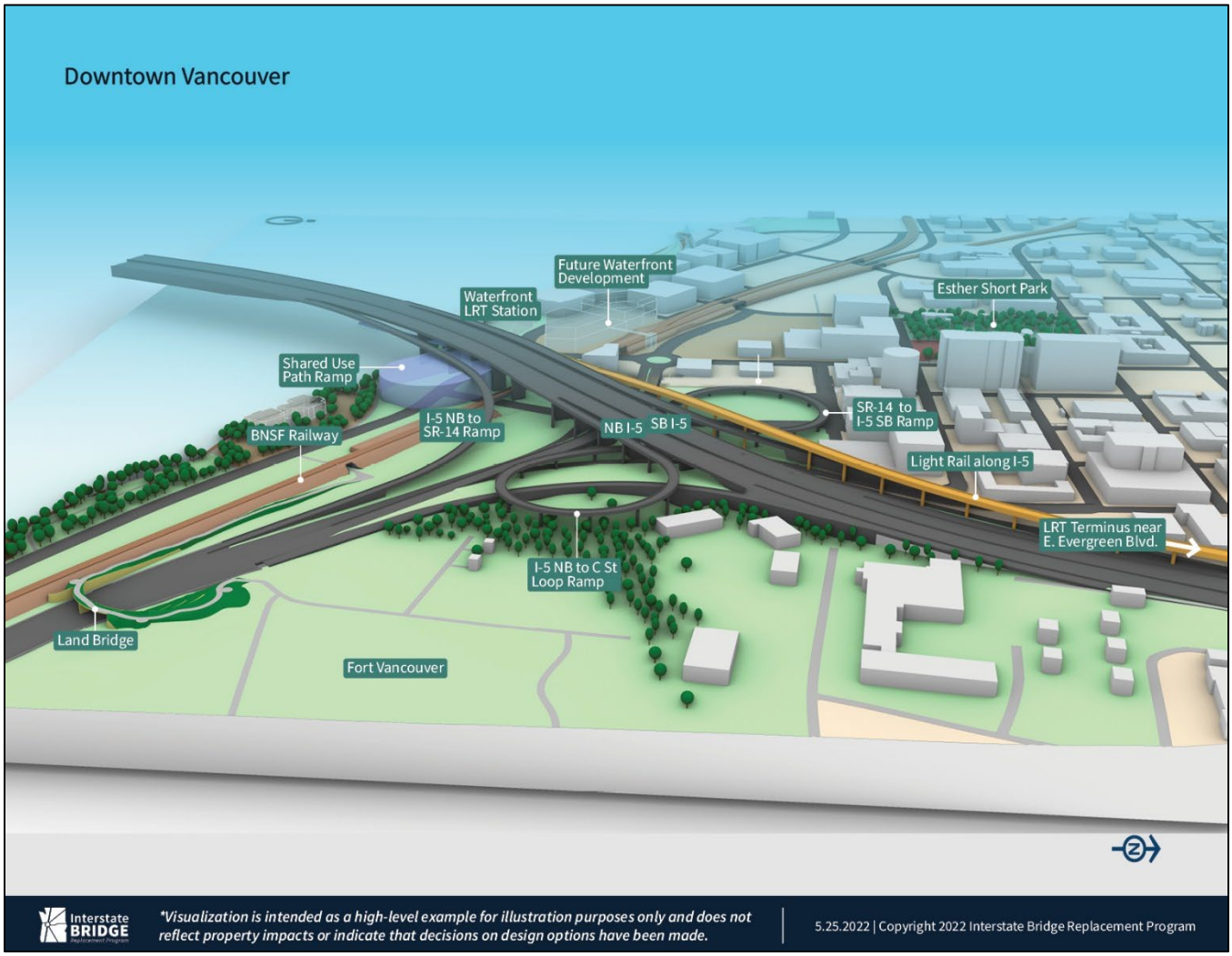


Figure 28. Visualization of SR-14 interchange in Downtown Vancouver. See the VNHR and Fort Vancouver in the foreground.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	

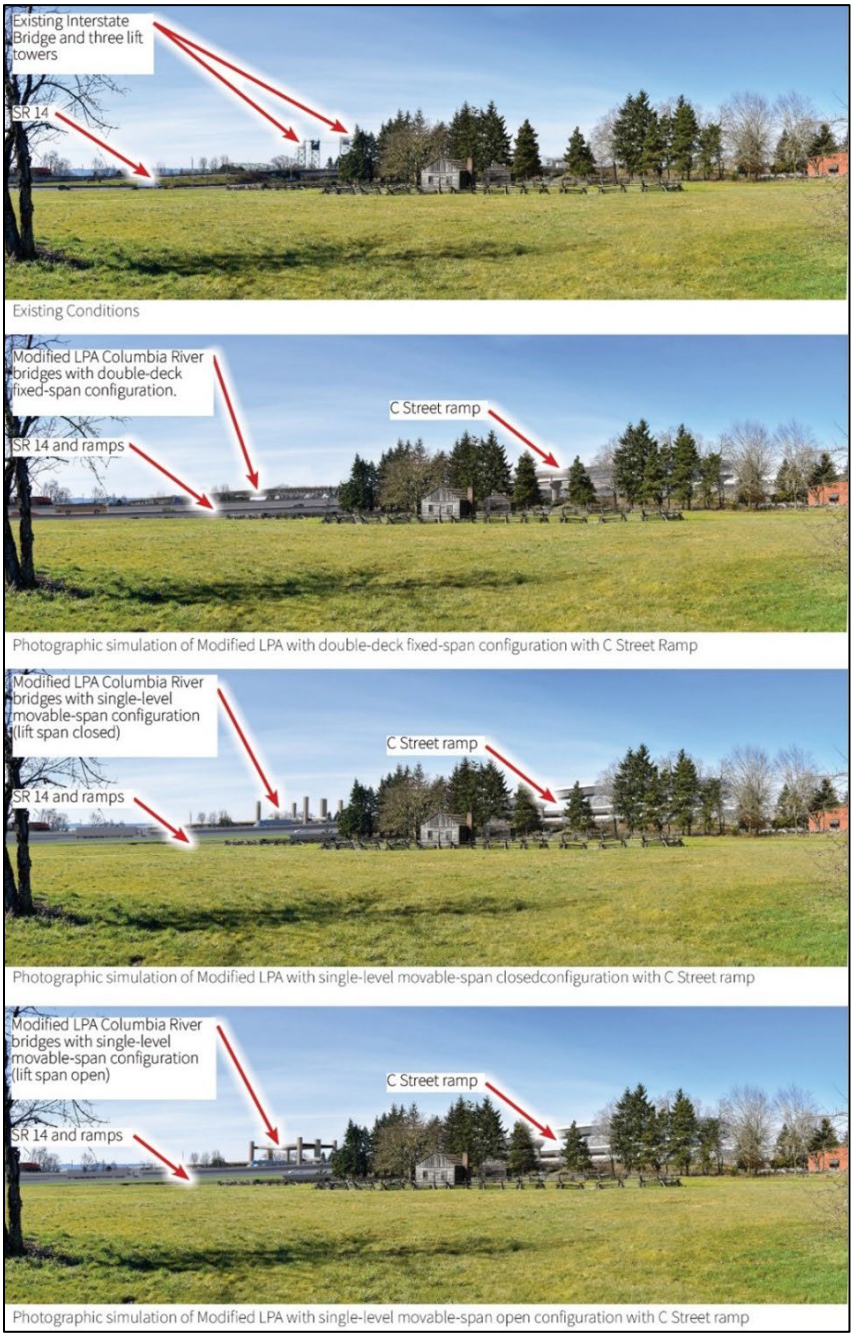


Figure 29. Conceptual photographic simulation showing the presence of the new Interstate Bridge per the Modified LPA from a vantage point west of the reconstructed stockade (Interstate Bridge Replacement Program, *Visual and Aesthetics Technical Report*, 4-55).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver National Historic Reserve		WISAARD Property ID: Various
Street Address: Various	City, County, State: Vancouver, Clark County, Washington	



Figure 30. Conceptual photographic simulation showing the presence of the new Interstate Bridge per the Modified LPA with the removal of the C Street ramps from a vantage point west of the reconstructed stockade (Interstate Bridge Replacement Program, *Visual and Aesthetics Technical Report*, 4-56).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Fendrich's Furniture (WA 7)	WISAARD Property ID: 33716
Street Address: 209 W 6th Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Fendrich's Furniture (209 W 6th Street), view southeast (WillametteCRA, January 13, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Fendrich's Furniture (WA 7)		WISAARD Property ID: 33716
Street Address: 209 W 6th Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Fendrich's Furniture building, a Stripped Classical, Art Deco, and Streamline Moderne commercial building located at 209 W 6th Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southeast corner of the intersection of Columbia Street and W 6th Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Fendrich's Furniture building. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Fendrich's Furniture (WA 7)		WISAARD Property ID: 33716
Street Address: 209 W 6th Street	City, County, State: Vancouver, Clark County, Washington	

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.
  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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Street Address: 209 W 6th Street	City, County, State: Vancouver, Clark County, Washington	

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The building at 209 W 6th Street (historically known as the Fendrich's Furniture building) is located in the Esther Short neighborhood of Vancouver, Clark County, Washington (Figure 3). The building is located on a square lot (originally a double lot); the building's footprint measures approximately 100 feet from north to south and approximately 100 feet from east to west. It is constructed atop a reinforced concrete foundation with a full basement and rises two stories above ground level. The flat roof is surrounded by a metal-capped parapet and covered by a light membranous material. The structure of the building is reinforced concrete; on the street-facing elevations, north and west, it is clad in a brick veneer (Figures 6 and 7). The public elevations are free of traditional ornamentation with walls that are planar and broken up by the textural effects of the variegated brickwork. The building's fenestration divides its public elevations into bays: five on the north elevation and five on the west elevation. Except for one, the ground floor of each bay is composed of aluminum frame plate glass shopfront windows set above tiled bulkheads. Above these are groupings of four wood frame hopper windows, each with four horizontal lights set in the story above them. There is a recessed entry on both north and west elevations, set into one bay with paired, full-glass wood doors. The southernmost bay of the east elevation is pierced by an oversized wooden paneled vehicular door in the southwestern corner. A neo-deco style sign projects from the northwestern corner.

Fendrich's Furniture is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the area of architecture as an example of the early work of Donald J. Stewart. The building was constructed during the period in which Stewart worked independently (1933–1952) and includes elements of Stripped Classical, Art

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Street Address: 209 W 6th Street	City, County, State: Vancouver, Clark County, Washington	

Deco, and Streamline Moderne styles, all of which were employed by Stewart at the time and which helped to establish his reputation.

The period of significance for Fendrich's Furniture under Criterion C is 1947, the year the building was completed. The building's exterior has been only minimally altered in the intervening years, although its setting has been slightly altered by the removal of historic buildings to the north and west and their subsequent replacement with modern construction. These modern buildings continue to demonstrate the dense mixed-use character of downtown Vancouver with footprints that extend to the sidewalk and blocky massing. Fendrich's Furniture continues to convey its rectilinear massing, minimal ornamentation, variegated masonry cladding, grouped upper story windows with horizontal lights, and interior double height spaces with period finishes. In addition to these features, the Fendrich's Furniture building continues to be occupied by a commercial tenant who uses the original design features, such as the storefront windows, as originally intended, for product display. In all, the building retains its integrity of location, design, materials, workmanship, feeling, and association to a high degree. Although somewhat diminished, the building also retains its integrity of setting. The building's square-shaped parcel roughly corresponds to the building's footprint; the identified boundary of the NRHP-eligible property is therefore recommended as the boundary of the tax lot parcel (Figure 4).

ALTERNATIVES CONSIDERED

Because the Fendrich's Furniture building at 209 W 6th Street has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Fendrich's Furniture building, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible Fendrich's Furniture building. Program activities within the vicinity of the property would include roadway improvements to Columbia Street, one block to the south of the subject property, and to East 6th Street, two blocks to the east of the subject

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property. These improvements would not involve substantial changes to the visual character, dimensions, configuration, or materials of the existing roadways (Figure 5 and 9).

The Modified LPA also contemplates constructing an LRT park and ride for the Waterfront Station at two potential sites visible from the Fendrich's Furniture building: one site lies at the west side of Columbia Street, approximately one and one-half blocks south of the Fendrich's Furniture building, and the other lies at the east side of Columbia Street, two blocks south of the building (Figure 5). Construction of the park and ride on either of these two sites would require the demolition of one existing commercial building, but it would not require the permanent acquisition of right of way from the tax lot containing the Fendrich's Furniture building.

Overall, the Modified LPA would not have an effect on any of the Fendrich's Furniture building's character-defining features. The subject property's location, footprint, height, exterior materials, fenestration pattern, and commercial use would be intact and unaltered following program implementation. Furthermore, the Modified LPA would not diminish any of aspects of the property's setting that enable it to convey its significance under Criterion C. Roadway improvements would be made more than one block away from the Fendrich's Furniture building, and these surface-level improvements would generally maintain the current roadways' visual character. Given their distance and relatively modest degree of visual change, these roadway improvements would be only minimally visible from vantage points at the building's exterior. The area of central Vancouver located south of the Fendrich's Furniture building, where the Modified LPA may demolish existing buildings to construct a park and ride, currently has a varied character that includes surface parking lots and more recent construction (such as the Vancouver Convention Center), in addition to older commercial buildings. In contrast, a more intact commercial district comprised of numerous other buildings from the first half of the twentieth century exists in the blocks to the east of the Fendrich's Furniture building, particularly along East 6th Street and Main Street. This commercial district, which is visible from the subject property's primary façade, would remain unaltered as a result of Program activities and is more important in conveying the Fendrich's Furniture building's historic setting than the blocks to its south. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criterion C; specifically, the building would maintain its ability to convey its association with the work of locally notable architect Donald J. Stewart. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible Fendrich's Furniture building.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Fendrich's Furniture building at 209 W 6th Street.

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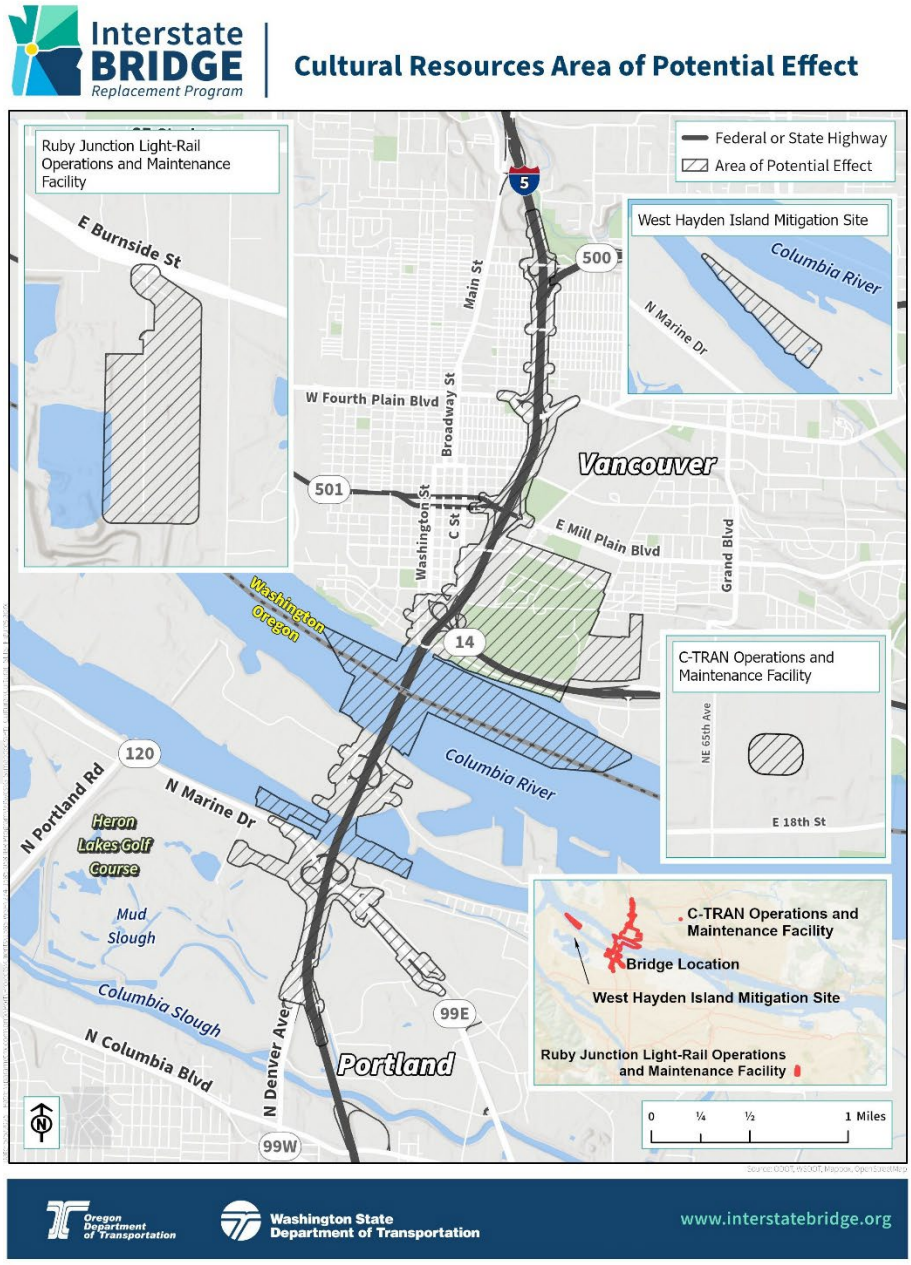


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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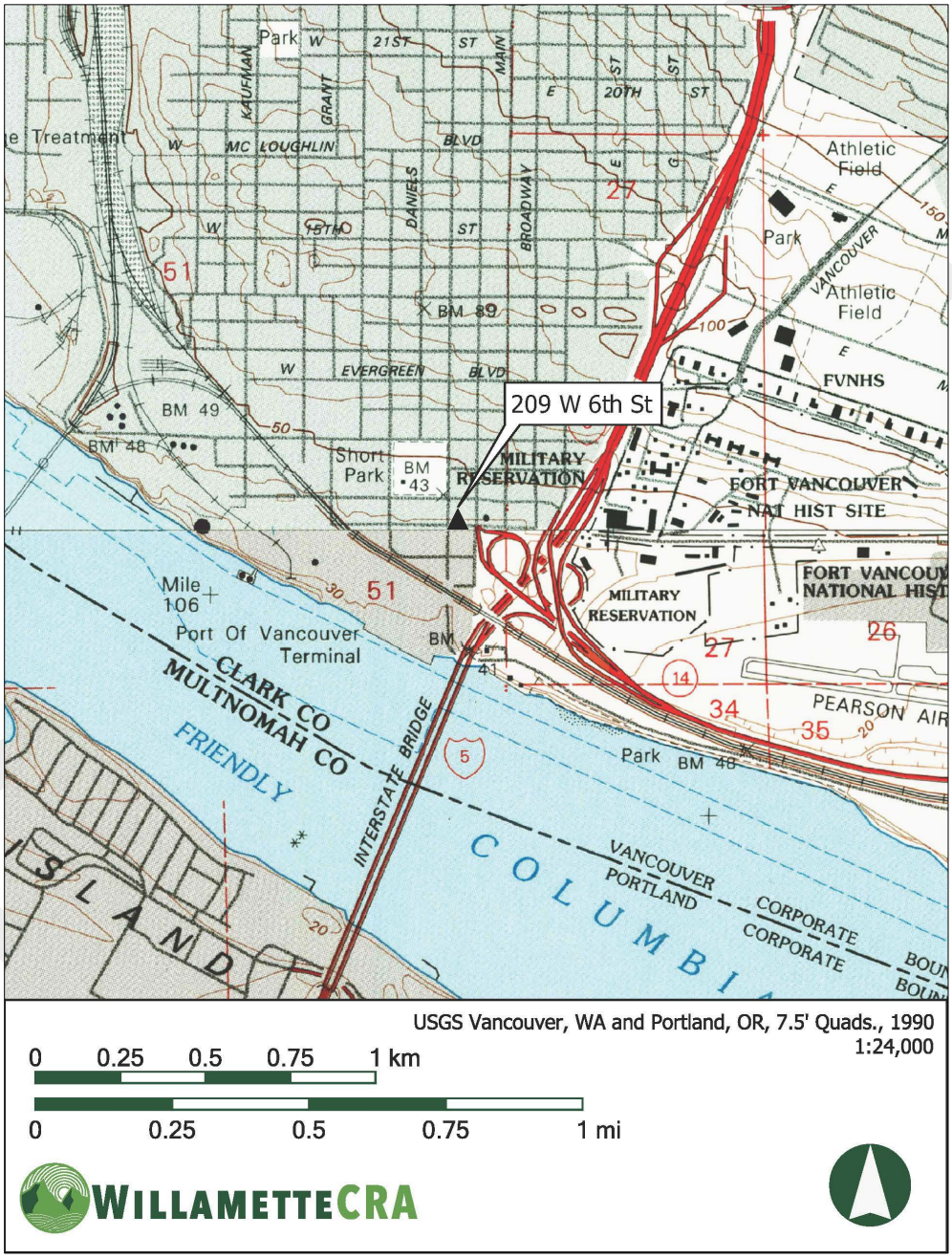


Figure 3. Location map of 209 West 6th Street, Clark County, Vancouver, Washington.

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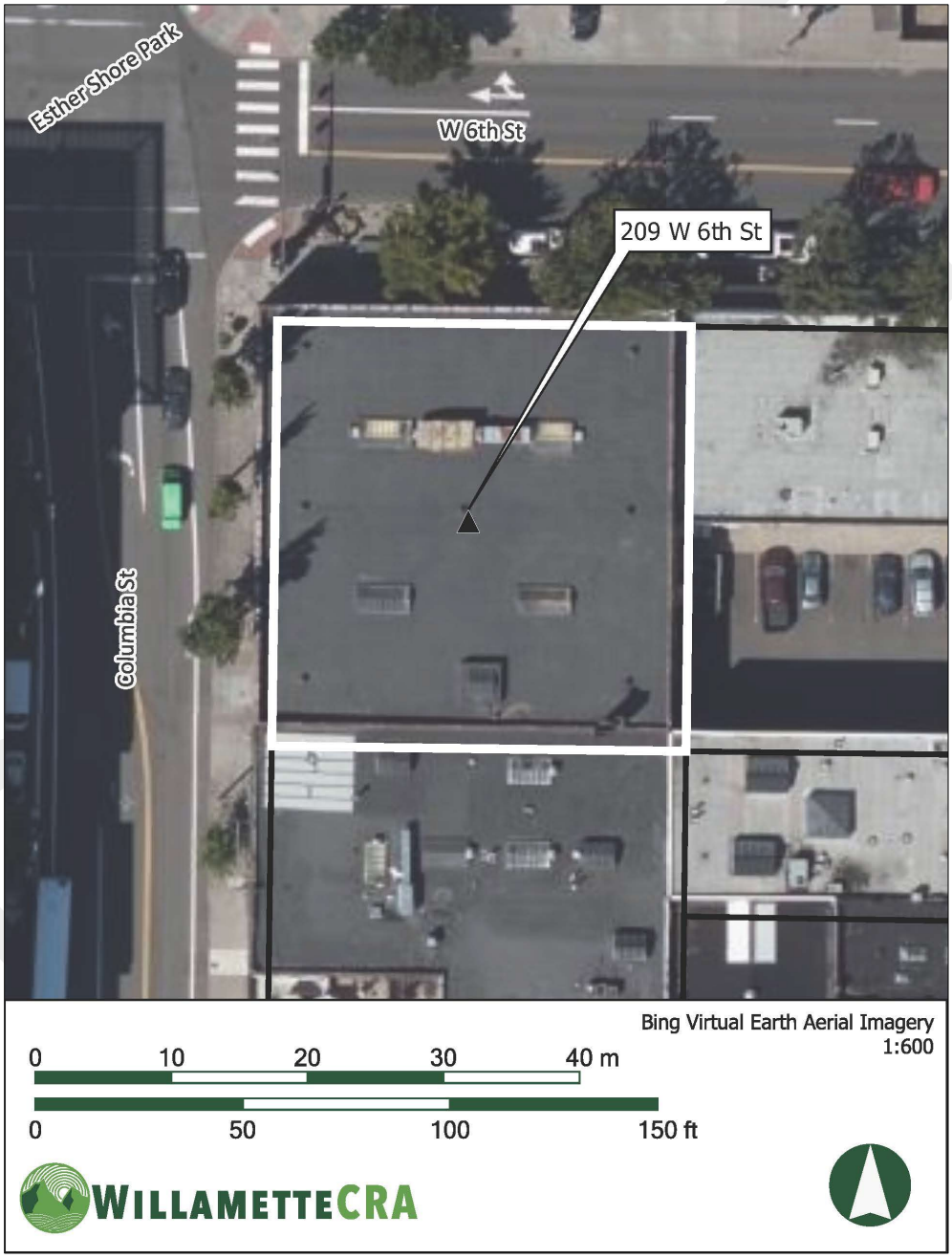


Figure 4. Aerial map of Fendrich's Furniture (209 W 6th Street), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 5. Aerial map showing the proximity of proposed Program activities to Fendrich's Furniture (209 W 6th Street), with the identified boundary of the NRHP-eligible property in white.

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Figure 6. North elevation of the Fendrich's Furniture building, including lower-level plate glass windows, view southwest (WillametteCRA, January 16, 2023).

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Figure 7. A portion of the western elevation of the Fendrich's Furniture building, including the vehicular entrance. View east (WillametteCRA, January 16, 2023).

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Figure 8. View from the intersection of Columbia Street and E. 6h Street, facing south toward surface-level roadway improvements proposed by the program, shown in green and indicated by yellow arrow; the Fendrich's Furniture building stands at left. (IBR/Bentley Systems, May 26, 2022; screengrab captured June 19, 2023).

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Figure 9. View from the intersection of Columbia Street and E. 6h Street, facing east toward surface-level roadway improvements proposed by the program, shown in green and indicated by yellow arrow; the Fendrich's Furniture building stands at right. (IBR/Bentley Systems, May 26, 2022; screengrab captured June 20, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Smith Tower (Mid-Columbia Manor) (WA 10)	WISAARD Property ID: 2124
Street Address: 515 Washington Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Smith Tower (515 Washington Street), view east (WillametteCRA, June 8, 2022).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Smith Tower (Mid-Columbia Manor) (WA 10)		WISAARD Property ID: 2124
Street Address: 515 Washington Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on Smith Tower, a Mid-century Modern residential building located at 515 Washington Street in Vancouver, Clark County, Washington. (Figure 1). The subject property, which is at the southeast corner of the intersection of Washington Street and W 6th, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A, B, and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on Smith Tower. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through-lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers more space and time to merge, diverge, and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configurations would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as a reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.
  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

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- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The building at 515 Washington Street, known as Smith Tower, is a Modern residential apartment complex constructed in 1966 and located in the Esther Short neighborhood of Vancouver, Clark County, Washington (Figure 3). The principal form of the building is a fifteen-story cylindrical tower measuring approximately 100 feet in diameter and 158 feet in height. The upper stories of the building, floors two through fifteen, are raised above the ground floor massing, which is an irregularly shaped assemblage of the central, structural, hollow concrete tube combined with the enclosed entrance lobby (Figure 7). Regularly spaced, reinforced concrete columns are slightly inset from the outer edge of the cylindrical mass. Floors two through fifteen are each defined by a reinforced-concrete floor slab with an interspersed curtain wall comprised of fixed and awning aluminum frame windows and cream-colored enamel spandrel panels. Although elevations in a cylindrical building are difficult to define, both the north elevation and the east elevation are characterized by stacked, recessed balconies. The curtain wall glazing and exterior balconies along the upper floors provide sweeping panoramic views of the surrounding landscape. On a northeastern arc of the cylinder, a linear stack of exposed-aggregate concrete panels separates private balconies on either side. The roof is defined by a raised parapet at its edge and the smaller volume of the mechanical penthouse, enclosing utility equipment and egress, at the center; the penthouse is surrounded by a rounded screen of vertical fins.

Smith Tower is eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion A at the local level in the areas of community planning and development and social history; under Criterion B at the local level in the area of social history; and under Criterion C at the state level in the area of architecture. The building is a manifestation of how private development, public funding, and interest in the public good created new models

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for development, management, and living in Vancouver. Smith Tower is a unique example of senior living: it was created by a local grassroots organization, dedicated to a population otherwise unaddressed, and added value with a distinct and innovative architectural form in a prime and visible location. The building is also associated with labor leader W. R. “Bill” Smith, who was involved in the development of the building and ensured that it would serve a community of retired union laborers. The building is also an early and relatively rare example of a high-rise, Mid-century Modern style residential tower in Washington State. The tower is still defined by many of its original features, including its iconic cylindrical form, its innovative technologies including a curtain wall and lift-slab construction, flat roof, pie-shaped interior units, and open ground floor. Its informal, indoor/outdoor living supports a visual connection to nature with its expansive upper level views, while also creating an emphasis on user experience and social relationships.

The period of significance for Criteria A and C is defined by the building’s date of construction in 1966. The building’s period of significance for Criterion B corresponds to the dates of Bill Smith’s involvement and residency at the building, from its creation in 1966 to Smith’s death in 1971. Some alterations to the property include balcony enclosures, changing exterior enamel panels from mustard to a cream color, reconfiguring the interior walls of some units, and tinting window glazing. Although these latter alterations to the building have modified the original design, many were necessary improvements to the somewhat experimental building—the balconies, in particular, which bore the auditory and physical force of strong south and west winds, were enclosed to retain resident views of the surrounding landscapes without the unintended inconveniences of the weather. Most of all, the views, both of and from the upper floors of the building, remain intact and continue to define the tower in Vancouver’s skyline as well as offer a panoramic amenity to the residents. In all, the building retains its integrity of location, setting, design, materials, workmanship, feeling, and association. In addition to the building, the parcel includes the underground parking lot, the ground floor surface lot, and the landscaping lining both Washington and 6th Streets. All of these elements have been present on the parcel since the end of the resource’s period of significance (1966–1971) and contribute to the property’s historic significance. The identified boundary of the NRHP-eligible property is thus recommended as the boundary of the resource’s parcel (Figure 4).

ALTERNATIVES CONSIDERED

Because Smith Tower has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Smith Tower, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program’s Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Adverse Effect on the NRHP-eligible Smith Tower. Program activities in the vicinity of the property would consist of improvements to the intersection of Main Street and Washington Street and the construction of a new, elevated onramp connecting State Route (SR) 14 westbound to I-5 southbound and a new bridge supporting LRT; both of these activities would be constructed to the south of Smith Tower and would be clearly visible from the property. The elevated onramp, in particular, would be located approximately 160 feet from the tax lot boundary, which is the identified boundary of the NRHP-eligible property. None of the proposed activities would require new right of way from Smith Tower, and they would be physically separated from the property by intervening streets and a parcel to the south comprised of a surface parking lot (Figure 5).

The proposed road improvements, as well as the construction of the elevated onramp and bridge, would slightly alter the property's setting through the introduction of new visual, atmospheric, and audible elements. However, the proposed road improvements, elevated onramp, and bridge would only be partially visible from the south side of the subject property's tax lot (Figure 6). The property's setting—specifically, the setting south of Smith Tower—is already defined by the existence of an onramp and I-5, constructed in the early 1950s, more than a decade before the subject property's period of significance. Additionally, the proposed onramp will be elevated approximately 30 feet above the pavement, comparable in height to the third floor of the surrounding buildings. Thus, the elevated onramp will not be elevated above the height of existing buildings located immediately southwest and southeast of the property tax lot, therefore keeping in line with the surrounding low- and mid-scale built environment that impact views at the tower's lower levels. While the onramp and bridge would introduce an elevated configuration which would have an effect on the property's expansive views of the area, these views have included the existing interstate and associated onramp since the building's construction. Despite a slight diminishment to the aspects of setting, the property is still able to convey its significance under Criterion A, B, and C. The property's design and materials would remain intact and unaltered, and its location would be unchanged by Program activities. The commercial character of the neighborhood to the north, west, and east would also remain unchanged, and so Program activities would not inhibit the property's ability to convey its significant development history. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would slightly alter the property's integrity of setting, but would not diminish the property's integrity of location, , design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under NRHP Criteria A, B, and C. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible Smith Tower.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Smith Tower (Mid-Columbia Manor) (WA 10)		WISAARD Property ID: 2124
Street Address: 515 Washington Street	City, County, State: Vancouver, Clark County, Washington	

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Smith Tower at 515 Washington Street.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Smith Tower (Mid-Columbia Manor) (WA 10)		WISAARD Property ID: 2124
Street Address: 515 Washington Street	City, County, State: Vancouver, Clark County, Washington	

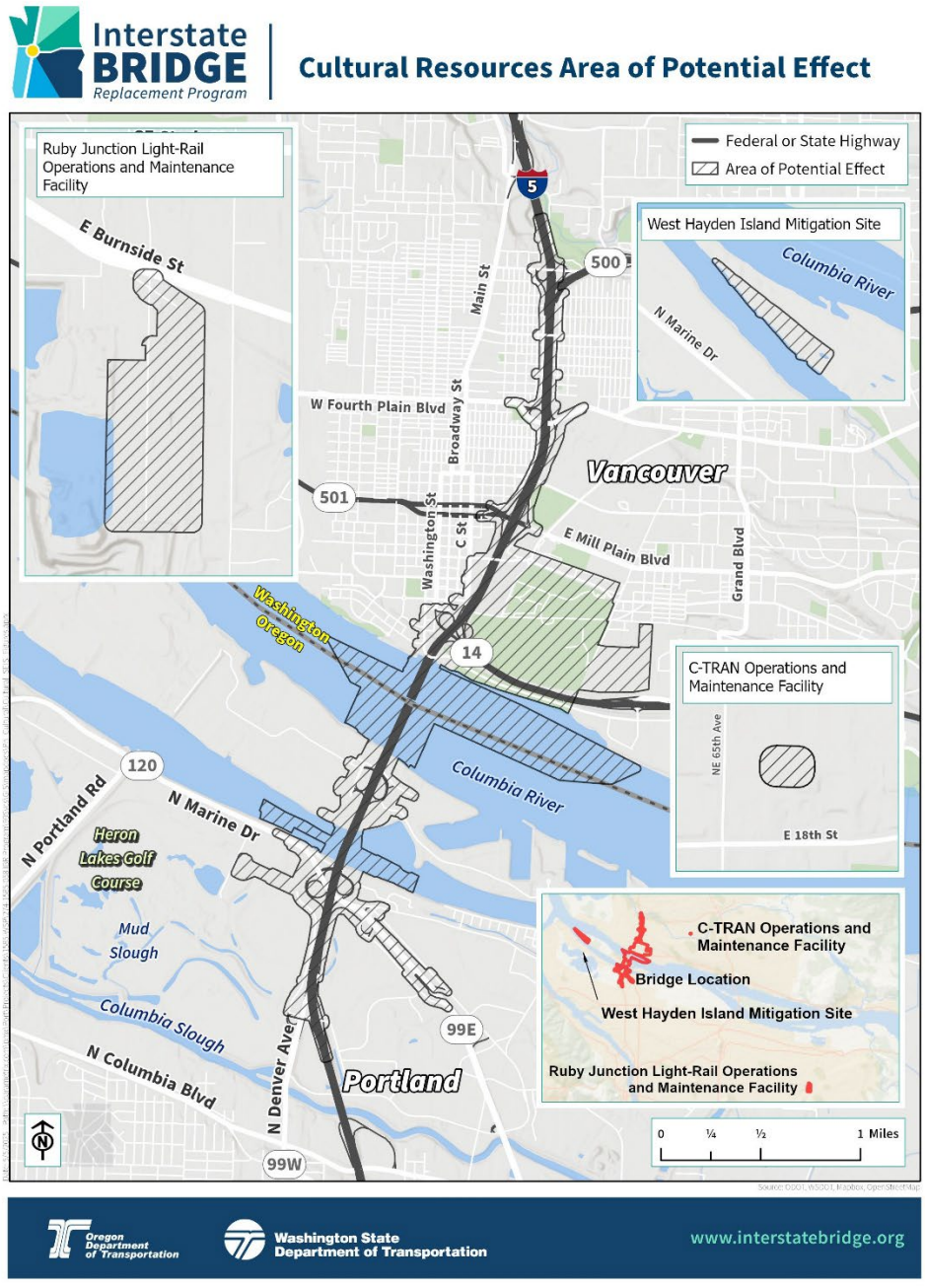


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Smith Tower (Mid-Columbia Manor) (WA 10)		WISAARD Property ID: 2124
Street Address: 515 Washington Street	City, County, State: Vancouver, Clark County, Washington	

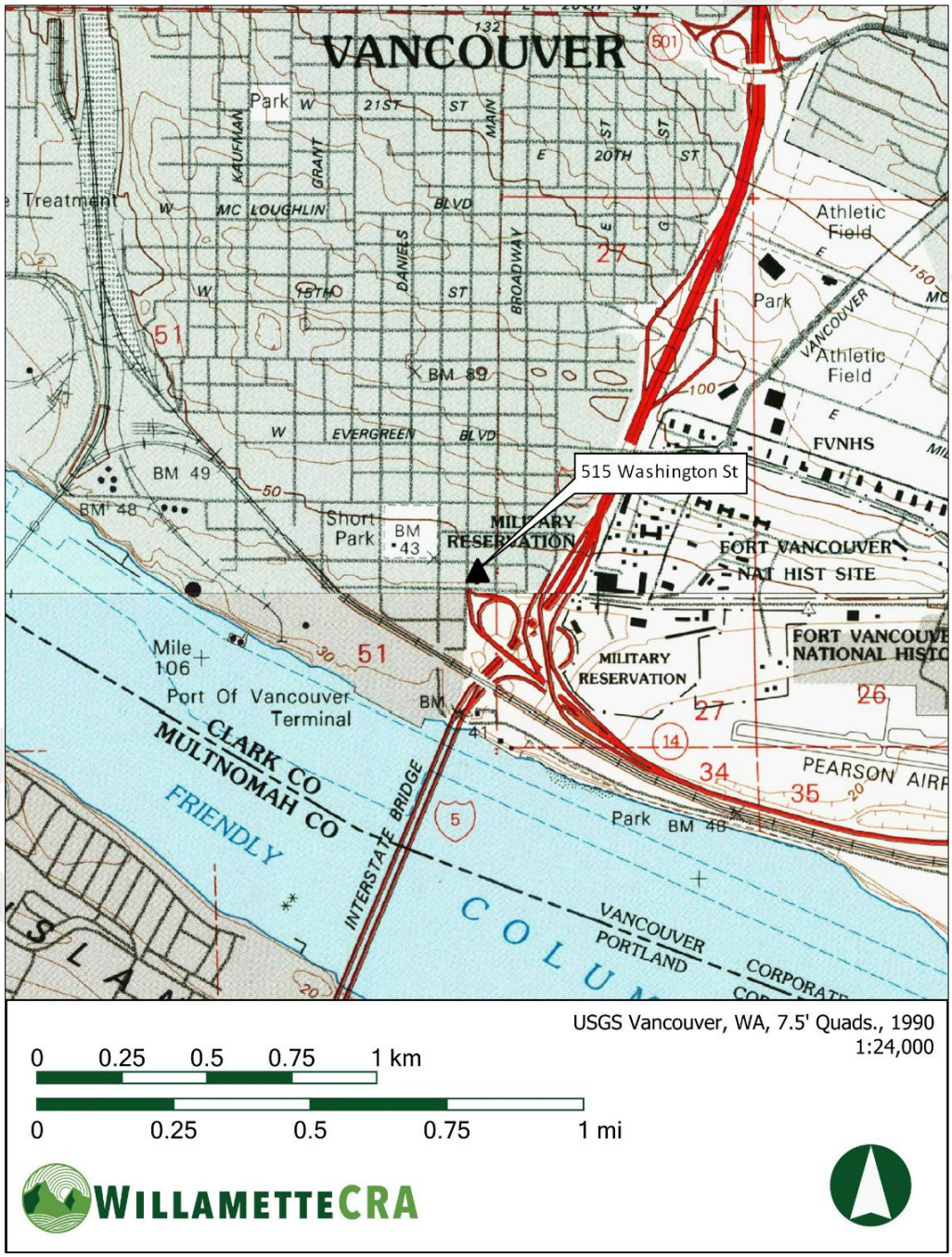


Figure 3. Location map of Smith Tower (515 Washington Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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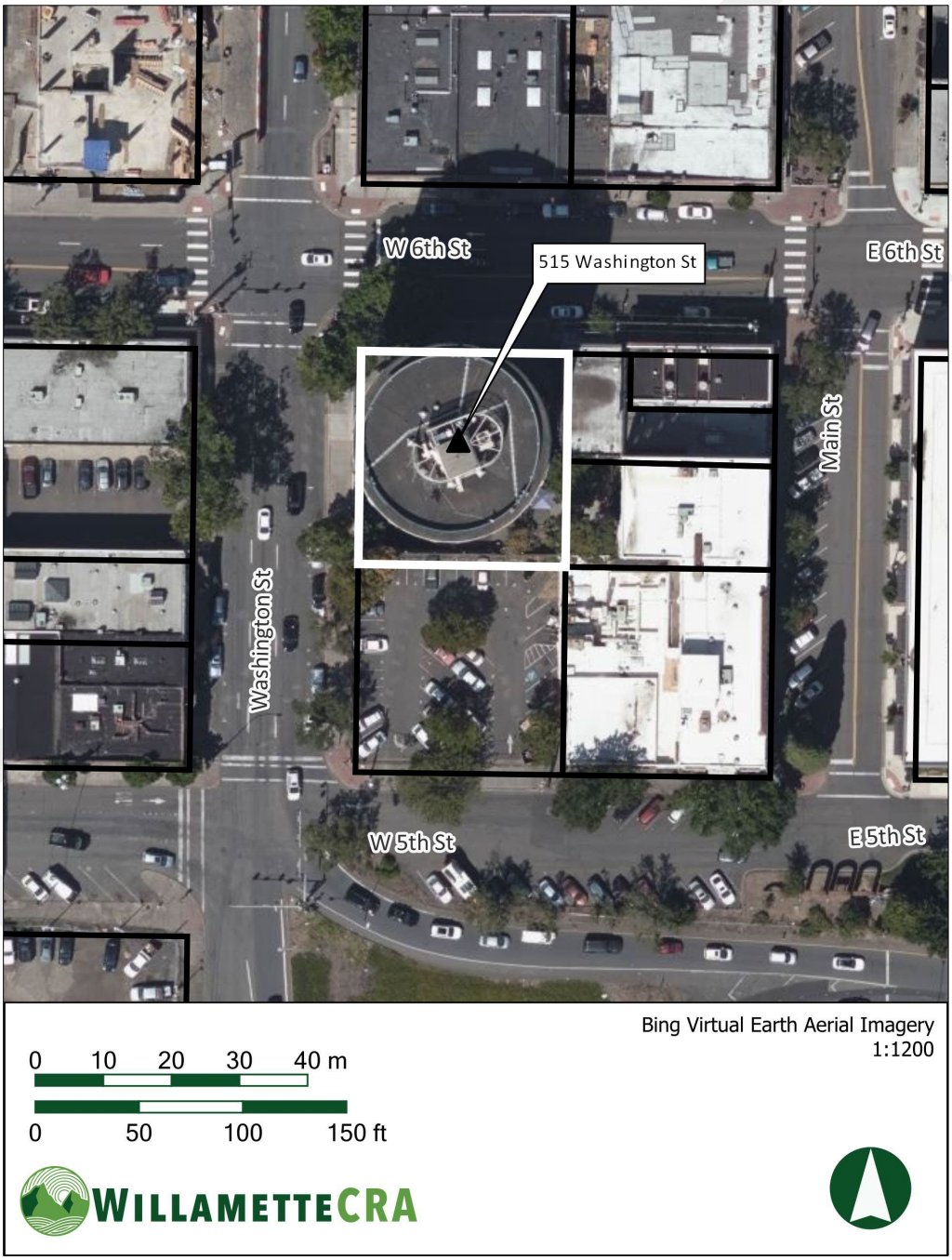


Figure 4. Aerial map of Smith Tower (515 Washington Street), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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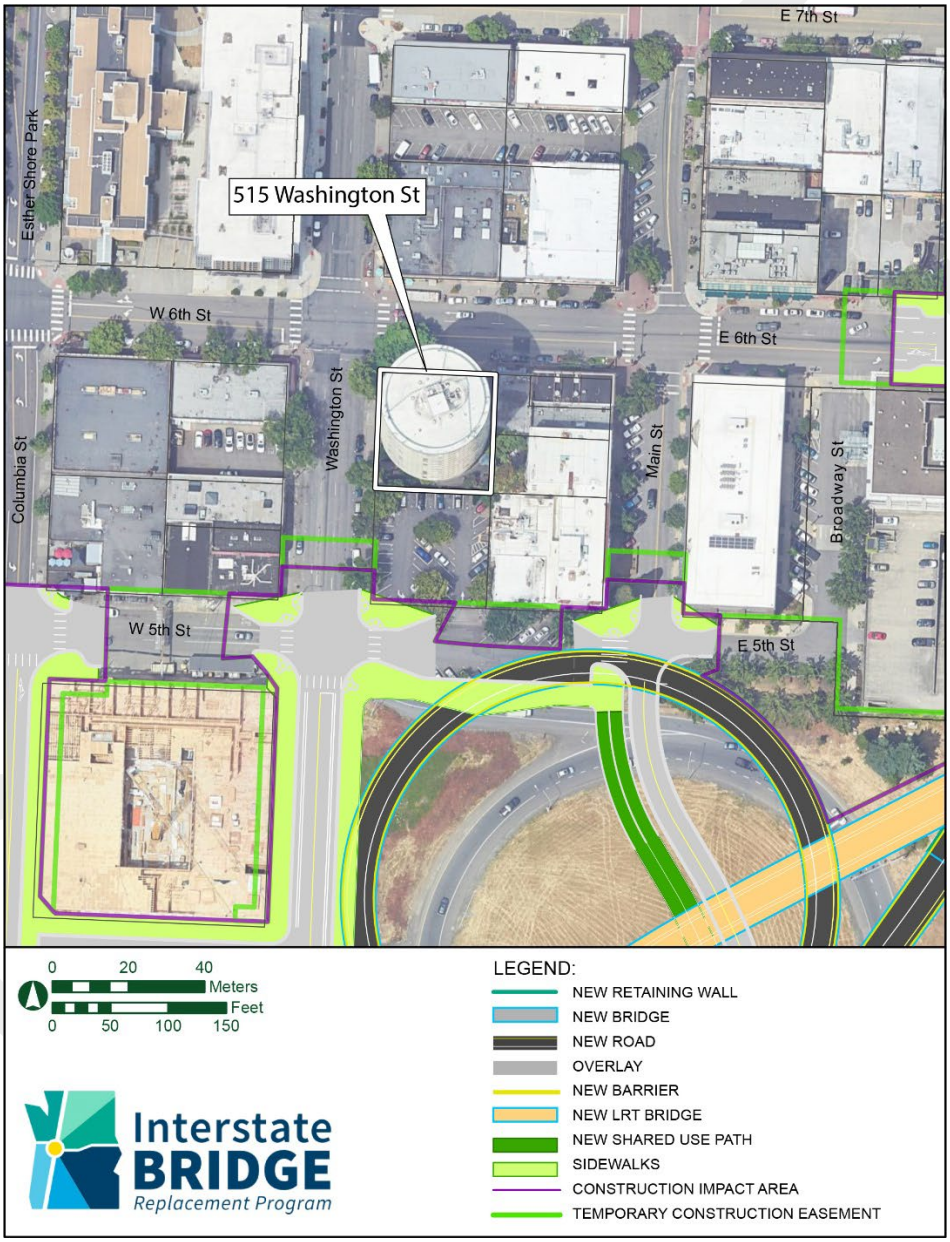


Figure 5. Aerial map showing the proximity of proposed Program activities to Smith Tower, showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Smith Tower (Mid-Columbia Manor) (WA 10)	WISAARD Property ID: 2124
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Figure 6. Digital rendering, view east, of the proposed river crossing, with LRT bridge along I-5 and the elevated onramp, showing proximity to Smith Tower (IBR Program, February 18, 2025).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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Figure 7. View of Smith Tower lobby entrance, looking east and showing a perimeter wall adjacent to the south surface parking lot (WillametteCRA, March 3, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Evergreen Hotel (WA 21)	WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The Evergreen Hotel (500 Main Street), view southwest (ARG, June 19, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Evergreen Hotel (WA 21)		WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Evergreen Hotel, an Italian Renaissance style hotel located at 500 Main Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the northwest corner of W 5th Street and Main Street, was listed in the National Register of Historic Places (NRHP) under Criterion A in 1979.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the Evergreen Hotel. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Evergreen Hotel (500 Main Street) is an Italian Renaissance style hotel in downtown Vancouver, Clark County, Washington (Figure 3). It is a five-story, concrete structure that is rectangular in plan. The base of the building is finished in a sandstone effect and the remainder of the structure is painted in a cream color, which is complemented by a red Spanish tile roof. At the second and fifth floor levels are marble balconies and ornamental marble window surrounds. At the fifth story, these window and balcony units are topped with round arch motifs and individual projecting roof forms clad with Spanish tile. The Main Street (east) elevation, which contains one of the building's two primary entrances, features a decorative parapet with a series of corbelled arches along the roofline. This elevation consists of six broad bays, three flanking each side of a centrally located entrance with a multilight transom and a suspended porch hood with decorative brackets (Figure 1). The building's second primary entrance is near the center of the 5th Street (south) elevation and features similar detailing (Figure 6). In the interior, the hotel features a red tile corridor with a main staircase, mezzanine, and elevator doors characterized by intricate grill patterns. There is also a lounge area with an interior balcony, a second-floor ballroom, hotel kitchen, dining room, and 65 sleeping rooms.

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Evergreen Hotel (WA 21)		WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington	

The Evergreen Hotel was listed in the NRHP in 1979 under Criterion A, at the local level of significance, in the areas of community planning and development and commerce. Designed by architects Tourt, Elliote, and Hummel, the property is significant as an example of an ambitious and highly successful community-wide project of the 1920s; until the construction of the Evergreen Hotel in 1928, there was no major hotel facility in Vancouver. For many years the establishment functioned as the social and business hub of the city, and it remains the oldest surviving hotel building in the city today. It is currently used as an assisted living facility.

The period of significance for the property is defined as 1928, the year of the building's construction. The hotel has not undergone any major alterations and retains all of its character-defining features, including its central downtown location, two primary entrances with six broad bays, marble balconies, arched motifs, sandstone style finish, projecting roof forms clad in Spanish tile, and expansive interior spaces with a large staircase and mezzanine. Overall, the property retains integrity of location, materials, workmanship, feeling, and association; however, its integrity of design has been slightly diminished by the infill of several exterior bays, and its integrity of setting has been diminished by the surrounding development of downtown Vancouver after the period of significance. Nonetheless, the building continues to retain enough integrity to convey its historic significance as a resource listed in the NRHP. The identified boundary of the NRHP-listed property coincides with the tax lot boundary, which is contiguous with the building footprint (Figure 4).

ALTERNATIVES CONSIDERED

Because the Evergreen Hotel is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-listed Evergreen Hotel, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have an effect on the NRHP-listed Evergreen Hotel, but that effect is not anticipated to be adverse. Program activities adjacent to the property would consist of improvements to the intersection of Main Street and E 5th Street, within existing right of way at the southeast corner of the property. Additional activities located near the property would include the removal of an at-grade ramp connecting SR 14

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westbound to I-5 southbound and the construction of a new, elevated ramp and a new bridge supporting LRT; both of these structures would be constructed to the south of the Evergreen Hotel and would be clearly visible from the property (Figures 5 and 7). The elevated ramp, in particular, would come within approximately 50 feet of the tax lot boundary, which is the identified boundary for the NRHP-listed property.

While Program activities would not require any permanent acquisitions from the Evergreen Hotel property, the improvements to the intersection of Main Street and E 5th Street are anticipated to require a temporary construction easement along the property's southern boundary. Construction activities would not affect the Evergreen Hotel building and would not alter any of its character-defining features, but the primary entrance in the south elevation would potentially be rendered inaccessible during construction. However, the building's other primary entrance, in the east elevation, would remain unobstructed and continue to function as normal. The east elevation is larger and more highly ornamented than the south elevation, and it faces a more intact street grid; consequently, the entrance on this elevation may be considered more important to the Evergreen Hotel's ability to convey its significant development history. As the east entrance would remain accessible during construction, the building would retain its ability to convey its significance during construction despite the temporary obstruction of the entrance on the south elevation. It is also anticipated that the entrance on the south elevation would be returned to regular use following the conclusion of construction activities.

Program activities would change the current setting of the Evergreen Hotel by constructing infrastructure improvements, including the elevated ramp, near the southern property boundary. However, the property's integrity of setting has already been considerably diminished since the end of its period of significance in 1928, principally by the construction of I-5 in the 1950s. The area to the south of the property, where the new improvements would be constructed, no longer reflects the historic street grid and does not contain any resources dating to the property's period of significance. The improvements would not alter the extant street grid or the character or design of buildings and structures to the north, east, or west of the property, and they would not introduce new visual intrusions in these areas. Overall, the improvements would not affect the Evergreen Hotel's ability to convey its significant development history or its role in the development of downtown Vancouver. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the introduction of new atmospheric and audible intrusions would not diminish any character-defining features of the property.

In conclusion, the Modified LPA would not diminish the Evergreen Hotel's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not reduce the property's ability to convey its significance under Criterion A. Despite the imposition of a temporary construction easement and construction of new, major infrastructure improvements to the south of the property, the Evergreen Hotel would maintain its ability to convey its association with the city's 1920s-era downtown development. Therefore, it is anticipated that the Modified LPA would have No Adverse Effect on the NRHP-listed property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-listed Evergreen Hotel.

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Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington	

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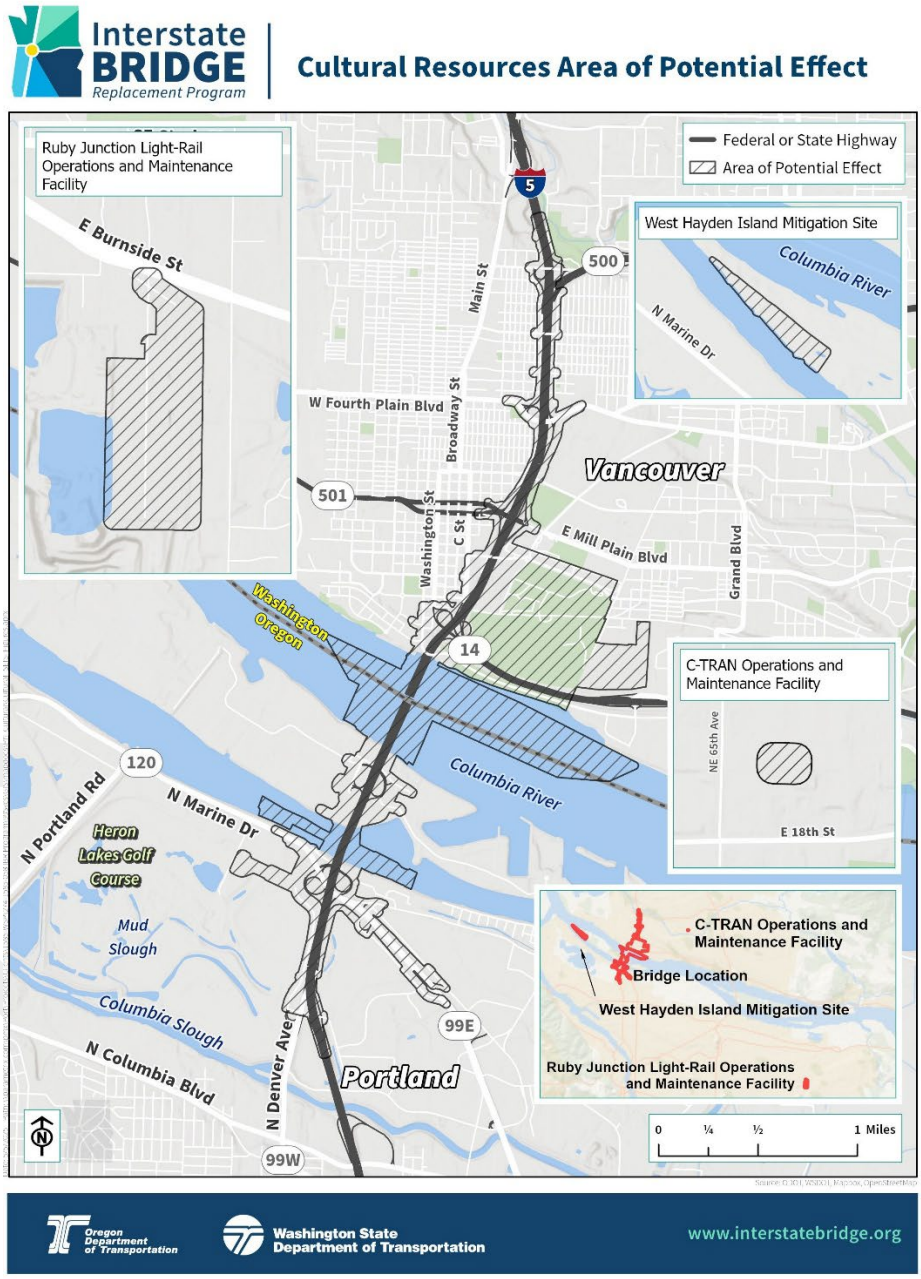


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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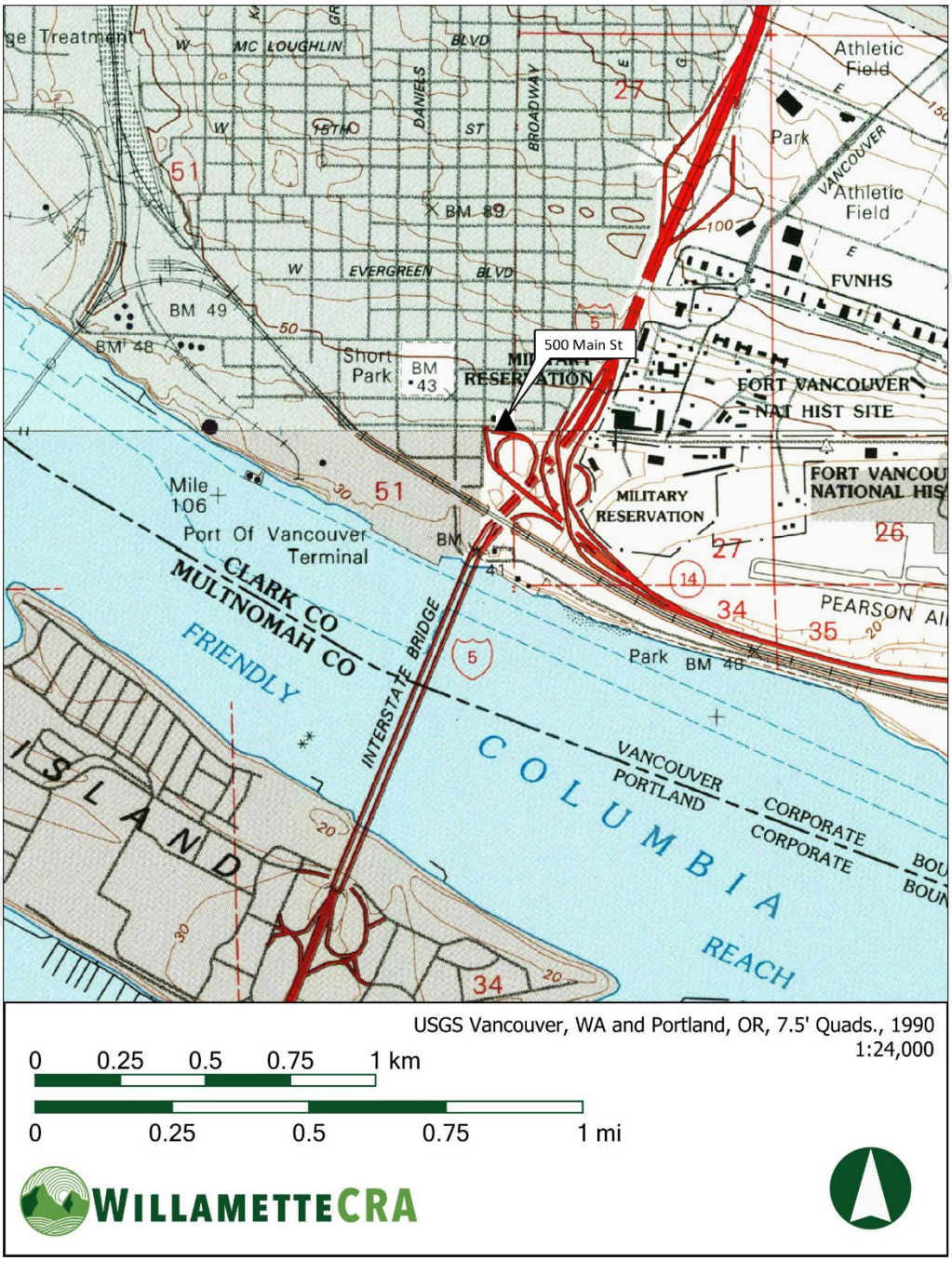


Figure 3. Location map of Evergreen Hotel (500 Main Street), Vancouver, Clark County, Washington.

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Property Name: Evergreen Hotel (WA 21)		WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington	

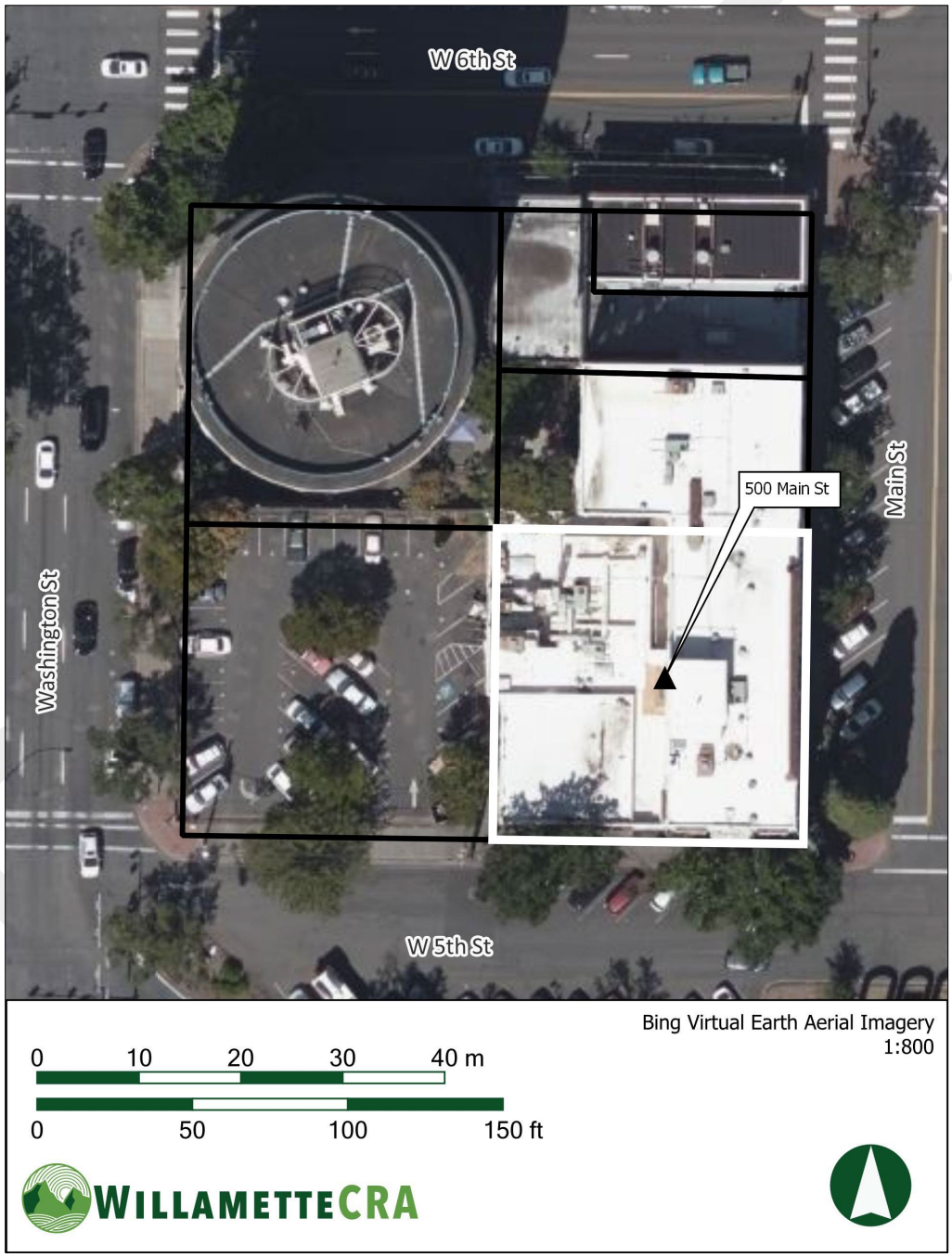


Figure 4. Aerial map of map of Evergreen Hotel (500 Main Street), showing the identified boundary of the NRHP-listed resource in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Evergreen Hotel (WA 21)		WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington	

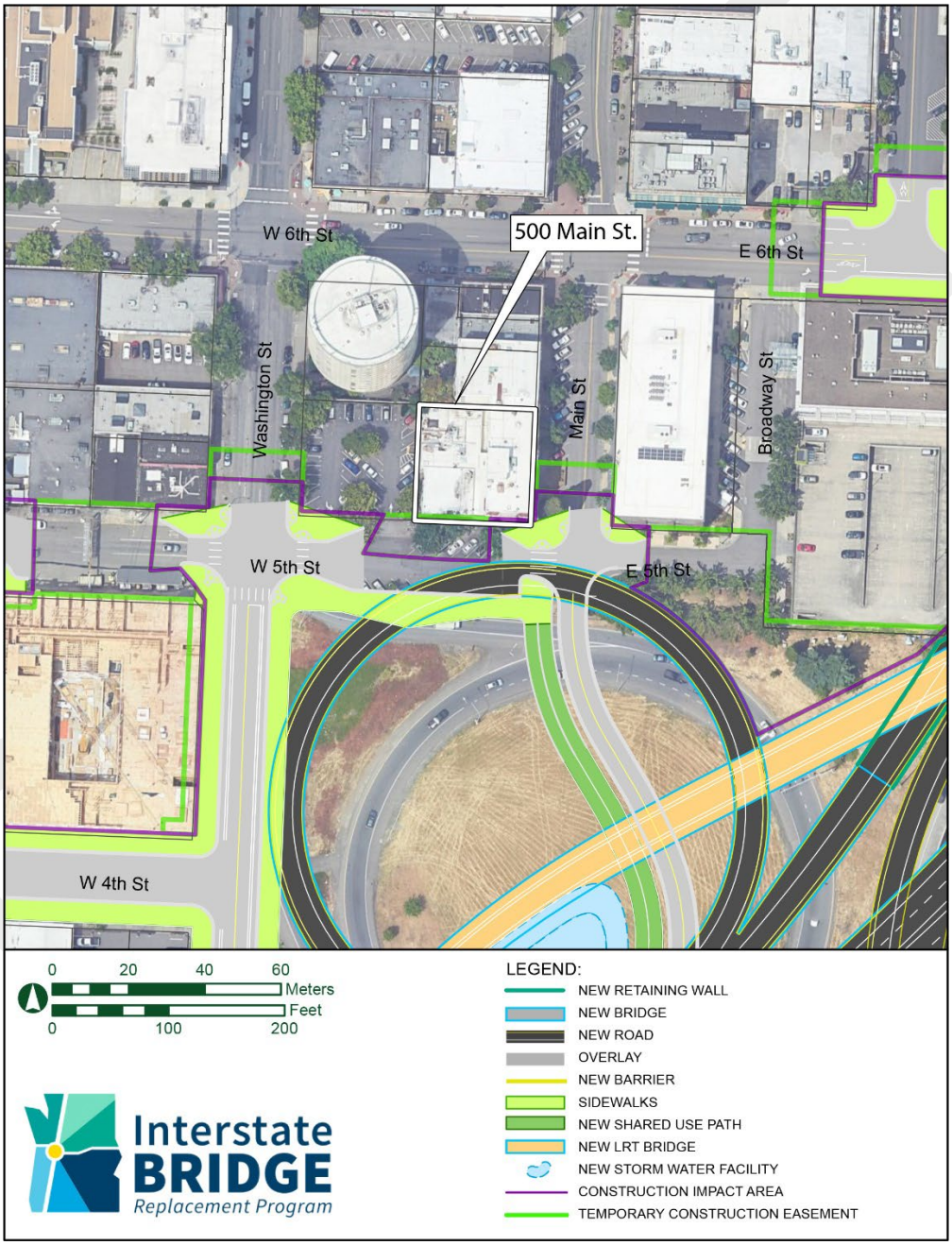


Figure 5. Aerial map showing the proximity of the Modified LPA to the Evergreen Hotel (500 Main Street, boundary outlined in white), including elevated ramp and improvements at the intersection of E 5th and Main Streets in Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Property Name: Evergreen Hotel (WA 21)	WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington



Figure 6. View of Evergreen Hotel's south façade, facing northeast (ARG, June 19, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Evergreen Hotel (WA 21)		WISAARD Property ID: 20430
Street Address: 500 Main Street	City, County, State: Vancouver, Clark County, Washington	



Figure 7. View south from the Evergreen Hotel, toward existing at-grade ramp where proposed elevated ramp and other infrastructure improvements would occur (ARG, June 19, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: U.S. National Bank Building (WA 29)	WISAARD Property ID: 20436
Street Address: 601–603 Main Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. U.S. National Bank Building (601–603 Main Street), view northeast (ARG, June 19, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: U.S. National Bank Building (WA 29)		WISAARD Property ID: 20436
Street Address: 601–603 Main Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the U.S. National Bank Building, a Renaissance and Classical Revival style commercial building located at 601–603 Main Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the northeast corner of E 6th Street and Main Street, was listed in the National Register of Historic Places (NRHP) under Criterion C in 1984.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the U.S. National Bank Building. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: U.S. National Bank Building (WA 29)		WISAARD Property ID: 20436
Street Address: 601–603 Main Street	City, County, State: Vancouver, Clark County, Washington	

highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The U.S. National Bank Building (601–603 Main Street) was constructed in 1912 in downtown Vancouver, Clark County, Washington (Figure 3). It is a five-story, steel-framed commercial building with Renaissance and Classical Revival style ornamentation. The exterior is clad in cream-colored brick with cast stone and terra cotta decoration, including rusticated pilasters at the corners of the building (imitating quoins) and a projecting cornice with dentils, modillions, antefixes, and bead and reel molding (Figure 6). The west (principal) elevation is divided into three bays and the south elevation is divided into five bays, all defined by rusticated pilasters with cast stone capitals and bases that rest on granite pedestals; the north and east elevations adjoin other neighboring buildings and a fenestrated but otherwise unornamented. The primary entrance is recessed at the center of the west elevation and features a cornice of cast stone; this cornice is contiguous with a belt course that wraps around the west and south elevations, visually dividing the base from the upper floors. Attached to a wrought iron rail above the entry on the second floor is a cartouche with the U.S. National Bank emblem. Other fenestration includes two storefront entrances on the west elevation, flanking the primary entrance, and one storefront entrance at the east side of the south façade; and one-over-one wood sash windows, with cast stone tiles on the windowsills and corbeled brick spandrel panels separating those at the second, third, and fourth floors. The attic floor is divided from the floor below by the second cast stone beltcourse. The interior of the building includes a small lobby with a

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: U.S. National Bank Building (WA 29)		WISAARD Property ID: 20436
Street Address: 601–603 Main Street	City, County, State: Vancouver, Clark County, Washington	

tiled floor and marble baseboard and wainscot; paneled half-glass office doors with transoms; and molded wood trim around windows and doors.

The U.S. National Bank Building was listed in the NRHP in 1984 under Criterion C, at the local level of significance, in the area of architecture. The building is a notable example of early twentieth century commercial design in Vancouver, and it is also significant for being the city's earliest large commercial structure. The bank is an attractively detailed Commercial Style building and is one of the most architecturally distinguished structures in Vancouver's central business district. Its character-defining features include its visually delineated storefront base, simple repetitive office stories, projecting piers accentuating the vertical emphasis of the design, and an attic story with cornice.

The period of significance for the property is defined as 1912, the year of the building's construction. The building has experienced only minor alterations since its construction; alterations to the west façade, for example, are limited to the replacement of original windows and doors with aluminum frames. Overall, the property retains integrity of location, design, materials, workmanship, feeling, and association; however, its integrity of setting has been somewhat diminished by surrounding development of downtown Vancouver after the period of significance. Nonetheless, the building continues to retain enough integrity to convey its historic significance as a resource listed in the NRHP. Its NRHP boundary coincides with the tax lot, which is contiguous with the building footprint (Figure 4).

ALTERNATIVES CONSIDERED

Because the U.S. National Bank Building is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-listed U.S. National Bank Building, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-listed U.S. National Bank Building, regardless of selected design options. Program activities within the vicinity of the property would include road

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improvements near the intersection of E 6th Street and Broadway Street, located at the southeast corner of the block containing the U.S. National Bank Building but not adjacent to the property itself (Figure 5). Additional road improvements and the relocation of a bridge loop ramp would occur one block south of the building. None of the proposed activities would require new right of way from the U.S. National Bank Building property, and they would be physically separated from the property by intervening streets and parcels containing commercial buildings or surface parking lots. Improvements would be constructed approximately 300 feet south and 200 feet east of the subject property, and the commercial building to the south and masonry perimeter wall of the parking lot to the east would obscure them from view of the south and east façades of the U.S. National Bank Building.

While the proposed loop ramp relocation would be partially visible from the southwest corner of the U.S. National Bank Building, it would not have an effect on any of the property's character-defining features—including its visually delineated storefront base, simple repetitive office stories, and attic story with cornice—or any of the aspects of setting that enable the property to convey its significance under Criterion C. The property's design and materials would remain intact and unaltered, and its location would be unchanged by Program activities. The commercial character of the neighborhood to the north, west, and south would also remain unchanged, and so the undertaking would not inhibit the property's ability to convey its significant development history. Furthermore, because the U.S. National Bank Building does not rely upon a quiet setting to convey its significance, the introduction of new atmospheric and audible intrusions would not diminish any character-defining features of the property.

In conclusion, the Modified LPA would not diminish the U.S. National Bank Building's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criterion C. The property would maintain its ability to convey its association as the earliest large commercial structure in downtown Vancouver and as an intact example of the Commercial Style of architecture. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-listed U.S. National Bank Building.

SOURCES/BIBLIOGRAPHY

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

Tess, John M. "U.S. National Bank Building." National Register of Historic Places Nomination Form. Washington, D.C.: U.S. Department of the Interior, National Park Service, 1984.

DRAFT

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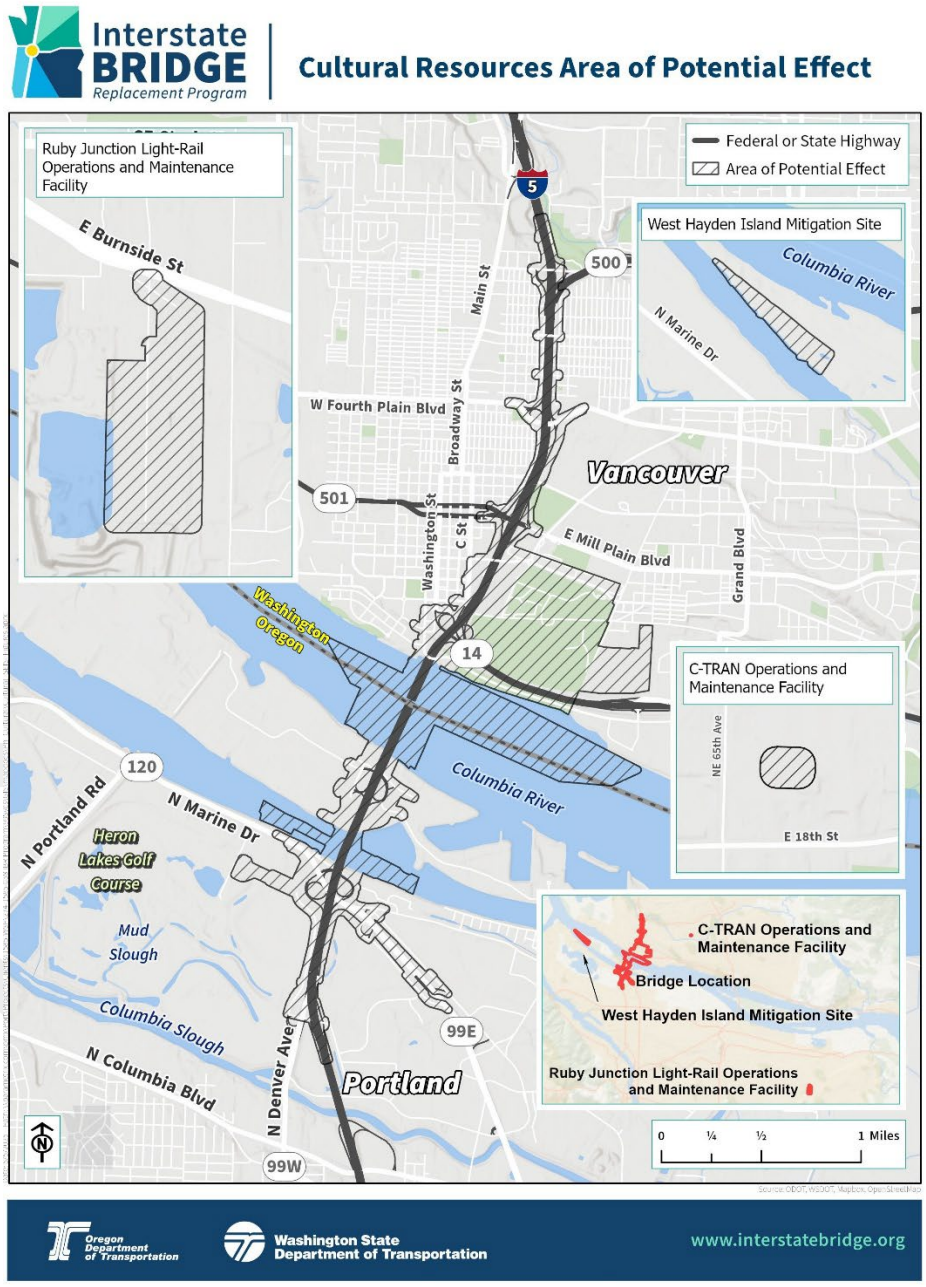


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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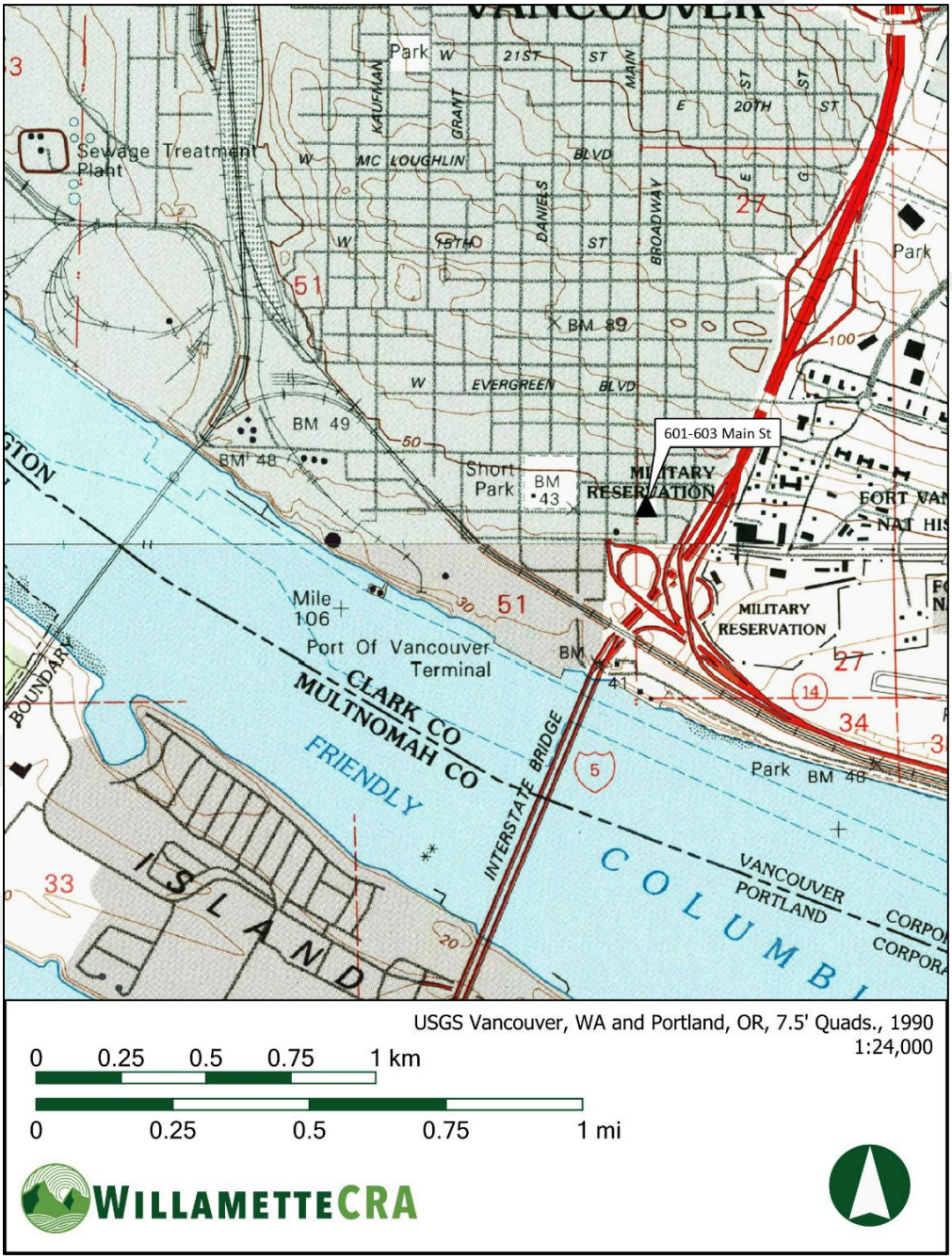


Figure 3. Location map of U.S. National Bank Building (601–603 Main Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 4. Aerial map of map of U.S. National Bank Building (601–603 Main Street), showing the NRHP boundary in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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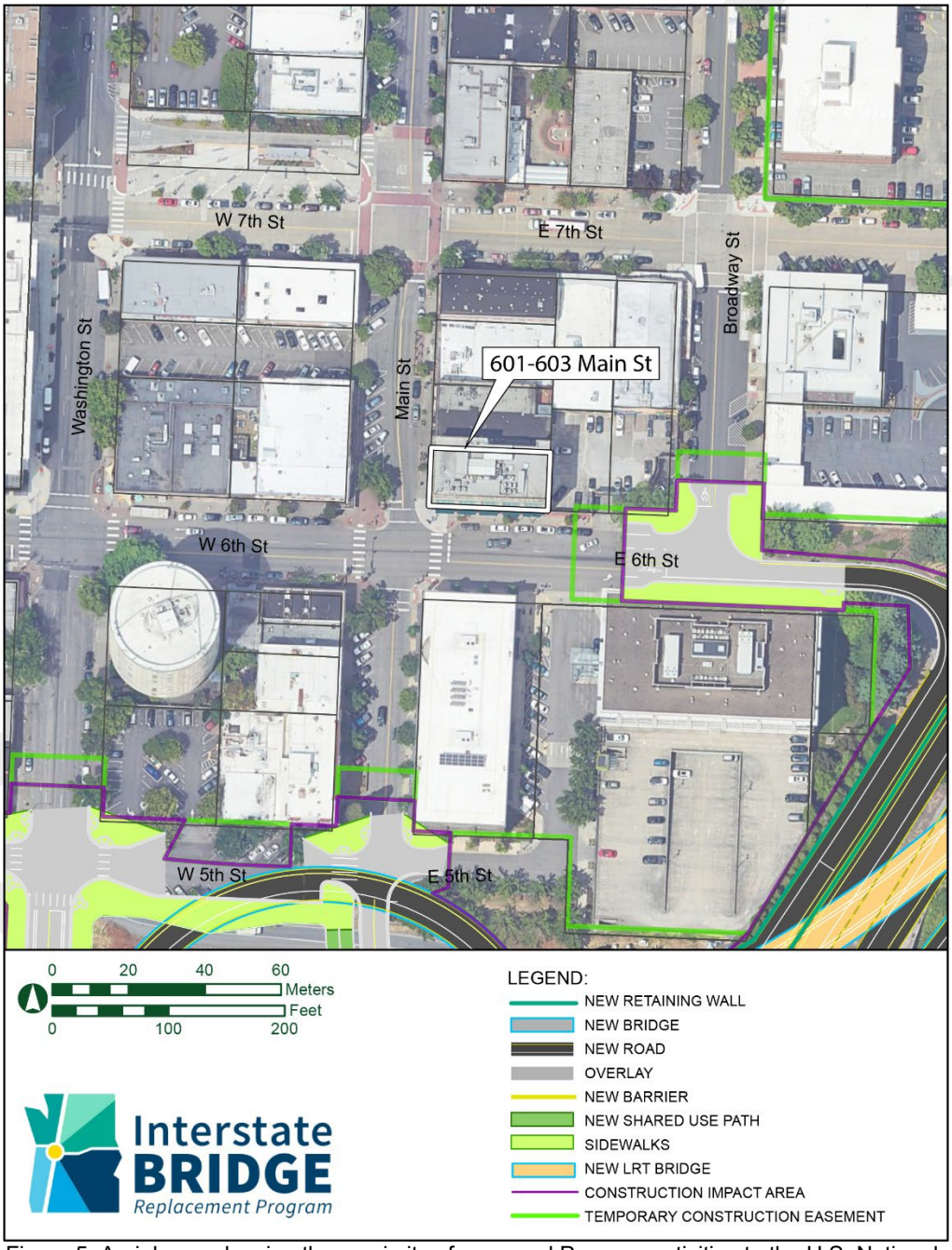


Figure 5. Aerial map showing the proximity of proposed Program activities to the U.S. National Bank Building (601–603 Main Street, NRHP boundary outlined in white).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 6. U.S. National Bank Building (601–603 Main Street), view northwest, showing parking lot with perimeter walls to the east (ARG, June 19, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Porter House (WA 61)	WISAARD Property ID: 89120
Street Address: 3000 K Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The Porter House (3000 K Street), east elevation, view west (WillametteCRA, March 8, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Porter House (WA 61)		WISAARD Property ID: 89120
Street Address: 3000 K Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Porter House, a Craftsman bungalow located at 3000 K Street in the Rose Village neighborhood of Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the west side of K Street between E 30th Street and E 31st Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the Porter House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Porter House (3000 K Street) is a ca. 1912 Craftsman bungalow in the Rose Village neighborhood of Vancouver, Clark County, Washington (Figure 3). The building has a T-shaped plan and a concrete foundation with a partial basement. The wood-framed, exterior walls rise one and half stories to a low-pitched, side-gabled roof with wide, overhanging eaves with exposed purlins and a wide fascia under the gable. A wide, raised porch with a front gabled roof is centered in the east (principal) elevation, intersecting with the primary side-gabled roof form and sheltering the primary entrance to the building. The exterior walls are clad in wood clapboard siding, punctuated by varied fenestration including double-hung wood windows, an art glass window in a projecting volume on the south elevation, and 12-light fixed wood windows in the gable peaks of the north, south, and east elevations. The property also includes a detached garage, a terraced stone retaining wall, a chain-link fence, and a wood fence (Figure 6).

The Porter House is eligible for inclusion in the NRHP under Criterion C, at the local level of significance and in the area of architecture. The property is eligible under Criterion C as a representative example of a Craftsman-style bungalow adapted to the Northwest climate. The residence's character-defining features include its T-

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shaped plan; low-pitched, gabled roof; raised partial front porch; wood clapboard siding; wood windows; and decorative exposed purlins and beams.

The period of significance under Criterion C is limited to 1912, the year of the building's construction. A ca. 1950 rear addition has slightly diminished the property's integrity of materials and design, and the construction of I-5 in the early 1950s has moderately reduced its integrity of setting. However, the property retains a high degree of integrity of location, workmanship, feeling, and association. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot, which is bounded by an adjacent parcel to the north, K Street to the east, E 30th Street to the south, and an alley to the west (Figure 4). Within this boundary, only the bungalow is contributing to the property's significance; the garage, retaining wall, and fences were added to the property after the end of the period of significance and are noncontributing.

ALTERNATIVES CONSIDERED

Because the Porter House has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Porter House, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would construct additional interstate lanes to the west of the Porter House and new, intervening retaining and noise walls along the western edge of the alley separating the property from I-5. Construction of the retaining wall would require the imposition of a subsurface easement on the western portion of the Porter House property, beneath the yard to the rear of the dwelling's footprint, for the installation of subterranean tie-back anchors. The noise wall would replace an existing noise wall in approximately the same location. Surface-level construction activities for the interstate expansion and retaining and noise walls are not anticipated to enter the tax lot, which is the identified boundary of the NRHP-eligible property. Ultimately, no features of the Porter House would be altered from their current conditions as a result of the Program.

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Program activities would change the current setting of the Porter House by constructing infrastructure improvements near the western property boundary. However, the property's integrity of setting has already been considerably diminished since the end of its period of significance in 1951, principally by the completion of I-5. The completion of the interstate permanently divided the single-family residential neighborhood surrounding the Porter House and introduced significant visual, atmospheric, and audible intrusions to the west of the property. While the Modified LPA would alter the existing interstate and its associated right of way, the Program would not remove or obscure those setting features that remain consistent with the property's period of significance. In particular, it would not alter the single-family residential character of the neighborhood to the north, east, and south of the Porter House, and it would not affect the property's ability to convey its significant development history. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would have an effect on the NRHP-eligible Porter House, but that effect would not be adverse. The Program would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association in a manner that would diminish its ability to convey its significance under Criterion C; the property would maintain its ability to convey an association with the Craftsman style, despite subterranean activities and the nearby infrastructure improvements. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the Program would have No Adverse Effect on the NRHP-eligible Porter House.

SOURCES/BIBLIOGRAPHY

Boyle, Brigid, and Emily Steele. "Porter House (WA 61)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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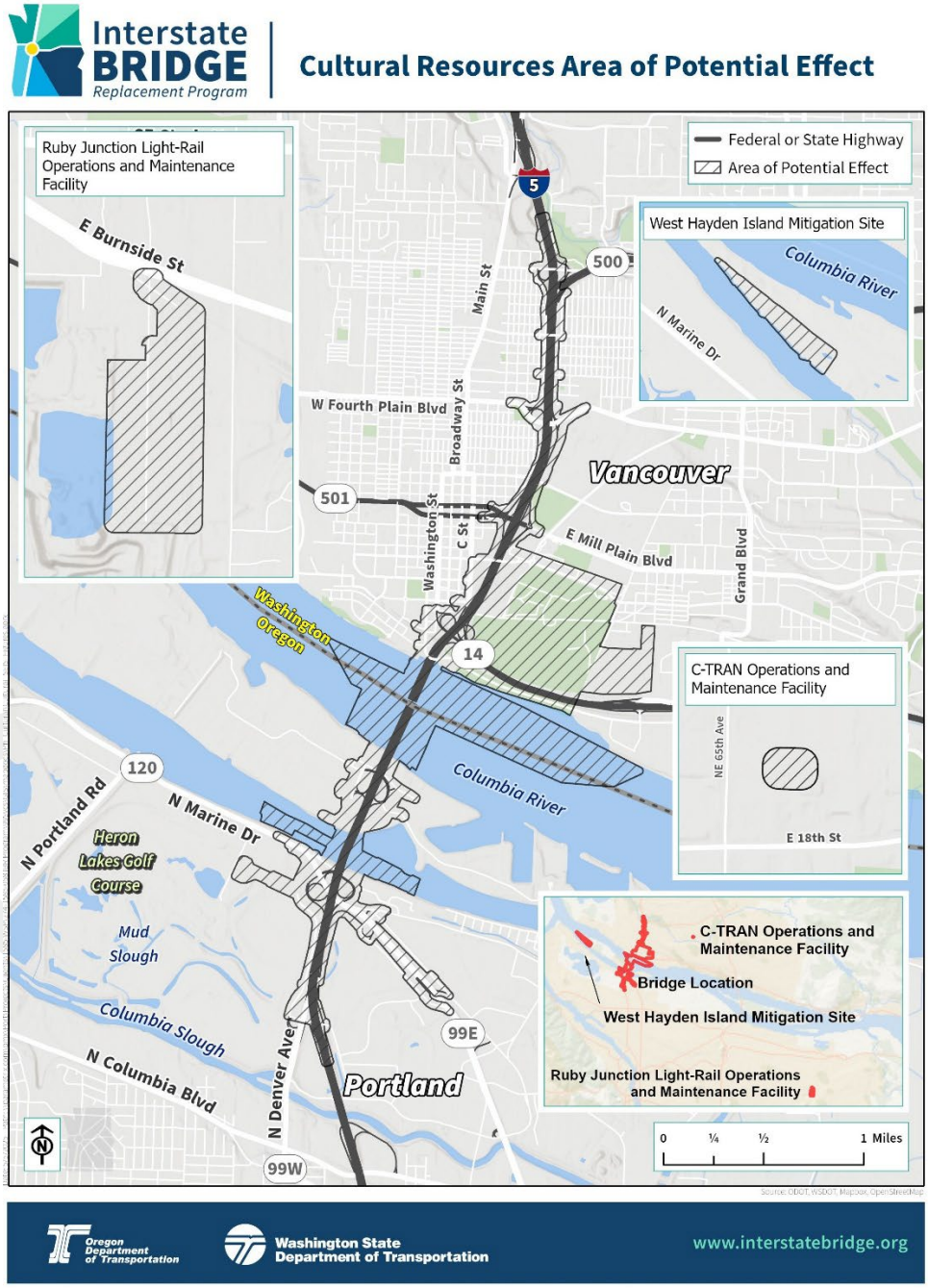


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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Figure 3. Location map of the Porter House (3000 K Street), Vancouver, Clark County, Washington.

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Figure 4. Aerial map of the Porter House (3000 K Street), showing the identified boundary of the NRHP-eligible property boundary in white.

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Figure 5. Aerial map showing the proximity of proposed Program activities to the Porter House (3000 K Street, the identified boundary of which is outlined in white), including retaining and noise walls and subsurface easement.

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Figure 6. West and south elevations of the Porter House (3000 K Street), view northeast (WillametteCRA, March 8, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Hall House (WA 62)	WISAARD Property ID: 25537
Street Address: 903 East 31st Street	City, County, State: Vancouver, Clark, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Hall House (903 E 31st Street), north elevation, view southwest (WillametteCRA, March 8, 2022).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Charles W. and Margaret B. Hall House, a Craftsman bungalow located at 903 E 31st Street in the Shumway neighborhood of Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southeast corner of E 31st Street and I Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the Hall House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Charles W. and Margaret B. Hall House (903 E 31st Street) is a Craftsman bungalow in the Shumway neighborhood of Vancouver, Clark County, Washington (Figure 3). Constructed in 1912, the building has a rectangular plan and a full concrete basement. Its wood-framed exterior walls rise two stories in height to a front-gabled roof with a deep overhang, wide wood bargeboards, and wood knee braces. The north elevation also features a prominent double-intersecting front-gabled wall dormer, and the east elevation features a front-gabled porch that shelters the principal entrance (Figure 6). The exterior walls are clad in wood clapboard siding, punctuated by varied fenestration including wood sash casement windows, wood sash cottage windows, wood sash double-hung windows, and an angled bay window. The property also includes a wood-framed, detached garage with clapboard siding at the southwest corner of the tax lot and trees along the east, south, and west tax lot boundaries.

The Hall House is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the area of architecture as a noteworthy example of a largescale Craftsman bungalow and as a highly visible and distinctive landmark in the Shumway neighborhood. The residence's character-defining features include its rectangular plan, intersecting gabled roof forms, wood clapboard siding, projecting east porch, angled bay

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window, wood knee braces, and varied arrangement of wood sash windows. Additional character-defining features on the property include the detached garage and low concrete wall that defines the edge of the central walkway and public sidewalks.

The period of significance under Criterion C, which is tied to the bungalow's construction, is limited to 1912. Although the construction of I-5 in the early 1950s has moderately reduced its integrity of setting, the Hall House generally retains integrity of location, design, materials, workmanship, feeling, and association to the period of significance. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot, which is bounded by E 31st Street to the north, I-5 to the east, an adjacent tax lot to the south, and I Street to the west (Figure 4). Within the tax lot, both the bungalow and the detached garage are contributing to the property's significance. A fence along the west property line does not appear to date to the period of significance and is therefore considered noncontributing.

ALTERNATIVES CONSIDERED

Because the Hall House has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Hall House, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would construct additional interstate lanes to the east of the Hall House, on the opposite side of J Street, and new, intervening retaining and noise walls along the eastern edge of J Street. Construction of the retaining wall would require a subsurface easement on the eastern portion of the Hall House property, extending into the side yard but not beneath the dwelling's footprint, for the installation of subterranean tie-back anchors. The noise wall would replace an existing noise wall in approximately the same location. Surface-level construction activities for the interstate expansion and retaining and noise walls are not anticipated to enter the tax lot, which is the identified boundary of the NRHP-eligible property. It is anticipated that no features of the Hall House would be altered from their current conditions as a result of the undertaking.

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Program activities would change the current setting of the Hall House by constructing infrastructure improvements within view of the building. However, the property's integrity of setting has already been considerably diminished since the end of its period of significance in 1951, principally by the completion of I-5 during the mid-1950s. The interstate's construction permanently divided the single-family residential neighborhood surrounding the Hall House and introduced significant visual, atmospheric, and audible intrusions to the east of the property. While the Modified LPA would alter the existing interstate and its associated right of way, the undertaking would not remove or obscure those setting features that remain consistent with the property's period of significance. In particular, it would not alter the single-family residential character of the neighborhood to the north, west, and south of the Hall

House, and it would not affect the property's ability to convey its significant development history. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would have an effect on the NRHP-eligible Hall House, but that effect would not be adverse. The undertaking would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association in a manner that would diminish its ability to convey its significance under Criterion C; the property would maintain its ability to convey an association with the Craftsman style, despite subterranean activities and the nearby infrastructure improvements. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Hall House.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Hall House (WA 62)		WISAARD Property ID: 25537
Street Address: 903 East 31st Street	City, County, State: Vancouver, Clark, Washington	

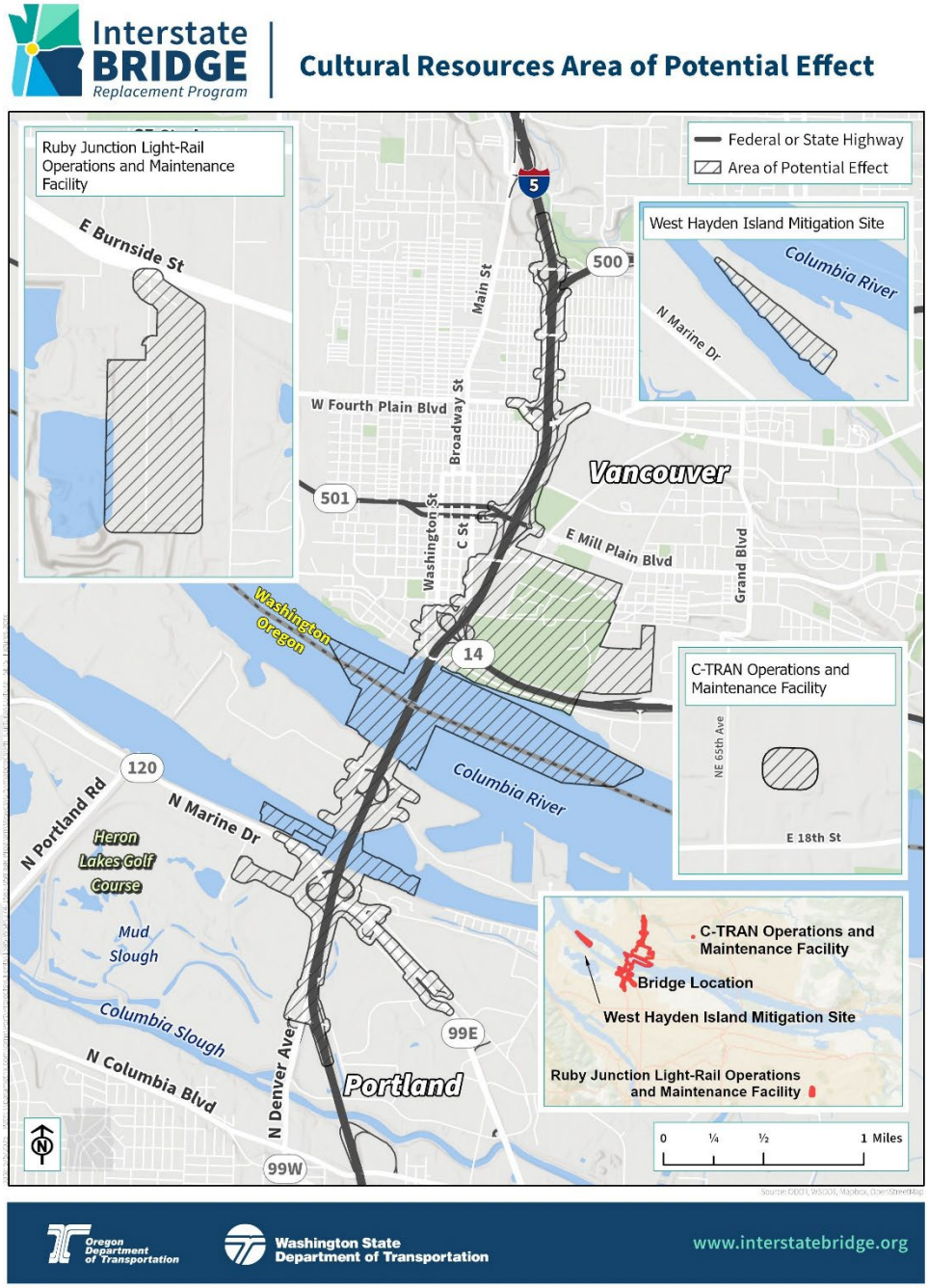


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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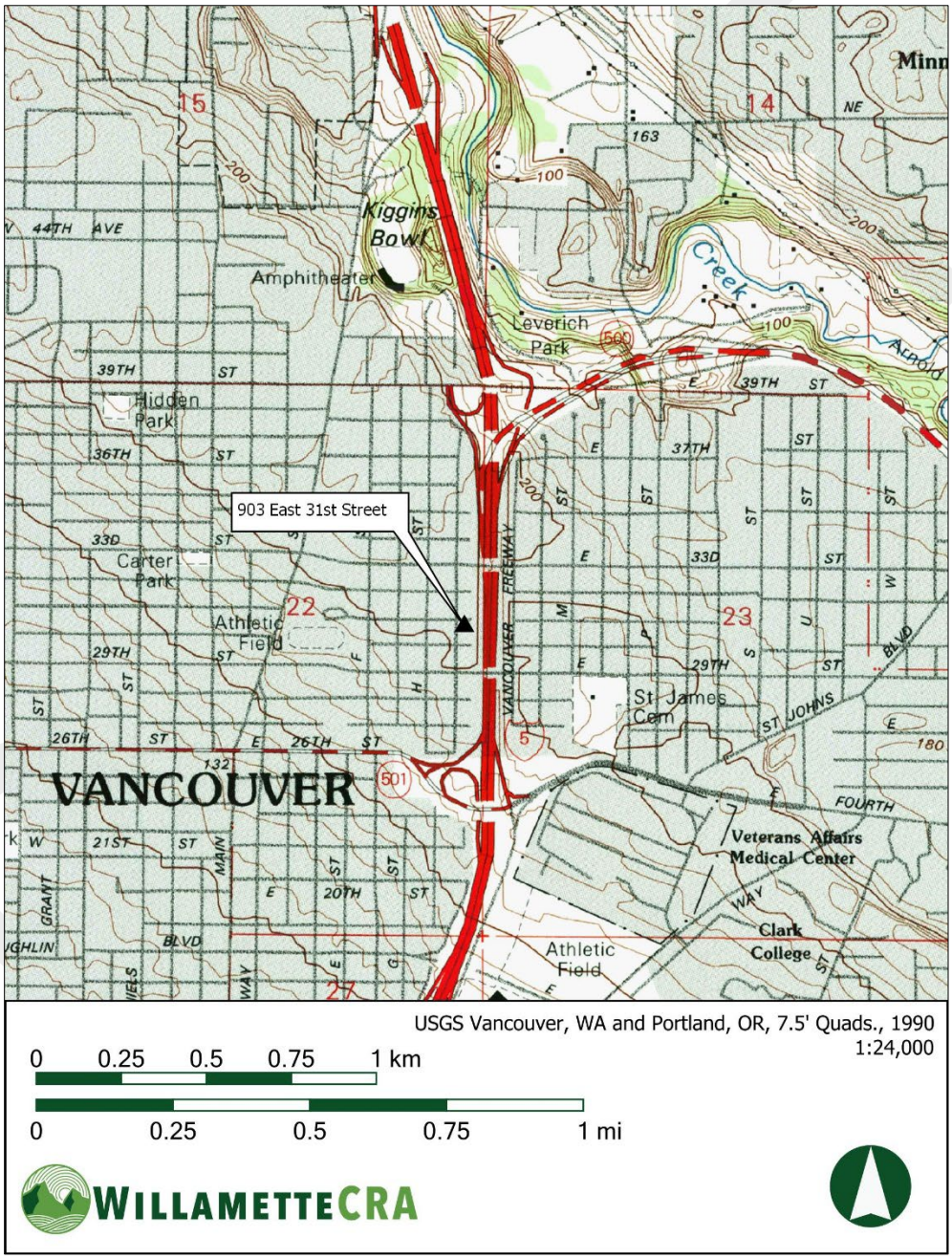


Figure 3. Location map of the Hall House (903 E 31st Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Hall House (WA 62)		WISAARD Property ID: 25537
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Figure 4. Aerial map of the Hall House (903 E 31st Street), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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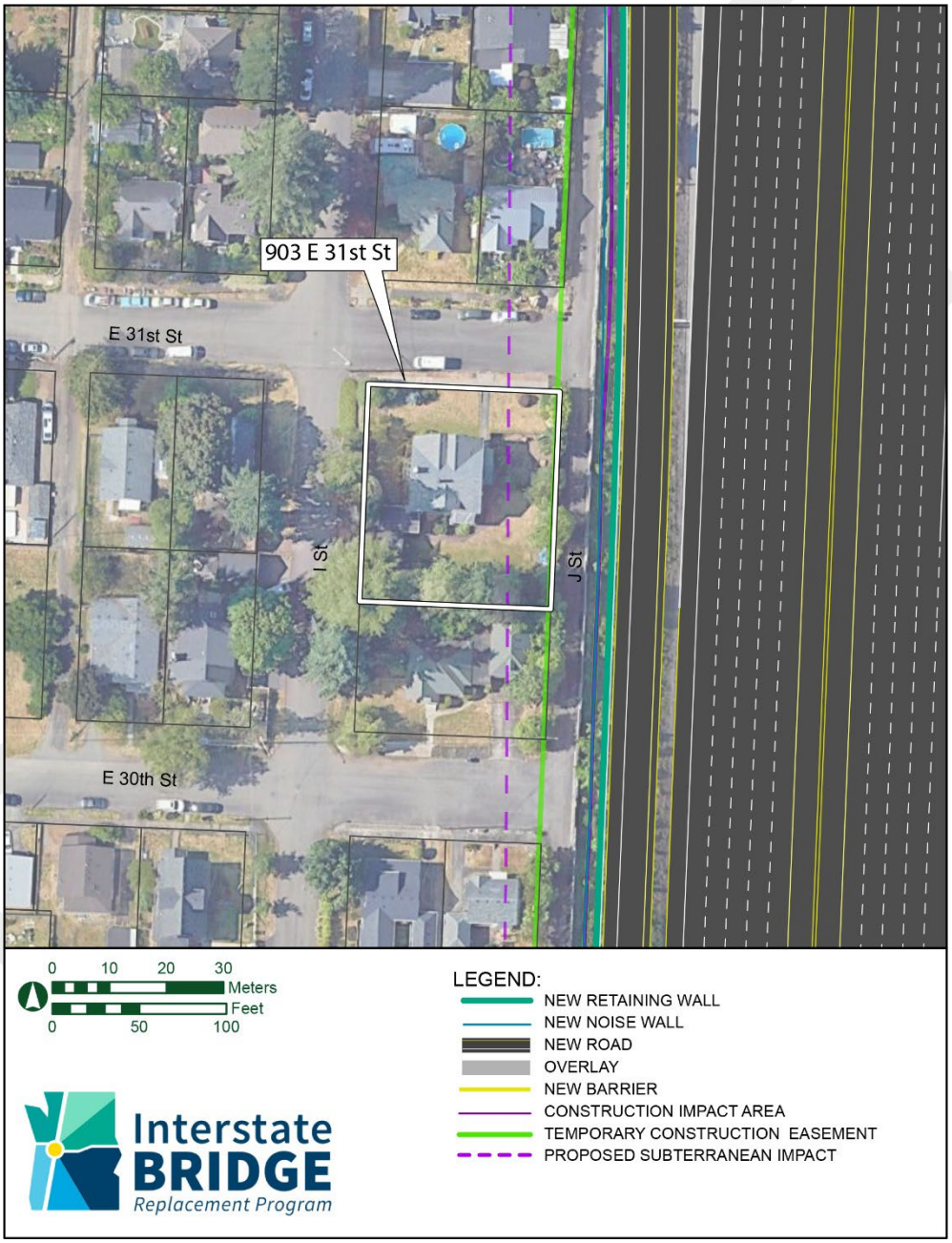


Figure 5. Aerial map showing the proximity of proposed Program activities to the Hall House (903 E 31st Street, the identified boundary of the NRHP-eligible property outlined in white), including retaining and noise walls and subsurface easement.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: 903 East 31st Street	City, County, State: Vancouver, Clark, Washington	



Figure 6. Hall House (903 E 31st Street), north and west elevations, view southeast (WillametteCRA, June 8, 2022).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Normandy Apartments (WA 149)	WISAARD Property ID: 33616, 89160
Street Address: 318 East 7th Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The Normandy Apartments (318 E 7th Street), view northeast (WillametteCRA, January 16, 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Normandy Apartments building, a Tudor Revival style, multi-family housing complex located at 318 E 7th Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is on the north side of E 7th Street between C Street and the Interstate 5 (I-5) right of way, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect on the Normandy Apartments. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through-lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers more space and time to merge, diverge and weave safely) in each direction. When all highway,

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configurations would provide 178 feet of vertical navigation clearance depending in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewlaks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Normandy Apartments building (318 E 7th Street) is a three-story, multi-family housing complex in Vancouver, Clark County, Washington (Figure 3). The footprint of the building is U-shaped and, at its maximum, measures approximately 110 feet long by 84 feet deep. The building is constructed atop a full, reinforced concrete basement and has a flat roof with a low parapet. Its principal elevation faces south onto E 7th Street, and the main entrance, which is marked by a projecting gable and decorative bargeboard, is set back in a central courtyard flanked by two residential wings. The elevation's façade is clad in stucco and decorated with Tudor Revival elements, including projecting bay windows on the upper two floors, topped by scalloped bargeboards and an M-shaped front-gabled roof, and supported below by decorative knee-brackets. The projecting bays of each wing and the central gable are stuccoed and decorated with half-timbering. On either side of the projecting bays are modified Chicago windows. All window units appear to be original wood sash cottage windows.

Between the two wings of the building's U-shaped footprint is a recessed courtyard and terraced concrete path that leads to the building's principal entry, which is enclosed within a three-sided porch. The walkway is surrounded by mature, ornamental vegetation. The main entrance is a full glass wood door flanked by eight-light

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sidelights topped by transoms. Above the ground floor, the east, west, north, and inner courtyard elevations are all "skintled" brick—irregular brick arrangements paired with weeping mortar joints, resulting in a textured wall effect. The west elevation is defined by three ground-floor entries—each a 15-light wooden door—into individual apartments. Fenestration on this elevation, as well as the rear north elevation, includes paired six-over-one double-hung wood sash windows, as well as single six-over-one and four-over-one double-hung wood sash windows.

The Normandy Apartments building is eligible for inclusion in the NRHP under Criteria A and C, at the local level of significance, in the areas of community planning and development and architecture. The building possesses a strong association with the interwar growth of Vancouver and is an excellent example of both an interwar multi-family apartment complex, as well as the application of the Tudor Revival style to a building other than a single-family dwelling. Its character-defining features include the building's U-shaped footprint and general massing; flat roof and parapet; projecting bay windows with scalloped bargeboards; skintled brick; half-timbering details; multilight wood windows; landscaped courtyard; and location in Vancouver's downtown commercial core.

The Normandy Apartments building's period of significance under Criteria A and C is 1928, the year that initial construction of the building was completed. Since this time, the Normandy Apartments building has been modified slightly. In 1960, after changes to the city streets impacted the circulation around the building, basement garages were removed from the eastern wing of the building and replaced with four additional apartments; additional changes include the addition of stucco over brick cladding as well as some window and door replacements. Overall, the Normandy Apartments building retains integrity of location, materials, workmanship, feeling, and association, and has slightly reduced integrity of design and setting. The identified boundary of the NRHP-eligible property is marked by the property boundary to the north, south, and east, and by the western edge of the building footprint to the west (Figure 4). Within this boundary, the apartment building and associated courtyard and landscaping are contributing to the property's significance. The boundary does not include the parking lot on the western portion of the building's tax lot, as it retains no features from the property's period of significance.

ALTERNATIVES CONSIDERED

Because the Normandy Apartments building has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Normandy Apartments building, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative therefore fails to meet the Program's Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would reconstruct and widen the I-5 right of way to the east of the Normandy Apartments. Related activities would include the construction of an elevated LRT alignment; a ramp connecting I-5 to SR 14; and noise and retaining walls immediately east of the building (Figure 5). These activities would require one long, narrow, permanent acquisition along the eastern property boundary. While these activities are not anticipated to alter the Normandy Apartments building itself or diminish its integrity of location, materials, workmanship, and design, they would considerably reduce the property's integrity of setting, feeling, and association in the following ways:

- New construction, including the proposed noise wall and elevated LRT alignment, would be located in close proximity to the apartment building; the noise wall, in particular, would be located approximately 5 feet from its southeast corner. This would considerably reduce the approximately 33-foot-wide buffer that currently separates the building from the western edge of the pavement for the I-5 offramp connecting to SR 14 (cf. Figure 4 and Figures 5-6). Furthermore, the proposed noise and retaining walls and elevated LRT alignment would be new intrusions, not replacing any preexisting elements of a similar design or function.

- The proposed elevated LRT alignment, which would rise to the approximate height of the apartment building, would visually overwhelm the property (Figure 7). The alignment would also increase audible effects at the Normandy Apartments from 69 dBA to an estimated 71 dBA. Both the current and estimated post-construction noise levels exceed the Washington State Department of Transportation's (WSDOT) definition of "an impact approaching" the threshold set by FHWA's Noise Abatement Criteria (NAC) for residential properties (67 dBA) and Section 4(f) sites (67 dBA).[2]

- The large trees currently screening the east side of the building from I-5 (Figure 4) would likely be removed for construction, eliminating the current visual barrier between the Normandy Apartments and I-5.

Overall, the undertaking would reduce the Normandy Apartments building's ability to convey its significant association with the interwar growth of downtown Vancouver by introducing these new, largescale infrastructure improvements within such close proximity to the building.

Under one of the Modified LPA's design options, the Program would additionally construct an LRT park-and-ride facility on the block immediately west of the Normandy Apartments. This option would require no additional right of way from the Normandy Apartments property and would not alter or otherwise affect any of the property's

[2] IBR Program, "Noise and Vibration Technical Report" (June 2025), 4-39.

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character-defining features. Although it would require the demolition of an existing building (703 Broadway Street) at the proposed LRT park and ride site, this existing building postdates the Normandy Apartments property's period of significance (1928), and its demolition and replacement would not affect the integrity of the NRHP-eligible property. However, the property's integrity would still be reduced by the reconstruction and widening of the I-5 corridor as described above.

Under another of the Modified LPA's design options, the Program would shift the I-5 mainline and ramps up to 40 feet to the west between SR 14 and Mill Plain Boulevard (Figure 6). These activities would require permanent acquisition of the Normandy Apartments property and the demolition of the apartment building and its associated landscaping. Under this option, no features dating to the property's period of significance or justifying its NRHP eligibility under Criteria A and C would remain following the completion of construction. In conclusion, the Modified LPA would result in an Adverse Effect to the Normandy Apartments. The Modified LPA without the option to shift the I-5 mainline and ramps to the west between SR 14 and Mill Plain Boulevard would result in an Adverse Effect due to the close proximity of proposed construction, including an elevated LRT alignment, and its consequent visual effects. These activities, which would occur regardless of the option to construct an LRT park-and-ride facility on the adjacent block, would reduce the apartment building's integrity of setting, feeling, and association to an extent that would impact the property's ability to convey its significant association with the interwar development of Vancouver, for which it has been determined NRHP-eligible under Criterion A. The Modified LPA's option to shift the I-5 mainline and ramps to the west between SR 14 and Mill Plain Boulevard would also result in an Adverse Effect to the Normandy Apartments. This option would require demolition of the apartment building, eliminating the property's character-defining features and integrity and rendering it ineligible for inclusion in the NRHP. The "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" and the "[p]hysical destruction of or damage to all or part of the property" are examples of adverse effects presented in 36 CFR 800.5(a)(2)(v) and 36 CFR 800.5(a)(2)(i), respectively. Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA would therefore have an Adverse Effect on the Normandy Apartments property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would affect the NRHP-eligible Normandy Apartments, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

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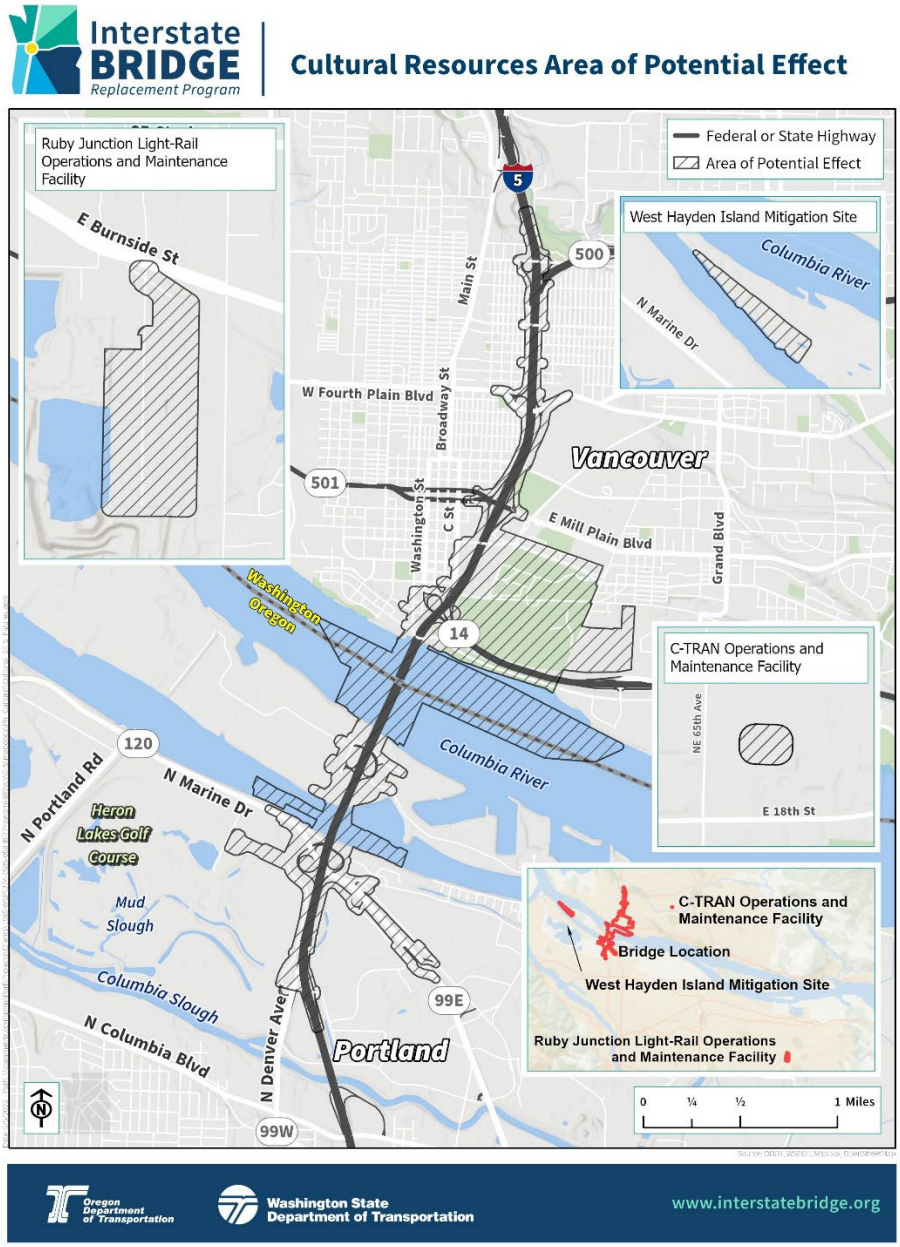


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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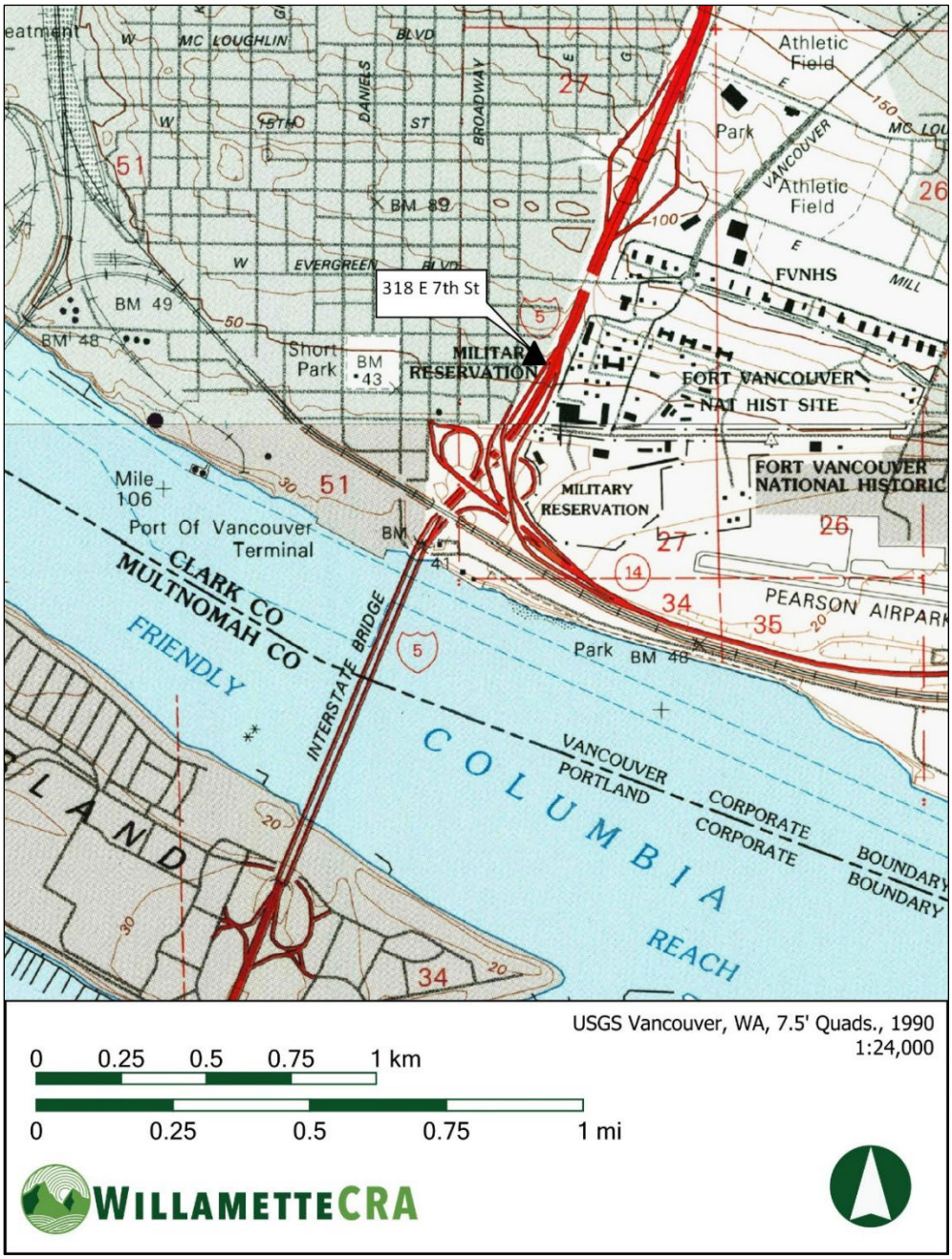


Figure 3. Location map of the Normandy Apartments (318 E 7th Street), Vancouver, Clark County, Washington.

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Figure 4. Aerial map of Normandy Apartments (318 E 7th Street), showing the identified boundary of the NRHP-eligible property in white.

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Property Name: Normandy Apartments (WA 149)	WISAARD Property ID: 33616, 89160
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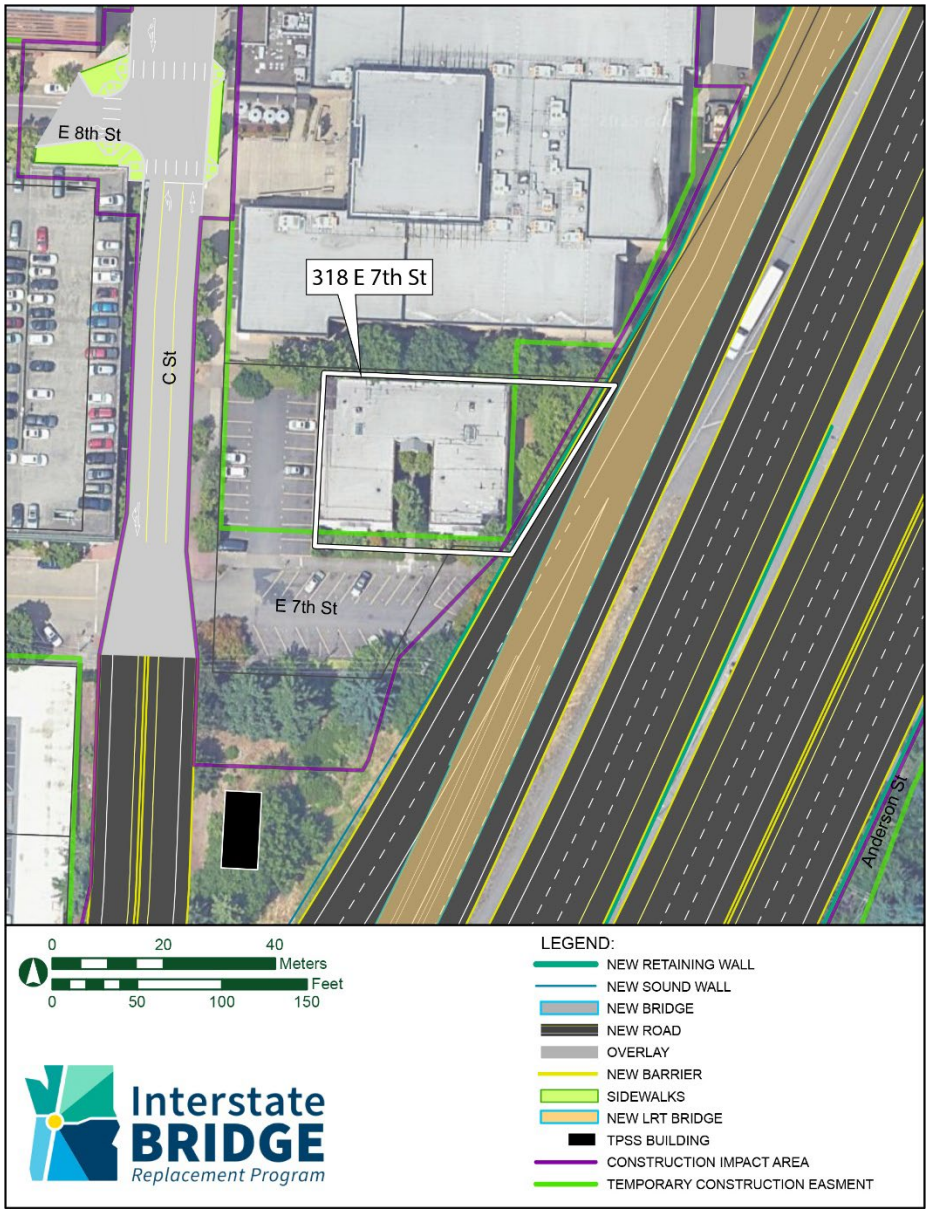


Figure 5. Aerial map showing the proximity of the Modified LPA (without the option to shift the I-5 mainline and ramps to the west between SR 14 and Mill Plain Boulevard) to the Normandy Apartments (318 E 7th Street), boundary shown in white.

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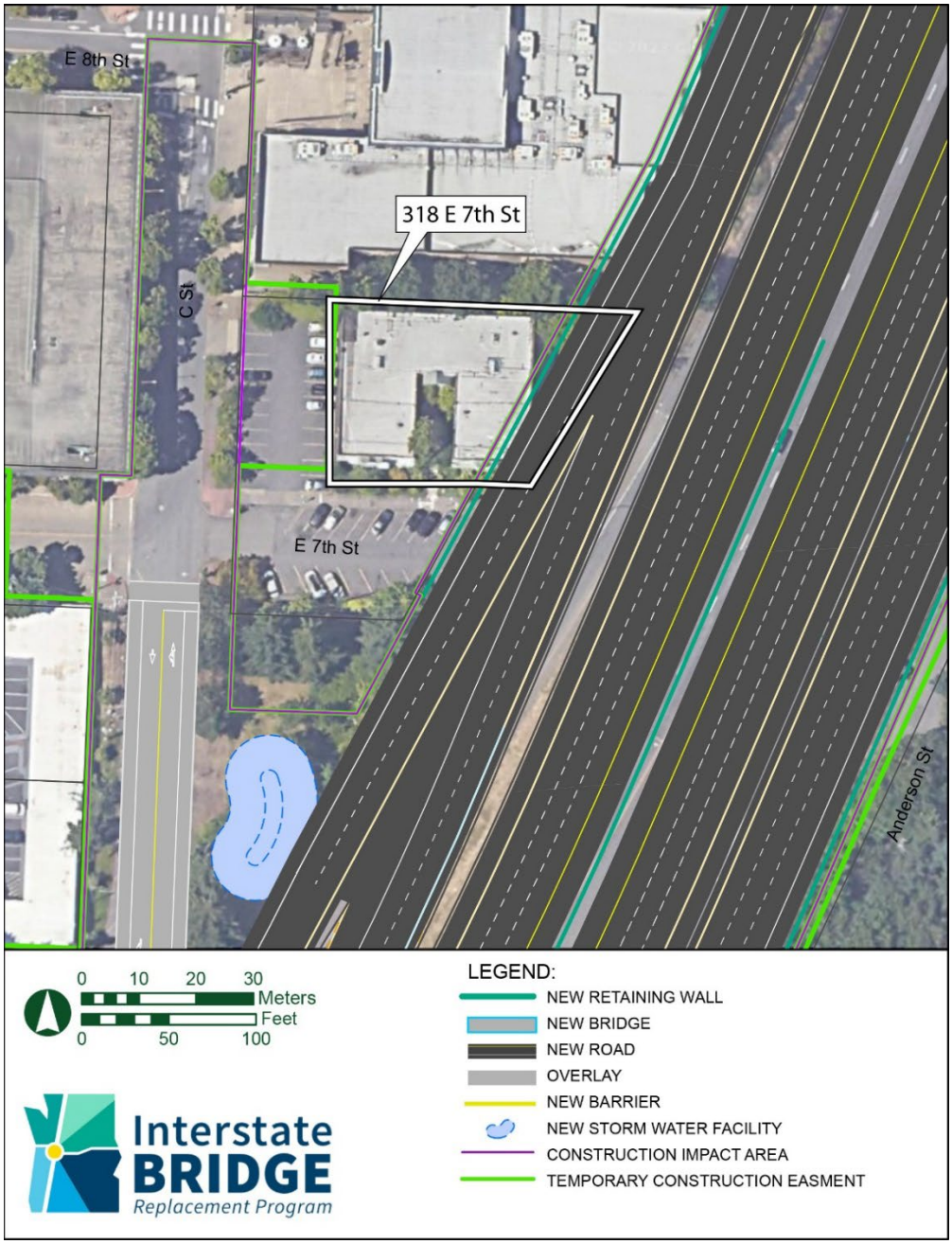


Figure 6. Aerial map showing the potential effects of the Modified LPA (with the option to shift the I-5 mainline and ramps to the west between SR 14 and Mill Plain Boulevard) on the Normandy Apartments (318 E 7th Street), boundary shown in white.

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Figure 7. Oblique aerial view depicting the Modified LPA without the option to shift the I-5 mainline to the west, overlaid on 2022 imagery of the Normandy Apartments and showing the proximity of the proposed elevated LRT alignment (in red) and other infrastructure improvements. View northeast (IBR/Bentley Systems, May 26, 2022; screenshot captured June 26, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: House of Providence/Providence Academy (WA 150)	WISAARD Property ID: 18827
Street Address: 400 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Primary building of the House of Providence and hedge along East Evergreen Boulevard, view facing north (WillametteCRA, 2021).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the House of Providence, a commercial property located at 400 East Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 1). The subject property was listed in the National Register of Historic Places (NRHP) in 1978. Updated documentation, including an evaluation of subsequent alterations to the property, was prepared in 2023 as part of the ongoing Program. This documentation recommended that the NRHP-listed House of Providence is significant under Criteria A, B, and C and revised the boundary proposed in 1978 to account for the loss of historic fabric at the edges of the property.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the House of Providence. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through-lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers more space and time to merge, diverge, and weave safely) in each direction. When all highway,

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configurations would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated in addition to the one auxiliary lane in each direction of I-5. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, an overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's Ruby Junction.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.
  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard is being evaluated.
  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

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- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The House of Providence (Providence Academy) is a commercial property located at 400 East Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 3). The property contains an ornate, three-story building that is clad in brick and shows the influence of the Georgian/Federal and French Colonial architectural styles. The building has a generally T-shaped plan and a roof form composed of numerous intersecting gables and dormers. At the center of the roof is a domed belltower surmounted by a lantern. Constructed in 1873-1874, the original building consisted of an east-west volume with a rear wing extending to the north. An addition constructed in 1891 extended the front portion of the building to the west. Most of the building's elevations are characterized by slightly projecting, gabled pavilions that alternate with open, balustraded galleries. The elevations are further articulated by brick pilasters and corbelled belt courses that frame the regularly spaced window openings.

Numerous outbuildings were also constructed on the grounds or moved to the grounds of the House of Providence to support the institution's operations. A barn, root cellar, convent building, and wellhouse have been removed, along with other buildings. The ca. 1887 laundry and 1910 boiler house and polygonal smokestack that stood northeast of the primary building were demolished in 2022. The House of Providence Kindergarten (also referred to as the gymnasium) to the east of the primary building is the only outbuilding associated with the House of Providence that remains, although it was constructed in 1943-1944 and therefore dates to after the property's initial period of development in the late nineteenth century. Additionally, early landscape features within the school grounds included lawns, garden plots, walks, and ornamental plantings in the Sacred Heart Garden. Over time, many of the landscape elements of the House of Providence grounds have

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been altered or removed, including garden plots and parterres. Paved parking lots were introduced across much of the original property during the second half of the twentieth century, and two parcels have been subdivided from the western portion of the parcel (along C Street) and are currently being redeveloped with five- and six-story mixed-use commercial and residential buildings. A 2023 renovation of the southeast parking lot resulted in the removal of some of the lawn on the south side of the Kindergarten, and consequent relocation of the south sidewalk. As of 2025, extant landscape elements include features of the c.1875 Sacred Heart Garden, which include the heart-shaped outer perimeter (now paved in asphalt), central north-south walkway, and circular central garden. Additional landscape elements that remain are areas of grass lawn, as well as a short hedge, concrete curb, and mortared stone gate posts along East Evergreen Boulevard that date to before the 1920s. The hedge and curb, however, remain intact along only the center of the historic grounds' southern boundary at East Evergreen Boulevard. The intact sections of the hedge and curb span a distance of approximately 250 feet (generally aligning with the primary House of Providence building), whereas they historically were present at East Evergreen Boulevard over a distance of more than 500 feet between C Street and the I-5 right-of-way. The western section of the hedge and curb was removed to accommodate construction of the mixed-use buildings along C Street, and the eastern section of these features was altered and ultimately removed to accommodate an expanded parking lot in the parcel's southeastern corner (Figures 7 and 8).

The House of Providence was listed in the NRHP in 1978 (NRHP Reference No. 78002738). The nomination form addressed the entire 7-acre site of the House of Providence, including the primary building and five outbuildings that remained at the time of listing: the boiler house, laundry, wellhouse, Kindergarten (at that time used as a school), and restaurant. The nomination form also briefly described extant landscape elements, specifically vegetation and the heart-shaped walk that approaches the primary entrance. The 1978 NRHP nomination did not specify the significance criteria under which the property was listed but did identify several areas of significance, including Architecture, Education, Exploration/Settlement, Religion, and Social/Humanitarian. These areas of significance generally correspond to Criteria A and C. Accordingly, the nomination form provides a detailed discussion of the history of the Sisters of Providence and their work in Washington, and it also notes that the property has exceptional architectural importance in the Pacific Northwest. At the time of its NRHP listing, the boundary of the property was defined as the historic extent of the grounds, corresponding to the city block bounded by 12th Street to the north, C Street to the west, East Evergreen Boulevard to the south, and Reserve Street and the I-5 right of way to the east.

Furthermore, the 1978 nomination did not provide a comprehensive inventory of features on the property or clearly identify all contributing elements. However, a site map included in the approved nomination form on file with the National Park Service include notations specifying that the property's historic components were the primary building, boiler house, laundry, wellhouse, and landscaping in front of the primary building's entrance (known historically as the Sacred Heart Garden). The notations also identified two "intrusions:" the restaurant building and 1943-1944 Kindergarten (then occupied by a Montessori school). The nomination form associated the property's significance with the era 1800-1899 but did not identify a more specific period of significance. The notations appear to reflect the evaluator's understanding of the property's contributing and non-contributing elements, and they suggest that the evaluator considered the property's significant period to have ended before the 1940s. It should be noted, however, that the Kindergarten was not yet 50 years old at the time the nomination form was prepared.

To account for the original NRHP nomination's lack of detail and alterations that have occurred within the House of Providence grounds since the property's original NRHP listing, a Determination of Eligibility (DOE) was prepared for the House of Providence as part of the current undertaking. The updated DOE formally establishes

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the NRHP criteria under which the property is listed, proposes a period of significance and character-defining features, and reconsiders the previously identified historic property boundary. The DOE recommends the House of Providence meets the significance threshold established by Criterion B in addition to Criteria A and C, in recognition of the property's close association with the significant achievements of Mother Joseph of the Sacred Heart, who was the leader of the Sisters of Providence in the late nineteenth century and the architect of the House of Providence's primary building. The proposed period of significance spans 1873 to 1924, beginning the year the Sisters of Providence constructed the House of Providence in Vancouver and ending the year that the order relocated its headquarters to Seattle. The DOE finds that the property retains sufficient integrity to convey its significance under Criteria A, B, and C, despite the House of Providence's grounds having undergone numerous alterations during the twentieth and early twenty-first centuries.

Although the original boundary proposed in the NRHP nomination encompassed the full extent of the House of Providence's historic grounds, the DOE recommends a smaller boundary corresponding to the current tax lot that contains the House of Providence (Figure 4). This proposed boundary excludes portions of the historic grounds along C Street and E 12th Street that now contain surface parking lots and new mixed-use development that do not contribute to the historic character of the property. The proposed historic property boundary encompasses all extant historic features that convey the institution's original campus-like qualities. Character-defining features are considered to be the original T-shaped House of Providence building and its west addition, including its brick cladding, intersecting gabled roof forms and dormers, alternating pavilions and wood galleries, pilasters, belt courses, fenestration pattern, wood windows and doors, projecting entrance, sculpture niche, and domed cupola. Character-defining landscape elements include the grass lawn that remains in front of the primary entrance, central walkway with circular flower bed, oval-shaped approach drives, mature trees, stone gateposts (concrete pylons not contributing), and extant section of the concrete curb and low hedge that define the southern parcel boundary along East Evergreen Boulevard. Features within the historic property boundary that do not contribute to its significance include the southeastern surface parking lot and the 1943-1944 Kindergarten.

ALTERNATIVES CONSIDERED

Because the House of Providence is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts to the property.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the House of Providence, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the east of the House of Providence. The widened interstate roadway would remain within the existing boundary of the interstate right of way, but reconfiguration of the interstate corridor would involve removing the sloped embankment that currently follows the western edge of I-5. The removal of the embankment and widening of the I-5 roadway would require the construction of a new retaining wall along the western boundary of the I-5 right of way, which runs parallel with the eastern boundary of the House of Providence's historic property boundary. The proposed location of the retaining wall currently contains a paved vehicular travel lane that corresponds to the disused Reserve Street right of way. A metal chain-link fence leads along the eastern edge of Reserve Street and marks the top of the embankment along the I-5 right of way. The retaining wall would not encroach into the boundary of the historic property.

The new retaining wall would not rise above grade as perceived from the parcel containing the House of Providence. However, the resulting grade change between the House of Providence property and the I-5 roadway would require the construction of a railing, fence, and/or parapet. The Program would also impose a temporary construction easement that would extend approximately 12 feet west of the retaining wall. This easement would extend less than five feet into the eastern boundary of the parcel that contains the House of Providence, and it would not overlap with any character-defining features of the property. Instead, it would encompass a strip of landscaping adjacent to the eastern edge of the non-historic surface parking lot that currently occupies the southeastern corner of the property. This temporary construction easement would remain approximately 200 feet east the primary House of Providence building, and the IBR Program commits to restoring this easement area to pre-construction conditions.

Although the reconstruction of I-5 would introduce new infrastructural elements (the retaining wall and associated railing or parapet) near the House of Providence's eastern historic property boundary, these features would not remove or obscure any significant aspects of the House of Providence's historic setting. Rather, the parcel's eastern boundary is currently characterized by the asphalt paved Reserve Street right of way, metal chain-link fence, several trees and other vegetation, and the sunken I-5 roadway.

The reconfiguration of the interstate would additionally require the reconstruction of the I-5 overcrossing at East Evergreen Boulevard, involving improvements to pedestrian and bicycle facilities along East Evergreen Boulevard adjacent to the House of Providence's southern boundary. These improvements would take place within the current East Evergreen Boulevard roadway and public sidewalk and would not change the profile of the existing overcrossing and at-grade street.

To accommodate construction of these new transportation facilities, the Program would impose a temporary construction easement along the southern property boundary at East Evergreen Boulevard. The easement would extend approximately 10 feet into the House of Providence's identified southern boundary, overlapping character-

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defining landscape features such as gate posts, hedge, and concrete curb along the public sidewalk. The easement would include the southernmost portion of the asphalt-paved perimeter walk that delineates the boundary of the Sacred Heart Garden, but it would not extend far enough into the property boundary to overlap with any portion of the garden that was historically planted. It appears that construction would not require the permanent use of this portion of the House of Providence property, and the IBR Program commits to restoring to pre-construction conditions the character-defining features located within the temporary construction easement, including preservation of the gate posts and replacement in-kind of the hedge, curb, and asphalt paving consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Furthermore, Program activities would not prevent vehicular access to the parking lot at the southeastern corner of the House of Providence property, which supports the operations of the property's current tenants, either during construction or after construction has been completed.

Other activities in the vicinity of the House of Providence include the construction of a community connector land bridge capping the I-5 right of way south of East Evergreen Boulevard, which would incorporate the new at-grade Evergreen LRT station. The Program also contemplates constructing a park and ride for the LRT station on an existing surface parking lot and undeveloped parcels that are located within the city block immediately south of the subject property. This site does not contain any features that contribute to the historic setting of the House of Providence.

The Program would thus not diminish the property's ability to convey the Sisters of Providence's significant history in Vancouver or the property's rich aesthetic character.

As a result of the reconfigured I-5 right of way, noise levels at the contributing elements of the NRHP-eligible property are anticipated to increase from a range of 58-62 decibels A (dBA) to 60-66 dBA. Neither of these increases reaches the FHWA's Noise Abatement Criteria thresholds for the property's current land uses.[2] Because the House of Providence was found to meet the eligibility requirements of the NRHP even with the I-5 right of way and associated noise in its immediate setting, the property's ability to convey its significance does not depend upon a quiet setting. An increase in noise may be perceptible as a result of the program, but the introduction of new atmospheric and audible intrusions would not diminish any character-defining features of the property.

In summary, the various Program activities occurring in the vicinity of the House of Providence under the Modified LPA would alter the visual and auditory qualities of the property's setting to an extent, but this setting is already defined by the adjacent I-5 corridor and associated traffic noise. No elements of setting that date to the property's period of significance would be affected. The Program would thus not diminish the property's ability to convey the elaborate design of extant elements or its history as a significant nineteenth-century religious and educational institution in Vancouver.

Under the Modified LPA's various bridge design options and under its two auxiliary lane option, the Program would involve the same activities in the vicinity of the House of Providence as described above.

[2] IBR Program, "Noise and Vibration Technical Report" (June 2025), 4-38.

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However, Program activities would differ under the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard. The shifting of the I-5 mainline would expand the I-5 corridor into the eastern portion of the House of Providence's identified boundary (Figure 6). Program activities would generally be similar to those described above (including the temporary construction easement along East Evergreen Boulevard), but certain features would be constructed in different locations. Specifically, the westernmost lanes of I-5 and the retaining wall would cross into the parcel containing the House of Providence, which corresponds to the historic property boundary. Therefore, the westward shift of I-5 would reduce the size of the area that historically contained the institution's grounds. However, no features of the House of Providence that contribute to the property's significant historic character would be altered. Rather, the portion of the parcel that would be replaced by the shifted I-5 corridor currently features a level ground surface, paved parking spaces, and a paved vehicular travel lane immediately east of the Kindergarten. The historic curb and hedge have already been removed in the location that would be occupied by the shifted I-5 mainline (Figures 7 and 8). Program elements within the identified boundary of the NRHP-listed resource would be located within 25 feet of the east end of the Kindergarten, which was constructed after the end of the period of significance and is not a character-defining feature of the larger House of Providence property. (The Program's effects on the Kindergarten considered as an individual historic property are addressed in a separate FOE.) Program elements would remain approximately 80 feet east of the extant section of the historic hedge and curb along East Evergreen Boulevard, and approximately 185 feet from the House of Providence's primary building.

Therefore, the Modified LPA would have No Adverse Effect on the NRHP-listed House of Providence, regardless of whether the I-5 mainline shift is implemented. Should the proposed design require permanent changes to the landscape elements within the temporary construction easement along the southern boundary of the property, this Finding of Effect would need to be revisited to determine the Program's level of effect.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-listed House of Providence.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: House of Providence/Providence Academy (WA 150)		WISAARD Property ID: 18827
Street Address: 400 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington	

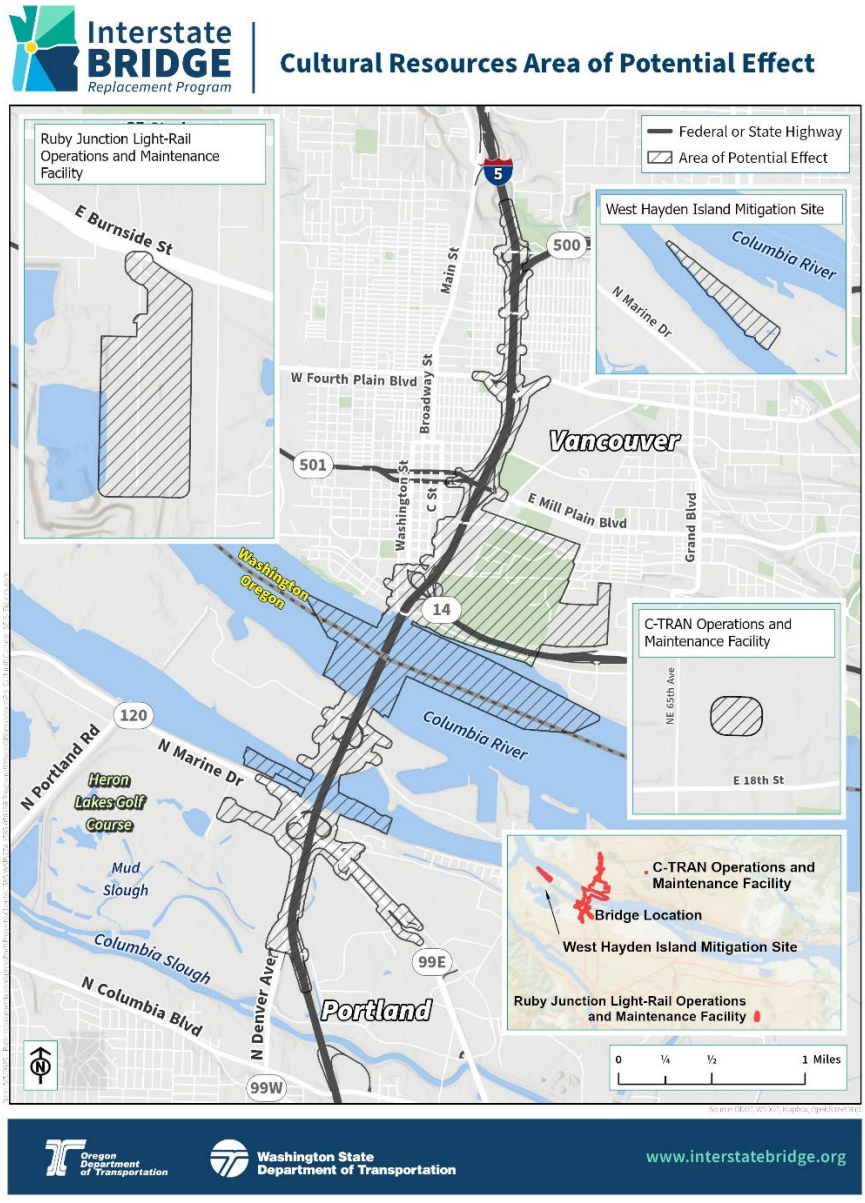


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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Figure 3. Location map of the House of Providence (400 East Evergreen Boulevard), Vancouver, Clark County, Washington.

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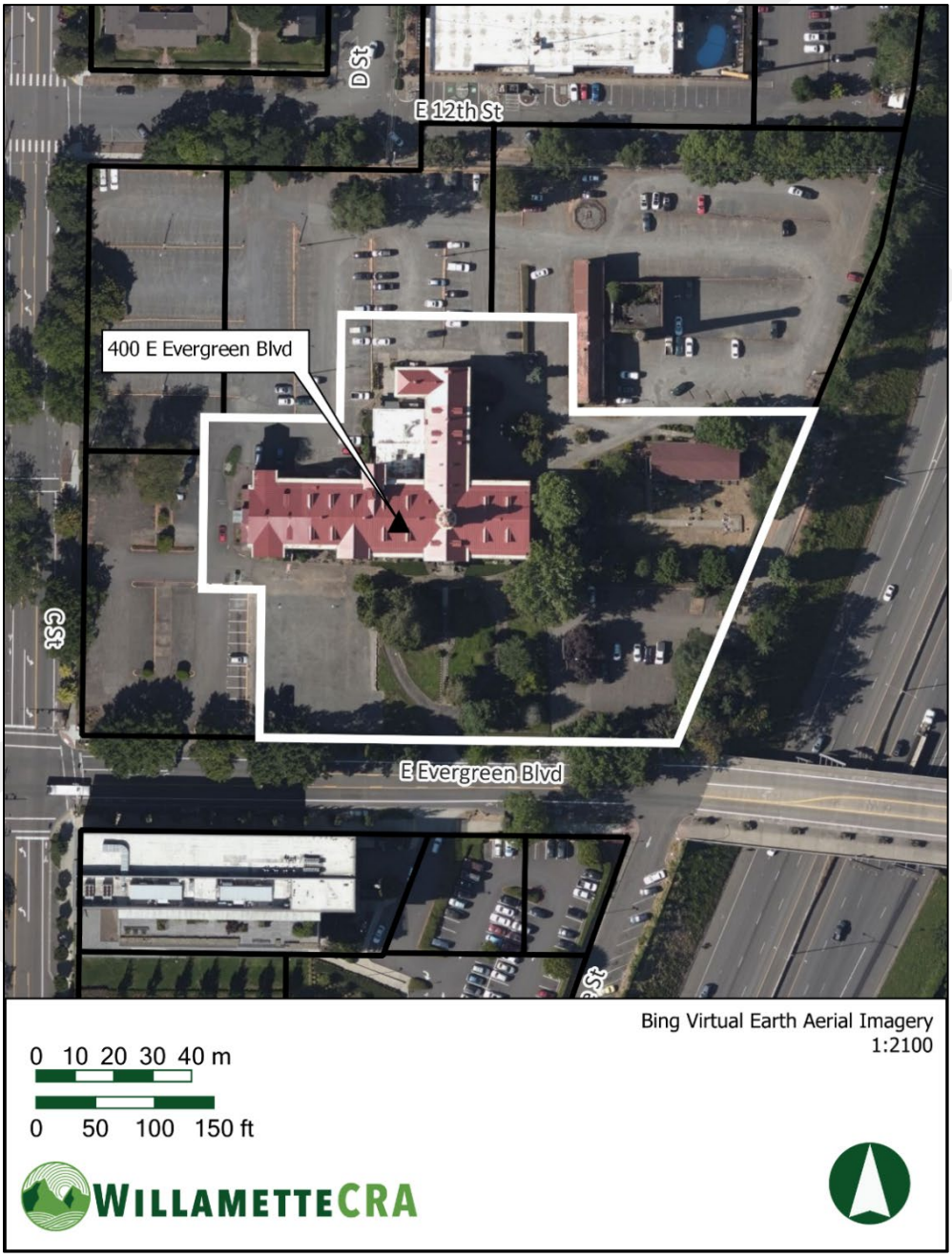


Figure 4. Aerial map of the House of Providence (400 East Evergreen Avenue), showing the identified boundary of the NRHP-listed property in white. Note that some buildings and landscaped areas east of the primary building have been demolished since the date of the aerial photograph background image.

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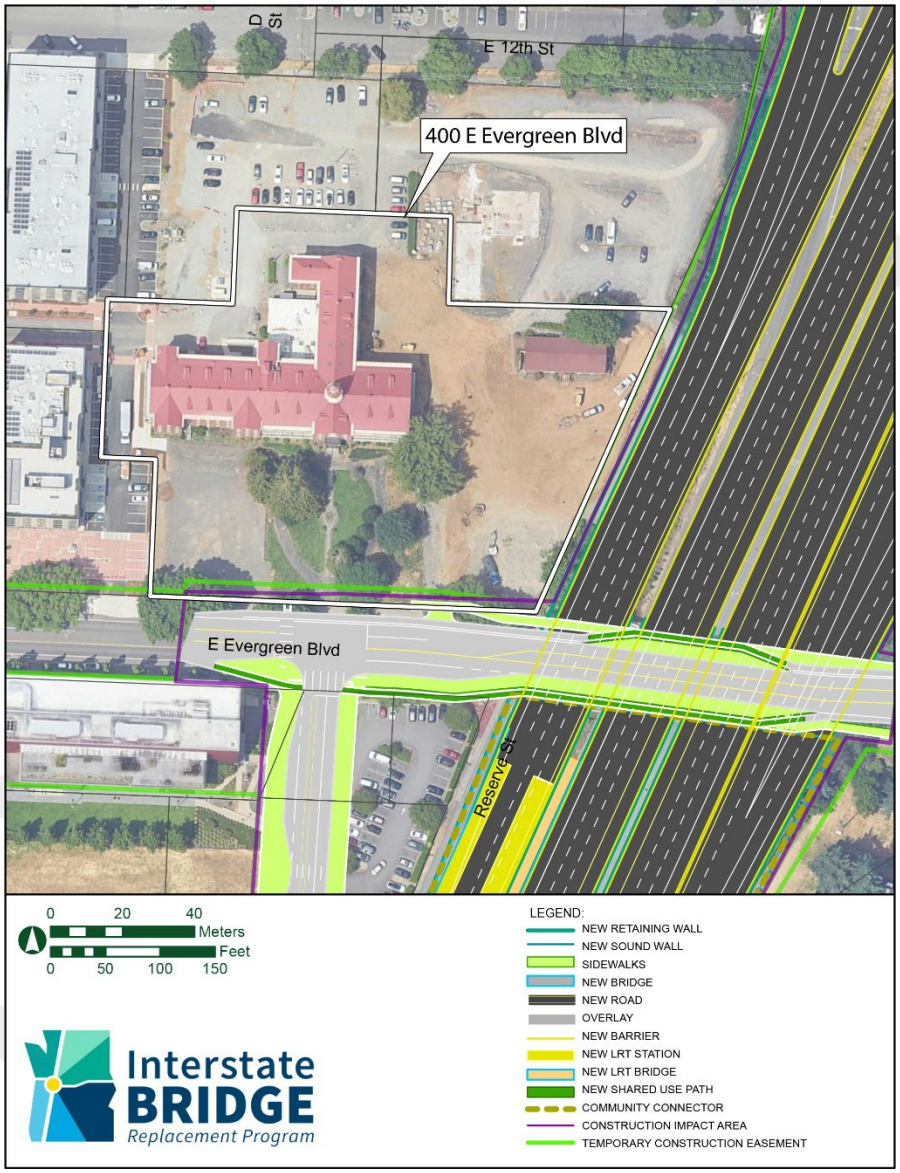


Figure 5. Aerial map showing the subject property and proposed Program activities in the vicinity. This map depicts the Modified LPA without the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard.

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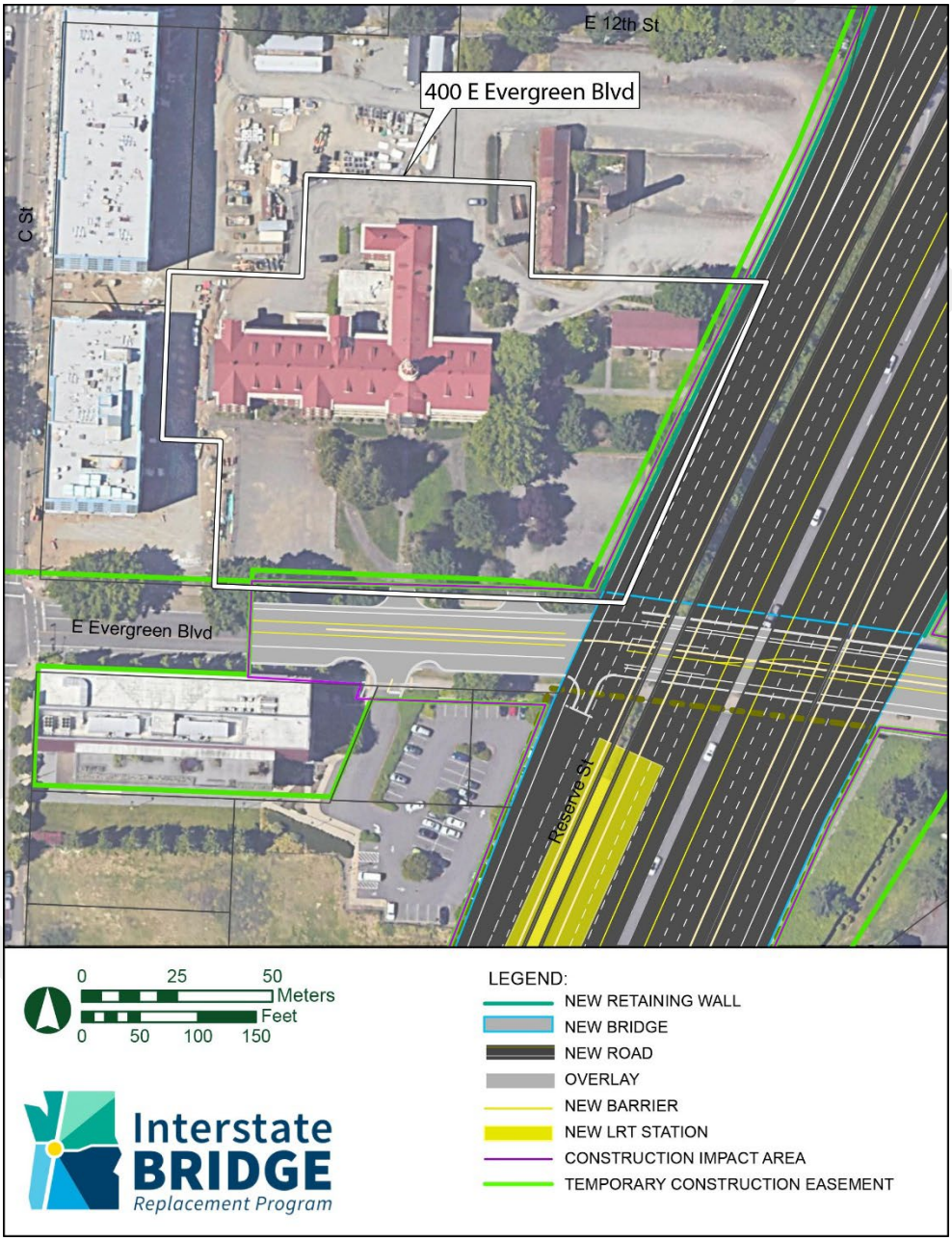


Figure 6. Aerial map showing the subject property and proposed Program activities in the vicinity. This map depicts the Modified LPA with the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard.

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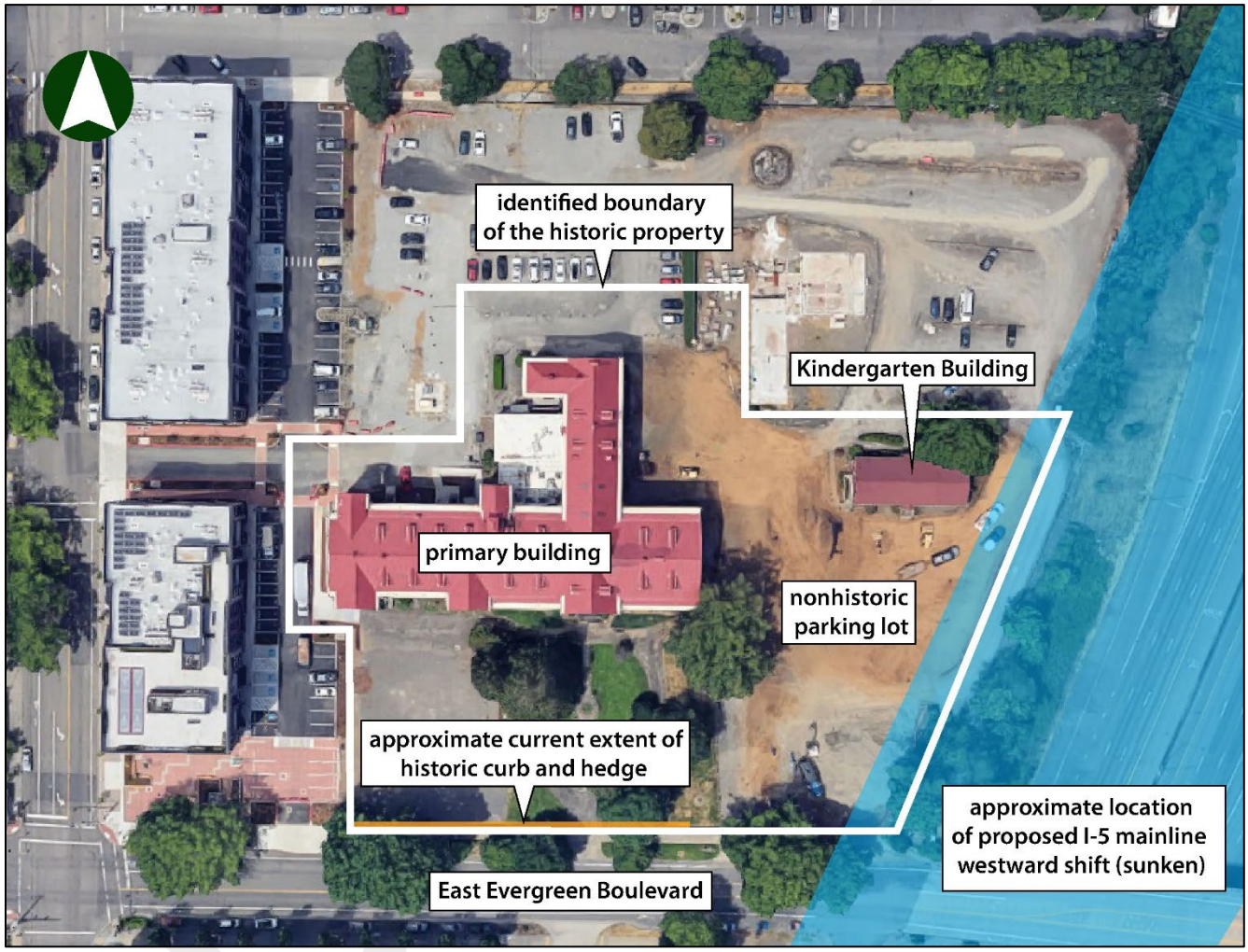


Figure 7. Aerial map showing the subject property, the approximate extent of the extant historic curb and hedge along East Evergreen Boulevard, and the approximate location of the proposed I-5 mainline westward shift relative to the identified boundary of the historic property (ARG, November 2023).

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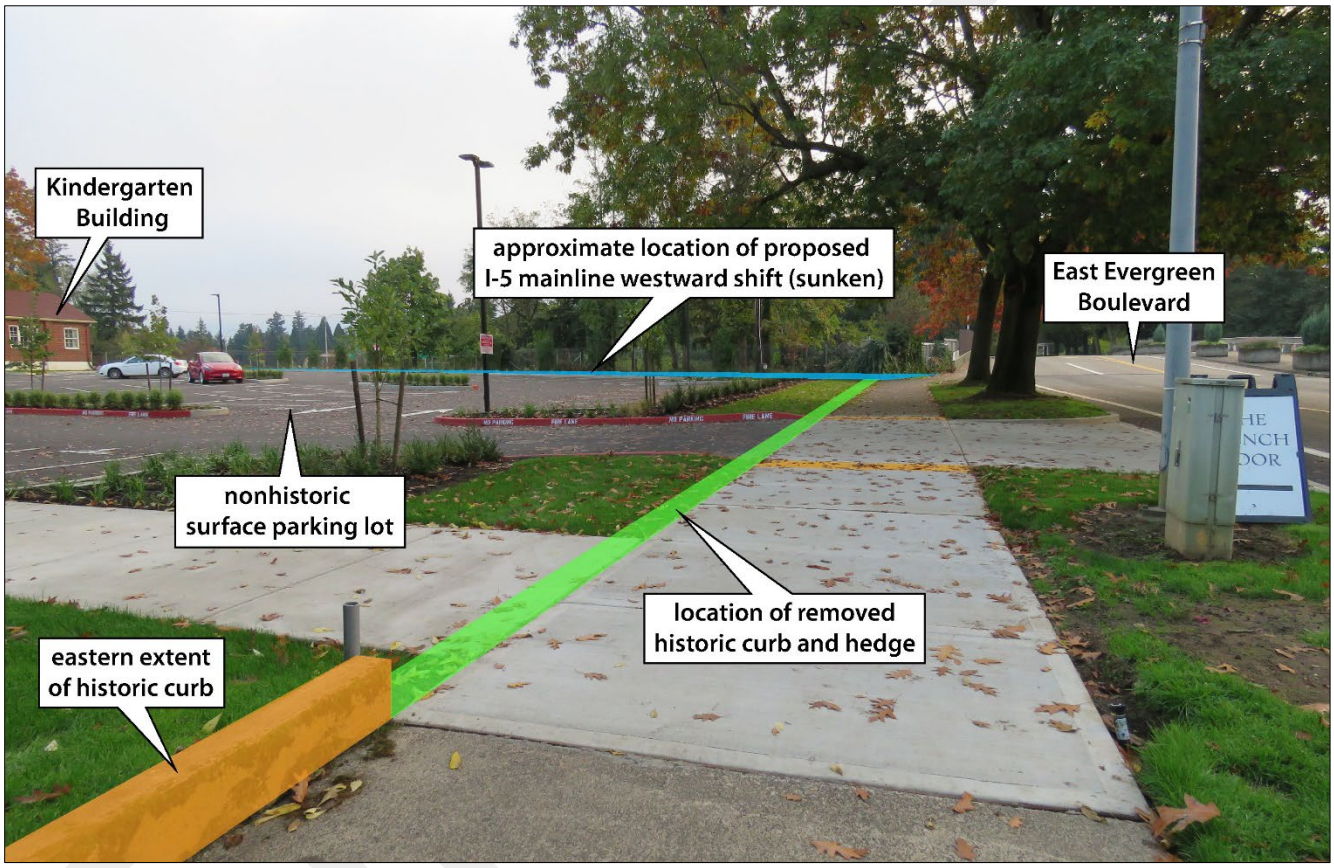


Figure 8. View of the southeast corner of the House of Providence property, facing northeast (ARG, October 2023). This view shows the sidewalk and parking lot along East Evergreen Boulevard, with the Kindergarten just visible at the left edge of the frame. The orange shading indicates the eastern extent of the extant historic curb, and the green shading denotes the location of the historic hedge and curb section that have been removed. The blue shading denotes the approximate location of the western edge of the I-5 right of way that is contemplated as a design option of the Modified LPA.

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: House of Providence Kindergarten (Kennedy Hall) (WA 150D)	WISAARD Property ID: 732294
Street Address: 404 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The House of Providence Kindergarten, south elevation, view facing north (WillametteCRA September 30, 2024).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the House of Providence Kindergarten at 404 East Evergreen Boulevard, hereafter referred to as the Kindergarten. The Kindergarten is an institutional property located at 404 East Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 1). The subject property, which is north of East Evergreen Boulevard between Interstate 5 (I-5) and C Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the Kindergarten. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.

  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

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- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Kindergarten, later called Kennedy Hall, is a former educational building located at 404 East Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 3). The Kindergarten is located within the eastern third of the tax lot containing the House of Providence (also known as Providence Academy), which the Sisters of Providence constructed in 1873-1874 as a private school property. The House of Providence retains its primary building, which is an ornate, three-story building near the center of the lot. The Kindergarten was designed by Sister Ignatia Marie Lindekugel and constructed between 1943 and 1944 on a site approximately 100' to the east of the primary House of Providence building. It is the only auxiliary building that remains within the historical extent of the House of Providence grounds, whose original boundaries correspond to current-day East Evergreen Boulevard to the south, C Street to the west, East 12th Street to the north, and the I-5 right of way to the east. Several other outbuildings that existed on the House of Providence grounds historically—including a barn, root cellar, convent building, wellhouse, laundry, and boiler house—have been removed. The ca.1887 laundry and 1910 boiler house and polygonal smokestack that stood northwest of the Kindergarten were demolished in 2022.

The Kindergarten has a rectangular footprint measuring approximately 30 feet from north to south and 80 feet from east to west. The walls of the building are constructed of structural clay tile masonry atop a concrete perimeter foundation and rise a single story in height to a side-gabled roof covered in asphalt shingles with minimal eaves. The masonry consists of oversized raked tiles laid in a running bond with five bays on the north and south elevations separated by raised lesenes. The building's fenestration includes original six-over-six and four-over-four double-hung wood sash windows covered by contemporary aluminum storms, as well as a replacement vinyl sliding window with a slim transom on the south elevation. The principal entry is located on the

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south elevation and is composed of half-glass double doors beneath a gabled canopy with triangular knee braces. The entry lies at the top of a set of concrete steps. A similar entry is located on the north elevation. A set of descending stairs along the west elevation leads below grade to a basement pedestrian entry.

The area around the Kindergarten and the House of Providence's primary building is part of a mixed-use district defined by a gridiron network of local streets bordered by parking strips and sidewalks. Development is characterized by a combination of low- and high-rise buildings of varying scale. While the tax lot includes the Sacred Heart Garden in front of the House of Providence's primary building, the immediate surroundings of the Kindergarten include a paved surface parking lot to the south and unpaved gravel parking lot to the north.

The larger House of Providence property was listed in the NRHP in 1978 (NRHP Reference No. 78002738). The 1978 NRHP nomination did not specify the significance criteria under which the property was listed but did identify several areas of significance, including Architecture, Education, Exploration/Settlement, Religion, and Social/Humanitarian. These areas of significance generally correspond to NRHP Criteria A and C. The nomination form documented the entire seven-acre site, including the primary building, Kindergarten, and several other outbuildings that remained at the time of listing. However, a site map included in the approved nomination form on file with the National Park Service includes notations specifying that the property's historic components were the primary building, boiler house, laundry, wellhouse, and landscaping in front of the primary building's entrance (corresponding to the Sacred Heart Garden). The notations also identified two "intrusions:" the restaurant building and the 1943-1944 Kindergarten (then occupied by a Montessori school). The nomination form associated the property's significance with the era 1800-1899 but did not identify a more specific period of significance. The notations appear to reflect the evaluator's understanding of the property's contributing and non-contributing elements, and they suggest that the evaluator considered the property's significant period to have ended before the 1940s. It should be noted, however, that the Kindergarten was not yet 50 years old at the time the nomination form was prepared.

Given the original NRHP nomination's lack of detail, as well as alterations that have occurred within the House of Providence grounds since the original NRHP listing, a Determination of Eligibility (DOE) was prepared for the House of Providence as part of the current undertaking. The updated DOE affirms the previous NRHP listing and clarifies that the property is significant under NRHP Criteria A, B, and C. The proposed period of significance is defined as 1873 to 1924, encompassing the years the property served as the headquarters of the Sisters of Providence order. The House of Providence DOE concluded that the property retains sufficient integrity to convey its significance under Criteria A, B, and C, despite its grounds having undergone numerous alterations during the twentieth and early twenty-first centuries. The House of Providence DOE recommended a smaller boundary corresponding to the current tax lot that contains the House of Providence, which encompasses all extant historic features that convey the institution's original campus-like qualities. The Kindergarten is located within the revised boundary recommended by the House of Providence DOE but was confirmed as a non-contributing element of the NRHP-listed property due to its construction date after the end of the period of significance.

Although the Kindergarten is not a contributor to the NRHP-listed House of Providence, a separate DOE was prepared for the current undertaking to address whether the Kindergarten is eligible for NRHP listing as an individual property. This individual DOE for the Kindergarten concluded that the building meets the eligibility requirements of the NRHP under Criterion A at the local level of significance, in the areas of community planning and development, education, and social history. The building is associated with the growth of Vancouver's community and educational system during World War II and is the only known extant resource that speaks directly to this history. The period of significance for this criterion is 1944 through 1945, extending from the

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building's completion through the end of World War II. Its character-defining features include its simple rectangular plan, one-story height, side-gabled roof form, clay tile masonry construction atop a concrete foundation, raised lesenes dividing the north and south facades into five bays, original double-hung wood-sash windows, partially glazed paired doors, and gabled entrance canopies with triangular knee braces.

Overall, the Kindergarten possesses sufficient integrity to communicate its historical significance. Because of changes to the Kindergarten's historical setting, including the addition of parking lots and removal of adjacent laundry facilities, the recommended NRHP boundary is limited to the footprint of the building (Figure 4).

ALTERNATIVES CONSIDERED

Because the Kindergarten is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts to the property.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the Kindergarten, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the east of the legal parcel containing the Kindergarten. The widened I-5 roadway would remain within the existing boundary of the interstate right of way, but reconfiguration of the interstate corridor would involve removing the sloped embankment that currently follows I-5's western edge (Figure 5). The removal of the embankment and widening of the I-5 roadway would require the construction of a new retaining wall along the western boundary of the interstate right of way, which is approximately 50 feet to the east of the Kindergarten's east façade. The proposed location of the retaining wall currently contains a paved vehicular travel lane that corresponds to the disused Reserve Street right of way. A metal chain-link fence leads along the eastern edge of Reserve Street and marks the top of the embankment along the I-5 right of way. The retaining wall would not encroach into the boundary of the parcel that contains the Kindergarten.

The new retaining wall would not rise above grade as perceived from the parcel containing the Kindergarten. However, the resulting grade change between the larger House of Providence property and the I-5 roadway

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would require the construction of a railing, fence, and/or parapet. The Program would also impose a temporary construction easement that would extend approximately 12 feet west of the retaining wall. This easement would extend less than five feet into the eastern boundary of the parcel that contains the Kindergarten, where it would overlap landscaping near the edge of the surface parking lot that occupies much of the parcel's southeastern corner. This temporary construction easement would remain more than 30 feet from the Kindergarten's east façade. The IBR Program commits to restoring this easement area to pre-construction conditions.

Although the reconstruction of I-5 would introduce new infrastructural elements (the retaining wall and associated railing or parapet) near the eastern boundary of the parcel containing the Kindergarten, these features would not remove or obscure any significant aspects of the Kindergarten's historic setting. Rather, the parcel's eastern boundary is currently characterized by the asphalt paved Reserve Street right of way, metal chain-link fence, several trees and other vegetation, and the sunken I-5 roadway.

The reconfiguration of the interstate would additionally require the reconstruction of the I-5 overcrossing at East Evergreen Boulevard, involving improvements to pedestrian and bicycle facilities along East Evergreen Boulevard. These improvements would take place within the current East Evergreen Boulevard roadway and public sidewalk (approximately 225 feet south of the Kindergarten) and would not change the profile of the existing overcrossing and at-grade street. Furthermore, a temporary construction easement would extend approximately 10 feet into the House of Providence property's southern boundary. This easement would remain more than 200 feet away from the Kindergarten, and the IBR Program commits to restoring this easement area to pre-construction conditions. This includes the concrete curb, hedge, and gate posts that delineate the southern boundary of the House of Providence approximately 275' southwest of the Kindergarten.

Other activities in the vicinity of the Kindergarten include the construction of a community connector land bridge capping the I-5 right of way south of East Evergreen Boulevard, which would incorporate the new at-grade Evergreen LRT station. The Program also contemplates constructing a park and ride for the LRT station on an existing surface parking lot and undeveloped parcels that are located within the city block immediately south of the subject property. This site does not contain any features that contribute to the historic setting of the Kindergarten.

As a result of the reconfigured I-5 right of way, the audible effects of traffic would be anticipated to increase from current conditions of 68 decibels A (dBA) to an estimated 73 dBA. The estimated post-construction noise level exceeds the Washington State Department of Transportation's (WSDOT) definition of "an impact approaching" the threshold set by FHWA's Noise Abatement Criteria (NAC) for commercial properties (71 dBA).[2] Because the Kindergarten was found to meet the eligibility requirements of the NRHP even with the I-5 right of way and associated noise in its immediate setting, the property's ability to convey its significance does not depend upon a quiet setting. An increase in noise may be perceptible as a result of the program, but the introduction of new atmospheric and audible intrusions would not diminish any character-defining features of the property.

Because the Kindergarten is within 100 feet of construction activities under the modified LPA and is constructed from unreinforced structural clay tile masonry, it is possible the building would be susceptible to damage from high levels of construction-related vibration. A worst-case scenario would assume the potential for structural damage to the building, which would render the Kindergarten unusable and its historical integrity would be lost. However,

[2] IBR Program, "Noise and Vibration Technical Report" (June 2025), 4-38.

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the IBR Program will implement monitoring to prevent excessive vibratory levels and does not anticipate damage to the Kindergarten from construction-related vibration. As construction delivery methods are further defined and/or construction and monitoring implemented, vibratory effects to this resource will be re-evaluated.

Under the Modified LPA's various bridge design options and under its two auxiliary lane option, the Program would involve the same activities in the vicinity of the Kindergarten as described above. However, Program activities would differ under the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard (Figure 6). Program activities would generally be similar to those described above (including the temporary construction easement along East Evergreen Boulevard), but certain features would be constructed in different locations. Specifically, the shifting of the I-5 mainline would push the I-5 corridor into the eastern portion of the tax lot containing the Kindergarten. The portion of the parcel that would be replaced by the shifted I-5 corridor currently features a level ground surface, paved parking spaces, and a paved vehicular travel lane immediately east of the Kindergarten. With the shifted I-5 mainline, the retaining wall constructed along the western boundary of the I-5 right of way would be located approximately 10 feet from the Kindergarten's east façade, and the westernmost southbound lanes of I-5 would be located approximately 10 feet east of the retaining wall. The expanded I-5 right of way would encroach into the eastern portion of the larger House of Providence property (Figure 7), but no permanent easement would overlap with the Kindergarten. Because the I-5 right of way is oriented diagonally from northeast to southwest in the vicinity of the House of Providence, the shifted I-5 right of way would also reduce the size of the House of Providence's parking lot south of the Kindergarten. As a result, it is anticipated that the retaining wall, fence or parapet, and I-5 right of way would be readily visible from vantage points in front of and to the east of the Kindergarten. Furthermore, the project would require a temporary construction easement behind the retaining wall extending to the building's east façade to allow construction of the wall. The building would not be physically altered during construction.

Although the design option would shift a major element of transportation infrastructure closer to the historic property where such a feature did not exist historically, the Kindergarten's setting to its east and south has already experienced substantial change since its period of significance. The resource is eligible for NRHP listing despite its altered setting, and the shifting of the I-5 mainline would not remove any additional elements of the Kindergarten's setting that are critical to its ability to convey its historical significance as a World War II-era educational facility.

Although construction activities would not touch the Kindergarten and would not alter any of its character-defining features, the east access to the basement would be blocked for safety during construction. The Kindergarten's west basement access and south primary entrance would remain unobstructed and continue to function as normal. As the west access to the basement and south entrance would remain accessible during construction, the building would retain its ability to convey its significance during construction despite the temporary obstruction of the east basement access.

As under the other design options, the proposed shifting of the I-5 mainline to the west would also involve construction activities occurring within a close enough distance to the Kindergarten that it remains possible the property's physical features may be damaged by excessive vibration. However, vibration monitoring will occur, and vibratory effects will be revisited as construction delivery methods are further defined and implemented.

Therefore, with the current level of design, all design options of the Modified LPA would result in No Adverse Effect to the Kindergarten. However, as monitoring is implemented, vibratory effects, as well as any other effects as a result of Program Changes, will be re-evaluated as appropriate.

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Street Address: 404 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington	

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Kindergarten.

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Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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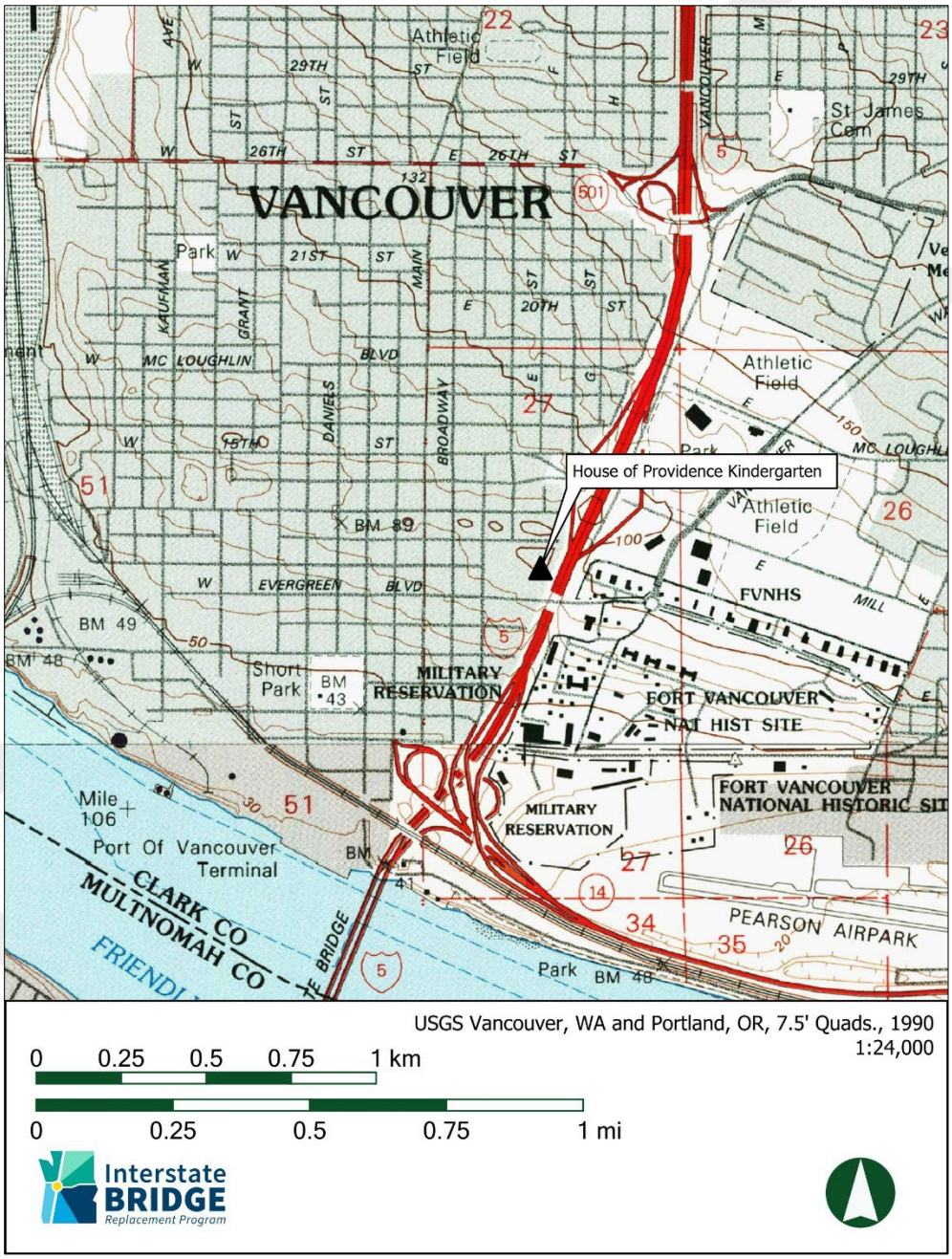


Figure 3. Location map of the House of Providence Kindergarten (404 East Evergreen Boulevard), Vancouver, Clark County, Washington.

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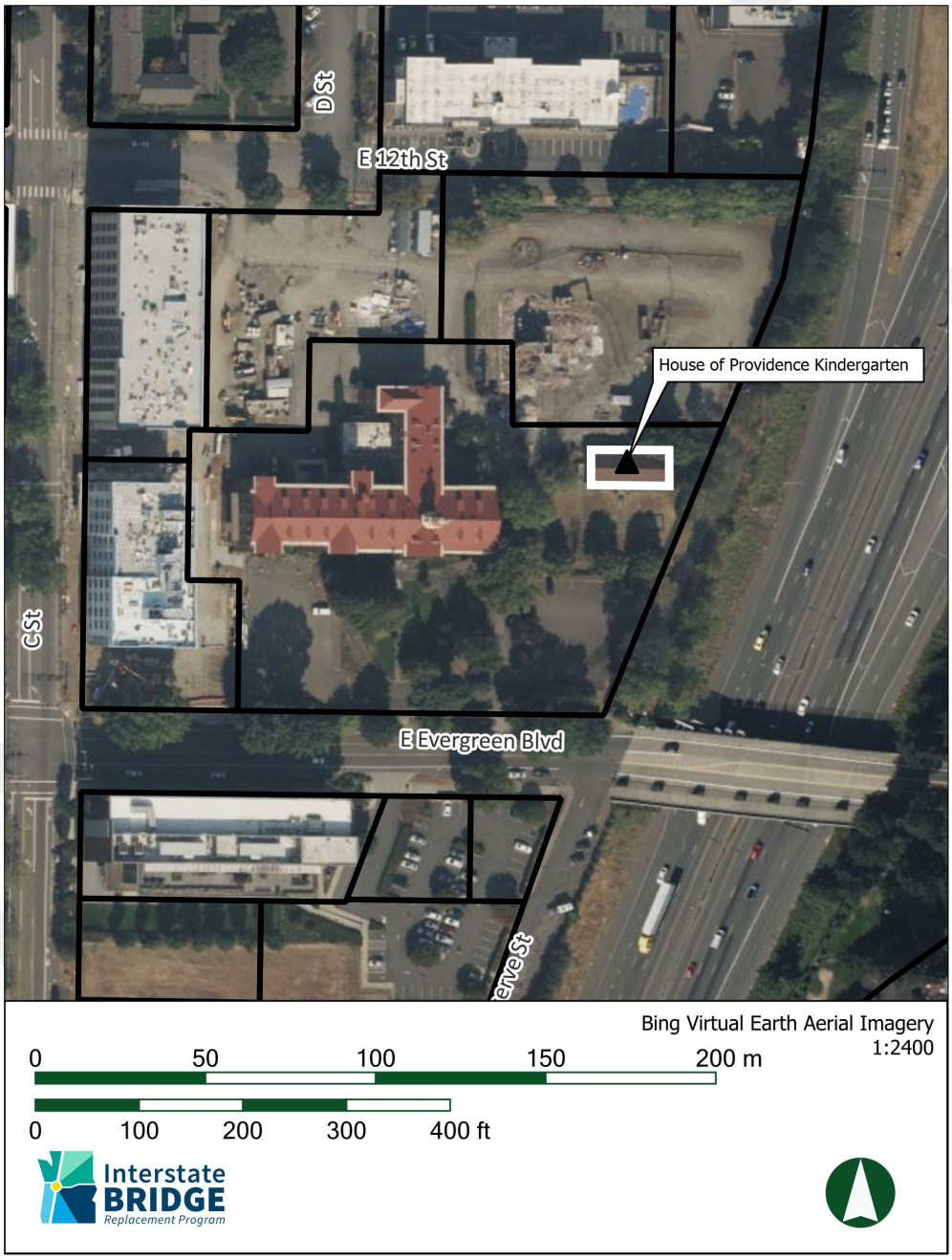


Figure 4. Aerial map of the House of Providence Kindergarten, showing the NRHP boundary in white.

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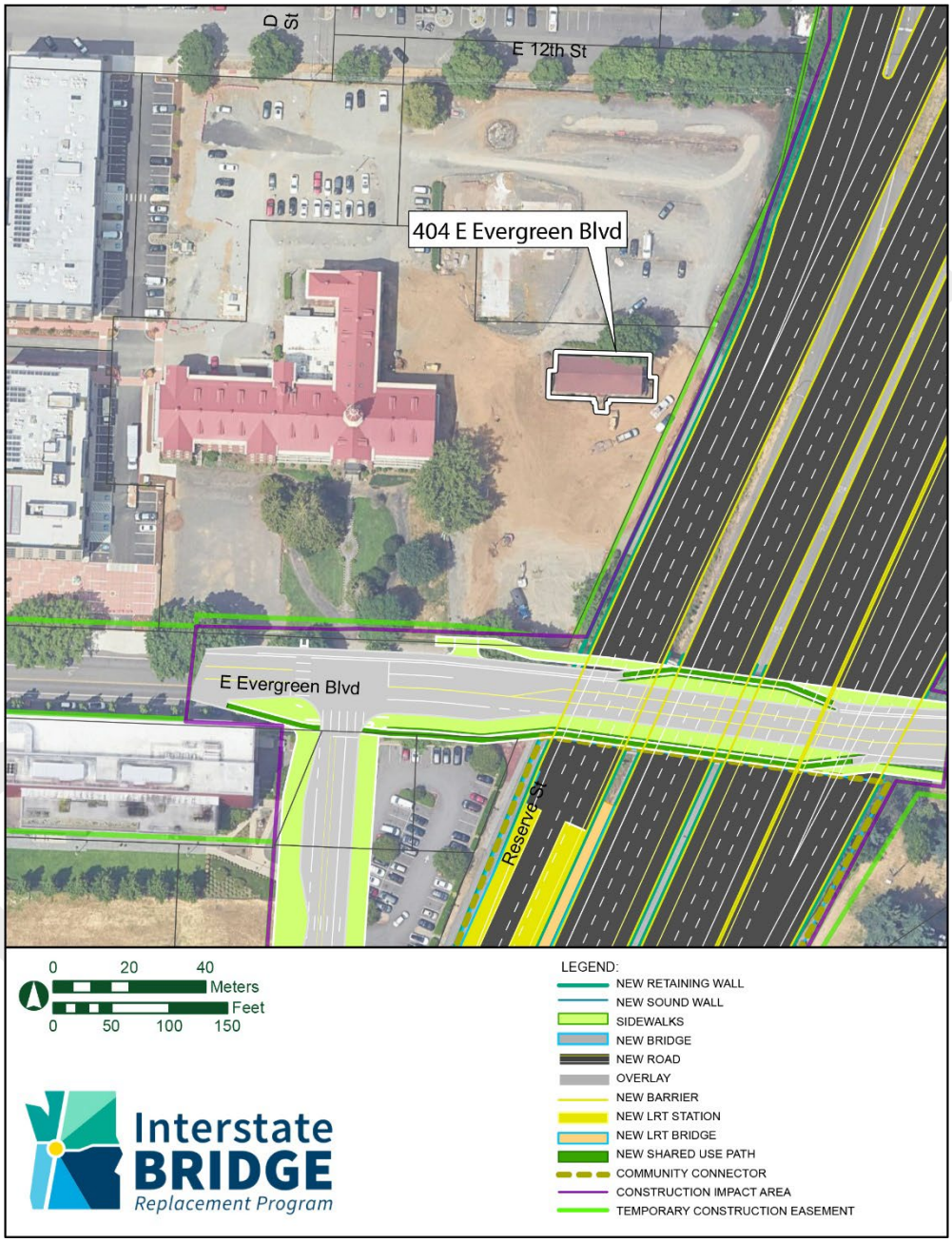


Figure 5. Aerial map showing the subject property and proposed Program activities in the vicinity. This map depicts the Modified LPA without the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard.

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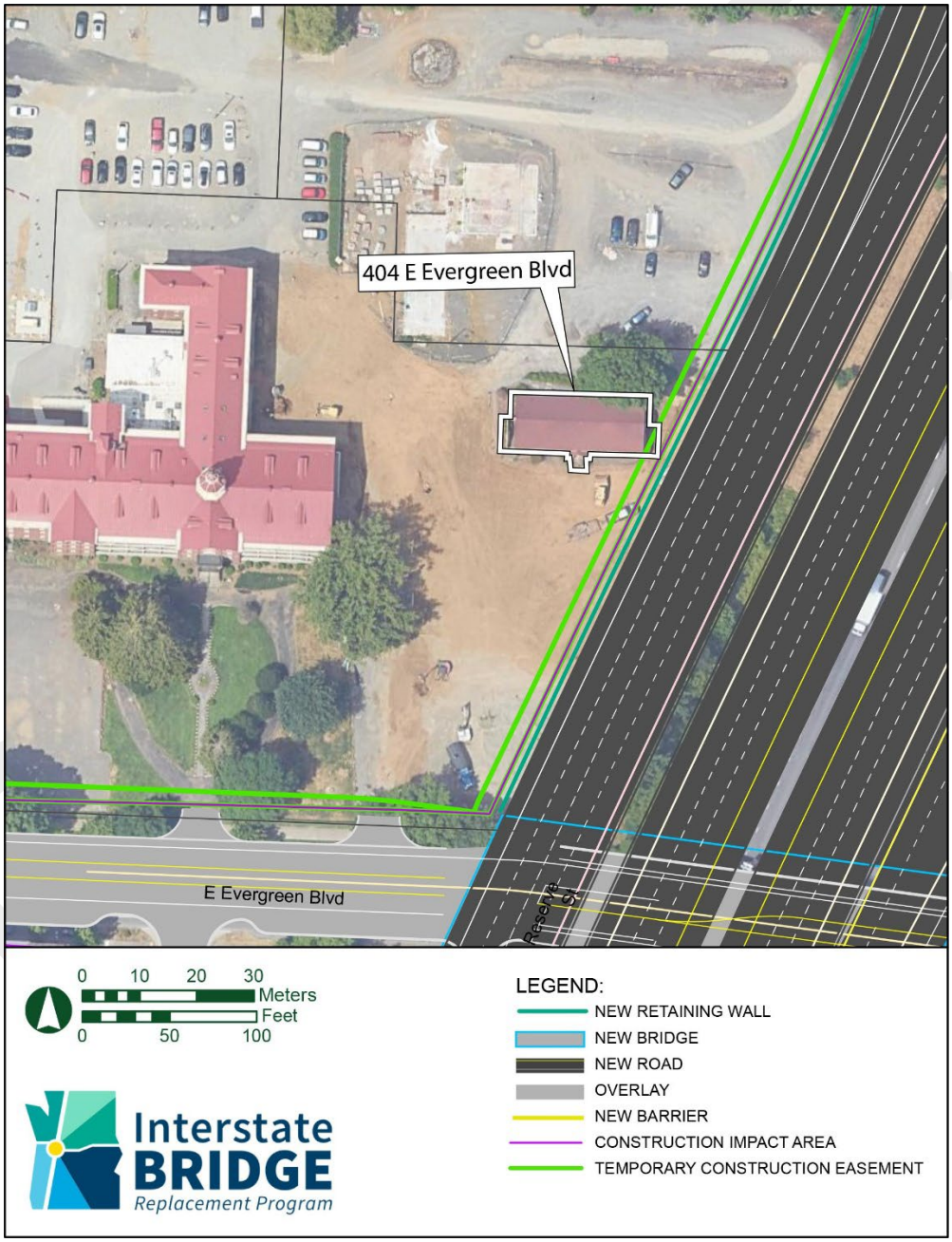


Figure 6. Aerial map showing the subject property and proposed Program activities in the vicinity. This map depicts the Modified LPA with the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard.

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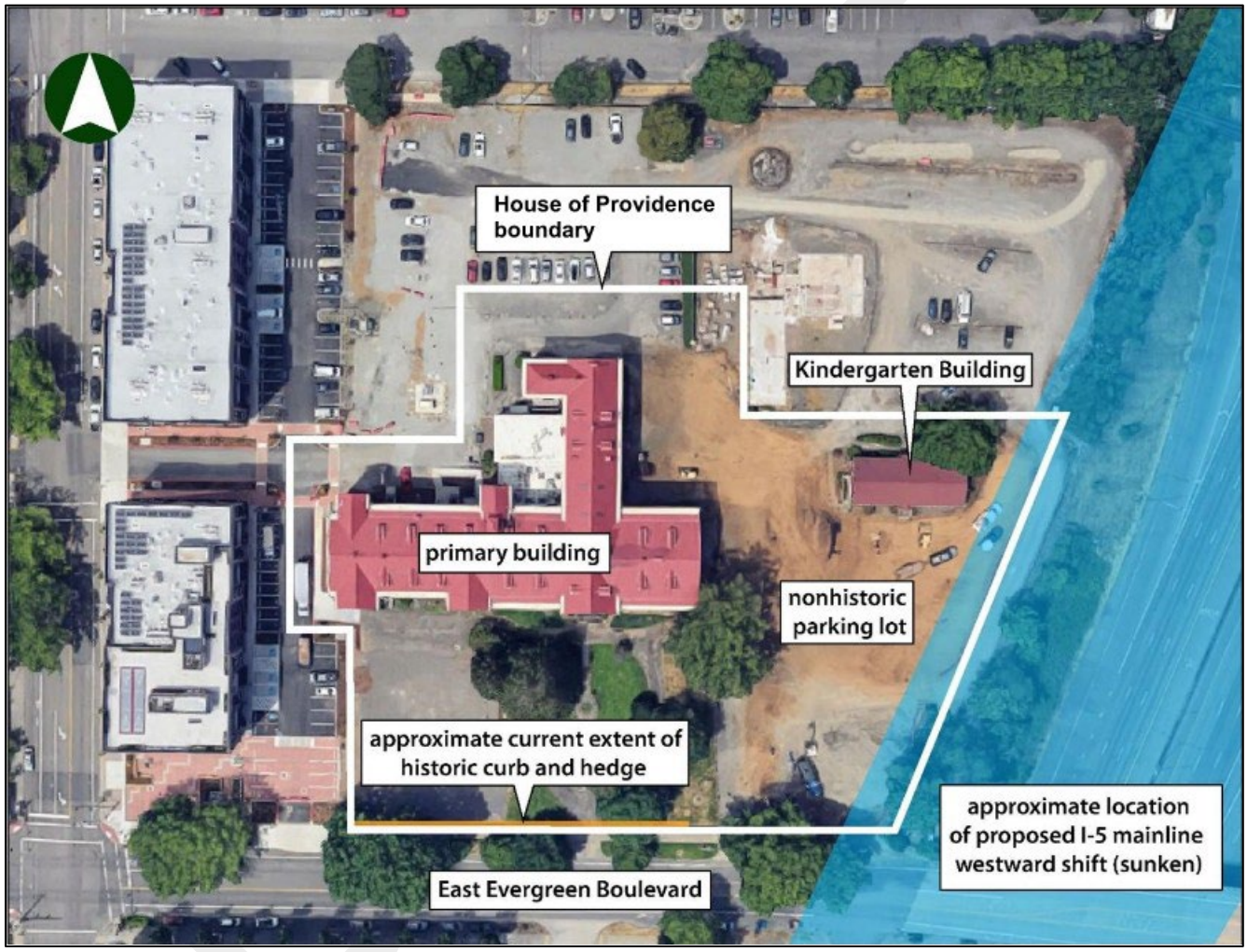


Figure 7. Aerial map showing the Kindergarten Building and surrounding House of Providence property in relation to the approximate location of the proposed I-5 mainline westward shift (ARG, March 2025).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Hood, William H. and Myrtle, Residence (WA 191)	WISAARD Property ID: 89189
Street Address: 3405 K Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. 3405 K Street, north and west elevations, view southeast (WillametteCRA, March 8, 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the William H. and Myrtle Hood Residence, a Craftsman bungalow located in the Rose Village neighborhood of Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the east side of K Street between E 33rd and E 35th streets, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Hood Residence. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.
  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

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- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The William H. and Myrtle Hood Residence at 3405 K Street is a ca. 1919 Craftsman bungalow located in the Rose Village neighborhood of Vancouver, Clark County, Washington (Figure 3). The one-story, wood-framed building is generally rectangular in plan, with a concrete foundation and a full basement. It features a front-gabled roof with unenclosed eave overhangs and an open rake with bargeboards supported by decorative knee braces. The exterior walls are clad in lapped wood siding with wood shingles on the foundation and in the gable ends; decorative features include a wood frieze board and wood watertable, which mark the approximate divisions between the building's attic, main floor, and basement. A gable-roofed, partial-width porch with square columns covers the south side of the west (principal) elevation, sheltering the principal entrance. Other fenestration includes various types and sizes of wood windows, including cottage style wood sash windows and one three-light wood sash window on the principal elevation. A ca. 1946 detached garage with wood-framed walls, vinyl siding, and a front-gabled roof is located at the northeast corner of the property.

The Hood Residence is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the area of architecture as a representative example of a modest Craftsman bungalow, as evidenced through features including the front gabled roof, unenclosed eave overhangs, decorative knee brackets, wood siding, partial-width porch, and square porch columns. The period of significance is ca. 1919, the approximate date of construction.

While the construction of the Vancouver Freeway (I-5) in the 1950s and its subsequent expansion has changed the setting of the Hood Residence since the period of significance, the neighborhood surrounding the property

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remains largely single-family residential in character; as such, the property retains some integrity of setting and feeling. As it remains in the original location and has experienced only minimal alteration since 1930, it also retains integrity of location, design, materials, workmanship, and association. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot. Within this boundary, the Craftsman bungalow and associated walkways and landscaping are contributing to the property's significance. The garage, which was constructed after the end of the period of significance, is noncontributing.

ALTERNATIVES CONSIDERED

Because the Hood Residence has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Hood Residence, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would require the construction of additional interstate lanes to the west of the Hood Residence, within existing highway right of way, and the construction of a new, intervening noise wall along the west side of K Street. The noise wall would be located approximately 30 feet west of the Hood Residence's western boundary and would not require the acquisition of any new right of way from the property, nor would it physically alter the character-defining features of the bungalow or its designed landscape. Following completion of construction, no features within the boundary of the NRHP-eligible property would be altered from their current conditions as a result of the Program.

The construction of additional freeway lanes and an intervening noise wall would alter the property's setting through the introduction of new visual, atmospheric, and audible elements. However, the property's setting—specifically, the setting west of K Street—has already been altered by the construction of I-5 in the early 1950s, more than a decade after the end of the ca. 1919 to 1930 period of significance. The interstate's construction permanently divided the single-family residential neighborhood surrounding the Hood Residence and introduced major visual, atmospheric, and audible intrusions to the west of the property. While the Modified LPA would alter the existing interstate and its associated right of way, the Program would not remove or obscure those setting

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features that remain consistent with the property's period of significance. In particular, it would not alter the single-family residential character of the neighborhood to the north, east, and south of the Hood Residence, and it would not affect the property's ability to convey its significant development history. Furthermore, because the property does not rely upon a quiet setting to convey its significance, Program activities would not reduce any significant atmospheric or audible qualities.

In conclusion, the Modified LPA would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criterion C. Therefore, the Modified LPA is anticipated to have no effect on the NRHP-eligible Hood Residence.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible William H. and Myrtle Hood Residence.

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Street Address: 3405 K Street	City, County, State: Vancouver, Clark County, Washington	

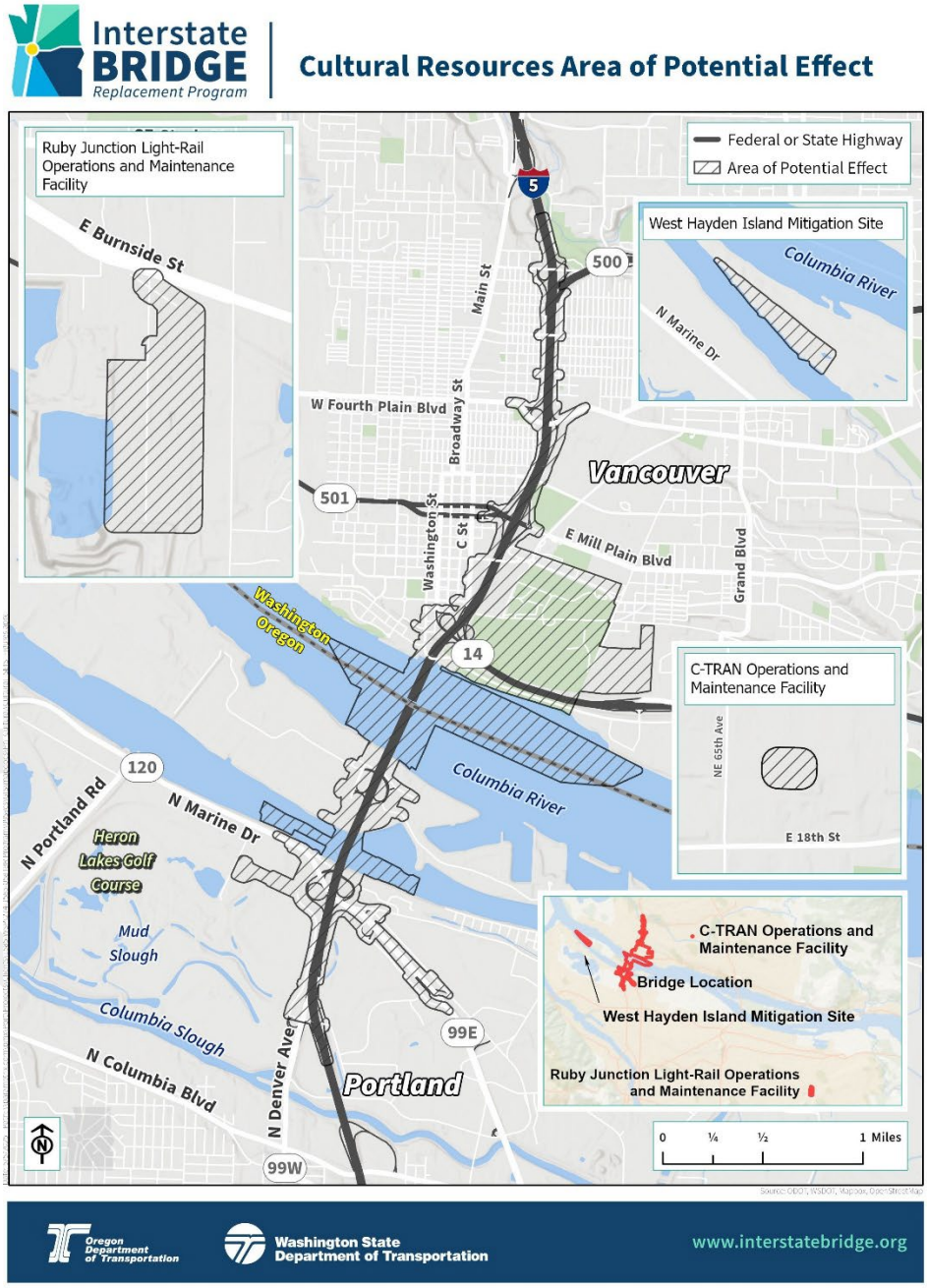


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Street Address: 3405 K Street	City, County, State: Vancouver, Clark County, Washington



Figure 3. Location map of the Hood Residence (3405 K Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 4. Aerial map of the Hood Residence (3405 K Street), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Hood, William H. and Myrtle, Residence (WA 191)		WISAARD Property ID: 89189
Street Address: 3405 K Street	City, County, State: Vancouver, Clark County, Washington	



Figure 5. Aerial map showing the proximity of proposed Program activities to the Hood Residence (3405 K Street), with the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Property Name: Hood, William H. and Myrtle, Residence (WA 191)		WISAARD Property ID: 89189
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Figure 6. Hood Residence (3405 K Street), north (left) and west (right) elevations, view southeast (WillametteCRA, March 8, 2023).

DRAFT

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Radio Transmission Building (Vancouver Veterans Affairs Veterans Museum) (WA 382)	WISAARD Property ID: 44853
Street Address: 1601 East 4th Plain Boulevard, Building 1819	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Radio Transmission Building (1601 East 4th Plain Boulevard, Building 1819), south elevation, view north (WillametteCRA, May 4, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: 1601 East 4th Plain Boulevard, Building 1819	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Radio Transmission Building, a Stripped Classical style building located at 1601 East 4th Plain Boulevard (Building 1819) in Vancouver, Clark County, Washington (Figure 1). The subject property, which is south of East 4th Plain Boulevard between Interstate 5 (I-5) and Plain Boulevard, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Radio Transmission Building. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Radio Transmission Building at 1601 East 4th Plain Boulevard is a Stripped Classical style building constructed in 1940 and located in the Central Park neighborhood of Vancouver, Clark County, Washington (Figure 3). Within the city, the building is situated along the eastern edge of I-5 inside the campus of the Vancouver Veteran's Affairs Medical Center (Vancouver VAMC). The Radio Transmission Building has an L-shaped footprint constructed atop a concrete slab foundation which measures approximately 40 feet from north to south and 60 feet from east to west. The walls of the building are constructed of brick masonry laid in a common (sometimes "American") bond and rise one story in height where they terminate in a nearly flat reinforced concrete roof with overhanging eaves. The wall corners are ornamented with quoins formed from raised masonry and a brick chimney protrudes from the southeast corner of the building. The building's fenestration includes multi-light wood windows with operable lower hopper sashes set atop cast stone sills. Its principal entry is recessed into the south elevation and is composed of a recessed single six-panel door set within a cast stone surround. A secondary entry with a six-panel door is located on the east elevation and accessed by a concrete ramp. Additional detailing includes a concrete top plate laid like an entablature beneath the roof overhang and steel bars placed atop the exterior of the windows.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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The Radio Transmission Building is eligible for inclusion in the National Register of Historic Places under Criterion A at the local level of significance in the areas of communications, military, and transportation, as well as under Criterion C at the local level in the area of architecture. The building is strongly associated with the development of military air operations at Pearson Field, as well as the use of radio in the development of aviation. It also remains a rare and intact example of the Stripped Classical style in use during the interwar period and it possesses further significance as a rare surviving example of an early radio facility.

The period of significance for the Radio Transmission Building under Criterion A is recommended to extend from 1940, the year of its construction, to 1941, the year of its last known use as a radio facility. The period of significance under Criterion C is limited to its completion in 1940. While the building's integrity is diminished through changes to its setting, and the loss of its associated antennae, it remains a rare example of a property type. Character-defining features include its small scale, flat roof, and masonry construction, as well as its intact ornamentation, fenestration, interior plan, and brick chimney. Ultimately, the building retains its integrity of location, design, materials, workmanship, and feeling to a high degree. The building is located on a parcel which covers more than 53 acres and includes the associated buildings of the Vancouver VAMC, as well as the associated parking lots and landscaping. Because these elements were constructed outside of the period of significance and are, ultimately, unrelated to the significance of the resource, the identified boundary of the NRHP-eligible property is recommended as the building footprint (Figure 4).

ALTERNATIVES CONSIDERED

Because the Radio Transmission Building at 1601 East 4th Plain Boulevard has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Radio Transmission Building, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

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As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible Radio Transmission Building. Program activities within the vicinity of the property would include a potential staging area at an existing parking lot to the south, as well as improvements to a frontage road, installation of a new storm water facility, and improvements I-5 freeway to the west. All of these activities would be located more than 150 feet from the building footprint, which is the identified boundary of the NRHP-eligible property. The building's character-defining features, including its small scale, flat roof, masonry construction, intact ornamentation, fenestration, interior plan, and brick chimney, would remain intact and unaltered.

Program activities would change the current setting of the Radio Transmission Building by constructing infrastructure improvements within the vicinity of the building. However, the building is largely insulated from these changes by distance as well as intervening trees and landscaping, as shown in Figure 6. Furthermore, the property's integrity of setting has already been considerably diminished through changes to its setting. The building is located on a parcel which covers more than 53 acres and includes associated buildings of the Vancouver VAMC, as well as the associated parking lots and landscaping—all elements constructed outside of the period of significance and that are unrelated to the significance of the resource. The setting features that would be altered, including I-5 to the west and a parking lot more than 300 feet away to the south, do not contribute to the building's ability to convey its association with the development of military air operations at Pearson Field, nor its association with the use of radio in the development of aviation. Additionally, the altered setting does not contribute to the building's ability to convey its association with the Stripped Classical style, nor as an example of an early radio facility. Finally, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of the property's character-defining features.

In conclusion, the Modified LPA would not diminish the Radio Transmission Building's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criteria A or C. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Radio Transmission Building at 1601 East 4th Plain Boulevard.

SOURCES/BIBLIOGRAPHY

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

Weiss-Tisman, Essie. "Radio Transmission Building (Vancouver Veterans Affairs Veterans Museum)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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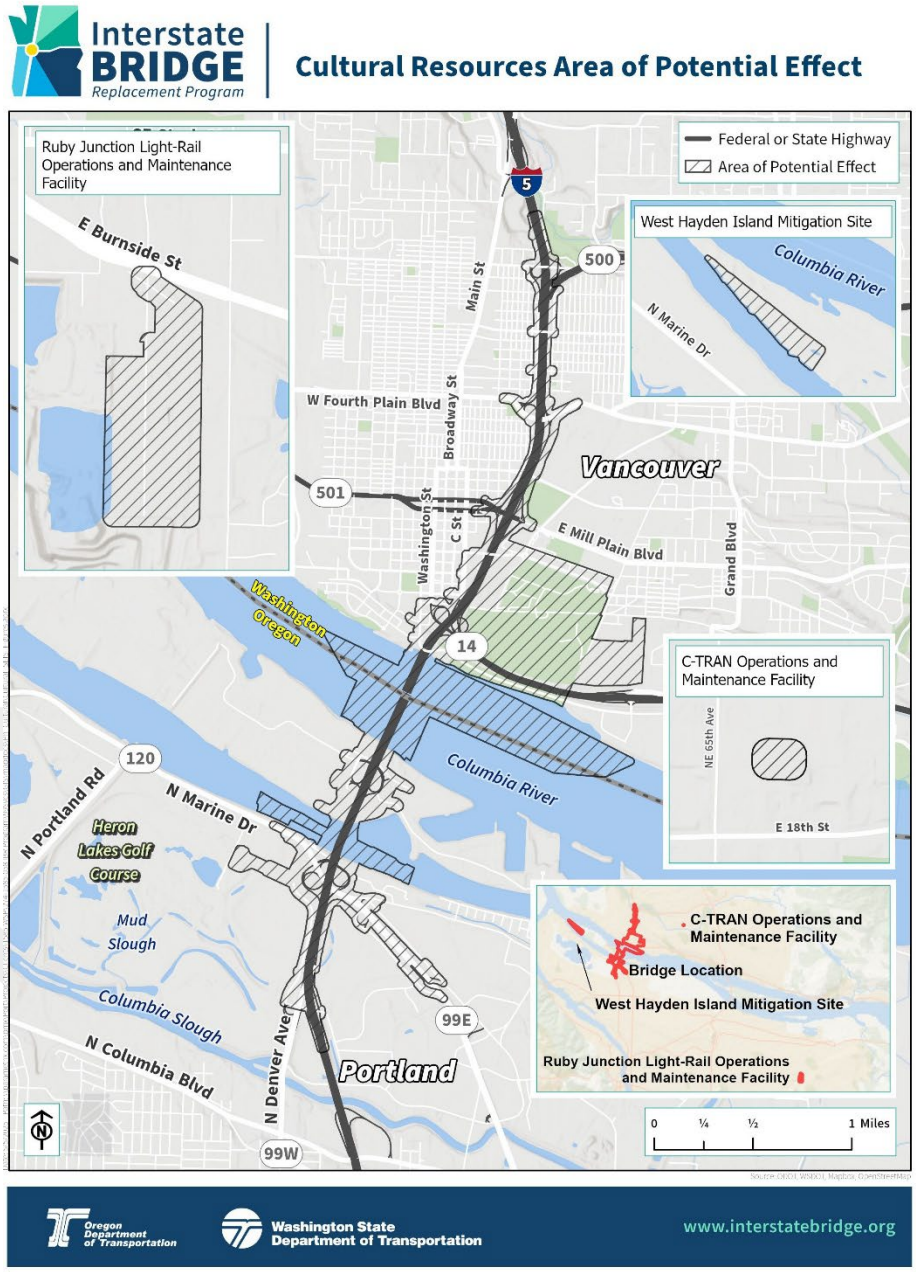


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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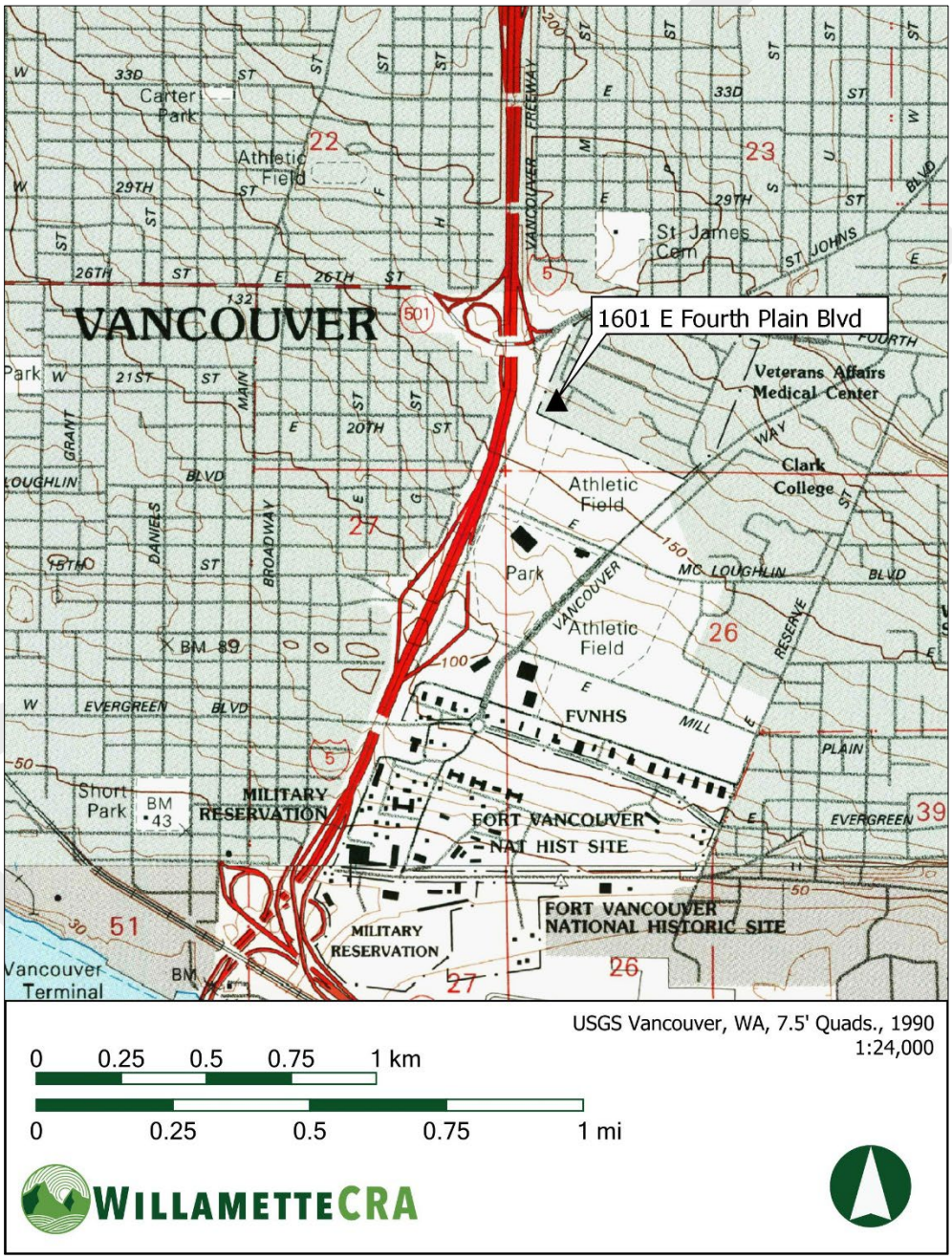


Figure 3. Location map of Radio Transmission Building (1601 East 4th Plain Boulevard), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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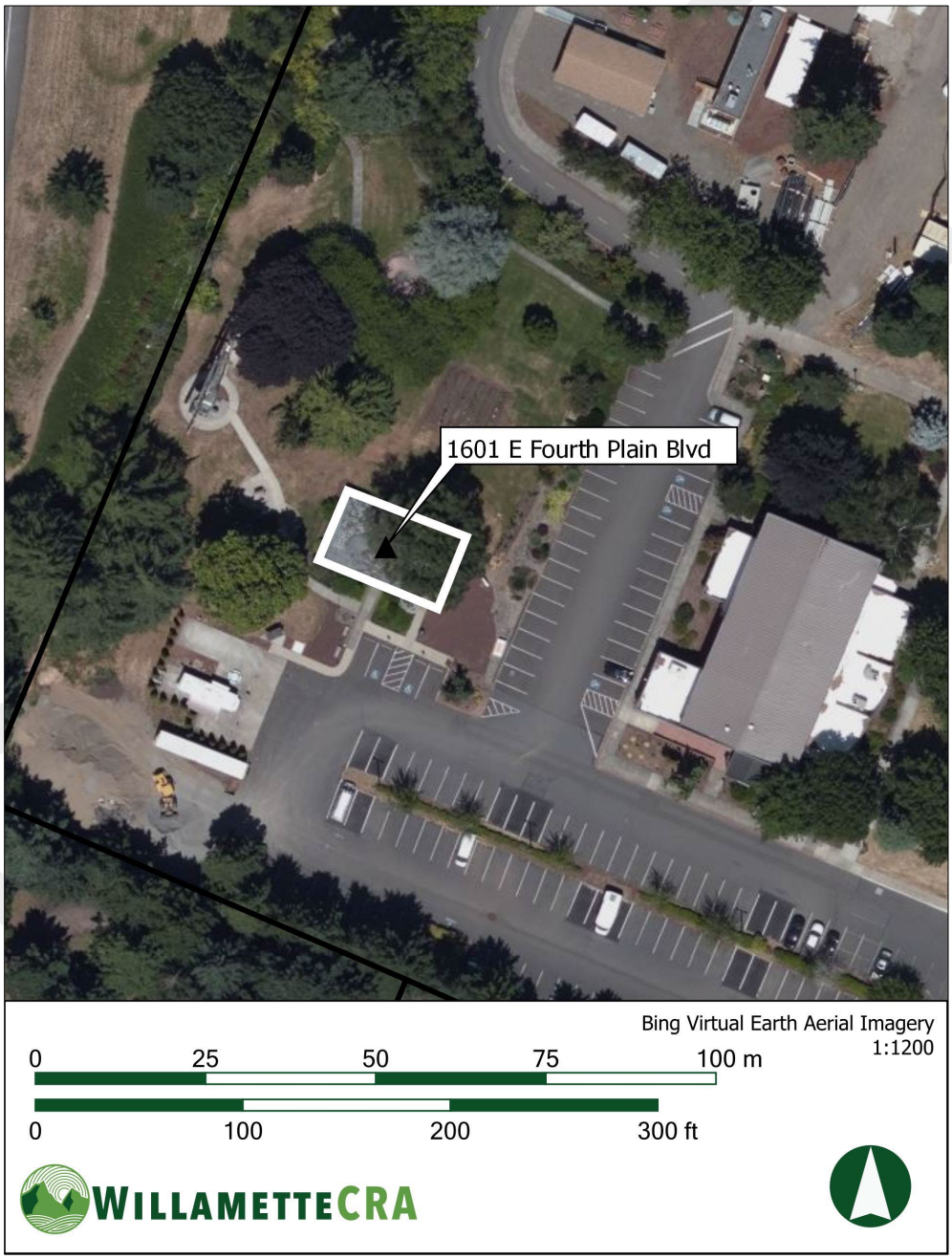


Figure 4. Aerial map of the Radio Transmission Building (1601 East 4th Plain Boulevard), showing the identified boundary in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Figure 5. Aerial map showing proposed Program activities near the Radio Transmission Building.

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Covington House (WA 900)	WISAARD Property ID: 20458
Street Address: 4201 Main Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Covington House, west elevation view facing southeast (WillametteCRA, June 10, 2022).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Covington House, a Hall-and-Parlor-Pioneer Log style former residential building located at 4201 Main Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is on the east side of Main Street between East 40th Street and NE 45th Street, was listed in the National Register of Historic Places (NRHP) in 1972 as a single building for its significance in the area of architecture. The 1972 Covington House NRHP nomination form predates current nomination criteria.

Based on the following information, it is the recommendation of Willamette Cultural Resources Associates (WillametteCRA) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect to Covington House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

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The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Covington House (WA 900)		WISAARD Property ID: 20458
Street Address: 4201 Main Street	City, County, State: Vancouver, Clark County, Washington	

- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Covington House at 4201 Main Street is an 1846 Hall-and-Parlor-Pioneer Log style, side-gabled single dwelling located in the Lincoln neighborhood of Vancouver, Clark County, Washington (Figure 3). The building's T-shaped footprint is constructed atop a modern concrete masonry unit (CMU) foundation. The walls are hewn logs with half dovetail joints and rise one story in height to a side-gabled, cedar shake roof with overhanging eaves and exposed rafters. The gable peaks are clad with clapboard. A shed roof awning extends over the building's primary entrance and a shed-roofed extension projects from its east (rear) side. A single chimney on its north side is constructed of cobblestone masonry. The building is sited on the same 35.19-acre tax lot/parcel as Kiggins Bowl and Discovery Middle School to the east and southeast respectively and is contained within a dense grove of mature conifers (Figures 6 and 7).

The building was listed in the NRHP in 1972 for its significance in the area of architecture as the former home of Richard Covington of the Hudson's Bay Company with a period of significance noted as "19th century." The form also notes that the building was originally constructed in the Orchards area approximately 5 miles east of

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Vancouver and moved to Leverich Park in 1926. Although originally constructed as a residence, the building has functioned as an event space since that time.[2]

Having been moved from its original location and converted to a new use, the building no longer retains its integrity of location, setting, or association. Although the building has a modern foundation and finished hardwood floors as well as heating, plumbing, and electrical systems, the building is otherwise well-maintained as a Pioneer Log style building and retains its integrity of design, materials, workmanship, and feeling. While the NRHP nomination form does not discuss a formal boundary for the listed property, the relocation of the building limits its significance to its architecture and supports building footprint as the identified boundary of the NRHP-listed property (Figure 4). This boundary is further corroborated by the Washington State Department of Archaeology and Historic Preservation's (DAHP's) WISAARD database which shows the extent of the listed property as a small polygon overlaying the building footprint.

ALTERNATIVES CONSIDERED

Because the Covington House is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-listed Covington House, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-listed Covington House. Program activities within the vicinity of the property would include the extension of an off-ramp beyond the eastern boundary of the building's tax lot and the acquisition of a subsurface easement beneath the tax lot's southeast corner. Program activities would also include the construction of a new noise wall, approximately 750 feet long,

[2] Robert A. Hidden, "Covington House," National Register of Historic Places Inventory/Nomination Form, for Vancouver Historical Society, Vancouver, Washington, May 5, 1972.

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along the west side of I-5 north of East 39th Street (Figure 5). All activities would be located more than 800 feet from the building footprint, which is the identified boundary of the NRHP-listed property. It is anticipated that the building's character-defining features including its small scale, one- and-a-half story construction, gable roof form, log construction, and cobble stone chimney would remain intact and unaltered as a result of the undertaking. It is further anticipated that the undertaking would have No Adverse Effect as a result of any auditory, visual, or atmospheric changes as the property is located over 700 feet west of this new noise wall's construction impact area and is heavily insulated from its construction through a dense grove of mature trees and Discovery Middle School.

In conclusion, the Modified LPA would not diminish the Covington House's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable to the property to convey its significance for which it was listed in the NRHP in 1972. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-listed property.

CONCLUSION

It is the recommendation of WillametteCRA to FHWA and FTA that the IBR Program would have No Effect on the NRHP-listed Covington House at 4201 Main Street.

SOURCES/BIBLIOGRAPHY

Hidden, Robert A. "Covington House." National Register of Historic Places Inventory/Nomination Form. For Vancouver Historical Society, Vancouver, Washington, May 5, 1972.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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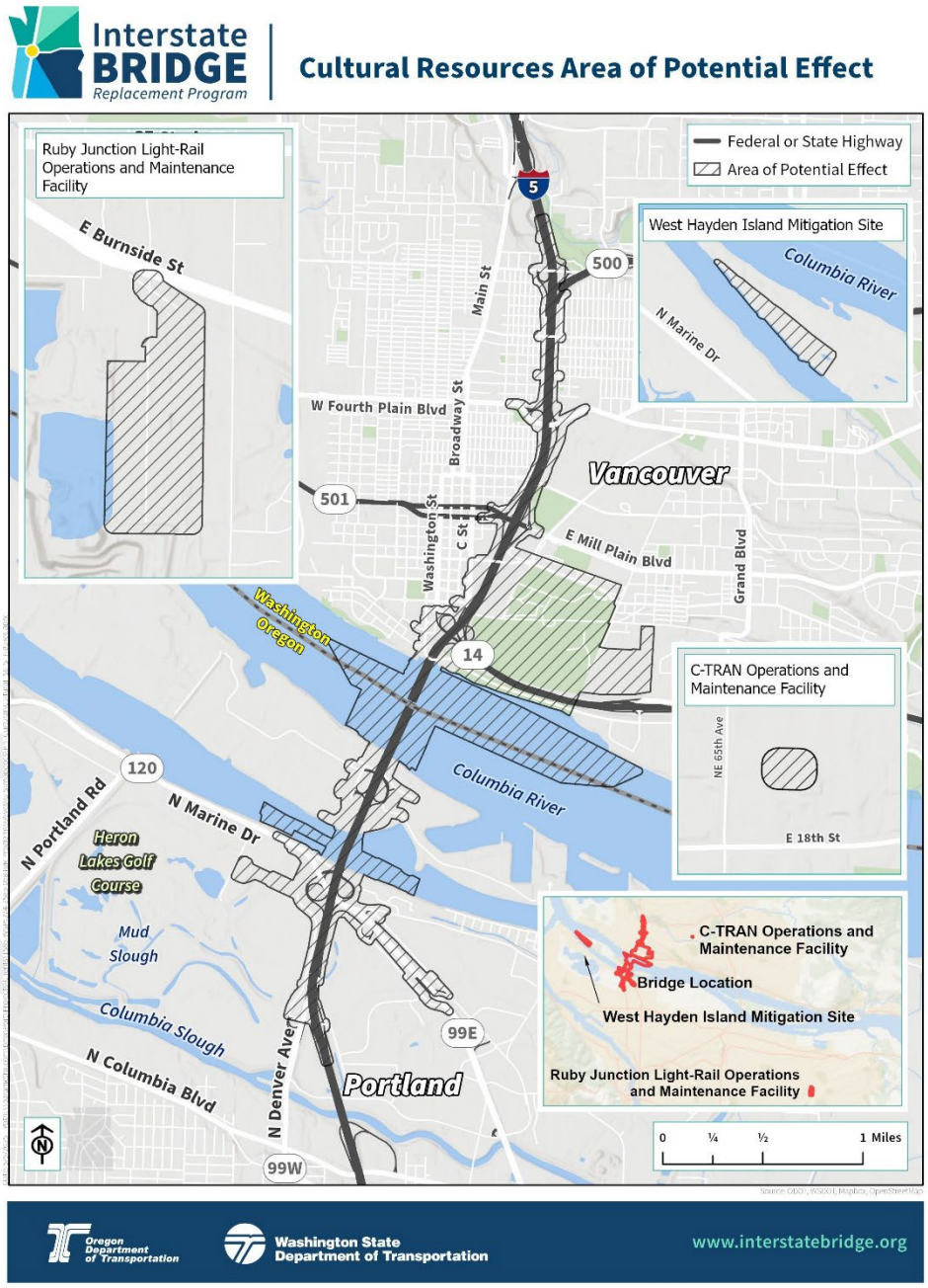


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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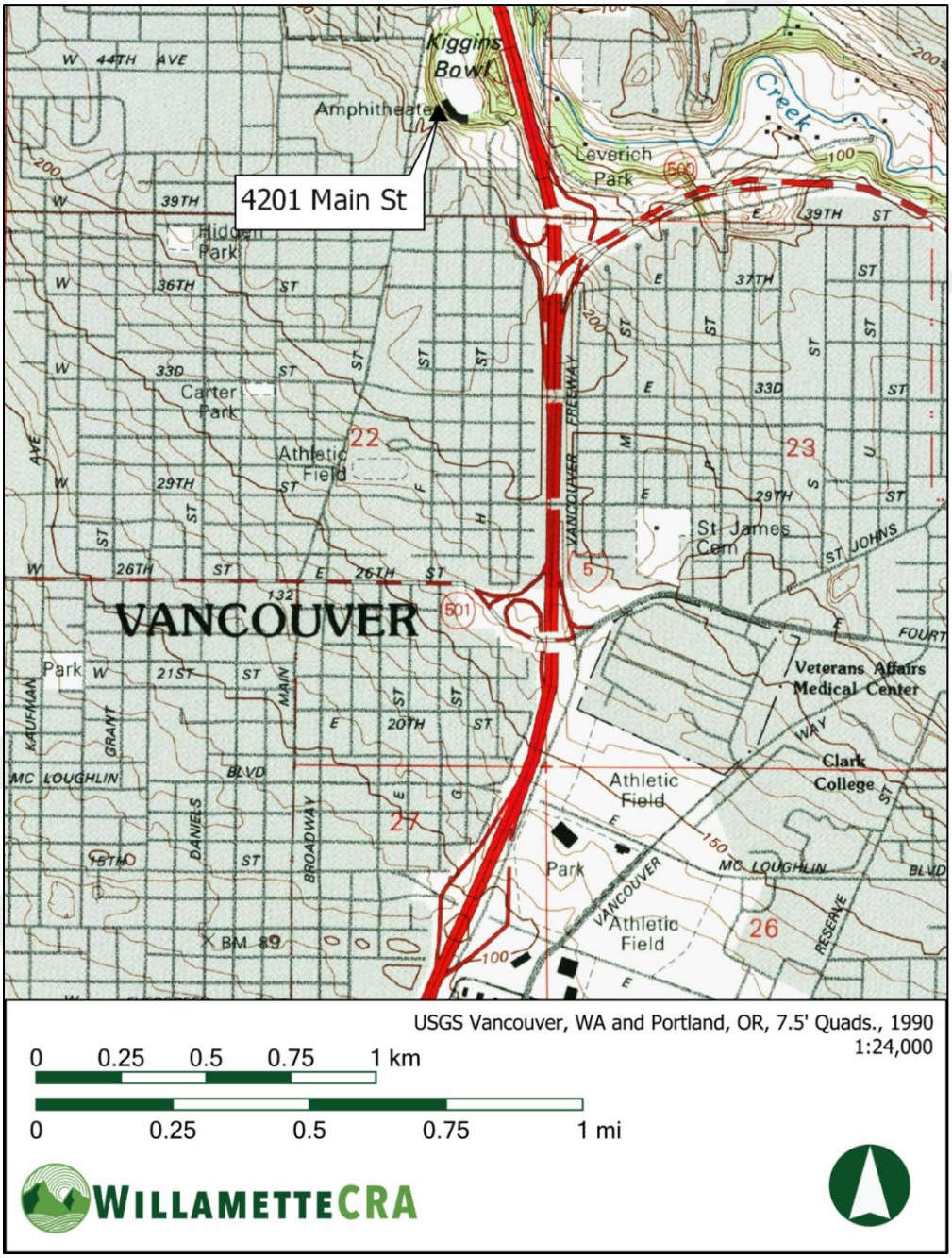


Figure 3. Location map of Covington House (4201 Main Street), Vancouver, Clark County, Washington.

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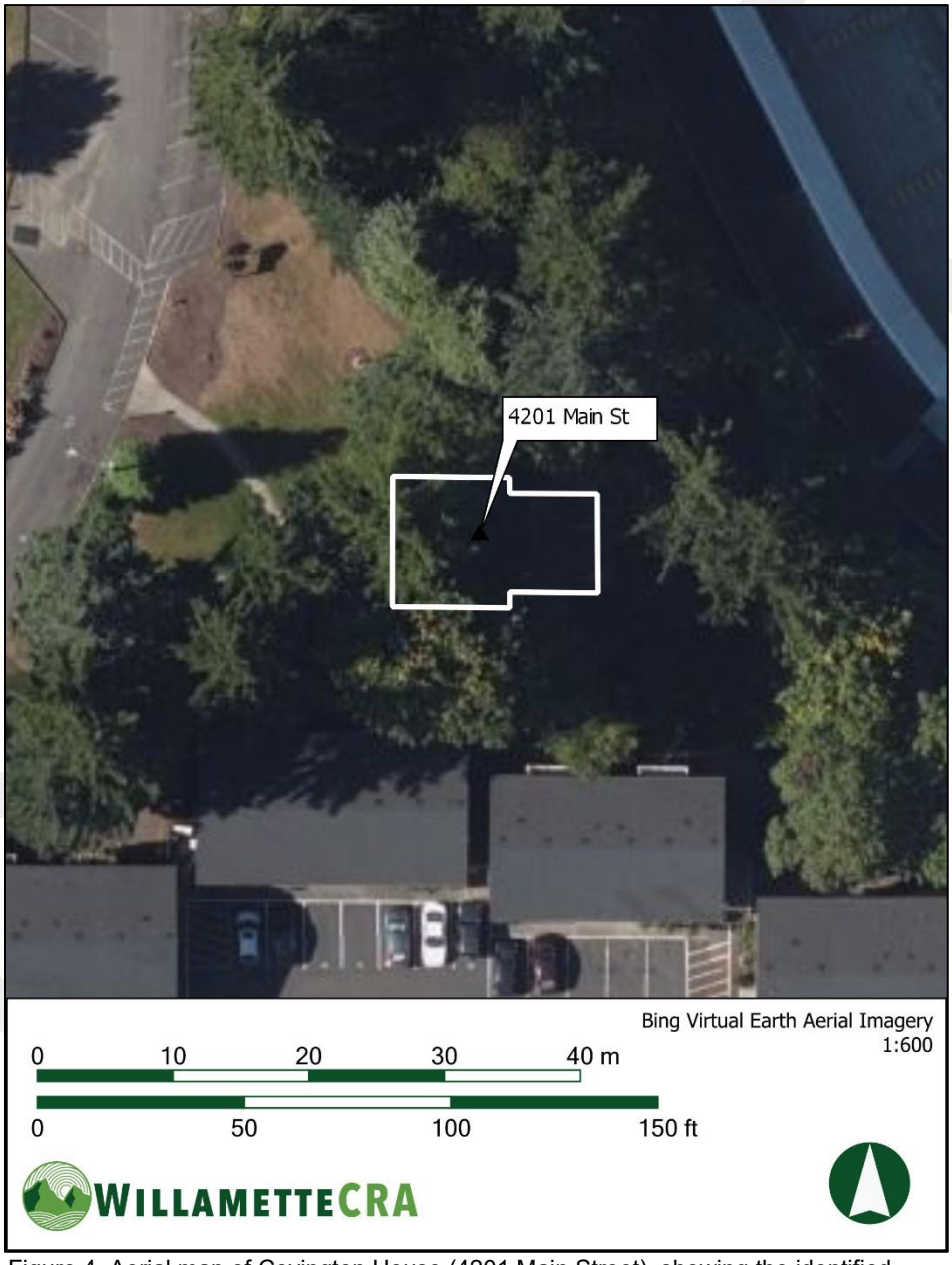


Figure 4. Aerial map of Covington House (4201 Main Street), showing the identified boundary of the NRHP-listed property in white.

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Figure 5. Aerial map showing the proximity of proposed Program activities to the Covington House (4201 Main Street, the identified boundary of the NRHP-eligible property is outlined in white), including retaining wall and subsurface easement.

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Figure 6. Covington House, north elevation, view facing south (WillametteCRA, June 10, 2022).

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Figure 7. Covington House, south and east elevations, view facing northwest (WillametteCRA, June 10, 2022).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Pacific First Federal Savings and Loan Association (WA 1133)	WISAARD Property ID: 729874
Street Address: 915 Broadway Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Pacific First Federal Savings and Loan Association building, view southwest (WillametteCRA, January 22, 2024).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Pacific First Federal Savings and Loan Association (Pacific First Federal) building, a Late Modern professional office building located at 915 Broadway Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southeast corner of Broadway Street and E Evergreen Boulevard, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Pacific First Federal building. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Pacific First Federal building (915 Broadway Street) is a Late Modern professional office building in the Esther Short neighborhood of Vancouver, Clark County, Washington (Figure 3). Constructed in 1975, the building has a square footprint and is situated diagonally on a rectangular tax lot. It has a poured concrete foundation and reinforced concrete walls that rise four stories in height to a flat roof with an unusual inclined parapet (Figure 1). The exterior walls, which are clad in oversized brick veneer laid in a 1/3 bond, alternate with sections of inset glass curtain wall systems made of tinted glass and dark spandrels; the corners consist of angled brick-clad piers. Primary entries, which consist of fully glazed double doors flanked by aluminum framed windows, are located in the west and north corners of the building. Stained, horizontal board wood panels ornament the space above each entry. Around the building, triangular shaped zones in the southwest and northwest corners of the tax lot are defined by elaborate landscaping, including an irregular rock garden infilled with mature bushes, shrubs, and trees, as well as an outdoor patio underneath a wood pergola. A paved surface parking lot accessed from Broadway and C streets occupies the south and east sections of the tax lot (Figure 6).

The Pacific First Federal building is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the area of architecture as a noteworthy example of the Late Modern style in Vancouver's central

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business district. The bank was one of the first institutions to reinvest in downtown Vancouver during its period in the aftermath of urban renewal, and it is therefore the best extant example of this style in the area. The building's character-defining features include its diagonal orientation on its tax lot; square footprint and four-story massing; concrete construction and brick veneer; glass curtain walls; angled parapet; and landscaped areas at the corners of the tax lot.

The period of significance for the Pacific First Federal building is 1975, the year of its construction. Since this time, the building has experienced only superficial exterior alterations including painting of the brick veneer and replacement of the original wood panels over the entries. The interior has been more extensively modified, but these changes are typical for commercial properties that experience tenant turnover. The area around the building has also been slightly changed by the installation of fences along Broadway Street and E Evergreen Boulevard and the replacement of a sculptural water fountain with the wood pergola. Despite these changes, the property generally retains integrity of location, design, materials, workmanship, feeling, and association to the period of significance. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot, which is lined by E Evergreen Boulevard to the north, C Street to the east, Broadway Street to the west, and the former "Sculpture Garden on Broadway" to the south (Figure 4). Within this boundary, the building, the associated surface parking lot, and the associated landscaping are all contributing to the property's significance.

ALTERNATIVES CONSIDERED

Because the Pacific First Federal building has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Pacific First Federal building, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible Pacific First Federal building. Program activities in the vicinity of the property would include potential enhancements along C Street, Broadway Street, E Evergreen Boulevard, and E 9th Street to support access to transit, which may include a park and ride on the block adjacent to the east. Additional activities, including the construction of a new LRT station and the

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Pacific First Federal Savings and Loan Association (WA 1133)		WISAARD Property ID: 729874
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widening and reconstruction of the I-5 corridor, would occur more than one block to the east of the property (Figure 5). None of the proposed activities would require new right of way from the Pacific First Federal building's tax lot, which is the historic boundary of the property.

The proposed LRT station, park and ride, and related transit enhancement would slightly alter the property's setting through the introduction of new visual, atmospheric, and audible elements. However, these activities would not have an effect on any of the character-defining features that enable the property to convey its significance under Criterion C, including the building's orientation on its tax lot, massing, cladding, and fenestration, as well as the extant landscaping in the triangular shaped zones in the corners of the tax lot. The property's design and materials would remain intact and unaltered, and its location would be unchanged by Program activities. The commercial character of the neighborhood to the north, west, and south would also remain unchanged, and so the undertaking would not alter the character of the property's setting or diminish its association with Vancouver's central downtown business district. Furthermore, because the Pacific First Federal building does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish its integrity in this respect.

In conclusion, the Modified LPA would not diminish the Pacific First Federal building's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criterion C. The property would remain a generally intact example of the Late Modern style, and it would maintain its association with the development of Vancouver's central downtown business district in the early aftermath of urban renewal. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible Pacific First Federal building.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Pacific First Federal Savings and Loan Association building.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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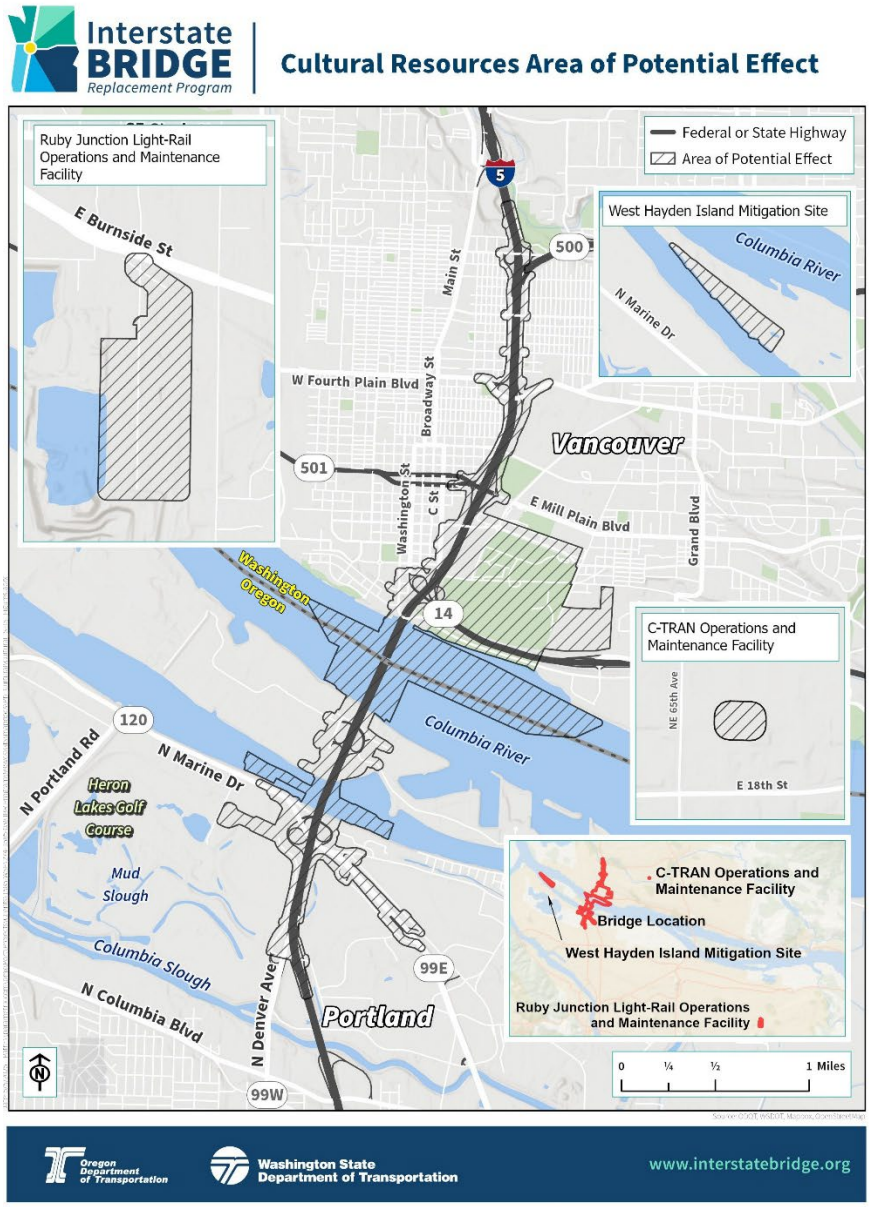


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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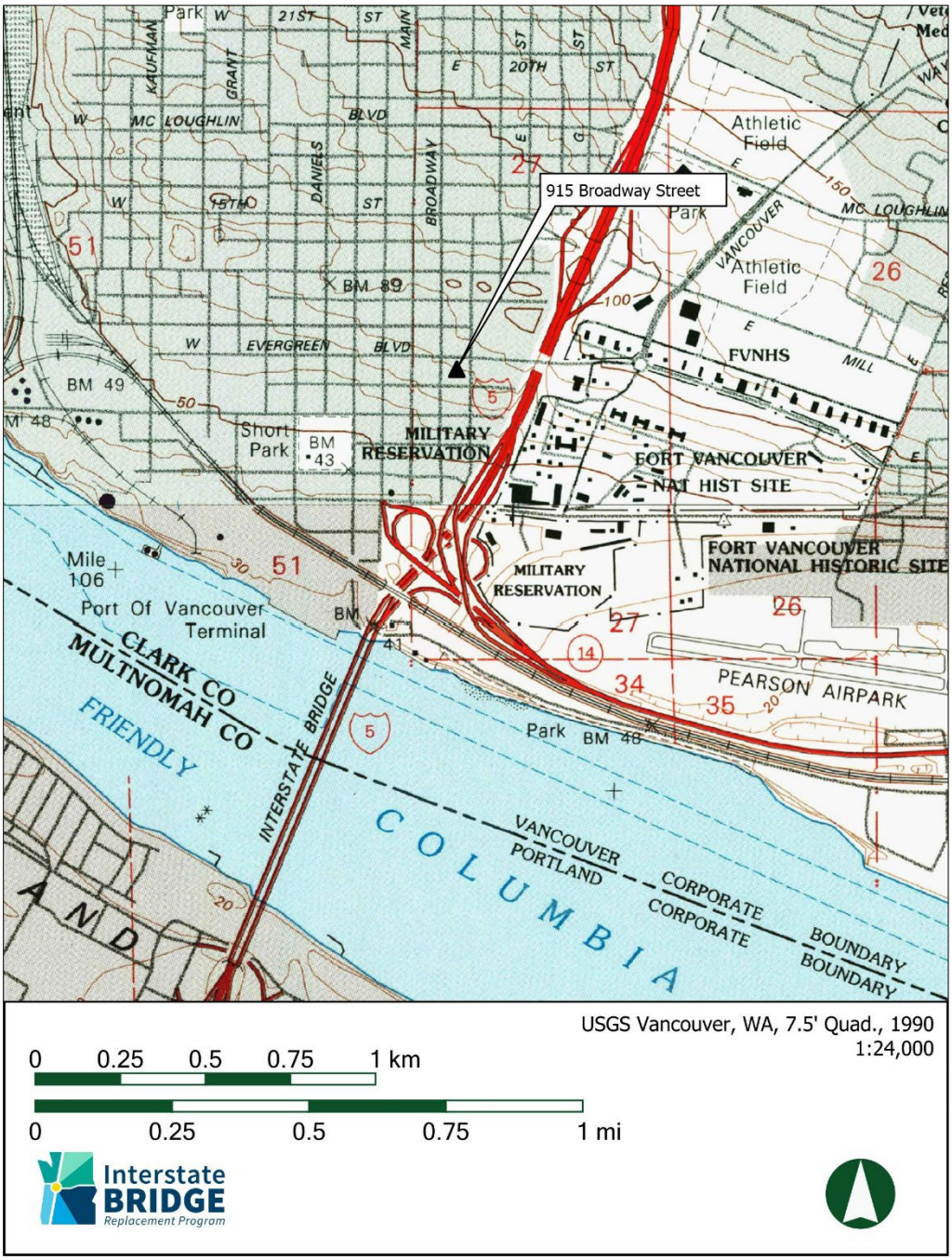


Figure 3. Location map of the Pacific First Federal building (915 Broadway Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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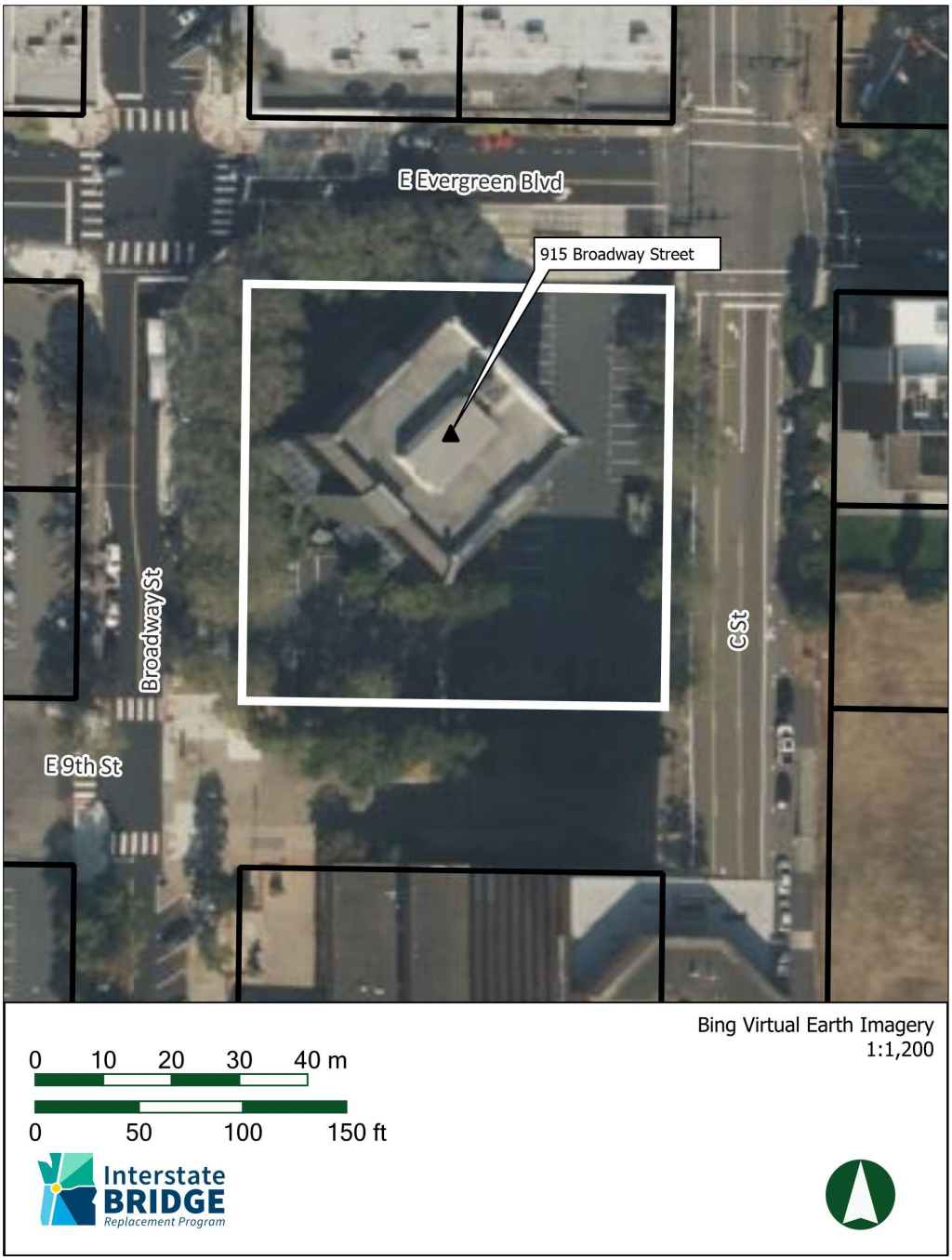


Figure 4. Aerial map of the Pacific First Federal building (915 Broadway Street), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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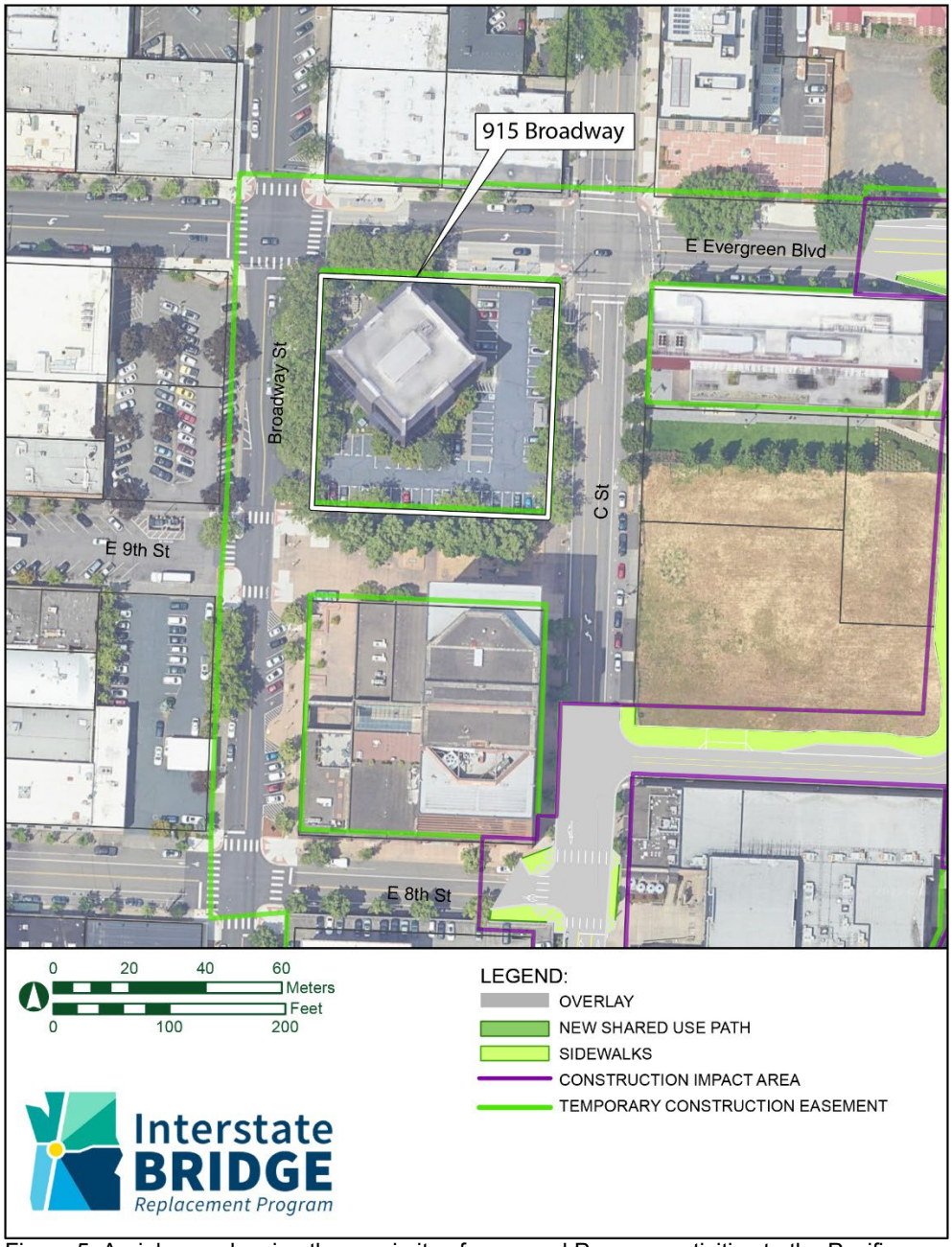


Figure 5. Aerial map showing the proximity of proposed Program activities to the Pacific First Federal building, showing the identified boundary of the NRHP-eligible property in white. A potential park and ride may be proposed for the lot to the east of the Pacific First Federal building, at the northeast corner of S Street and E 8th Street.

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Figure 6. Pacific First Federal building and landscaping, view north (WillametteCRA, January 22, 2024).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Who Song & Larry's Restaurant (WA 1138)	WISAARD Property ID: 731246
Street Address: 111 SE Columbia Way	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Who Song & Larry's Restaurant, north elevation, view south (WillametteCRA March 8, 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on Who Song & Larry's Restaurant, a Roadside style restaurant building located at 111 SE Columbia Way in Vancouver, Clark County, Washington (Figure 1). The subject property, which is located on the south side of SE Columbia Way and east of Interstate 5 (I-5), was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on Who Song & Larry's Restaurant. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

DRAFT

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

Who Song & Larry's Restaurant at 111 SE Columbia Way is a Roadside style commercial building constructed in 1981 and located along the north shore of the Columbia River in Vancouver, Clark County, Washington (Figure 3). The building has a highly irregular plan and is constructed atop a concrete foundation. The walls of the building are clad in wood clapboard siding with corner boards and rise one to three stories in height. The building's highly complex volumetric proportions consist primarily of stepped massing with a wide and sprawling first story base topped by hip and valley roof forms, a setback second story with hip and valley roof forms and large gabled dormers, as well as a central third story tower with a bellcast and steeply pitched pyramidal frustrum roof. The roof over each story is clad with asphalt composition shingles and has overhanging eaves. Each of the building's gabled dormers are supported by scalloped knee braces with central louvered vents while neon lighting elements edge the second story eaves. The building's primary entrance is located on the west end of the building's north elevation under a hipped-roof awning. It is composed of wooden double doors each with a beveled arched light above a square panel. On the building's south elevation are multiple sets of wood-frame, stained-glass double doors that open onto the outdoor dining deck. Lastly, there are three flush steel service doors located at the building's northeast corner. One provides access to the parking lot, a second to a fenced-in waste area, and a third on the second story to the building's HVAC equipment. The building's fenestration

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consists of a variety of fixed, wood frame windows arranged singly, in pairs, in tripartite configurations with a central picture window ("Chicago windows"), and in groupings of four. Several windows include false muntins and there are five ornamental stained-glass windows on the building's north elevation as well.

Who Song & Larry's Restaurant is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the areas of architecture and commerce. It is the best known example of Roadside style architecture within the corporate limits of Vancouver and demonstrates its hallmarks including a distinctive eye-catching design meant to attract and serve customers traveling by car on the adjacent interstate. Character-defining features include the building's general form and massing, its complex roof forms, intricate fenestration and detailing, as well as its associated parking area. The building's outdoor dining area, river-facing viewsheds, and visibility to I-5 are also important features of its original design and are considered character-defining.

The period of significance for Who Song & Larry's Restaurant is defined by the year of its construction, 1981. Despite some modifications to the building's roof, decking, and other interior alterations, the restaurant building still retains its integrity of location, design, materials, workmanship, feeling, and association. The building's setting has more dramatically changed to the west and east, though its viewsheds across the Columbia River remain unimpaired. As a result, its integrity of setting has been only somewhat diminished. Who Song & Larry's Restaurant is set on two parcels (38279908 and 502300000) which include the subject building as well as the surrounding landscaping, concrete walkways, paved parking lot, outdoor dining deck, and public boardwalk. A section of the northern parcel also extends approximately 140 feet to the northwest to encompass a small number of parking stalls set perpendicular to SE Columbia Way. Additionally, a portion of the outdoor dining and deck and the public boardwalk lie outside the southern boundary of parcel 502300000. All of these features contribute to the property's historic significance except for the public boardwalk and the parking stalls included in the northwest extension. The boardwalk was constructed after the building's 1981 period of significance, while the parking stalls are visually and compositionally associated with the former Joe's Crab Shack rather than Who Song & Larry's Restaurant. As such, the identified boundary of the NRHP-eligible property is defined by the southern edge of the outdoor dining deck to the south, the eastern boundaries of the subject parcels (marked on site by a concrete dwarf wall) to the east, the southern edge of the SE Columbia Way sidewalk to the north, and the western boundaries of the subject parcels to the west, excluding the northwest extension (Figure 4).

ALTERNATIVES CONSIDERED

Because Who Song & Larry's Restaurant at 111 SE Columbia Way has been identified as a historically significant resource that is eligible for listing in the NRHP, program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Who Song & Larry's Restaurant, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. As currently proposed, the Modified LPA would have an effect on the NRHP-eligible Who Song & Larry's Restaurant, but that effect would not be adverse.

Program activities within the vicinity of Who Song & Larry's Restaurant would entail road improvements along the existing SE Columbia Way to the north, a proposed new shared use path and bridge to the west, and a construction impact area within the Columbia River waterway to the east (Figure 5). Road improvements along SE Columbia Way would potentially include enhancements to pedestrian and traffic access (e.g., sidewalks, curb ramps, signage), but they would not include the reconfiguration of the current roadway or the construction of additional traffic lanes; this section of SE Columbia Way would remain a two-lane, two-way road. The road improvements along SE Columbia Way would require a narrow temporary construction easement within the boundary of the NRHP-eligible property. This narrow strip take would be located approximately 150 feet away from the property's primary building. It is assumed that the temporary construction easement would not remove any vegetation and would return the northern edge of the property—including the concrete curb and landscaping elements—to its pre-construction state. Additionally, a large parcel is located west of the restaurant building, buffering the restaurant property from the proposed shared use path and bridge, which would be constructed approximately 300 feet away to the west.

While the proposed road improvements along SE Columbia Way would be partially visible from the north side of the property, there are two rows of mature trees—with a sidewalk in between each row—running along SE Columbia Way that would partially visually obscure the proposed road improvements. Overall, the improvements would not have an effect on any of the property's character-defining features or any of the aspects of setting that enable the property to convey its significance under Criterion C. The property's character-defining features would remain intact and unaltered—including the restaurant's conspicuous Roadside architectural design, outdoor dining area, river-facing viewsheds, and visibility to I-5. The property's location and landscaping would also remain unchanged by Program activities. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would not diminish Who Song & Larry's integrity of location, design, materials, workmanship, feeling, or association. While the proposed activities would have an effect on the setting as a result of the temporary construction easement along SE Columbia Way, the activities would not have an effect on any features that enable the property to convey its significance under Criterion C. The property would maintain its ability to convey its association with a distinctive eye-catching Roadside design meant to attract and serve customers traveling by car along I-5. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Who Song & Larry's Restaurant.

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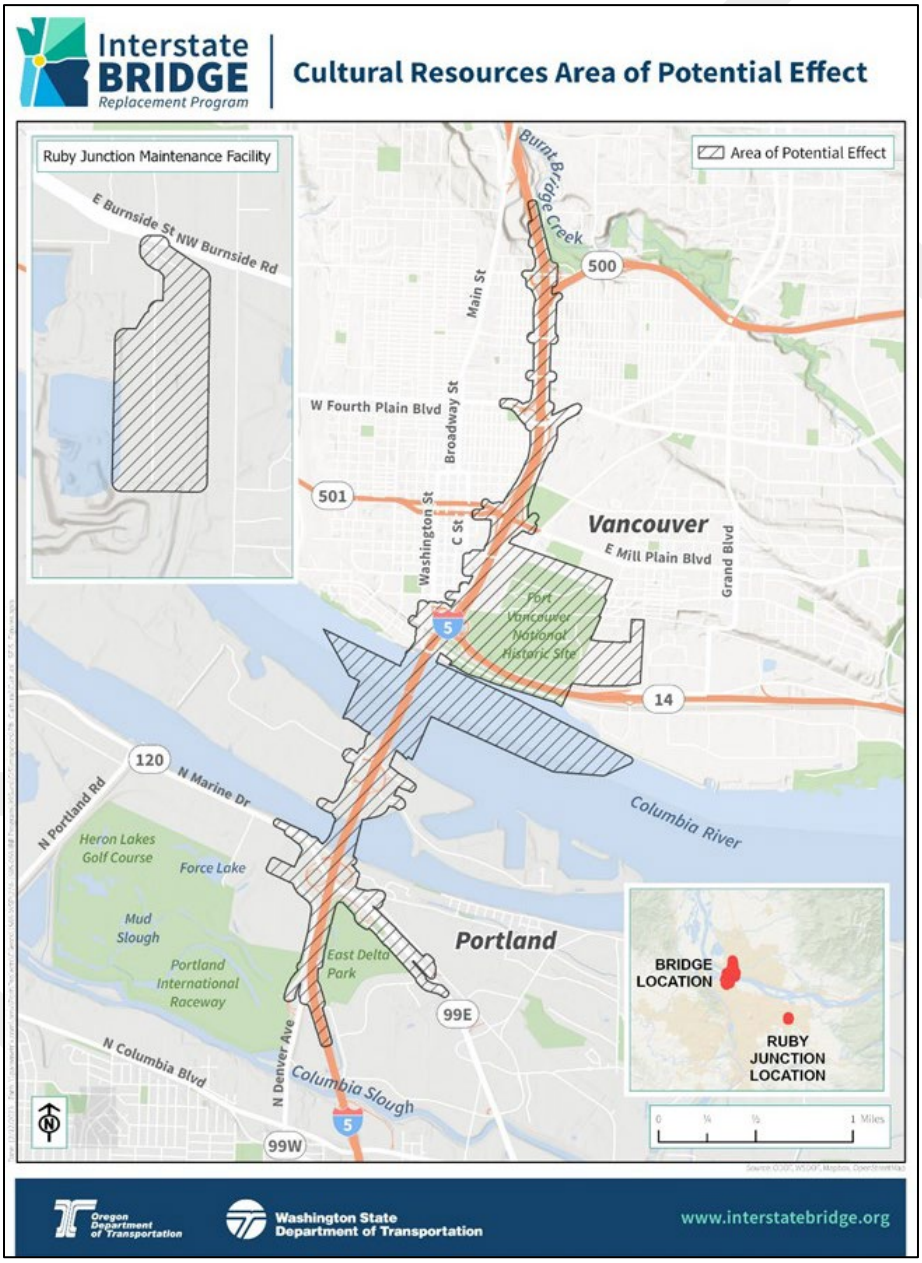


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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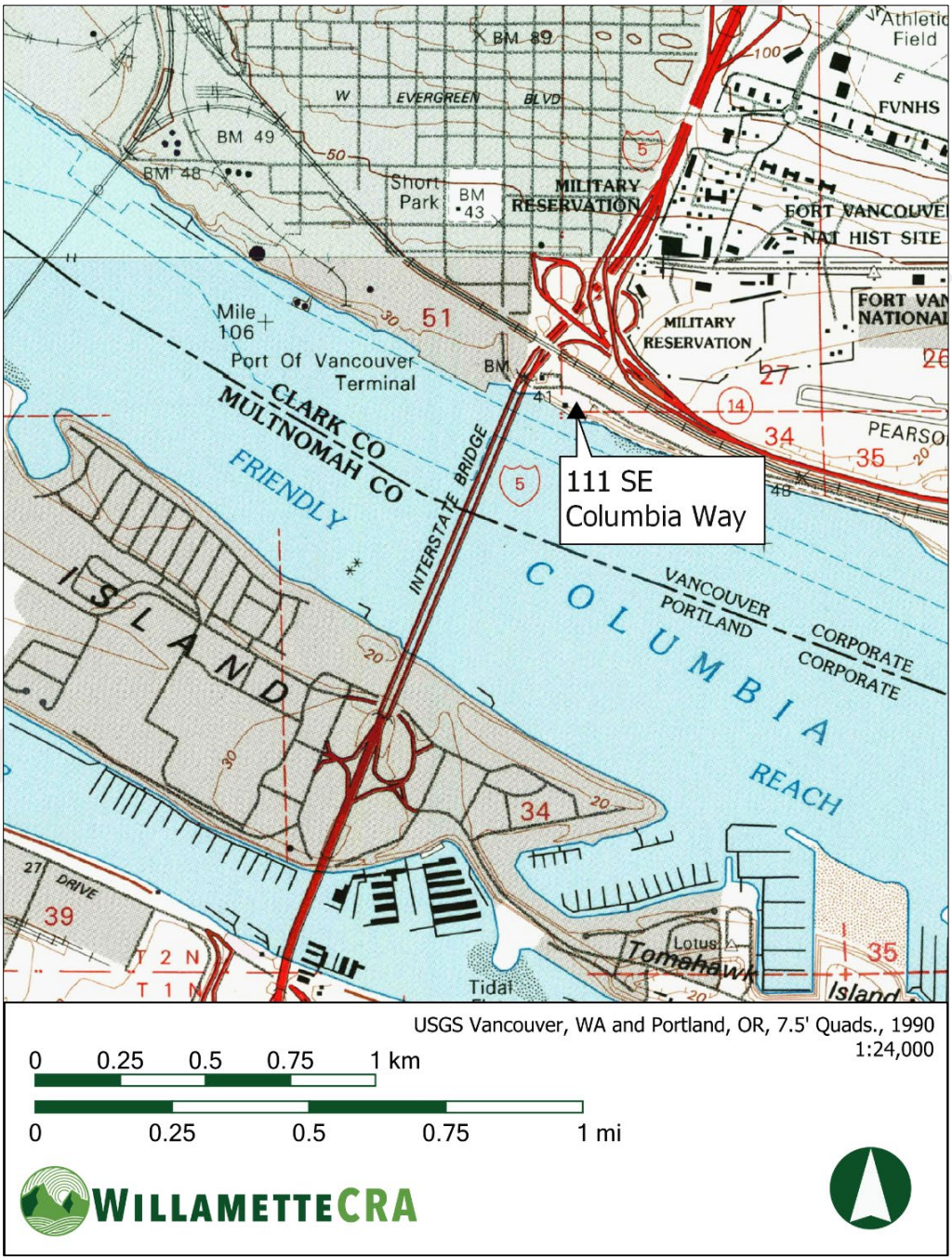


Figure 3. Location map of Who Song and Larry's Restaurant (111 SE Columbia Way), Vancouver, Clark County, Washington

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Street Address: 111 SE Columbia Way	City, County, State: Vancouver, Clark County, Washington	

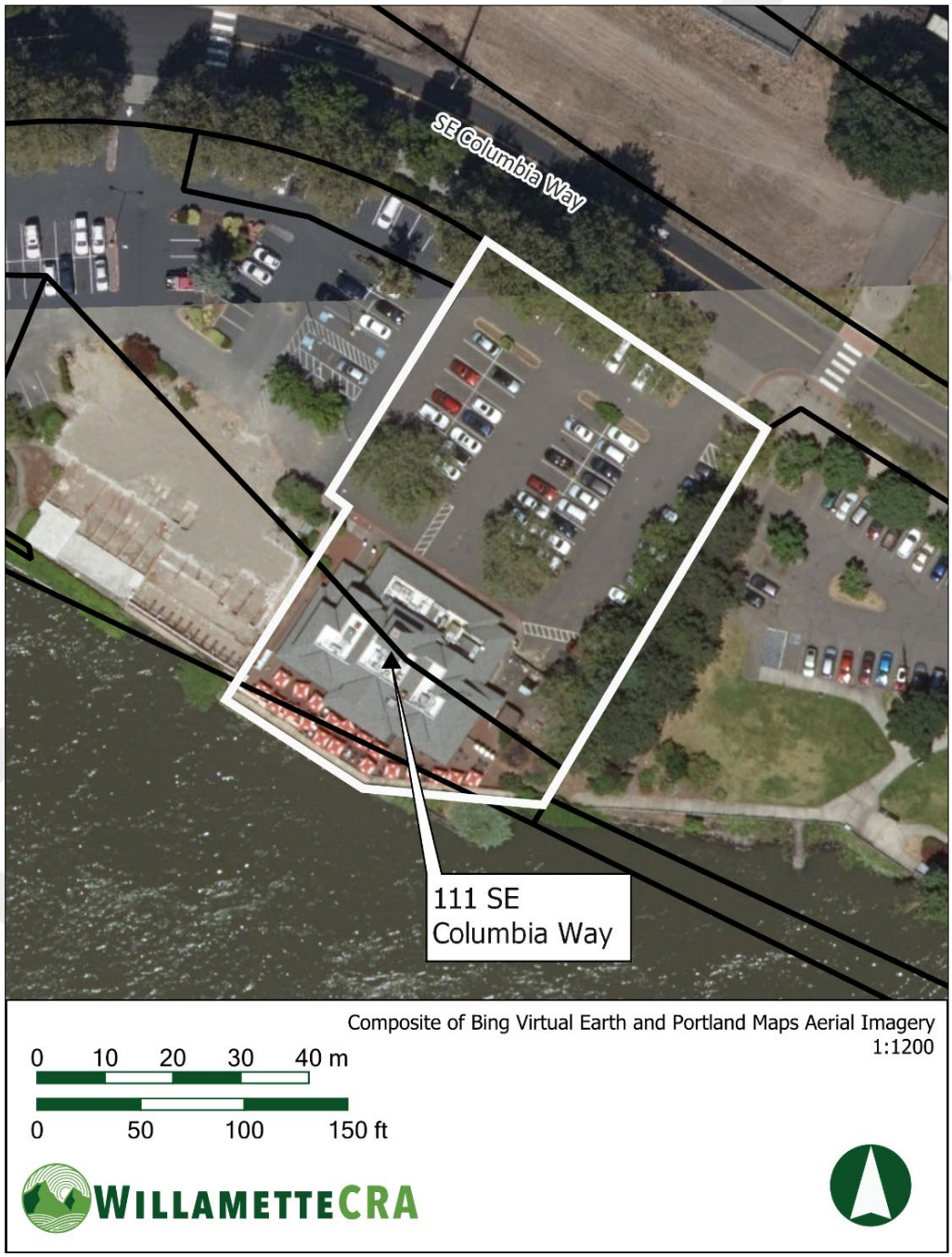


Figure 4. Aerial map of Who Song & Larry's Restaurant (111 SE Columbia Way), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Who Song & Larry's Restaurant (WA 1138)		WISAARD Property ID: 731246
Street Address: 111 SE Columbia Way	City, County, State: Vancouver, Clark County, Washington	

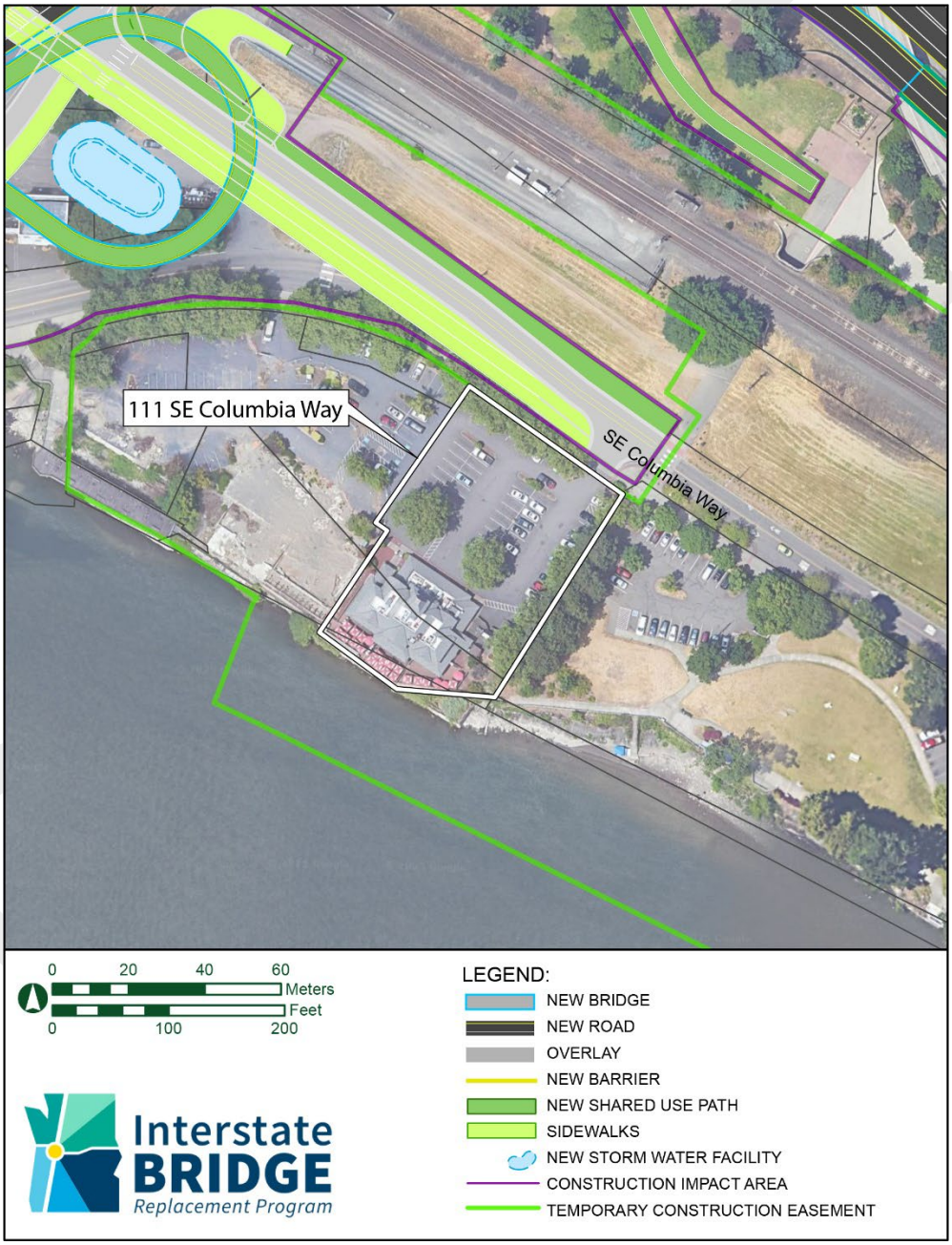


Figure 5. Aerial map showing the proximity of proposed Program activities to Who Song & Larry's Restaurant, showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Who Song & Larry's Restaurant (WA 1138)		WISAARD Property ID: 731246
Street Address: 111 SE Columbia Way	City, County, State: Vancouver, Clark County, Washington	



Figure 6. Who Song & Larry's Restaurant, west and south elevations, view northeast from the existing Interstate Bridge (WillametteCRA, March 8, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Office Building (WA 1144)	WISAARD Property ID: 731267
Street Address: 1514 E Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Office building at 1514 E Street, view facing southwest (WillametteCRA, December 14, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Office Building (WA 1144)		WISAARD Property ID: 731267
Street Address: 1514 E Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the office building at 1514 E Street, a Postmodern/Northwest Regional style office building in Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southwest corner of the intersection of E 16th Street and E Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the office building at 1514 E Street. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Office Building (WA 1144)		WISAARD Property ID: 731267
Street Address: 1514 E Street	City, County, State: Vancouver, Clark County, Washington	

highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The building at 1514 E Street is a Postmodern/Northwest Regional style office building located near the southern edge of the Arnada neighborhood in Vancouver, Clark County, Washington (Figure 3). Constructed in 1977, the building features a rectangular footprint measuring 44 feet from north to south and 37 feet from east to west. It has a reinforced concrete foundation and wood frame walls that rise one story in height to a distinctive, steeply pitched roof that is hipped on the east, north, and south sides, with a gable end on the west side. The walls are clad in T1-11 plywood siding, punctuated on the east (principal), north, and south elevations by fixed aluminum windows (Figure 6). The interior is divided into two units that are accessed by recessed corner vestibules in the building's northeast and southeast corners.

The 1514 E Street property is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the area of architecture. The building successfully demonstrates its designers' and developers' sensitivity to the concerns of the local residential neighborhood, and it also showcases a blend of the Postmodern and Northwest Regional styles. Its character-defining features include its setback from adjacent roadways; one-story height and pitched roof with combined hipped and gabled forms; T1-11 plywood siding; fixed aluminum windows; and subtle internal division into two distinct offices. The period of significance for the office building at

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Office Building (WA 1144)		WISAARD Property ID: 731267
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1514 E Street is limited to 1977, the year that construction of the office building and its associated landscaping were completed.

The 1514 E Street property has experienced relatively few alterations and remains in use as a professional office, and so it retains integrity of location, design, materials, workmanship, feeling, and association. However, its integrity of setting has been somewhat diminished by the replacement of nearby single-family residences with high-density housing units since the end of the period of significance. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot, which is bounded by East 16th Street to the north, E Street to the east, and the surface parking lot of an adjacent parcel to the west and south (Figure 4). The boundary includes the office building, an associated surface parking lot, and associated landscaping, all of which contribute to the property's significance.

ALTERNATIVES CONSIDERED

Because the office building at 1514 E Street has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible office building at 1514 E Street, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible office building at 1514 E Street. Program activities within the vicinity of the property would include the addition of a shared use path along the north side of E 15th Street, immediately west of the I-5/Mill Plain Boulevard interchange, and potential enhancements to traffic and pedestrian access at the intersection of E 15th Street and D Street (Figure 5). These activities would not require any new right of way from 1514 E Street, and they would be physically separated from the property by an intervening parking area and an existing two-story building (404 E 15th Street) constructed ca. 1990. Although a small portion of the shared use path could be visible from the southeast side of the property (Figure 7), it would not have an effect on any of the property's character-defining features or any of the aspects of its setting that enable it to convey its significance under Criteria A and C. The property's setback, height, roof form, siding, fenestration, and internal organization would remain intact and unaltered, and its location and

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Office Building (WA 1144)		WISAARD Property ID: 731267
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relationship with adjacent streets, sidewalks, and parking areas would be unchanged during and after construction. Furthermore, because the property does not rely upon a quiet setting to convey its significance, Program activities would not reduce any significant atmospheric or audible qualities.

In conclusion, the Modified LPA would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under NRHP Criterion C. The building would maintain its ability to convey its association with Postmodern and Northwest Regional style architecture. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible property at 1514 E Street.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible office building at 1514 E Street.

SOURCES/BIBLIOGRAPHY

Boyle, Brigid. "Office Building at 1514 E Street (WA 1144)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

DRAFT

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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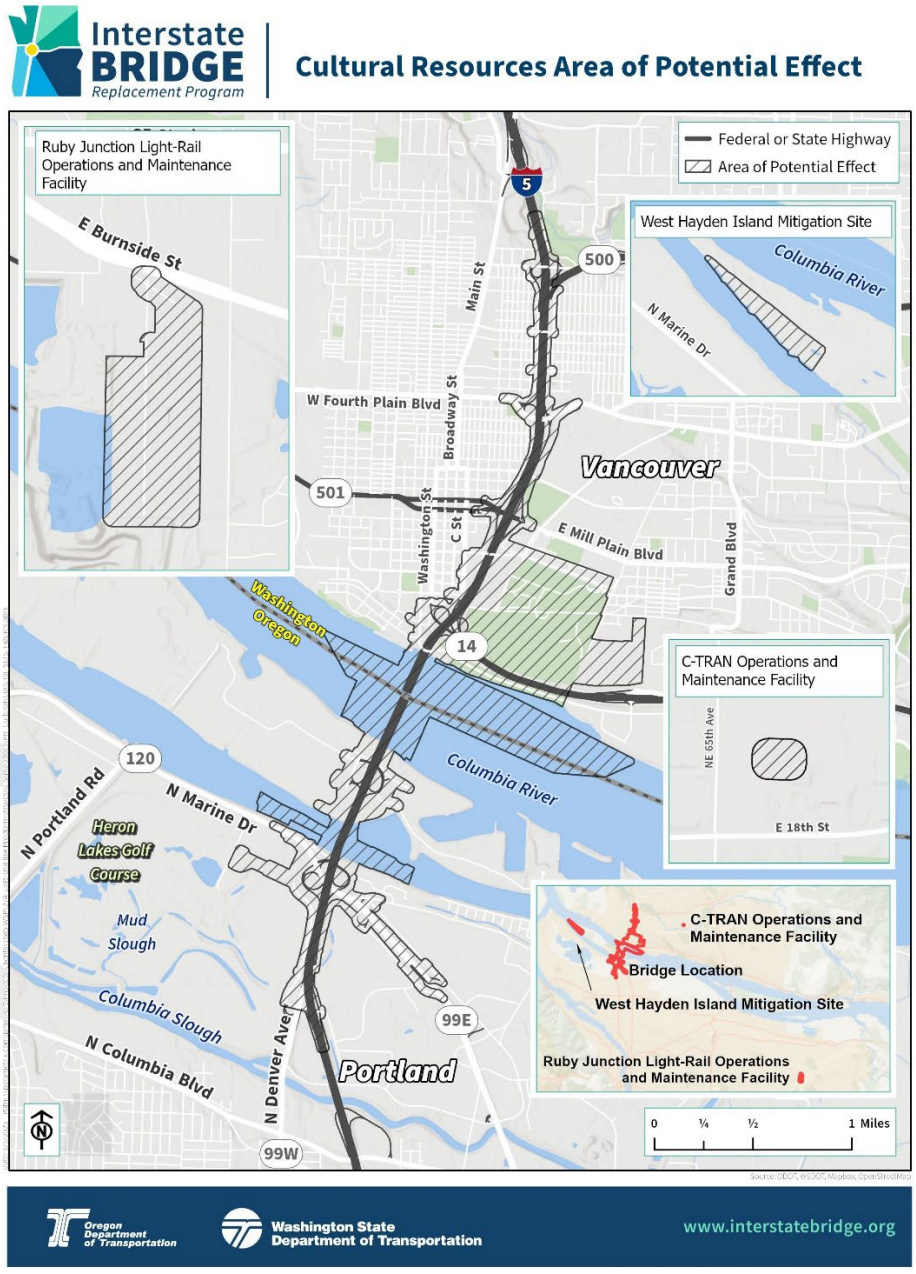


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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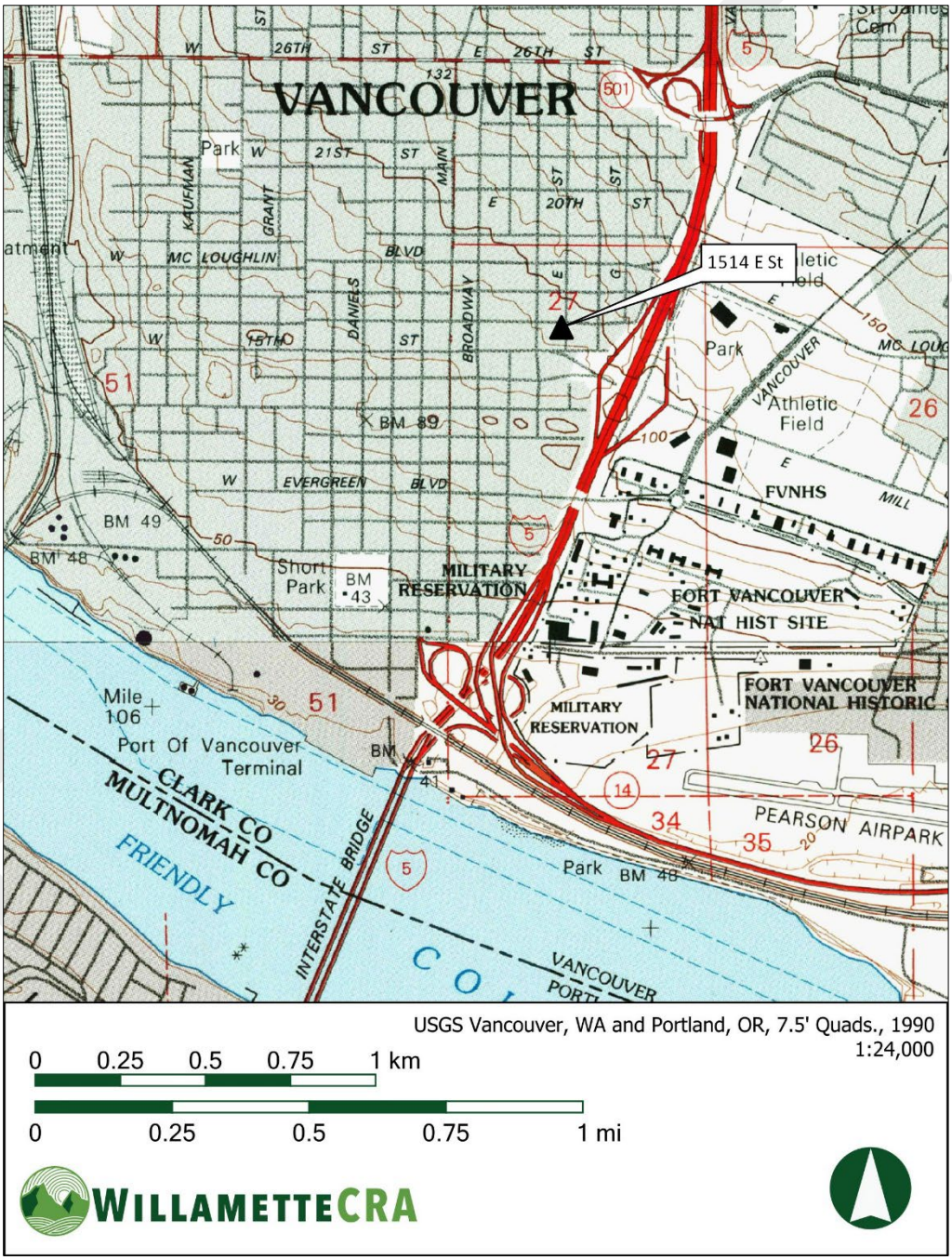


Figure 3. Location map of 1514 E Street, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Figure 4. Aerial map of 1514 E Street, showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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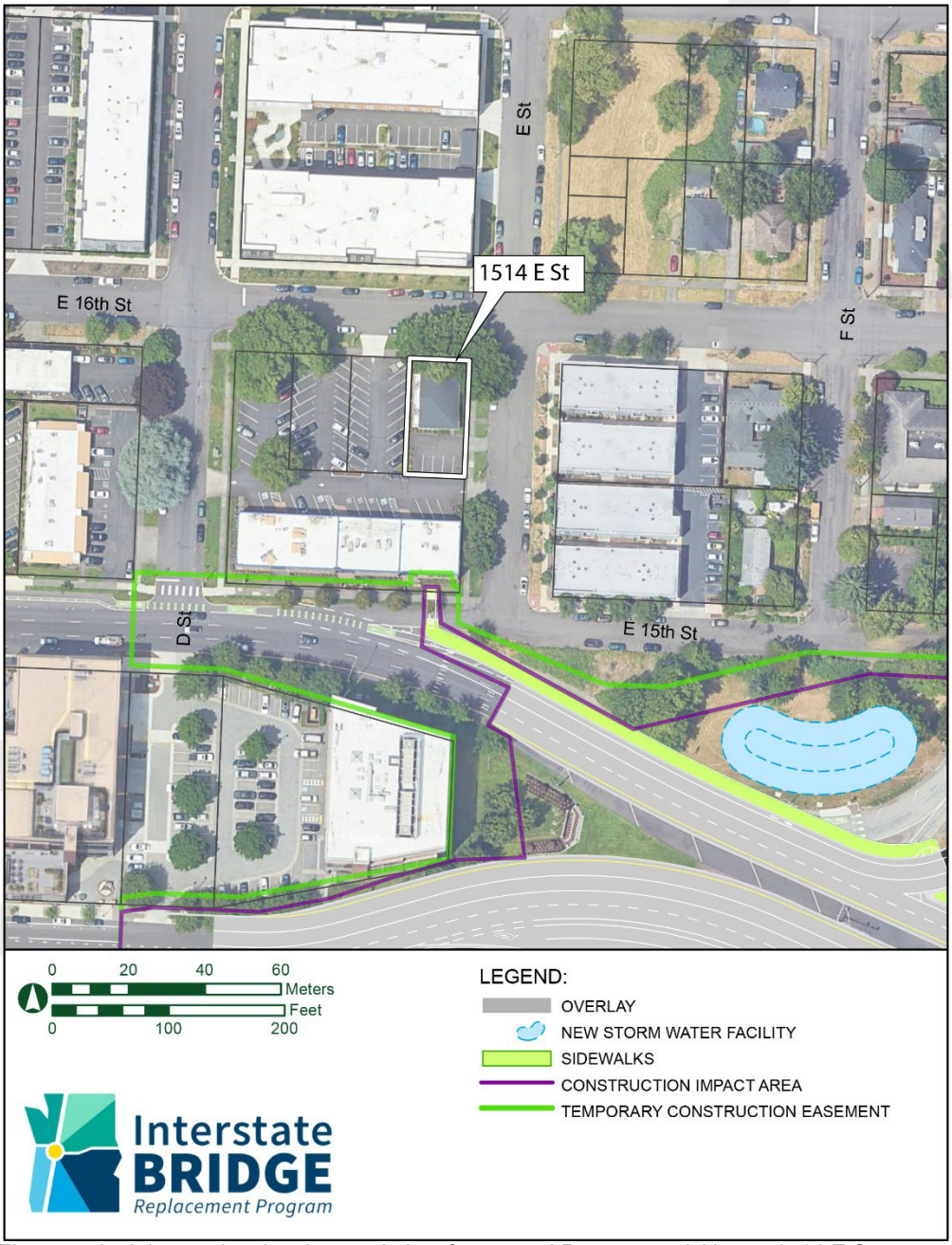


Figure 5. Aerial map showing the proximity of proposed Program activities to 1514 E Street, with the identified boundary of the NRHP-eligible property in white. Note intervening building to the south.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 6. Office building at 1514 E Street, view south (WillametteCRA, December 14, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 7. View from 1514 S Street southeast toward the proposed shared use path along E 15th Street, shown in green and indicated by yellow arrow (IBR/Bentley Systems, May 26, 2022; screengrab captured June 14, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 8. View from 1514 S Street southwest toward the intersection of E 15th Street and D Street (indicated by yellow arrow); view is obstructed by intervening building (IBR/Bentley Systems, May 26, 2022; screengrab captured June 14, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Washington State Patrol District Five Headquarters (Vancouver Police Headquarters) (WA 1148)	WISAARD Property ID: 731279
Street Address: 605 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. View of Washington State Patrol District Five Headquarters (605 E Evergreen Boulevard), north elevation, view south (WillametteCRA, May 4, 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: 605 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on Washington State Patrol (WSP) District Five Headquarters (now the Vancouver Police Headquarters), a Late Modern style municipal building located at 605 E Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 1). The subject property, which is on the east side of Interstate 5 between E Evergreen Boulevard and Anderson Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the WSP District Five Headquarters. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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Street Address: 605 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington

highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Washington State Patrol (WSP) District Five Headquarters (now the Vancouver Police Headquarters) is a Late Modern style building located at 605 E Evergreen Boulevard on the west edge of Vancouver National Historic Reserve (VNHR) of Vancouver, Clark County, Washington (Figure 3). The two-story building is T-shaped in plan, with a reinforced concrete foundation and a flat roof covered with a white membrane and a low parapet capped with metal flashing. The walls of the building, which are constructed from wood framing, rise two stories at the southern rear end of the lot and transition to one story where the grade rises towards the north front of the site along E Evergreen Boulevard. Overall, the building possesses a tripartite massing that responds to the slope of the site with receding stepped blocks. This stepping allows the building's middle to have a span of recessed windows facing to the south over the building's rear garage section.

The building's exterior is clad primarily in red brick laid in a stretcher bond with recessed plaster panels. Fenestration consists primarily of fixed single section windows and small spans of window ribbons all with aluminum frames, as well as three fixed cottage-style windows on the east elevation. The building's principal entry is a recessed glass door, flanked by reverse cottage-style windows, on the east half of the north elevation. There

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are three additional pedestrian side entrances. The property overall is landscaped with a mix of grass lawn, ivy, shrubs, and mature trees. In front of the building's principal entry is a circular planting box constructed with brick that rises approximately 3 feet above a sloped concrete walkway that surrounds it. Two linear concrete walkways converge at the circular walkway and connect it with E Evergreen Boulevard to the north of the building and the nine-car parking strip to the east and northeast of the building. The tax lot also contains additional parking areas: one for approximately 26 cars located in front of the building's south elevation, another for approximately five cars on the west side of the property adjacent to a small fueling station, and a secure, 10-car impound parking lot surrounded by a locked chain link fence with privacy slats at the southwest corner of the property. Other structures on the property include a 200-foot communications tower in front of the building's west elevation and a radio equipment shelter adjacent to the secured parking lot on the west (Figure 6).

The WSP District Five Headquarters is eligible for inclusion in the NRHP under Criterion C at the local level of significance in the area of architecture as a representative example of the Late Modern style. It demonstrates hallmarks of the style including its highly functional design, lack of ornamentation, flat roof, glass entry, asymmetrical arrangement of its entry and windows, repetition of its recesses and stepped massing, and the axial symmetry of its T-shaped plan. The property's period of significance under Criterion C is defined as 1979, the year of the current building's construction and initial occupation. Since 1979, the building remains in its original location, although its setting has been modestly altered by the widening of I-5 between 1977 and 1984 and the reconstruction of the E Evergreen Boulevard overpass between 1979 and 1981. While some ground removal and road reconfiguration occurred, the setting immediately around the WSP District Five Headquarters still retains its character. The only major changes to the building's exterior are the replacement of its roof surface, which is surrounded by a parapet and not visible from street level. Overall, the resource retains its integrity of location, design, workmanship, feeling, and association while its integrity of setting and materials has only been slightly diminished. The principal building, walkways, circular planting box, landscaping, parking areas, and communications tower contribute to the tax lot's historic significance. The radio equipment shelter and a new fueling station, which were constructed after the property's period of significance, do not contribute to the tax lot's historic significance. Since 1979, the tax lot boundary has also remained unchanged and, as such, the identified boundary of the NRHP-eligible property is the boundary of the tax lot (Figure 4).

ALTERNATIVES CONSIDERED

Because the WSP District Five Headquarters at 605 E Evergreen Boulevard has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible WSP District Five Headquarters, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would construct additional interstate lanes to the west of the WSP District Five Headquarters, as well as improvements along the existing Anderson Street alignment to the south and the E Evergreen Boulevard alignment to the north (Figures 5 and 7). Additionally, a community connector land bridge (also called a “lid”) would cap the I-5 right of way south of E Evergreen Boulevard and incorporate a new at-grade Evergreen LRT station on the west side of the interstate, opposite the WSP District Five Headquarters property (Figure 7). These activities would require the permanent acquisition of small areas from the southwest corner of the property, adjacent to Anderson Street, and from the northern boundary of the property, adjacent to E Evergreen Boulevard. The undertaking would also require narrow temporary construction easements adjacent to each permanent acquisition. The acquisition and easement along Anderson Street would be located approximately 200 feet from the principal building and communications tower and would not affect any of the property’s contributing structures or landscaping; while it would be located relatively close to the radio equipment shelter, that building is a later addition to the property and does not contribute to its significance. The easement along E Evergreen Boulevard would be located more than 60 feet from the principal building and is not anticipated to affect the intervening planting box, walkways, or any of the landscaping around the building or walkways. While it may have the potential to disturb the street trees lining the roadway, these are not a character-defining feature of the WSP District Five Headquarters and are not necessary for the property to convey its significant association with the Vancouver Barracks or with the WSP presence in Vancouver during the late 1970s. The property’s character-defining features—including its highly functional design, lack of ornamentation, flat roof, glass entry, asymmetrical arrangement of its entry and windows, repetition of its recesses and stepped massing, and the axial symmetry of its T-shaped plan—would remain intact and unaltered. Additionally, the walkways, circular planting box, landscaping, parking areas, and communications tower would be unchanged during and after construction.

The various infrastructure improvements proposed by the Modified LPA would alter the current setting of the WSP District Five Headquarters property through the introduction of new visual, atmospheric, and audible elements. However, many of these new elements would have a negligible presence in the property’s setting. The radio equipment shelter and asphalt-paved parking lot, both of which are enclosed by a fence, distance the property from the proposed construction activity on Anderson Street to the south. To the north, the property is deeply set back from the public right of way. Finally, an expanse of existing vegetation and mature trees obstruct views towards the interstate and proposed community connector to the west (Figure 7). Ultimately, Program activities would alter only minor and distant features of the property’s setting, and the visual and spatial relationships that contribute to the property’s significance—namely, the principal building, walkways, circular planting box, landscaping, parking areas, and communications tower—would not be affected. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program’s introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

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In conclusion, the Modified LPA would have an effect on the NRHP-eligible WSP District Five Headquarters, but that effect would not be adverse. The undertaking would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association in a manner that would diminish its ability to convey its significance under Criterion C. The proposed acquisitions and temporary construction easements are minor and located at a distance from the property's contributing elements and character-defining features; the property would continue to represent an example of a Late Modern institutional property. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible WSP District Five Headquarters.

SOURCES/BIBLIOGRAPHY

Heuser, Tom. "Washington State Patrol District Five Headquarters (Vancouver Police Headquarters) (WA 1148)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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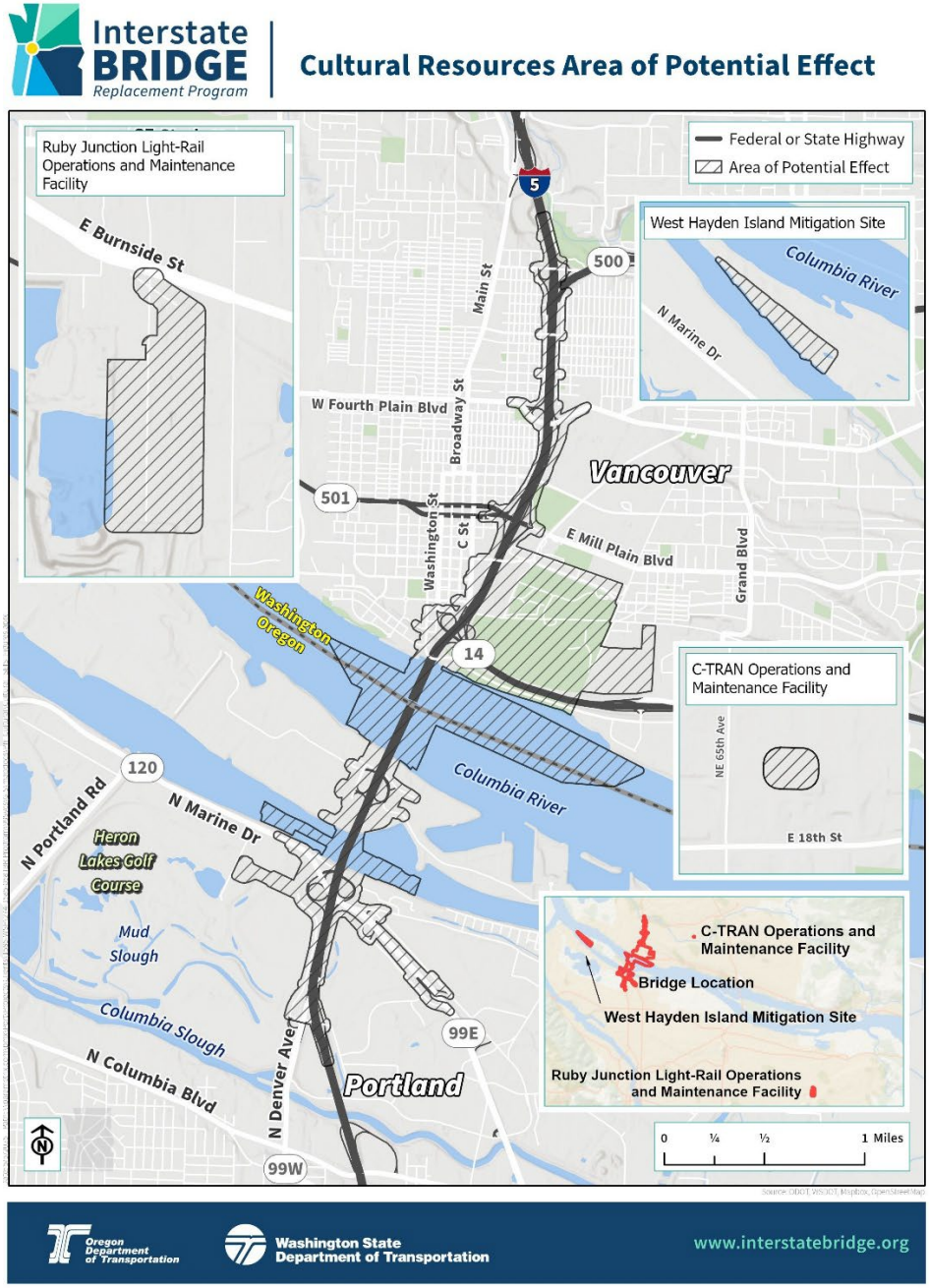


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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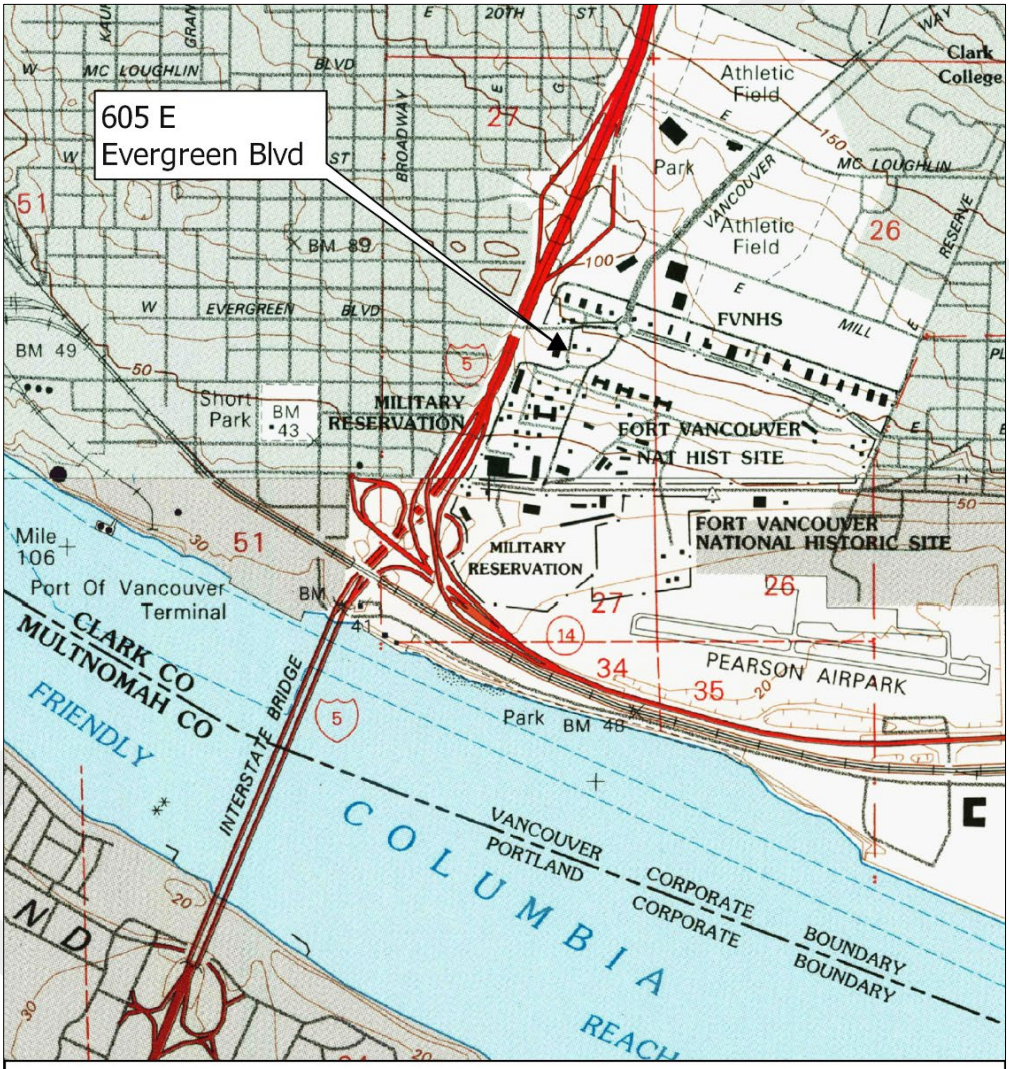


Figure 3. Location map of the WSP District Five Headquarters, Vancouver, Clark County, Washington.

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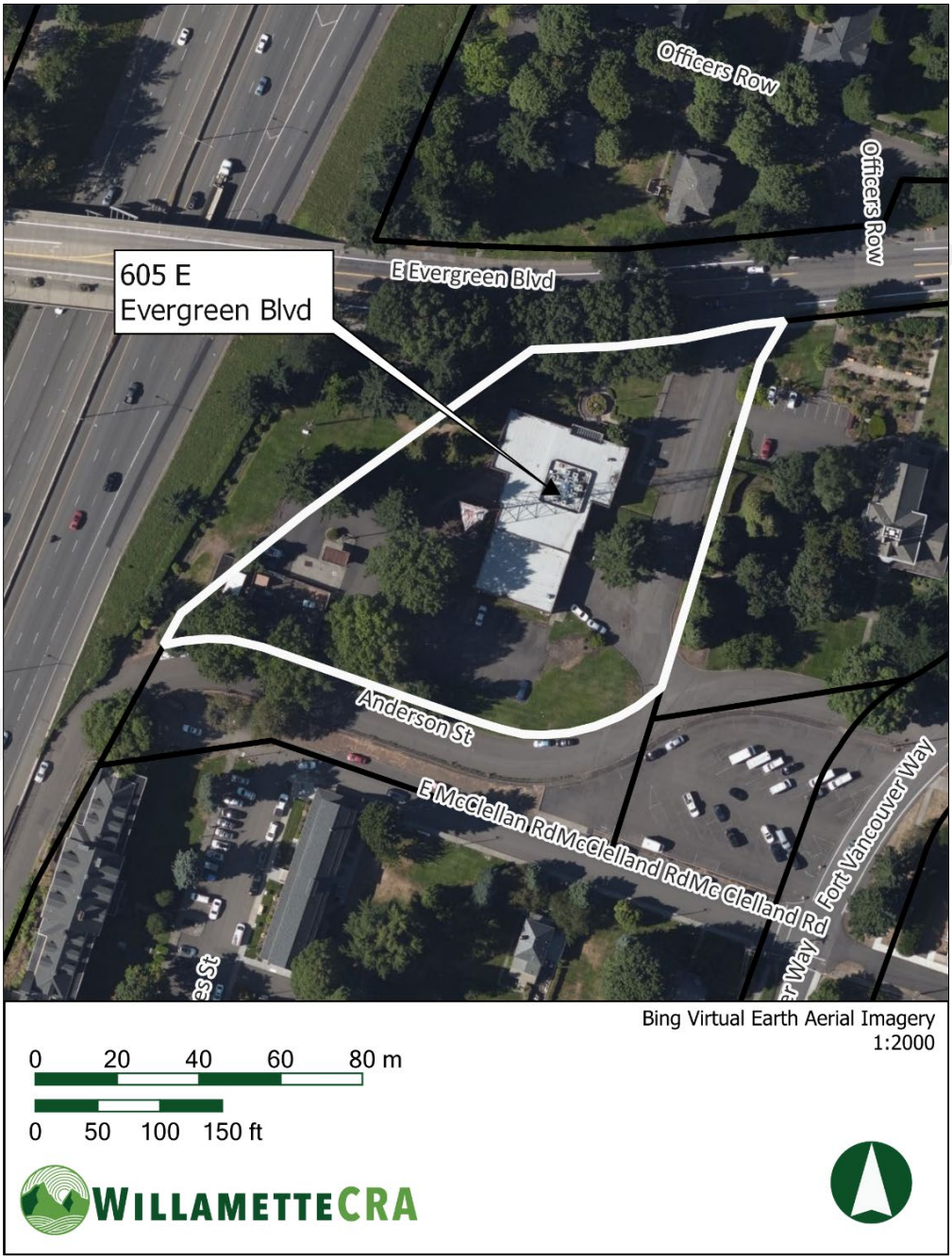


Figure 4. Aerial map of the WSP District Five Headquarters building and immediate surroundings, showing the identified boundary of the NRHP-eligible property in white.

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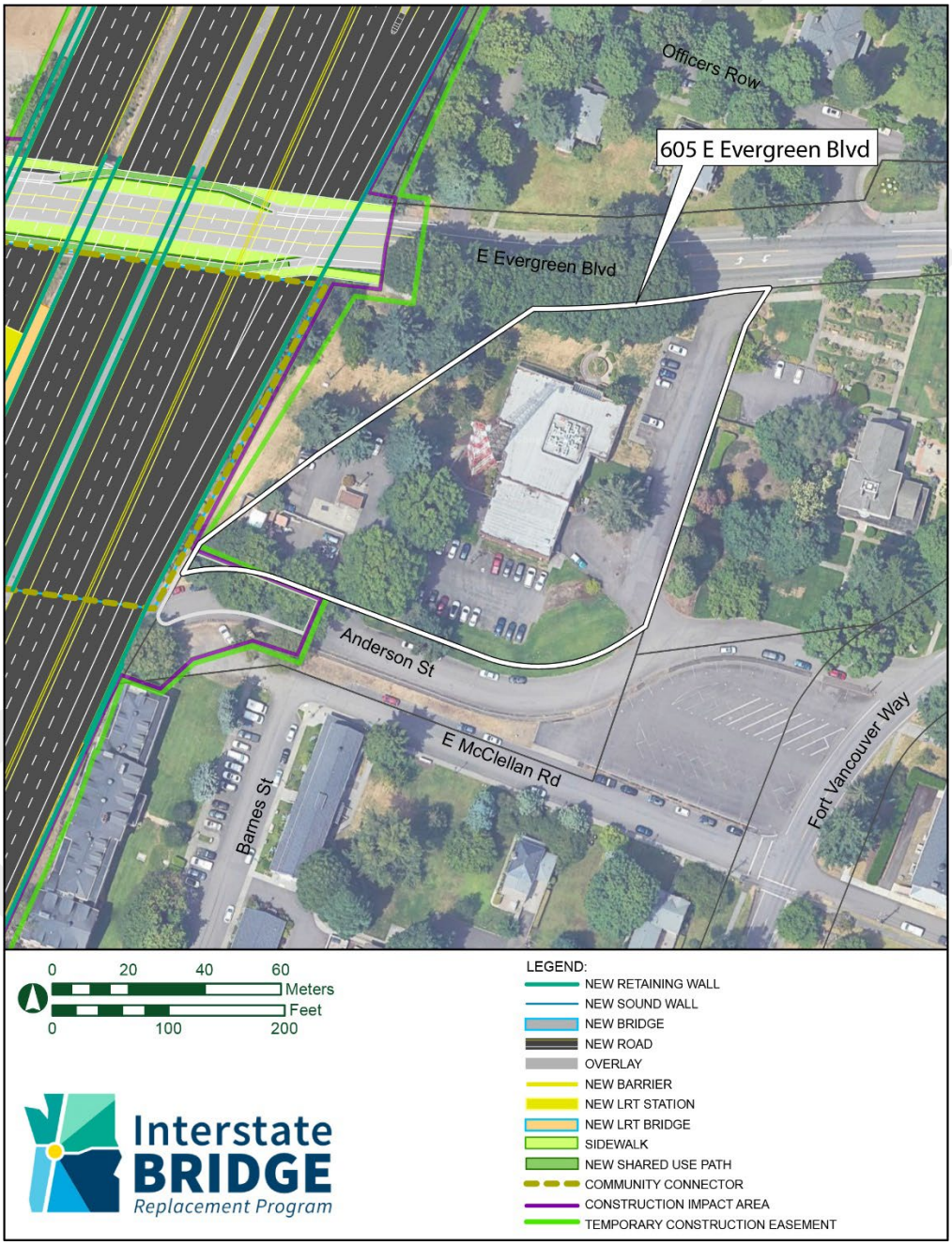


Figure 5. Aerial map showing the WSP District Five Headquarters boundary in white and the proposed Program activities to the north, west, and south.

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Figure 6. Radio equipment shelter and parking lot at Washington State Patrol Headquarters building, view facing northeast. The radio equipment shelter is on the left and the secure automobile impound lot is on the right (Google Street View, June 2019).

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Figure 7. View west toward the proposed community connector, showing intervening lawns and trees, as well as surface parking lots and setbacks to the north and south (IBR/Bentley Systems, May 26, 2022; screengrab captured June 15, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Duplex Residences, 2901 K Street (WA 1168)	WISAARD Property ID: 731275, 731276
Street Address: 2901–03 and 2905–07 K Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. 2901 K Street (situs), view east (WillametteCRA, March 8, 2023).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Duplex Residences at 2901 K Street, a pair of Contemporary style duplexes in the Rose Village neighborhood of Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southwest corner of K Street and E 29th Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the Duplex Residences at 2901 K Street. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Duplex Residences at 2901 K Street are single-story, Contemporary duplexes constructed in 1968 and located on a single tax lot in the Rose Village neighborhood of Vancouver, Clark County, Washington (Figure 3). Each duplex (2901–03 on the southern half of the lot and 2905–07 on the northern half) is a one-story detached building with a rectangular footprint that measures approximately 30 feet (north-south) by 50 feet (east-west). Both duplexes are wood-framed and clad with horizontal lapped wood siding, accentuated by panels of brick masonry veneer below the windows and centered on the east elevation. Four sets of aluminum sliding windows comprise the south elevation of 2901–03 K Street and the north elevation of 2905–07 K Street. The principal entries to both buildings are off of the shared courtyard—the north elevation of 2901–03 K Street, and the south elevation of 2905–07 K Street. On each of these elevations, there are two entry doors, flanked by aluminum windows on either side. The roof form of each duplex building is a Dutch gable, which extends slightly over the western elevations to create a shallow eave. At the eastern edge of the property, the roof extends well beyond the eastern elevations of each duplex, creating two covered parking spaces perpendicular to the adjacent paved alley (Figure 6). The shared courtyard is landscaped, including a large cluster of mature trees in the center; a concrete path that abuts the K Street sidewalk branches around the central courtyard and leads to the principal entrances of the buildings.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Duplex Residences, 2901 K Street (WA 1168)	WISAARD Property ID: 731275, 731276
Street Address: 2901–03 and 2905–07 K Street	City, County, State: Vancouver, Clark County, Washington

The Duplex Residences at 2901 K Street are eligible for listing in the NRHP under Criterion A at the local level of significance in the area of community planning and development, as well as under Criterion C in the area of architecture. The two mirrored buildings demonstrate how developers maximized available blocks in order to respond to the contemporaneous crisis of affordable housing in Vancouver, as well as the opportunities it offered, particularly as an investment for small-scale landlords. Thus, the buildings are representative of the pattern of piecemeal private development that occurred in Vancouver in the 1960s in Rose Village. The buildings are also representative examples of ranch duplexes constructed in the Contemporary style, with long and linear massing, Dutch gable roofs, covered parking spaces, a blend of indoor/outdoor space, a shared courtyard with associated walkways and landscaping, and landscaping elements including grass lawns and shrubs growing against the buildings. Other character-defining features displayed by the buildings include the broad expanse of the elevation facing K Street, emphasized with a vertical section of masonry, and windows set into a secondary material, as shown on the north and south elevations. Furthermore, the consistently scaled residential neighborhood to the west, north, east, and south of the property conveys the subject property's significant development history.

The period of significance for the property under Criteria A and C is defined as the year of construction, 1968. The buildings are relatively intact and have not undergone any major alterations since their construction in 1968. The buildings are in their original location, and while development in the Rose Village neighborhood has continued, they are consistent with contemporary community planning and development trends. The buildings continue to showcase their original materials, method of construction, and workmanship. Overall, they retain their integrity of location, setting, design, materials, workmanship, feeling, and association. The identified boundary of the NRHP-eligible property coincides with the tax lot boundary and includes both buildings, their shared courtyard, grass lawn, and rear concrete driveways (Figure 4).

ALTERNATIVES CONSIDERED

Because the Duplex Residences at 2901 K Street have been identified as a historically significant resource eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Duplex Residences at 2901 K Street, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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As currently proposed, the Modified LPA would involve widening the I-5 corridor to the west of the Duplex Residences at 2901 K Street and reconstructing the I-5 overcrossing at E 29th Street. Construction of new pedestrian and bicycle facilities at the E 29th Street overcrossing would involve improvements to the intersection of K Street and E 29th Street, which lies immediately southwest of the subject property. Although the undertaking would not require permanent acquisition of right of way from the property, it would impose a temporary construction easement extending into the property's southwest corner, which currently contains a portion of grass lawn and one mature ornamental shrub. The IBR Program commits to preserving this shrub during construction and to restoring the portion of the lawn within the temporary construction easement to pre-construction conditions, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, the undertaking would not result in the permanent loss of any of the property's character-defining features.

Program activities would change the current setting of the Duplex Residences at 2901 K Street by replacing the overcrossing and improving pedestrian and bicycle facilities within the block west of the property. However, these new elements would be visually similar to the overcrossing that currently exists within the subject property's immediate setting—and that was present when the property was constructed in 1968. Implementation of the Program activities would therefore result in a negligible visual change in the immediate setting of the subject property. It would not alter the consistently scaled residential character of the surrounding neighborhood, and it would not affect the property's ability to convey its significant development history or its architectural character. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would have an effect on the NRHP-eligible Duplex Residences at 2901 K Street, but that effect would not be adverse. Program activities would not diminish the property's integrity of location, setting, design, materials, workmanship, feeling, or association in a manner that would diminish its ability to convey its significance under NRHP Criteria A and C. However, should the proposed design be altered to require changes to the southwestern corner of the property beyond those described above, this Finding of Effect would need to be revisited to determine the IBR Program's level of effect.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Duplex Residences at 2901 K Street.

SOURCES/BIBLIOGRAPHY

Boyle, Brigid. "Duplex Residences, 2901 K Street (WA 1168)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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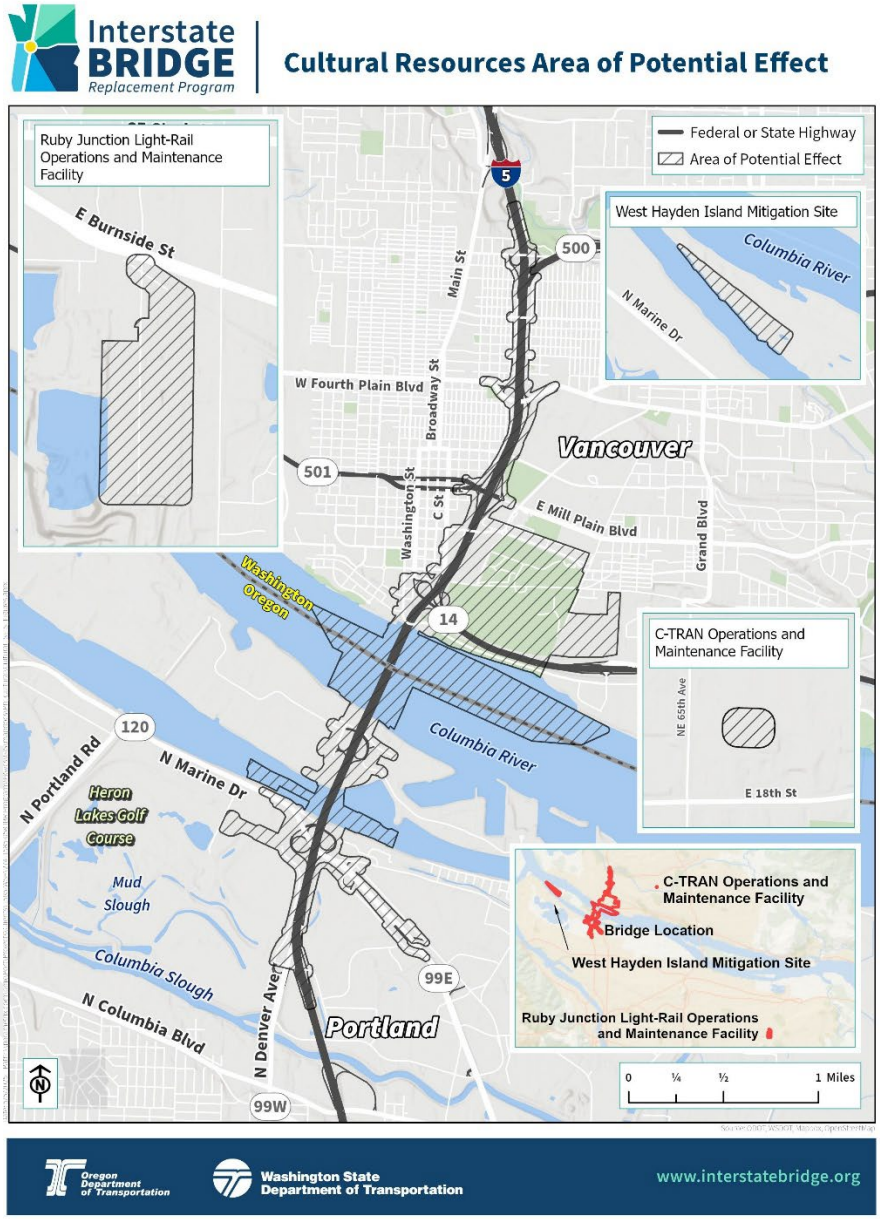


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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Figure 3. Location map of the Duplex Residences at 2901 K Street, Vancouver, Clark County, Washington.

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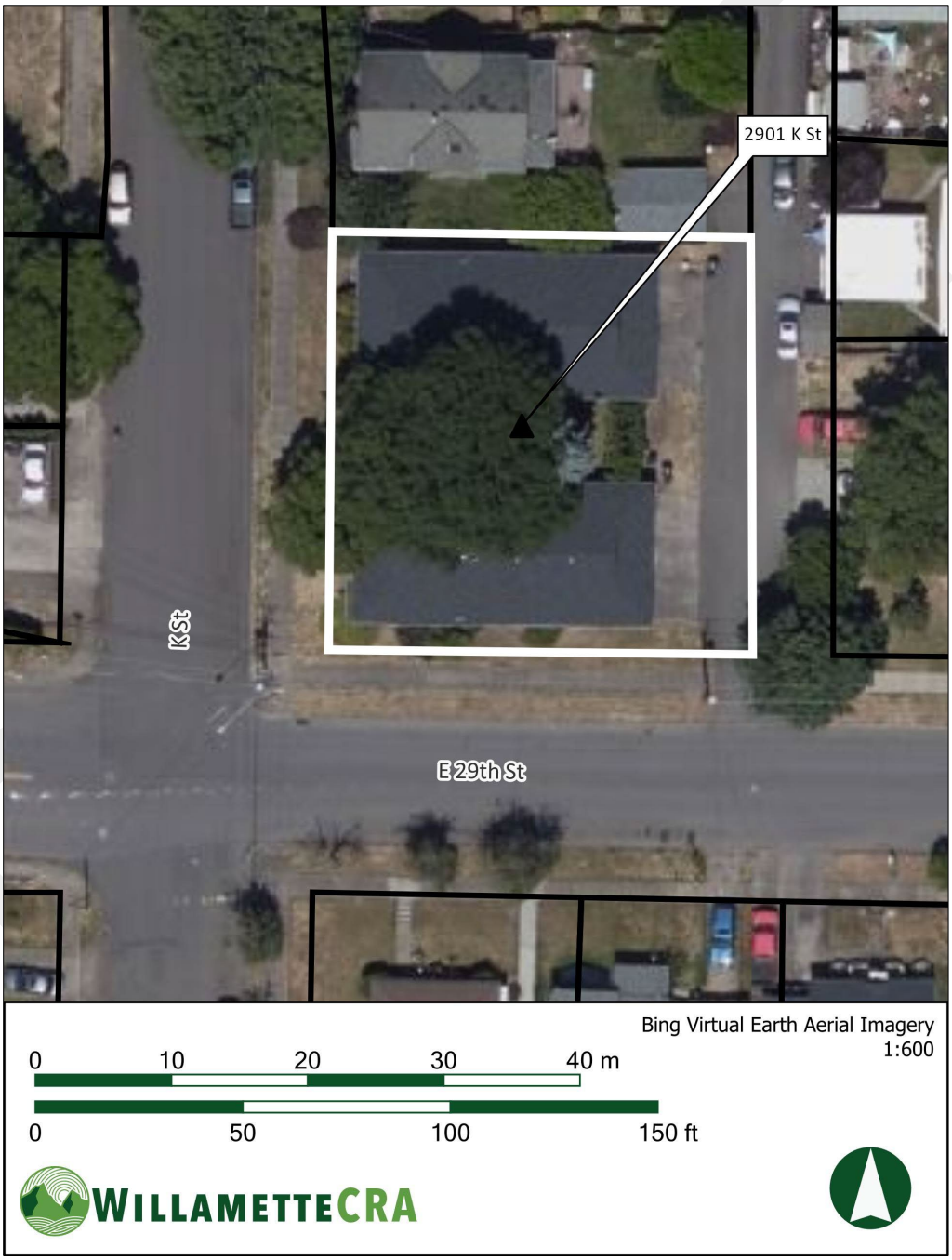


Figure 4. Aerial map of the Duplex Residences at 2901 K Street, showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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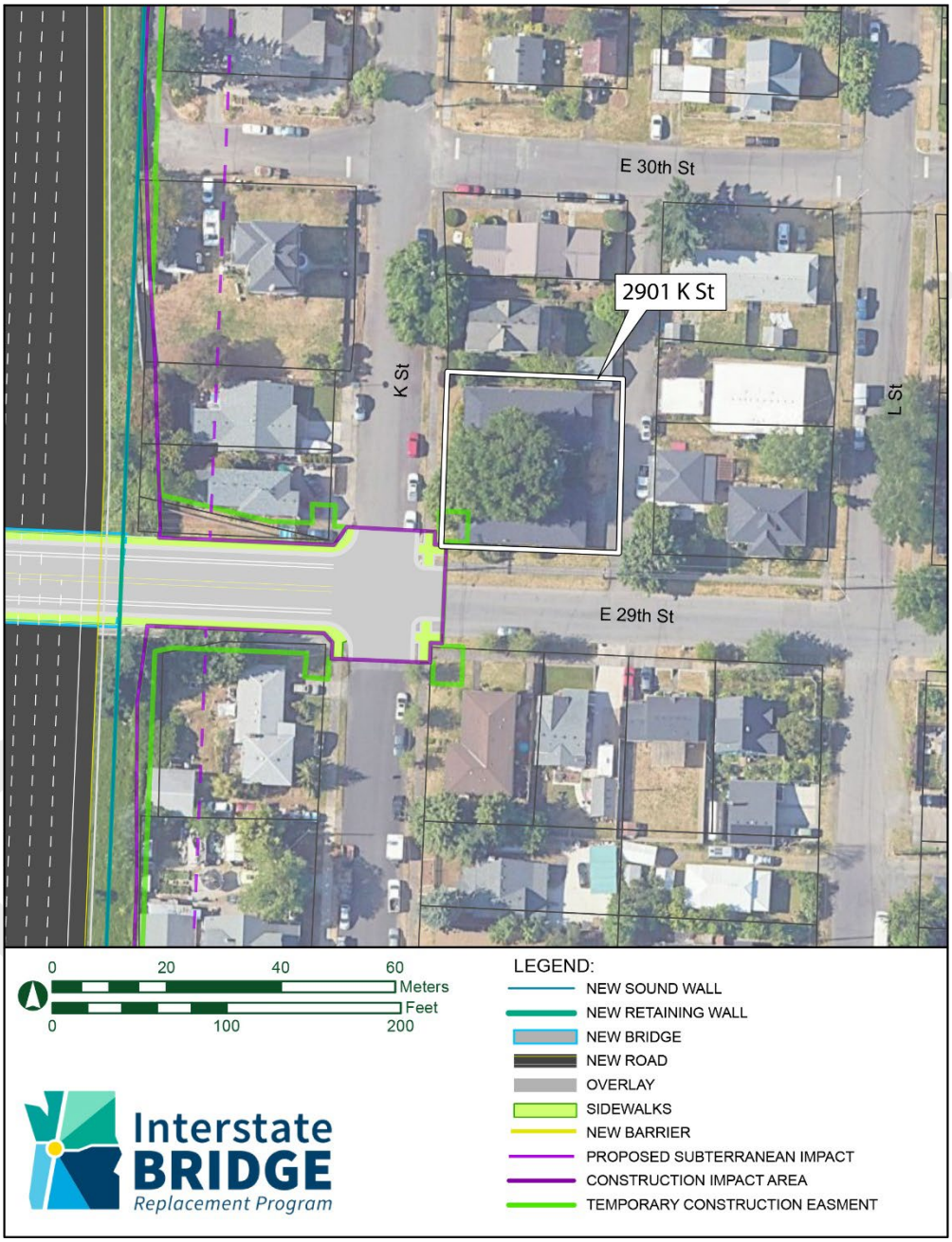


Figure 5. Aerial map showing the proximity of proposed program activities to the Duplex Residences at 2901 K Street, with the identified boundary of the NRHP-eligible property in white.

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Figure 6. Parking spots associated with the Duplex Residences at 2901 K Street, view northwest (WillametteCRA, March 8, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Rudy Luepke Center for Senior Citizens (WA 1182b)		WISAARD Property ID: TBD
Street Address: 1009 East McLoughlin Boulevard	City, County, State: Vancouver, Clark County, Washington	

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Rudy Luepke Center for Senior Citizens (1009 E McLaughlin Boulevard), southwest corner including main entrance, view northeast (WillametteCRA, May 4, 2023).

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Street Address: 1009 East McLoughlin Boulevard	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Rudy Luepke Center for Senior Citizens, a Northwest Regional style building located in the Central Park neighborhood of Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southeast corner of E McLoughlin Boulevard and the Interstate 5 (I-5) right of way, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Rudy Luepke Center for Senior Citizens. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

DRAFT

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Rudy Luepke Center for Senior Citizens at 1009 E McLoughlin Boulevard is a Northwest Regional style building located in the Central Park neighborhood of Vancouver, Clark County, Washington (Figure 3). The building possesses an irregular footprint constructed atop a concrete foundation that measures approximately 93 feet from north to south and 164 feet from east to west. The walls are wood-framed and rise a single story in height to an irregular, truncated hipped roof. Several gables run the width of the roof from north to south, and a wide, low-pitched gable extends outwards from the building's northeast corner. The fenestration of the building is mostly composed of large window walls divided by wide mullions, as well as fixed aluminum-frame windows. High horizontal ribbon windows bracket the southeast corner. There are multiple entrances to the building, most defined by a pair of full-glass doors. A covered walkway extends from the main building block towards the Marshall Center, directly northeast; a narrow-light door on the north elevation of the Luepke Center provides access to the interior.

The Luepke Center is eligible for inclusion in the NRHP under Criterion A, at the local level of significance, in the areas of community planning and development. The senior center is a manifestation of the advocacy efforts of

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elderly citizens and the coalitions lobbying on their behalf, and it provided critical social services that allowed Vancouver's senior citizens to improve their quality of life and remain a visible, participatory, and vibrant demographic. The Luepke Center is also significant under Criterion C, at the local level of significance, in the area of architecture. It was once a good example of the work of local architecture firm Nelson, Walla, and Dolle (NWD), as it illustrated the firm's proclivity for adapting contemporary architectural trends to the vernacular forms and materials of the Pacific Northwest. However, due to a large addition completed at the east side of the building in 1997, the building no longer has sufficient integrity to communicate its significance under Criterion C, and it is therefore eligible for the NRHP under Criterion A only.

The period of significance for the Luepke Center is constrained to 1979, the year of the building's construction. Although the 1997 addition has diminished the Luepke Center's integrity of design, the building has experienced relatively few other alterations and retains its original location, function, and some elements of its parklike setting. Therefore, the property retains integrity of location, setting, materials, workmanship, feeling, and association. The identified boundary of the NRHP-eligible property is limited to the building's footprint (Figure 4). It does not include the nearby Marshall Center, Marshall Park, or an adjacent parking lot, all of which were constructed outside of the period of significance and have been evaluated as separate properties for the purposes of Section 106 compliance.

ALTERNATIVES CONSIDERED

Because the Rudy Luepke Center for Senior Citizens has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Rudy Luepke Center for Senior Citizens, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would require the reconfiguration of the I-5 interchanges at Mill Plain Boulevard and E Fourth Plain Boulevard. As a result, the alignment of the I-5 northbound onramp from Mill Plain

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Boulevard would be shifted to the west of the location of the current onramp (i.e., further away from the Luepke Center), but the northbound offramp approaching the E Fourth Plain Boulevard interchange would be shifted approximately 50 feet to the east of the location of the current offramp structure. In its proposed location, the offramp to E Fourth Plain Boulevard would require the acquisition of a permanent right of way from the tax lot containing the Luepke Center generally along the parcel's western boundary (Figure 5).

Program activities would require both permanent right-of-way acquisition and a temporary construction easement from the western boundary of the tax lot containing the Luepke Center. Because the Luepke Center's identified boundary is limited to the building footprint rather than its tax lot, however, it does not appear that any features within the boundary of the NRHP-eligible property would be altered from their current conditions as a result of the undertaking. The temporary construction easement would be located nearly 200 feet from the westernmost point of the building, and any permanent acquisition would be located slightly further than that. The building's character-defining features, including its irregular plan, roof composed of multiple gables and hipped forms, large window walls, ribbon windows, smooth cladding, and covered walkways would not be affected.

It is anticipated that the new offramp to E Fourth Plain Boulevard would be visible from the Luepke Center: the proposed location of the offramp would lead along the western edge of the Luepke Center's parking lot, which currently contains an area of grass lawn and a row of trees that screens the existing offramp (Figure 6). It appears that construction of the new offramp would remove these trees, as well as a number of horseshoe pits in Marshall Park. However, none of these features are important in contextualizing the historical and architectural significance of the Luepke Center. The location of the proposed offramp would be separated from the NRHP-eligible property by a distance of approximately 200 feet. The existing offramp already forms a visual boundary along the western edge of the parcel, and the proposed offramp is anticipated to have a generally similar visual character to the existing offramp as perceived from the Luepke Center, even though the offramp would be approximately 50 feet closer to the NRHP-eligible property. For these reasons, it does not appear that the proposed offramp would result in a noticeable change in the historic setting of the Luepke Center, and construction would not extensively diminish the overall character of Marshall Park, which forms the property's immediate setting to the south and west. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the Program's introduction of new atmospheric and audible intrusions would not diminish any of its character-defining features.

In conclusion, the Modified LPA would not diminish the Luepke Center's integrity of location, setting, design, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under NRHP Criterion A. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Rudy Luepke Center for Senior Citizens.

SOURCES/BIBLIOGRAPHY

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Rudy Luepke Center for Senior Citizens (WA 1182b)		WISAARD Property ID: TBD
Street Address: 1009 East McLoughlin Boulevard	City, County, State: Vancouver, Clark County, Washington	

Weiss-Tisman, Essie. “Rudy Luepke Center for Senior Citizens (WA 1182b).” Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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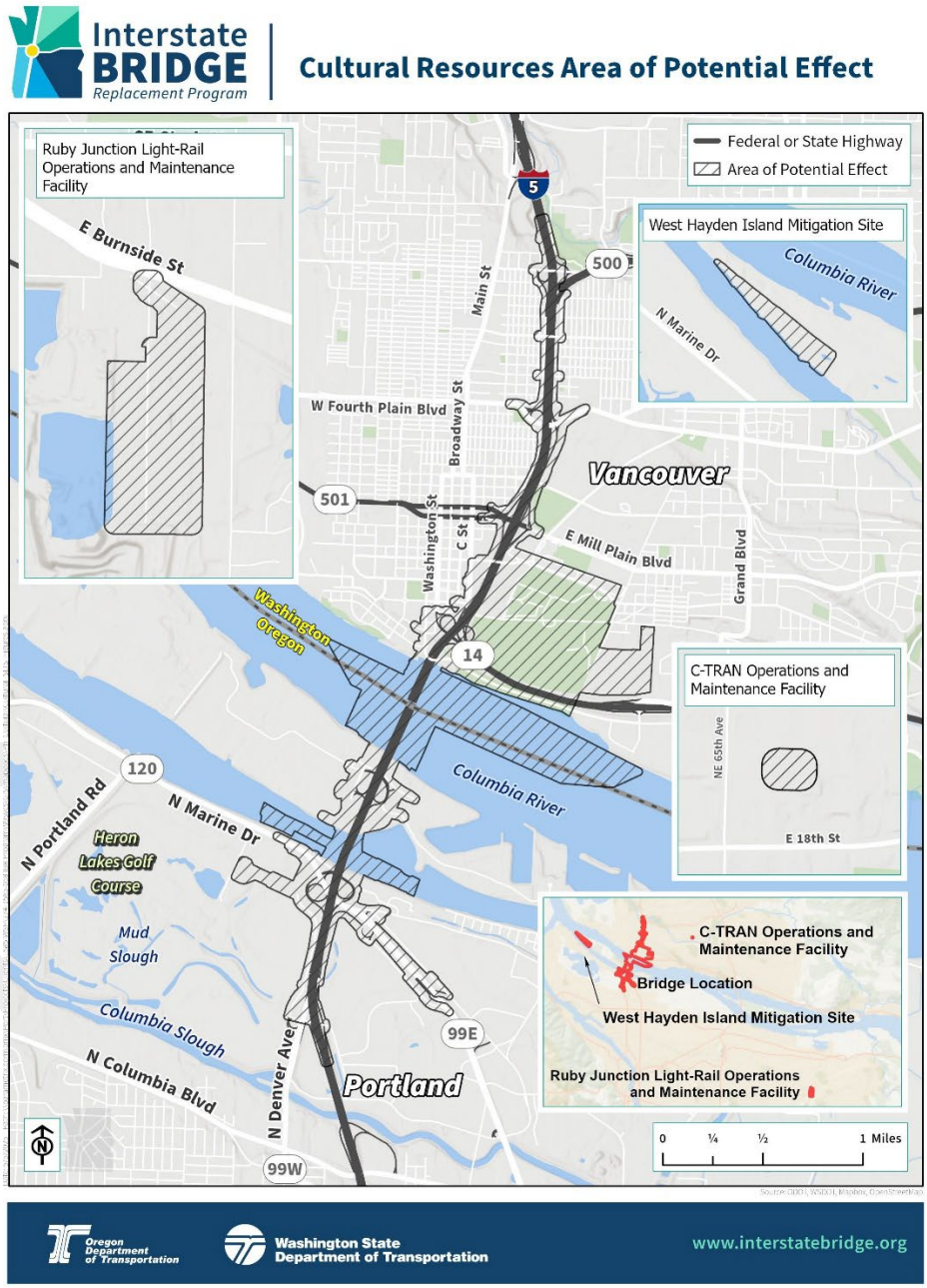


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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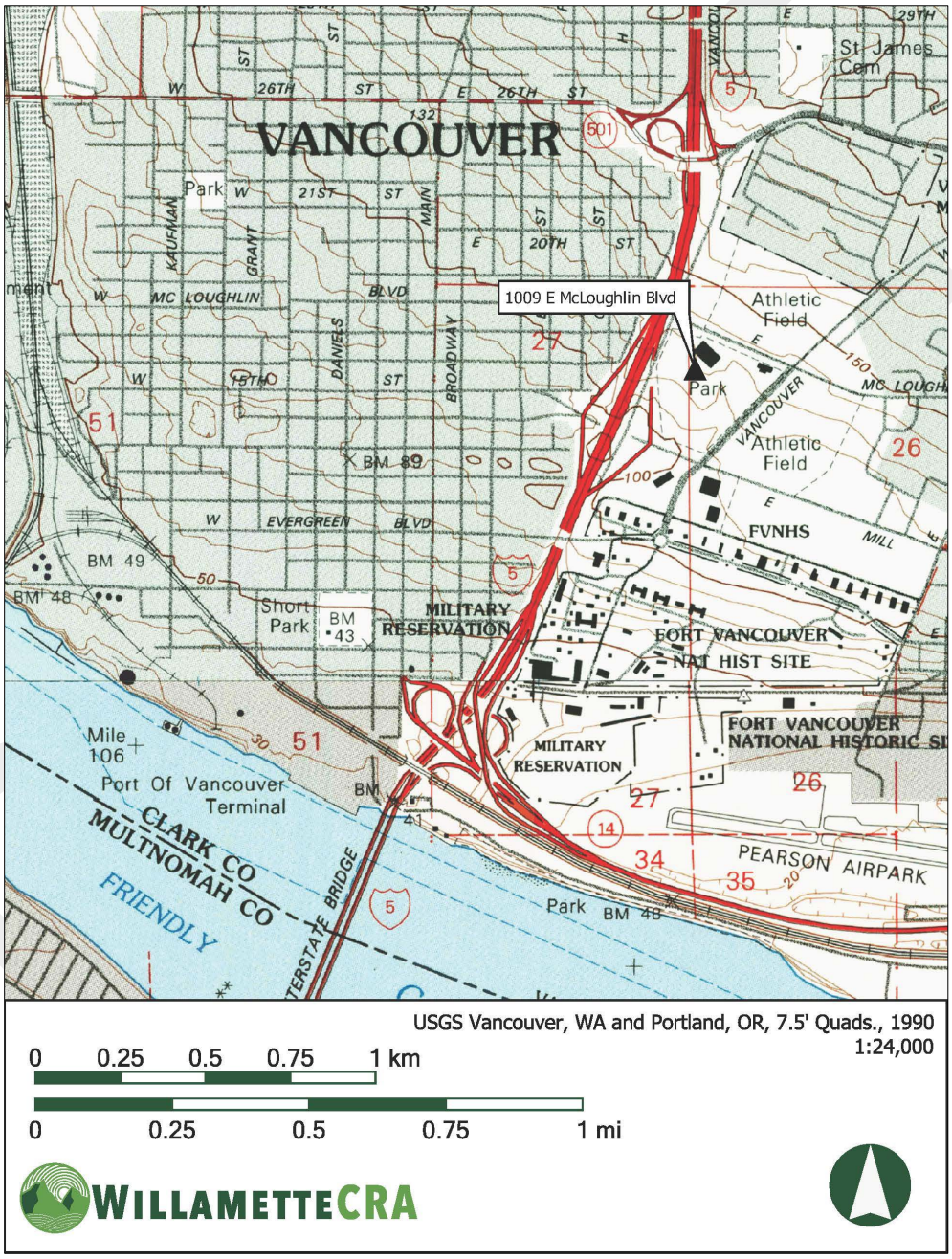


Figure 3. Location map of the Rudy Luepke Center for Senior Citizens (1009 E McLaughlin Boulevard), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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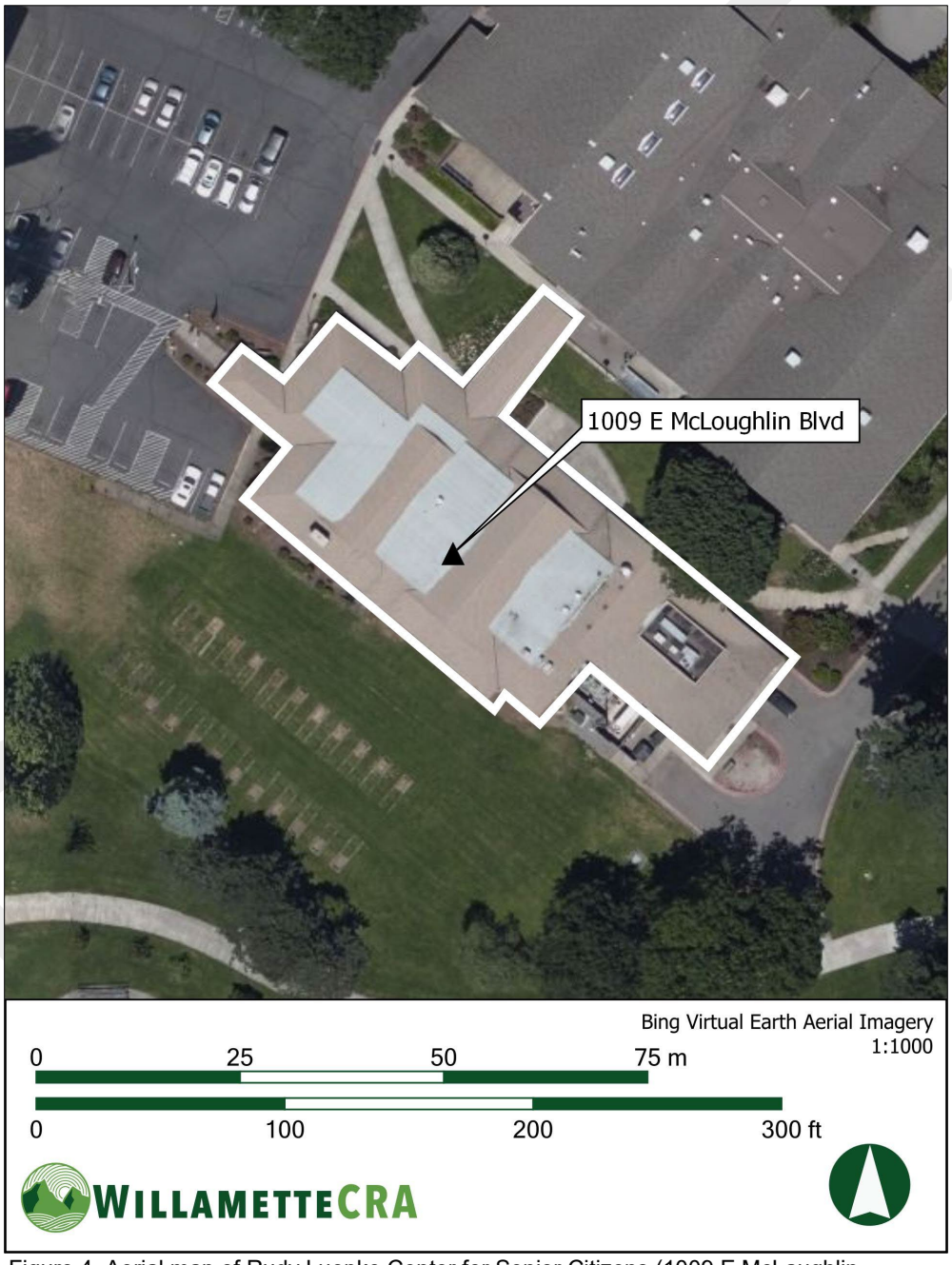


Figure 4. Aerial map of Rudy Luepke Center for Senior Citizens (1009 E McLaughlin Boulevard), showing the identified boundary of the NRHP-eligible property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Street Address: 1009 East McLoughlin Boulevard	City, County, State: Vancouver, Clark County, Washington

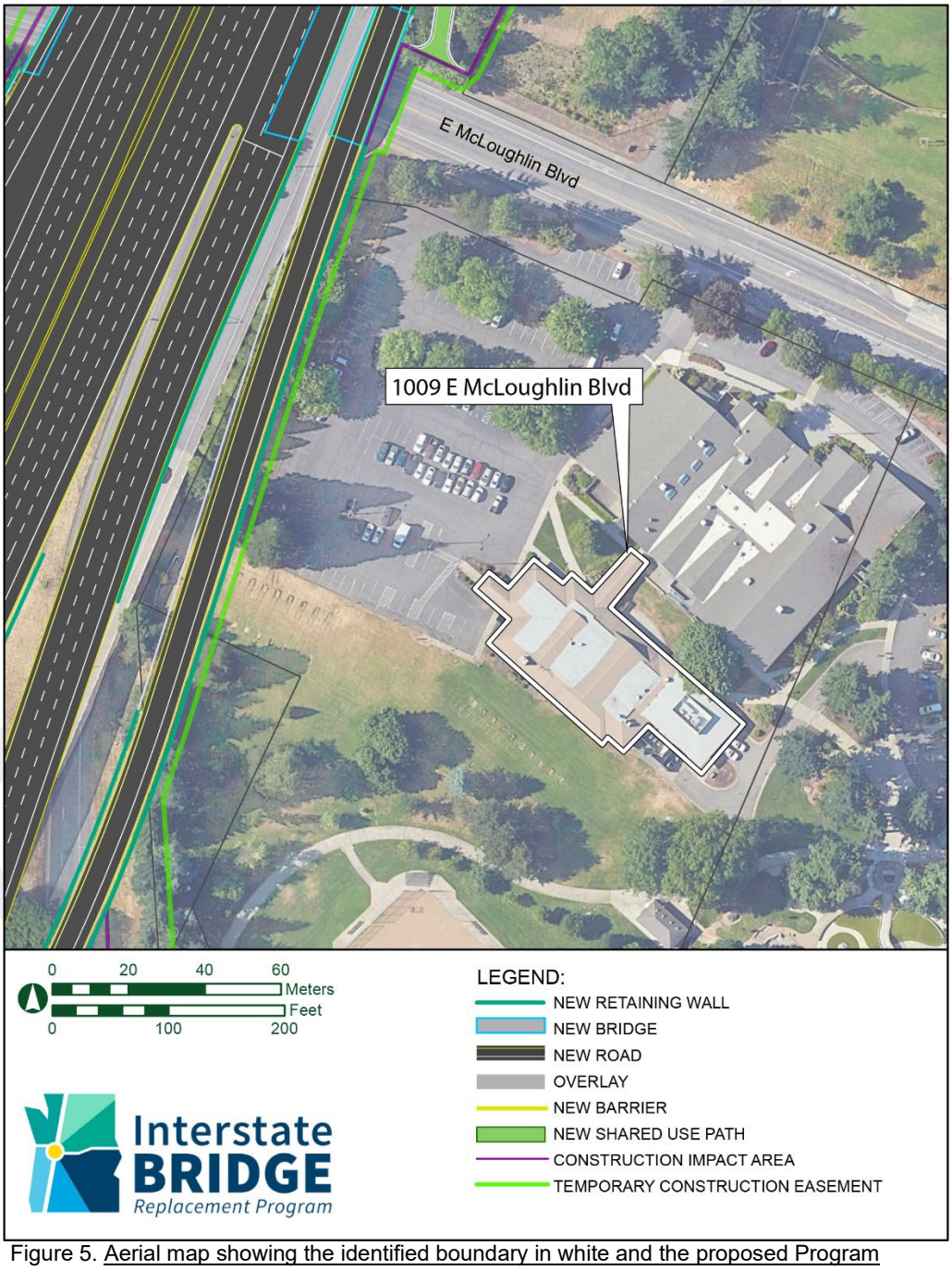


Figure 5. Aerial map showing the identified boundary in white and the proposed Program activities in the vicinity.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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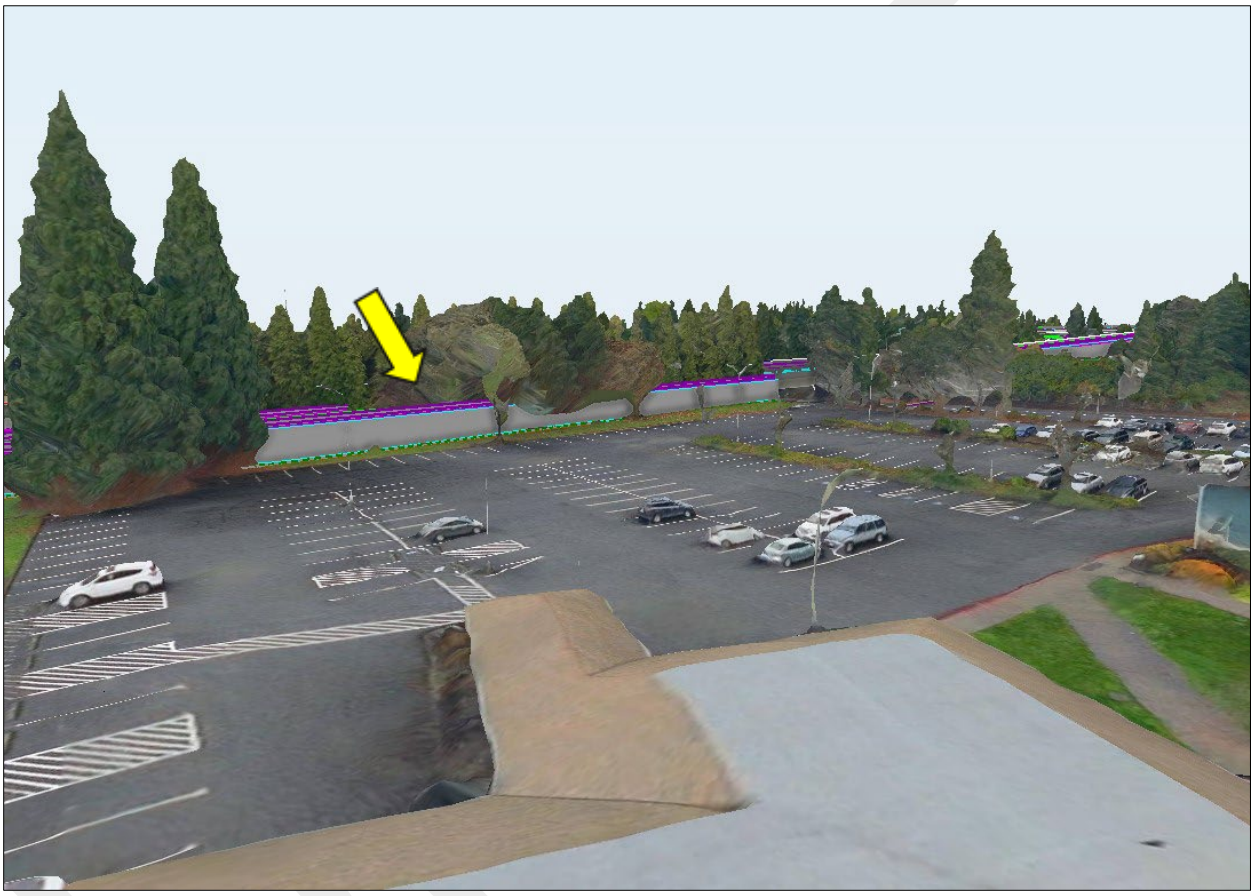


Figure 6. View from the Luepke Center northwest toward I-5 and the proposed offramp to E Fourth Plain Boulevard, indicated by yellow arrow; note intervening parking lot (IBR/Bentley Systems, May 26, 2022; screengrab captured June 19, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Bridge Substation / Interstate Bridge Transformer House / Portland Electric Power Company (PEPCO) Substation / Clark County Utility Substation (WA 1192)	WISAARD Property ID: 89097
Street Address: 100 SE Columbia Way	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Bridge Substation (100 SE Columbia Way), view northeast (WillametteCRA, June 8, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Bridge Substation, a utilitarian electrical substation building located at 100 SE Columbia Way in Vancouver, Clark County, Washington (Figure 1). The subject property, which is on the north side of SE Columbia Way and immediately east of Interstate 5 (I-5), was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in an Adverse Effect on the Bridge Substation. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Bridge Substation (100 SE Columbia Way) is a utilitarian electrical substation building located in Vancouver, Clark County, Washington (Figure 3). The building has an L-shaped footprint constructed atop a reinforced-concrete foundation. The east portion of the building rests upon a reinforced-concrete foundation over an enclosed basement. The west portion of the building includes an enclosed office area at the lower level, which was originally a partially enclosed storage area. The public-facing north, east, south, and west elevations of the Bridge Substation are reinforced-concrete frames with reinforced-concrete infill panels (Figure 6). The concrete is board formed and has been painted. The north, east, and south elevations of the two-story portion of the Bridge Substation are each divided into three equal structural bays with pilasters. Applied segmented arch motifs have been added to the structural bays as decorative elements and are located at the cornice line near a simplified corbelled overhang at the top of the parapet. There is a stucco-clad entrance pavilion addition at the west end of the one-story, west portion of the building that is capped with a front gabled roof and has a circular vent in the gable end. The gabled roof is clad with standing seam metal roofing which has been painted blue. There are typical anodized aluminum finish double doors protected by the overhanging roof of the entrance pavilion.

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Additional fenestration includes large metal rollup doors and steel factory sash windows. There is no fenestration on the west elevation of the one-story west portion of the Bridge Substation. Both the one-story and two-story building masses are capped with flat built-up roofs surrounded by low parapet walls.

The Bridge Substation is eligible for inclusion in the NRHP under Criterion C, at the local level in the area of architecture. The building is significant as a relatively rare surviving example of the electrical substation building type constructed between the late 1880s and early 1920s and is one of the last remaining physical links to early electrification efforts in Vancouver and Clark County. Its period of significance is defined as 1913 to 1926, which demarcates the year that the Bridge Substation was relocated to its present location and the year prior to when a one-story addition to the west was added in 1927.

The Bridge Substation is located at 100 SE Columbia Way in Vancouver, Clark County, Washington. The building retains most of its character-defining features indicative of its utilitarian style and electrical substation building type. However, a one-story, west addition was constructed in 1927, and an entrance pavilion was subsequently added to the same part of the building. The primary setting of the building consists of the BNSF railroad embankment to the north and east, SE Columbia Way to the southeast and south, the 1917 Interstate Bridge to the southwest, and I-5 to the west. The setting has changed little from the 1960s and is consistent with the period of significance. As a result, the building retains its integrity of location, setting, workmanship, and feeling, while its integrity of materials, design, and association have been somewhat diminished. The building's tax lot is bounded by the BNSF railroad embankment to the north and east, SE Columbia Way to the southeast and south, the 1917 Interstate Bridge to the southwest, and I-5 to the west. The boundaries of the tax lot have been successively altered based on changes to the surrounding infrastructure and its immediate surroundings, including a surface parking lot and surrounding vegetation, do not contribute to its significance. The 1927 one-story addition was also constructed outside the period of significance and is not considered a contributing element. Therefore, the identified boundary of the NRHP-eligible Bridge Substation is defined by the original, eastern portion of the building located at its present site since 1913 (Figure 4).

ALTERNATIVES CONSIDERED

Because the Bridge Substation has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Bridge Substation, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

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ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. As currently proposed, the Modified LPA would involve the permanent right-of-way acquisition of the Bridge Substation to construct a proposed shared use path and shared use path bridge. Construction of the path and bridge would furthermore require the demolition of the Bridge Substation. As a result, no features that date from the property's period of significance (1913 to 1926) or that justify the property's NRHP eligibility under Criterion C would remain following the completion of construction.

In conclusion, the Modified LPA would destroy the features that convey the property's significance under NRHP Criterion C and would eliminate the property's integrity of location, setting, design, materials, workmanship, feeling, and association. The "[p]hysical destruction of or damage to all or part of the property" is an example of an Adverse Effect presented in 36 CFR 800.5(a)(2)(i). Based on application of the Criteria of Adverse Effect defined in 36 CFR 800.5(a)(1), the Modified LPA is anticipated to have an Adverse Effect on the NRHP-eligible Bridge Substation.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the Program would affect the NRHP-eligible Bridge Substation, and the effect would be Adverse.

SOURCES/BIBLIOGRAPHY

Alsobrook, Adam. "Bridge Substation / Interstate Bridge Transformer House / Portland Electric Power Company (PEPCO) Substation / Clark County Utility Substation (WA 1192)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

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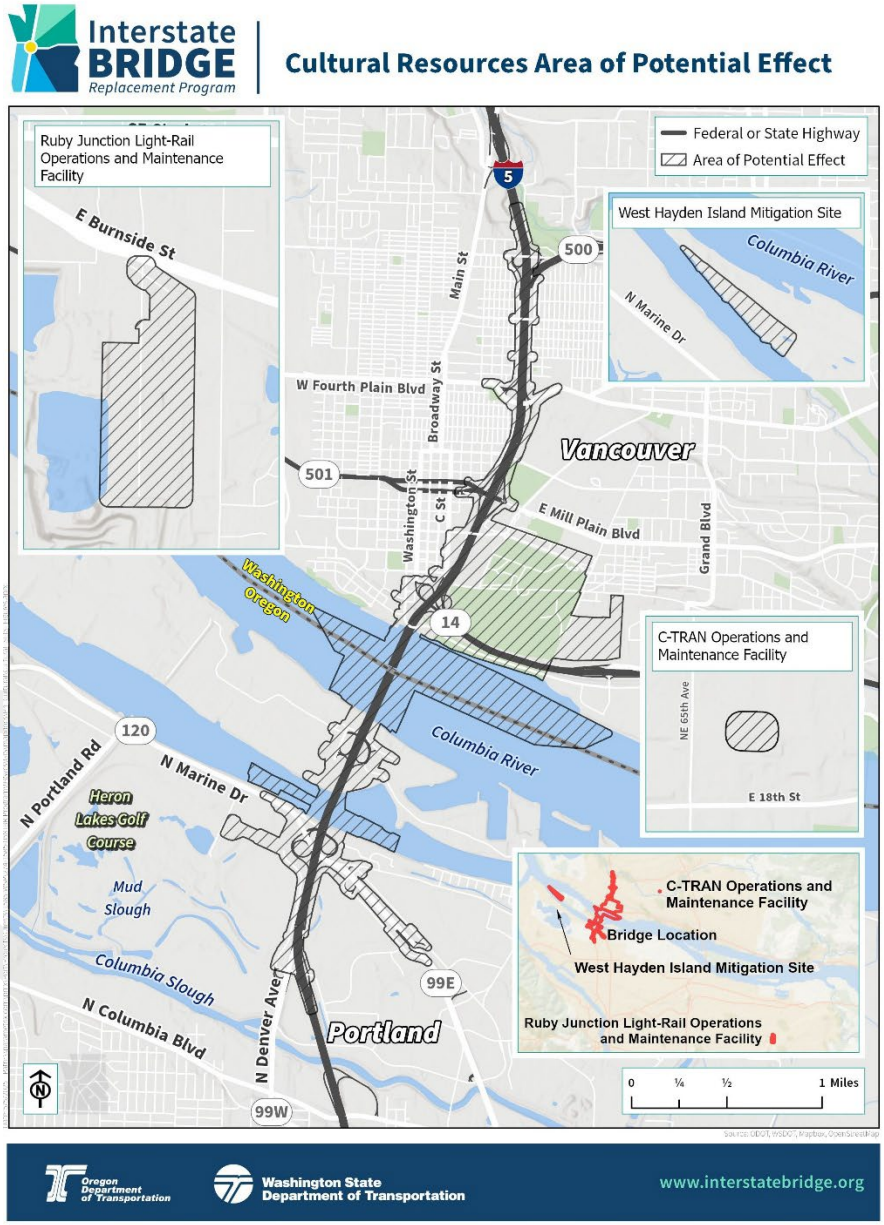


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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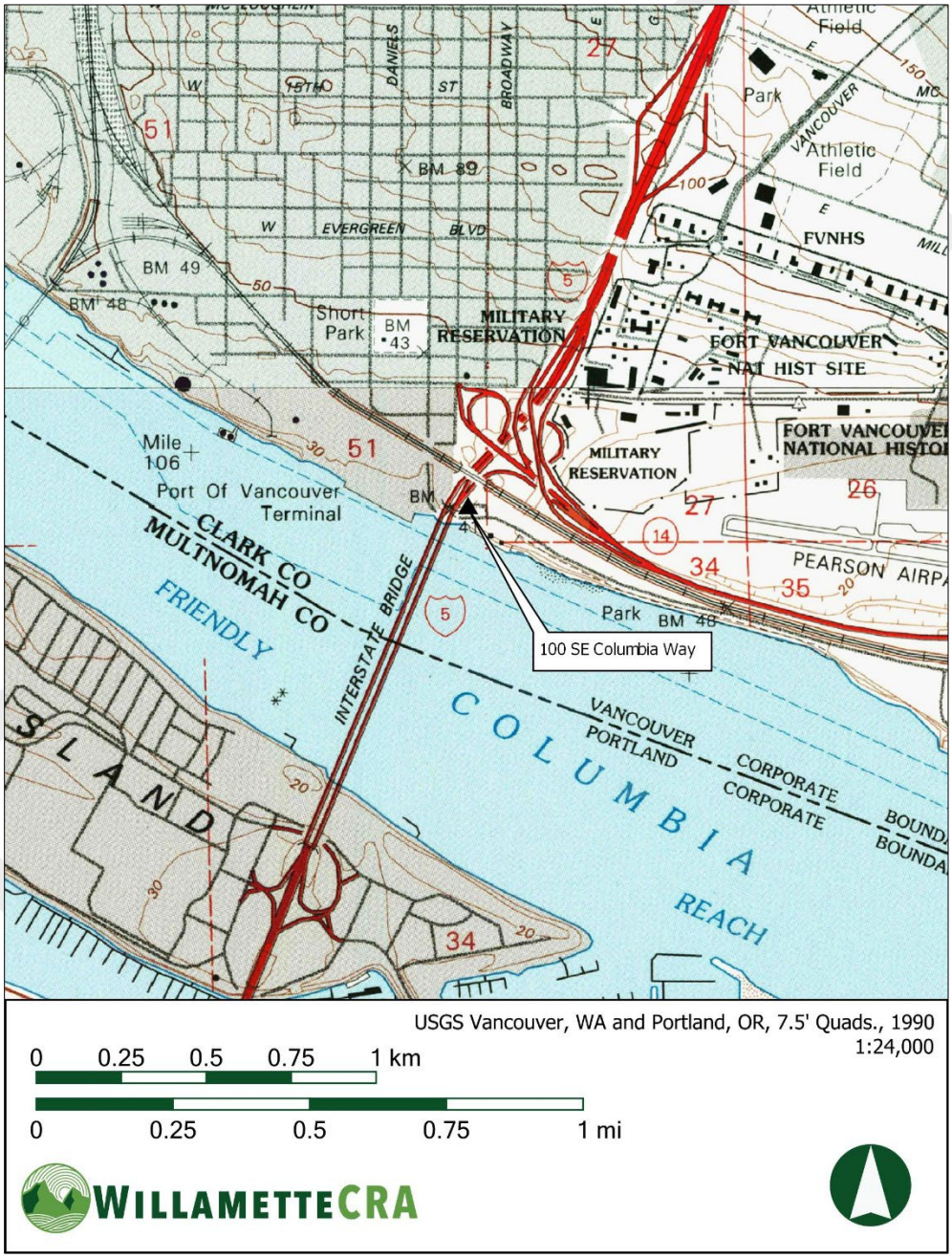


Figure 3. Location map of 100 SE Columbia Way, Vancouver, Clark County, Washington.

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Figure 4. Aerial map of 100 SE Columbia Way, showing the identified boundary of the NRHP-eligible property with a white line.

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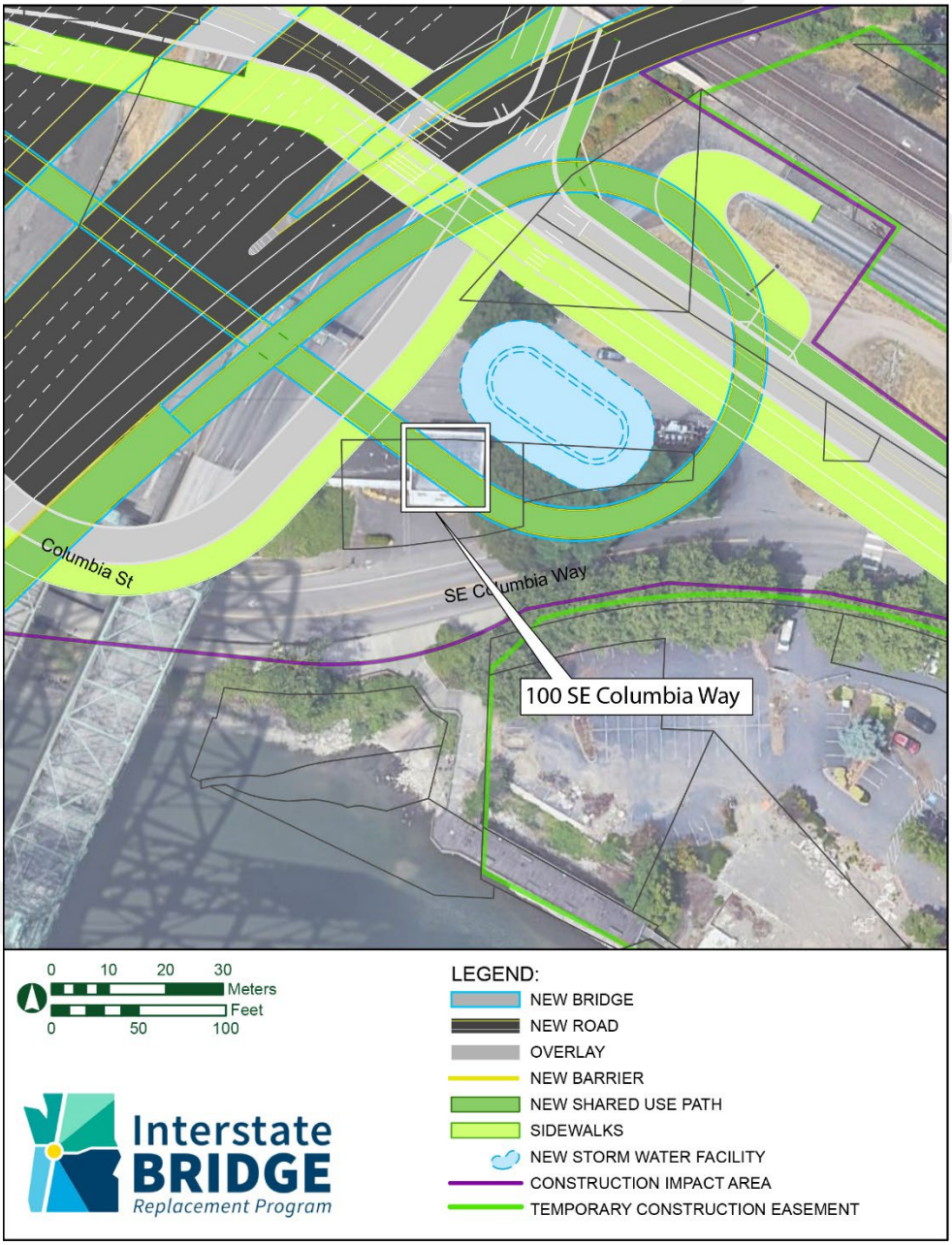


Figure 5. Aerial map showing the proximity of proposed Program activities to 100 SE Columbia Way (identified boundary of the NRHP-eligible property outlined in white). The property would be demolished for these activities.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Bridge Substation / Interstate Bridge Transformer House / Portland Electric Power Company (PEPCO) Substation / Clark County Utility Substation (WA 1192)	WISAARD Property ID: 89097
Street Address: 100 SE Columbia Way	City, County, State: Vancouver, Clark County, Washington



Figure 6. North elevation of Bridge Substation (100 SE Columbia Way), view south (WillametteCRA, March 8, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Earls House (WA 1233)	WISAARD Property ID: 89149
Street Address: 815 East 22nd Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Earls House (815 E 22nd Street), north elevation, view south (WillametteCRA, March 8, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Earls House (WA 1233)		WISAARD Property ID: 89149
Street Address: 815 East 22nd Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Earls House, a World War II-Era cottage located at 815 E 22nd Street in the Arnada neighborhood of Vancouver, Clark County, Washington (Figure 1). The subject property, which is on the south side of E 22nd Street between H Street and Interstate 5 (I-5), was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Earls House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Earls House (WA 1233)		WISAARD Property ID: 89149
Street Address: 815 East 22nd Street	City, County, State: Vancouver, Clark County, Washington	

highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Earls House at 815 E 22nd Street is a 1938 World War II-Era Cottage located in the Arnada neighborhood of Vancouver, Clark County, Washington (Figure 3). The dwelling features a T-shaped footprint and a concrete slab foundation. Its wood frame walls rise one story in height to a moderate-pitched, hipped roof with no eaves and asphalt shingle cladding. The north (principal), east, and west elevations are clad in original wood drop siding; the south (rear) elevation is clad in non-historic lapped fiber cement or aluminum siding. The building's principal entry is a wood door with small diamond light, located on the north elevation to the east of a projected wall. This projected wall possesses full-length fixed wooden corner windows each with five horizontal lights arranged at the northeast and southeast corners; an identical corner window is also located on the northwestern corner of the building. A small wooden casement window with horizontal lights and scalloped exterior trim is located next to the door on the north elevation. Additional fenestration includes double-hung wood windows also with horizontal lights, a non-historic steel half-glass door at the rear with a nine-light window and an adjacent sliding vinyl window. The dwelling's rectangular lot includes the principal building and a rear yard.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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The Earls House is eligible for inclusion in the NRHP under Criterion C, at the local level of significance, in the area of architecture as a particularly representative example of a Minimal Traditional style dwelling. The Earls House is emblematic of the style through character-defining features including its gradual pitch hip roof with no overhang, single-story height, relatively small square footage, corner windows, and minimally ornamented wood cladding. Its period of significance under Criterion C is 1938, the year of the dwelling's completion.

Despite the construction of I-5 in the 1950s, the immediate setting of the Earls House remains largely single-family in character with an abundance of detached dwellings to the north, south, and west. The removal of a detached garage has a slight effect on the property's integrity of design; however, the dwelling otherwise appears to be little changed. Overall, the property retains sufficient integrity of location, setting, feeling, design, materials, workmanship, and association to convey its historic significance. The identified boundary of the NRHP-eligible property coincides with the boundary of the tax lot, which is bounded by E 22nd Street to the north, an alley to the south, and adjacent parcels to the east and west (Figure 4). All of the features within the tax lot, including the surrounding ground, landscaping, and walkways, contribute to the property's significance.

ALTERNATIVES CONSIDERED

Because the Earls House has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Earls House, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible Earls House. Program activities within the vicinity of the property would include the reconstruction and widening of the existing I-5 corridor to the east of the property and the construction of a new noise wall paralleling I-5 and terminating at the north side of the intersection between E 22nd Street and I Street, where no noise wall currently exists. However, none of these activities would require new right of way from the Earls House, and they would be physically separated from the property by two intervening parcels containing residential resources; together, the parcels

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provide an approximately 80-foot buffer between the Earls House and proposed Program activities. They also obscure the proposed Program activities from view of the east side of the Earls House property.

The proposed interstate improvements and noise wall would be partially visible from the north side of the Earls House property (Figure 5). However, they would not have an effect on any of its character-defining features or any of the aspects of setting that enable the property to convey its significance under Criterion C. The property's design and materials would remain intact and unaltered, and its location, landscaping would be unchanged by Program activities. Furthermore, because the property does not rely upon a quiet setting to convey its significance, Program activities do not have the potential to reduce any significant atmospheric or audible qualities.

In conclusion, the Modified LPA would not affect the Earls House's integrity of location, setting, design, materials, workmanship, feeling, or association, nor would it alter any features that enable the property to convey its significance under NRHP Criterion C; specifically, the Earls House would maintain its ability to convey its association with the Minimal Traditional style. Therefore, the Modified LPA would have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Earls House.

SOURCES/BIBLIOGRAPHY

Cottrell-Crawford, Penelope. "Earls House (WA 1233)." Interstate Bridge Replacement Program Section 106 Documentation Form (Individual Properties). ODOT Key No. 21570, WSDOT Work Order No. 400519A. Prepared by WillametteCRA, 2023.

Interstate Bridge Replacement Program. "2. Description of Alternatives." In "Final Supplemental Environmental Impact Statement." 2025.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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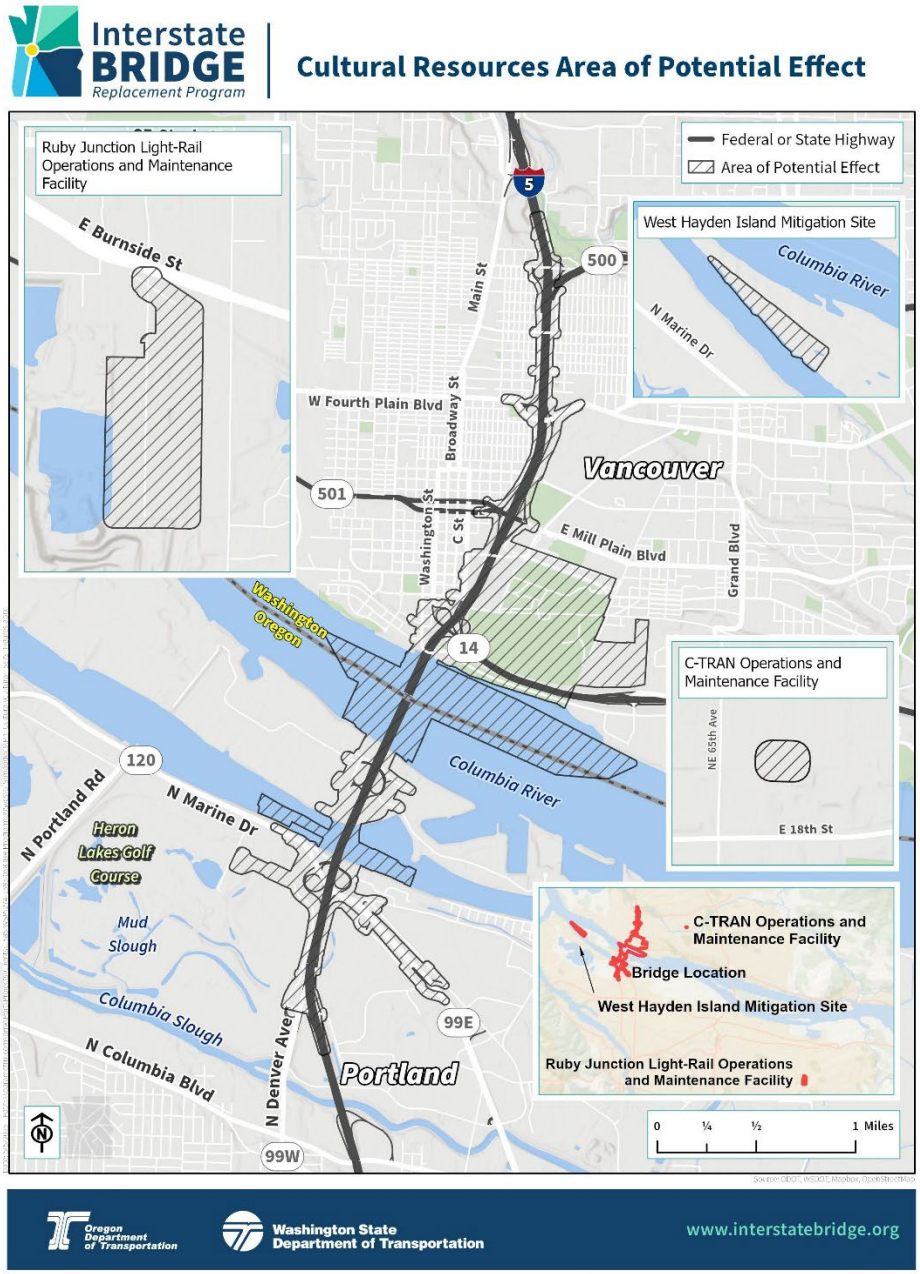


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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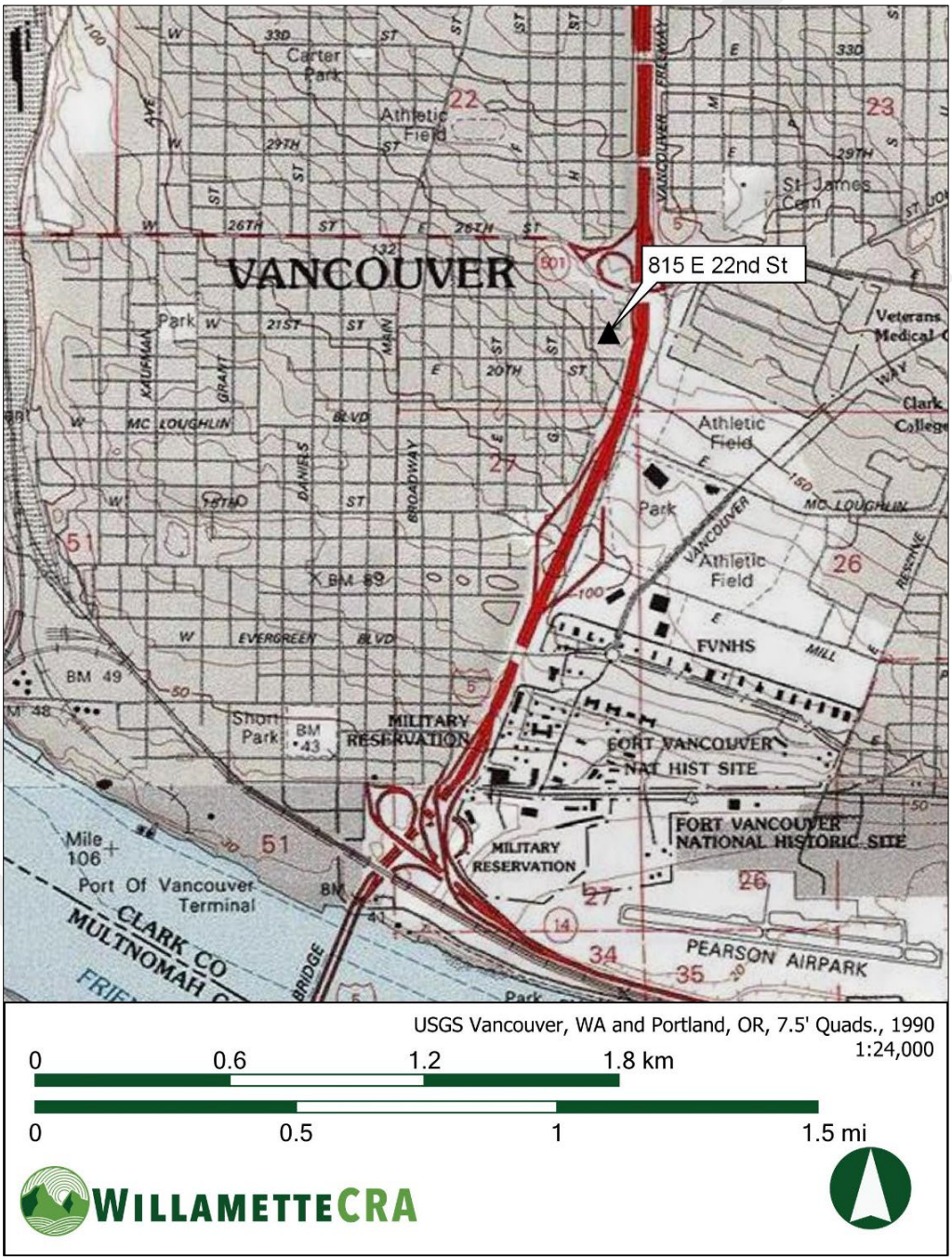


Figure 3. Location map of the Earls House, Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Figure 4. Aerial map of the Earls House, showing the identified boundary of the NRHP-eligible property in white.

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Figure 5. Aerial map showing the proximity of proposed Program activities to the Early House, with the identified boundary of the NRHP-eligible property in white. Note intervening properties and trees.

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Mickler House (WA 1258)	WISAARD Property ID: 89483
Street Address: 901 East 29th Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Mickler House (901 East 29th Street), north and west elevations, view southeast (WillametteCRA, June 9, 2022).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
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Street Address: 901 East 29th Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Mickler House, a Workingman's Foursquare dwelling located at 901 East 29th Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which is at the southeast corner of I Street and East 29th Street, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the Mickler House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

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[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
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- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The building at 901 East 29th Street, known as the Mickler House, is a Workingman's Foursquare single-family dwelling located in Vancouver, Clark County, Washington (Figure 3). The current tax lot includes the dwelling as well as a prefabricated storage shed and uncovered wood deck in the rear yard, a wood fence around the property boundary, and trees along the west property line. The main footprint of the dwelling is rectangular and constructed atop a partial concrete basement foundation. The walls are constructed from wood frame and rise one story in height. The north, east, and west elevations are clad with painted wood tongue and groove siding (V-groove rustic siding), while the corners are capped with flat painted wood corner boards. The dwelling is capped with a hipped roof clad with asphalt composition shingles, as well as boxed eaves with painted wood soffits and fascia. A masonry chimney protrudes from near the ridgeline of the hip roof. The main entrance, which is on the north elevation, is defined by a front entry porch with a replacement entry door and transom beneath a porch roof supported by square painted wood posts. At the south elevation, there is an addition clad with painted horizontal wood clapboard siding and capped with a low shed roof clad with rolled asphalt composition roofing material. Fenestration includes painted double-hung wood windows, modern horizontal slider units, modern vinyl window units, and central fixed panels flanked by horizontal sliding sashes.

The Mickler House is eligible for inclusion in the NRHP under Criterion A at the local level of significance in the area of community planning and development. The dwelling is a particularly early example of development in the area and is also representative of the first wave of urban residents to occupy the Vancouver Heights subdivision, which is now part of the Shumway neighborhood. Its character-defining features include the building's one-story height, hipped roof with boxed eaves, wood tongue and groove siding with flat wood cornerboards, double-hung

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wood windows, and setback from the adjacent street. Furthermore, the consistently scaled residential neighborhood to the north, west, and south of the Mickler House provides relevant context that establishes the dwelling as one of the earlier residential constructions within this area.

The period of significance for the Mickler House begins in 1907, the year of the dwelling's construction, and ends in 1951, the year of the first documented changes to the neighborhood related to construction of the Vancouver Freeway (I-5). The dwelling is in its original location and retains all of its character-defining features indicative of the Workingman's Foursquare type. Since its original construction, the property's setting appears to have changed somewhat, particularly with the construction of I-5 to the east. Additionally, the replacement of the original front door and some of the windows has diminished the building's integrity of materials. Ultimately, the building retains its integrity of location, design, workmanship, feeling, and association; however, it has somewhat diminished integrity of setting and materials. The identified boundary of the NRHP-eligible property coincides with its tax lot boundaries, which have remained unchanged since the end of the period of significance (Figure 4). Within the boundary, only the residence and the front walkway contribute to the property's significance. All other elements including the paved driveway, shed, fence, and deck are non-contributing.

ALTERNATIVES CONSIDERED

Because the Mickler House has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Mickler House, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor, which is currently separated from the NRHP-eligible Mickler House by one residential parcel, J Street, and a concrete noise wall. Adjacent to the property, Program activities would consist of improvements to East 29th Street between the I-5 overcrossing and the I Street intersection. These improvements would potentially include enhancements to pedestrian and traffic access (e.g., sidewalks, curb ramps, signage), but they would not include the

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reconfiguration of the current roadway or the construction of additional traffic lanes; this section of East 29th Street would remain a two-lane, two-way road.

It is anticipated that Program activities would not require any permanent right of way from the Mickler House property. However, the improvements to East 29th Street would require a temporary construction easement from the extreme northern edge of the tax lot, which is the identified boundary of the NRHP-eligible property. Construction activities within this easement could potentially interfere with or require the removal of the existing wood fence that delineates the property boundary (Figures 6 and 7); however, the IBR Program commits to reconstructing the fence, if necessary, following Program implementation. As the fence post-dates the Mickler House's period of significance, its potential removal and reconstruction would not reduce the property's ability to convey its significance. Activities within the temporary construction easement also have the potential to disturb the northern edge of the concrete-paved walkway connecting the north (principal) elevation of the Mickler House to the sidewalk along East 29th Street; while this feature is considered contributing to the property's significance, it is a minor feature, and any disturbance or damage would be limited to its extreme northern edge. The Program commits to minimizing to the maximum extent possible the impacts to the existing walkway and curb when implementing ADA design efforts. The property's character-defining features, including its one-story height, hipped roof with boxed eaves, wood tongue and groove siding with flat wood cornerboards, double-hung wood windows, and setback from East 29th Street would remain intact and unaltered despite Program activities. Its location at the corner of East 29th Street and I Street and its orientation toward East 29th Street would also be unaffected.

In addition to the proposed temporary construction easement, Program activities would introduce new visual, audible, and atmospheric elements as a result of construction and of increased traffic capacity following its conclusion. However, these changes would not adversely affect any of the aspects of setting that enable the property to convey its significance under Criterion A. The consistently scaled residential character of the neighborhood immediately surrounding the property would be unaffected by Program activities, and as noted above, the Mickler House's location, setback, orientation would also remain unchanged. The property would also continue to be separated from the I-5 corridor by one residential parcel, J Street, and a noise wall (though not the existing noise wall), as well as a retaining wall. Finally, because the Mickler House does not rely upon a quiet setting to convey its significance, Program activities do not have the potential to reduce any significant atmospheric or audible qualities.

In conclusion, the Modified LPA would have an effect on the NRHP-eligible Mickler House, but that effect would not be adverse. The undertaking would not diminish the property's integrity of location, design. setting, materials, workmanship, feeling, or association in a manner that would diminish its ability to convey its significance under Criterion A; ultimately, the property would maintain its ability to convey its association with the early development of the Vancouver Heights subdivision (now part of the Shumway neighborhood) despite the proposed temporary construction easement and the adjacent infrastructure improvements. Therefore, the Modified LPA is anticipated to have No Adverse Effect on the NRHP-eligible property. Should the proposed Program activities require permanent changes to the Mickler House beyond the removal of the noncontributing fence and the disturbance of the extreme northern edge of the walkway, this Finding of Effect would need to be revisited to determine the undertaking's level of effect.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible Mickler House.

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Property Name: Mickler House (WA 1258)		WISAARD Property ID: 89483
Street Address: 901 East 29th Street	City, County, State: Vancouver, Clark County, Washington	

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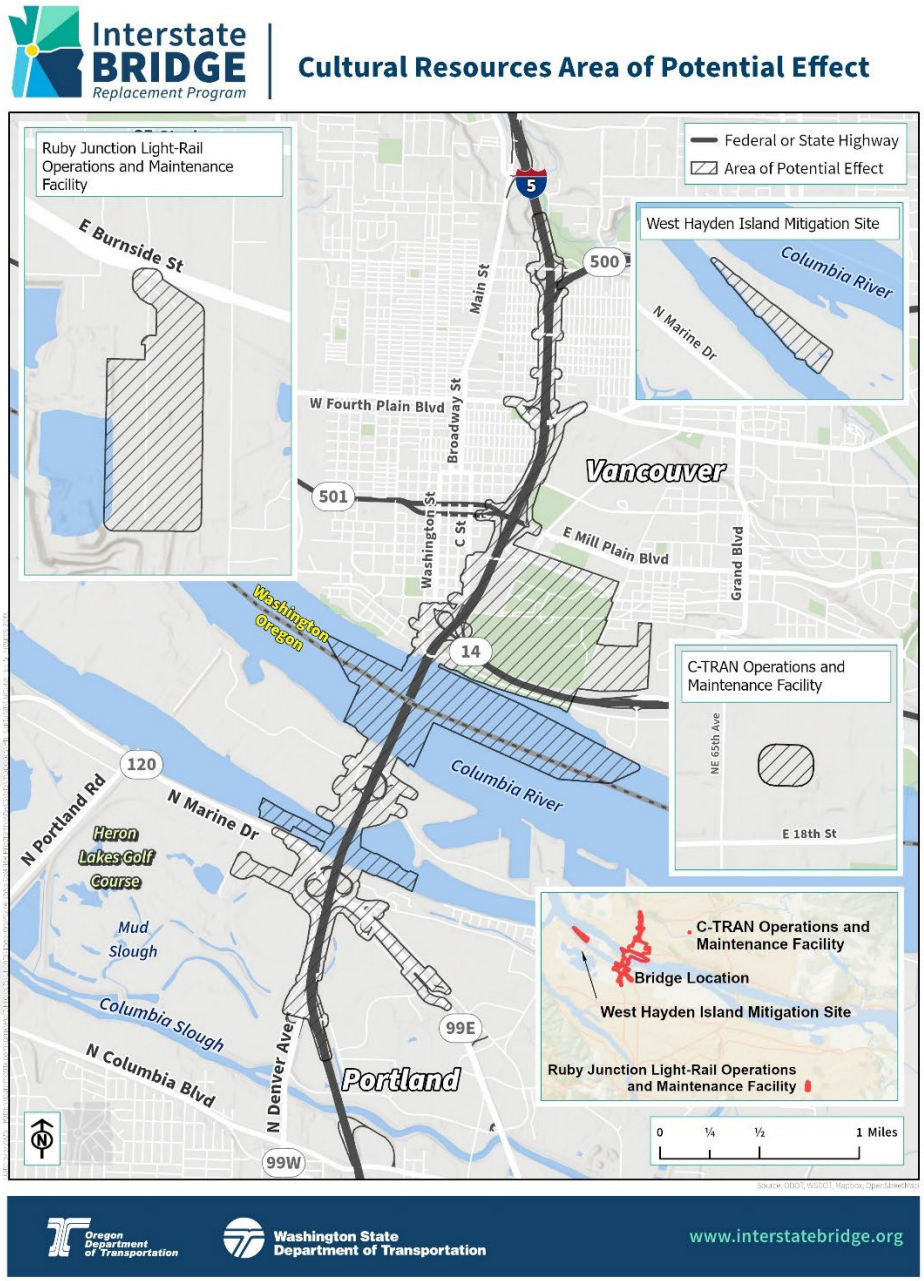


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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Figure 3. Location map of the Mickler House (901 East 29th Street), Vancouver, Clark County, Washington.

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Figure 4. Aerial map of the Mickler House (901 East 29th Street), showing the identified boundary of the NRHP-eligible property in white.

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Figure 5. Aerial map showing the proximity of proposed Program activities to the Mickler House (901 East 29th Street), the identified boundary of the NRHP-eligible property is outlined in white.

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Figure 6. Mickler House (901 East 29th Street), east and north elevations, view south (WillametteCRA, March 8, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Vancouver Barracks National Cemetery (Army Post Cemetery) (WA 1319)	WISAARD Property ID: 20317
Street Address: 1200 East 4th Plain Boulevard	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. Vancouver Barracks National Cemetery, view northwest (WillametteCRA, June 14, 2022).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver Barracks National Cemetery (Army Post Cemetery) (WA 1319)		WISAARD Property ID: 20317
Street Address: 1200 East 4th Plain Boulevard	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Vancouver Barracks National Cemetery, a cemetery located at 1200 East 4th Plain Boulevard in Vancouver, Clark County, Washington (Figure 1). The subject property, which is located immediately northeast of the I-5/East 4th Plain Boulevard interchange, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A in a Determination of Eligibility that was accepted by the Washington Department of Archaeology and Historic Preservation (DAHP) in July 2016.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the Vancouver Barracks National Cemetery. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Vancouver Barracks National Cemetery at 1200 East 4th Plain Boulevard, also referred to as the Army Post Cemetery, is a cemetery located near the southwestern corner of the Rose Village neighborhood in Vancouver, Clark County, Washington (Figure 3). The property was established in 1882 as a permanent cemetery for the Vancouver Barracks, the earliest U.S. Army post in the American Pacific Northwest. The cemetery is contained within a generally triangular tax lot bounded by East 4th Plain Boulevard to the south, the I-5 northbound onramp to the west, residential lots to the north, and the St. James Acres Cemetery to the north and east. Historically the cemetery formed the northwestern corner of the Vancouver Barracks; the Army transferred some of the installation's land during the 1940s, so that a healthcare campus, parks, and educational institutions currently separate the cemetery from the Fort Vancouver National Historic Site, which contains the other extant elements historically associated with the barracks.

The Vancouver Barracks National Cemetery measures approximately 6.2 acres in size and occupies a largely level site. Although the entrance currently used to access the cemetery is located at its east corner (Figure 6), its historical main entrance is located at the center of the cemetery's southeast boundary along East 4th Plain Boulevard. This historical entrance is marked by curving, stepped cobblestone walls that flank a wrought iron gate

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(Figure 7). A metal picket fence lines the property's southeastern boundary along East 4th Plain Boulevard. A central paved asphalt road proceeds straight through the historical entrance and leads to the northwest corner, bisecting the cemetery into two interment areas. Additional roads run along the heart-shaped perimeter of the property. Along the northern boundary, a metal chain-link fence separates the Vancouver Barracks National Cemetery from the adjacent St. James Acres Cemetery, which is privately owned and operated.

The Vancouver Barracks National Cemetery contains more than 1,000 evenly spaced, federal-issue marble headstones, organized in linear rows oriented from southwest to northeast. The current property is the fourth cemetery associated with Fort Vancouver but contains burials reinterred from earlier cemeteries established for the Hudson's Bay Company and Fort Vancouver. The cemetery also contains more than 50 trees, the majority of which are conifers. Most trees stand near the property boundaries, particularly within the western half of the cemetery. Several other trees line the central roadway or are present within the interment areas. Other small-scale features within the cemetery include a flagpole immediately inside the historic entrance gate, concrete benches, and signage.

In 1975, the Vancouver Barracks National Cemetery was recorded on an inventory form as part of the Washington State Historic Inventory Project, under the name Army Post Cemetery. The 1975 inventory form briefly documented the physical characteristics and historical significance of the property but did not identify applicable significance criteria or period of significance. The cemetery was again recorded in 1999 on a State of Washington Historic Property Inventory Form, which provided photographic documentation but did not address the property's historical development, physical qualities, or significance. In 2016, field recorder Julie Weisgerber entered a Determination of Eligibility for the Vancouver Barracks National Cemetery into the Washington Information System for Architectural and Archaeological Resources Data (WISAARD). The 2016 documentation included a detailed description and historical narrative of the Vancouver Barracks National Cemetery, as well as a statement of significance clarifying that the property is eligible for the NRHP under Criterion A. It is significant for its association with the expansion of American military presence in the lower Columbia River region during the late nineteenth and early twentieth centuries, as well as its association with the practice of reinterring Native American, Hawaiian, and Euro-American burials from pre-existing cemeteries near Fort Vancouver.

The 2016 Determination of Eligibility did not formally identify a period of significance but presents information that supports a period of 1882 to 1918. This proposed period of significance begins with the establishment of the current cemetery and the reinterment of earlier burials; it extends to the end of World War I, at which time Camp Lewis was under construction in Washington. After this point, Fort Vancouver's importance as the preeminent United States military installation in the Pacific Northwest declined. The 2016 documentation furthermore did not assess the property's integrity relative to its Criterion A significance, but it appears the physical characteristics of the Fort Vancouver National Cemetery have changed relatively little since its period of significance. Although its integrity of setting has been diminished to an extent by the construction of I-5 adjacent to its western boundary during the 1950s, as well as by its physical separation from what remains of its associated installation, the cemetery maintains good integrity of location, design, materials, workmanship, feeling, and association to express its historical significance. DAHP reviewed and accepted the Determination of Eligibility for the property in July 2016.

The identified boundary of the NRHP-eligible property corresponds to the boundary of its triangular tax lot (Figure 4), which encompasses the physical elements that comprised the Vancouver Barracks National Cemetery during its period of significance. The 2016 Determination of Eligibility did not comprehensively date the features included in its property description, and it did not identify the features that date to the cemetery's period of significance and

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contribute to its historically significant character. However, for the purposes of the current effects analysis, the cemetery's character-defining features are assumed to include its original property boundary, level topography, grass lawn, symmetrical layout including central and perimeter roadways, rows of headstones and associated interments, mature trees, cobblestone entrance walls and gate, perimeter fence, and extant small-scale features throughout the cemetery including benches and the flagpole. The low hedge that runs between East 4th Plain Boulevard and the outside edge of the perimeter fence does not appear in historic aerial photographs captured prior to the 1990s and therefore is not considered a character-defining feature.

ALTERNATIVES CONSIDERED

Because the Vancouver Barracks National Cemetery has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible Vancouver Barracks National Cemetery, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. As currently proposed, the Modified LPA would have No Effect on the NRHP-eligible Vancouver Barracks National Cemetery.

The Modified LPA would involve the removal and reconstruction of the bridge that carries East 4th Plain Boulevard over I-5 and the reconfiguration of the East 4th Plain Boulevard interchange immediately west of the Vancouver Barracks National Cemetery (Figure 5). Construction would not require any permanent or temporary acquisition of land from the cemetery's tax lot, which is also the identified boundary of the NRHP-eligible resource. Program activities would, therefore, involve no disturbance to any portion of the cemetery.

The Modified LPA also proposes to construct new infrastructure including a noise wall and shared-use paths in the immediate vicinity of the Vancouver Barracks National Cemetery. A noise wall would be constructed along (but outside of) an approximately 125-foot-long portion of the cemetery's western property boundary, where no such wall currently exists. The noise wall would be located in the general vicinity of the existing I-5 onramp, which was constructed well after the cemetery's period of significance, and it would not further reduce the property's integrity of setting. Furthermore, the wall would limit the anticipated increase in noise from the widened freeway to

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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approximately 1 dBA, keeping the overall noise level within the cemetery at or below 64 dBA; this does not approach or exceed 67 dBA, which is the threshold set by FHWA's Noise Abatement Criteria (NAC) for Section 4(f) sites.[2] The new shared-use paths would run near the southern and western boundaries of the cemetery, along the East 4th Plain Boulevard interchange and I-5 onramp. Construction of the path along East 4th Plain Boulevard may require the removal of the hedge that leads along the outside of the cobblestone wall and perimeter fence to the west of the historic entrance gate (Figure 8). However, this hedge is not located within the identified boundary of the NRHP-eligible property and was installed after the 1990s (as evidenced by historical aerial photographs), well after the conclusion of the cemetery's period of significance; it is therefore not a character-defining feature of the cemetery property. The shared-use path would be a new component of transportation infrastructure adjacent to the southern boundary of the cemetery property, but its visual character would be generally consistent with the automobile roadway that already exists along the property boundary. Furthermore, construction of the shared-use path and the noise wall would not remove any elements of the cemetery property's setting that allow it to convey its historical significance. The cobblestone walls, iron gate, and fence—which are character-defining features of the cemetery property—would not be affected by construction.

In conclusion, the Modified LPA would have No Effect on the NRHP-eligible Vancouver Barracks National Cemetery. Program activities, including the construction of the new shared-use path and noise wall, would not diminish the property's integrity of location, design, setting, materials, workmanship, feeling, or association in a manner that would affect its ability to convey its significance under NRHP Criterion A. However, should the proposed design be altered to require permanent changes to character-defining features along the cemetery property's southern and western boundaries, this Finding of Effect would need to be revisited to determine the IBR Program's level of effect.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible Vancouver Barracks National Cemetery.

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[2] IBR Program, "Noise and Vibration Report" (June 2025), 4-74.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: Vancouver Barracks National Cemetery (Army Post Cemetery) (WA 1319)		WISAARD Property ID: 20317
Street Address: 1200 East 4th Plain Boulevard	City, County, State: Vancouver, Clark County, Washington	

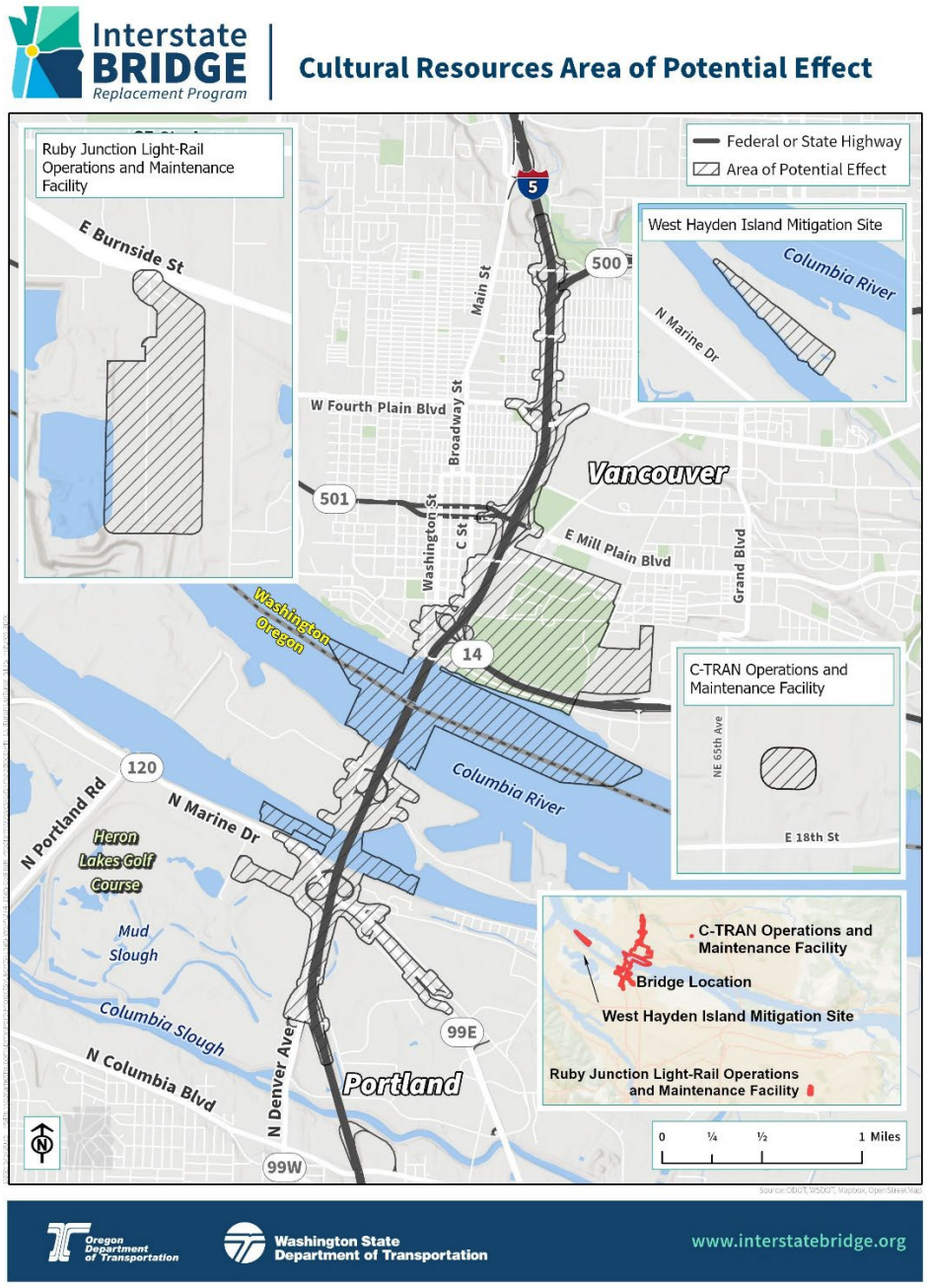


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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Figure 3. Location map of Vancouver Barracks National Cemetery, Vancouver, Clark County, Washington.

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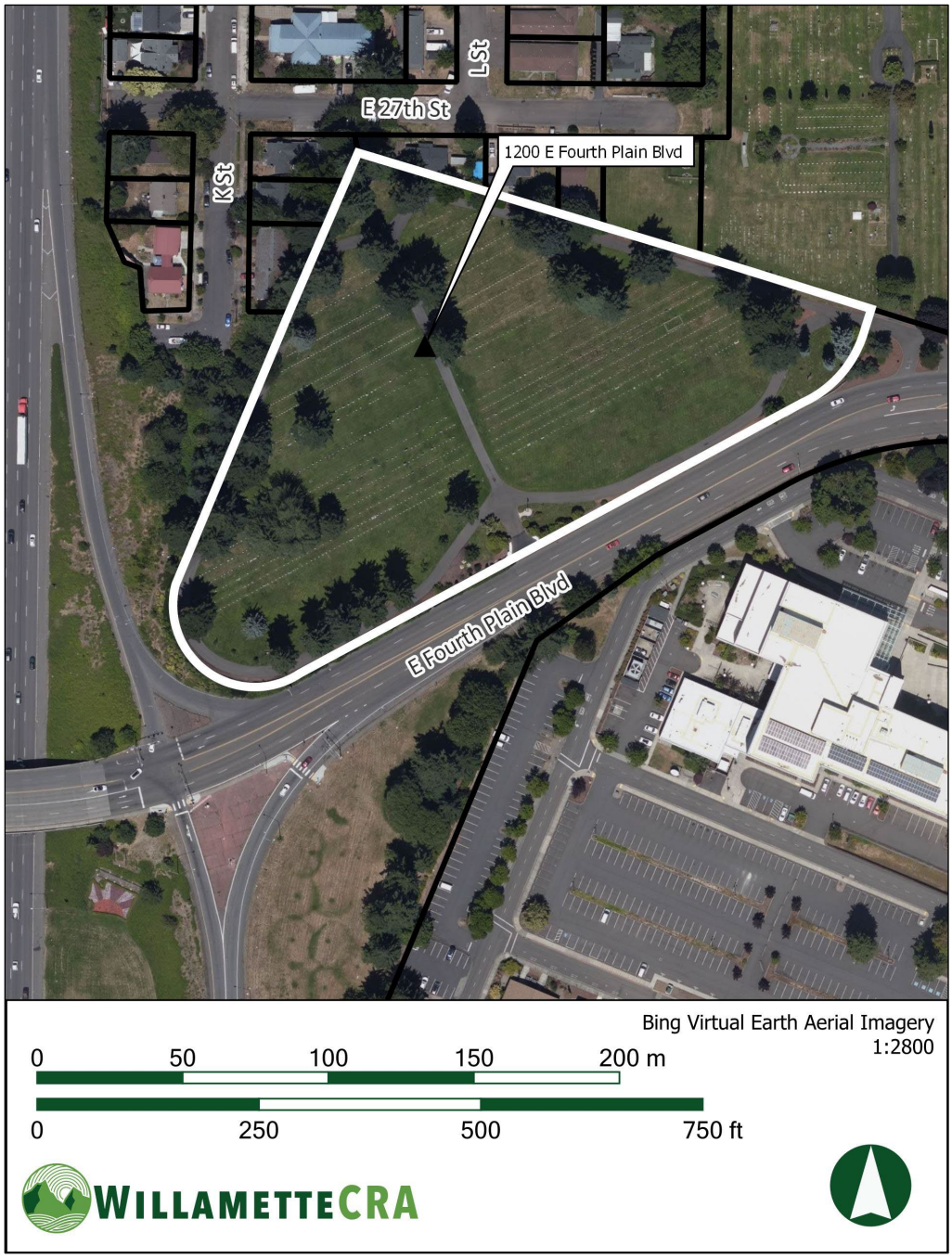


Figure 4. Aerial map of Vancouver Barracks National Cemetery, showing the identified boundary of the NRHP-eligible property in white.

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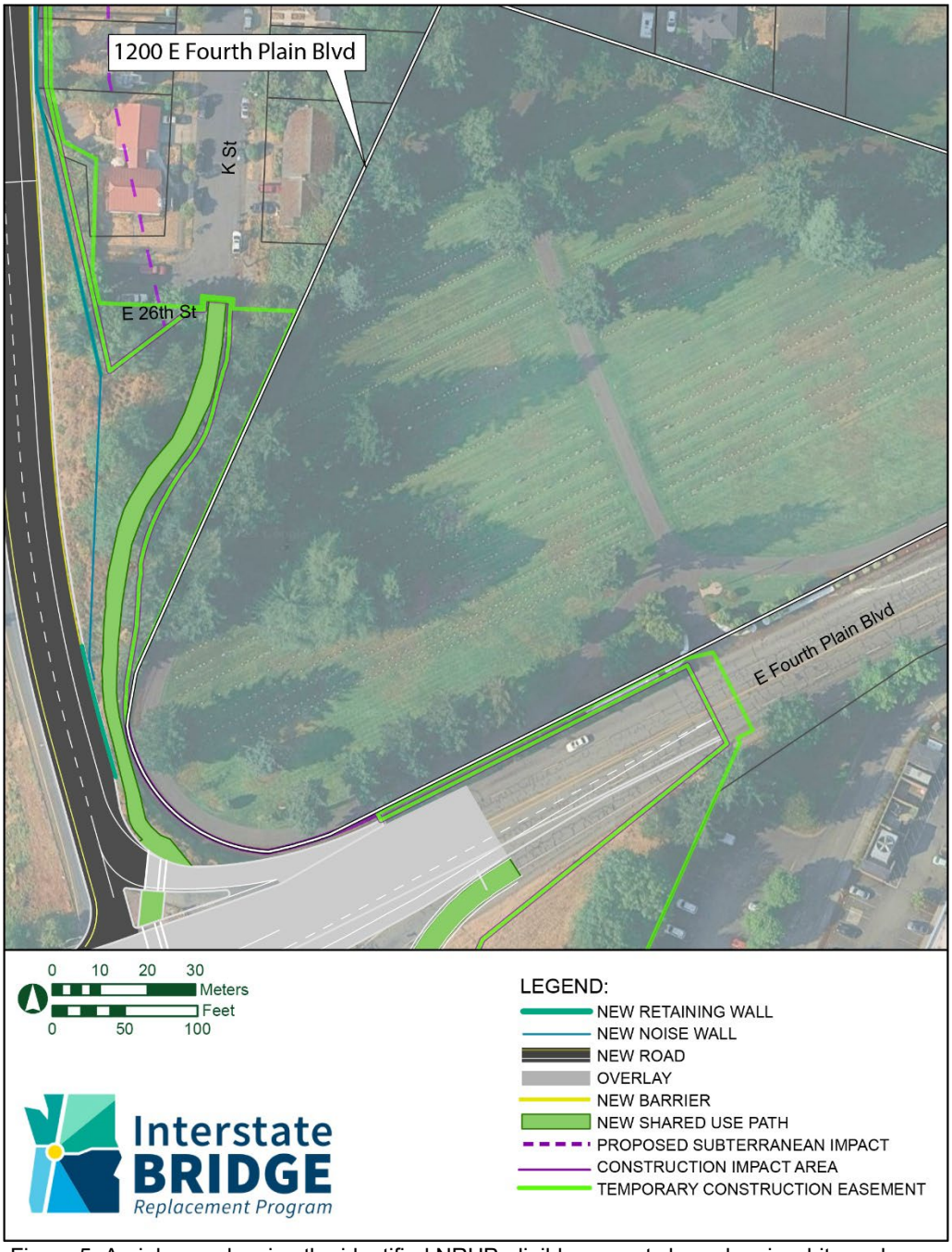


Figure 5. Aerial map showing the identified NRHP-eligible property boundary in white and proposed Program activities in the vicinity.

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Figure 6. View of the east corner of the Vancouver Barracks National Cemetery looking west (WillametteCRA, June 14, 2022).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
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Figure 7. View of the historical entrance to the Vancouver Barracks National Cemetery looking northwest (WillametteCRA, June 14, 2022).

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Figure 8. View of south cemetery boundary, looking southwest from the historical entrance; the proposed shared-use path would stretch along the cobblestone wall and iron fence, replacing the low hedge (Google Street View, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: St. James Acres Cemetery (Mother Joseph Catholic Cemetery of Vancouver) (WA 1320)	WISAARD Property ID: 731277
Street Address: 1401 East 29th Street	City, County, State: Vancouver, Clark County, Washington

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. St. James Acres Cemetery, view north (WillametteCRA, June 14, 2022).

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DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: St. James Acres Cemetery (Mother Joseph Catholic Cemetery of Vancouver) (WA 1320)		WISAARD Property ID: 731277
Street Address: 1401 East 29th Street	City, County, State: Vancouver, Clark County, Washington	

INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the St. James Acres Cemetery, a cemetery located at 1401 E 29th Street in Vancouver, Clark County, Washington (Figure 1). The subject property was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and D in an evaluation process carried out as part of the ongoing Program.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Effect on the St. James Acres Cemetery. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers with more space and time to merge, diverge and weave safely) in each direction. When all

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

  - Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

  - A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The St. James Acres Cemetery at 1401 E 29th Street is a cemetery located at the southern edge of the Rose Village neighborhood in Vancouver, Clark County, Washington (Figure 3). Founded in 1871, the cemetery is located on an irregular tax lot currently bounded by residential lots to the west, E 29th Street to the north, O Street to the east, and the Vancouver Barracks National Cemetery to the south. The topography of the 8-acre site is relatively level, and the landscape is characterized by grassy lawns and a loose array of tall, mature trees of multiple varieties that have been planted informally throughout the property. Individual gravestones are situated in rows oriented north to south throughout a majority of the site, with the exception of one section in the southwest quadrant that is dedicated to Mother Joseph and other Sisters of Charity of Providence; this section, which is separated from the rest of the cemetery by a row of small trees, features rows of gravestones oriented east to west.

Circulation through the site is defined by an 8-foot-wide paved pathway, N Street that originates at the south property boundary and runs north to south through the approximate center of the site. The pathway's entrance is flanked by rough-cut stone posts and a short series of mature Mediterranean cypress trees, evoking a long

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funerary tradition. A 6-foot-wide, rosebush-lined pathway extends directly west from N Street, through the Sisters of Charity of Providence section, and terminates at a funerary monument to Mother Joseph and the Sisters of Charity of Providence. Immediately north of the intersection between N Street and this smaller pathway, N Street features a vegetated roundabout. In the northern third of the site, N Street curves to the northeast, and a secondary access road splits off to the west. This access road turns at a right angle and terminates near the western corner of the north property boundary. A one-story, wood-framed outbuilding with a square footprint and a shallowly pitched shed roof was added at the southwest corner of the intersection between N Street and the access road between 1955 and 1968.

The St. James Acres Cemetery is eligible for inclusion on the NRHP under Criteria A and D, with Criterion Considerations A and D, at the local level of significance in the areas of exploration/settlement and religion. The cemetery is strongly associated with the early American occupation of Fort Vancouver and Catholic presence in the Pacific Northwest, and it acts as a link with early and locally prominent Catholic figures including Bishop A.M. Blanchet, Mother Joseph (born Esther Pariseau), and the Sisters of Charity of Providence. It also holds the potential to yield valuable information pertaining to the re-interment of remains from the Hudson's Bay Company cemetery at Fort Vancouver, which was the oldest historic-period cemetery associated with this area (established by ca. 1833). As the St. James Acres Cemetery is a religious property and a cemetery significant primarily for its historical importance and association with historic events, it satisfies Criteria Considerations A and D.

The period of significance for the St. James Acres Cemetery, related to its significance under Criterion A, stretches from the cemetery's establishment in 1871 to the conclusion of notable development activities in 1947. The period of significance under Criterion D stretches from 1871 to the conclusion of re-interment activities in 1883. Despite some alterations that have diminished the property's integrity of design (e.g., the construction of the outbuilding), the cemetery maintains sufficient integrity of location, setting, materials, workmanship, feeling, and association to communicate its significance in the areas of exploration/settlement and religion. The identified boundary of the NRHP-eligible property corresponds to the boundary of tax lot 17450000, which is at the center of the three parcels that currently constitute the cemetery (Figure 4). The two other parcels (17450000 and 21750000), which were added in 1999, are sufficiently small and peripheral to the historic cemetery so as to leave its circulation, cluster arrangement, landscaping, and views unaffected. The cemetery's character-defining features include its original property boundary, level topography, grass lawn, mature trees (including cypress trees at the entrance) and other vegetation, organization of gravestones and their associated interments in rows, arrangement of paved pathways with roundabout, stone gateposts, and monuments. Furthermore, the St. James Acres Cemetery has a significant historical relationship and physical proximity to the Vancouver Barracks National Cemetery, which lies immediately adjacent to its south boundary.

ALTERNATIVES CONSIDERED

Because the St. James Acres Cemetery has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

<u>No-Build Alternative</u>

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

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The No-Build Alternative would result in No Effect to the NRHP-eligible St. James Acres Cemetery, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)
As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would require the removal and reconstruction of the bridge that carries E Fourth Plain Boulevard over I-5. The Modified LPA also proposes to reconfigure the E Fourth Plain Boulevard interchange. The roadway of E Fourth Plain Boulevard would be replaced approximately 100 feet southwest of the St. James Acres Cemetery, but the new roadway would retain the same alignment and number of travel lanes as the current roadway. The undertaking would make additional improvements to traffic and pedestrian access within the E Fourth Plain Boulevard roadway nearer to the southern boundary of the property. The Modified LPA would improve sidewalks and existing medians along E Fourth Plain Boulevard within approximately 20 feet of the St. James Acres Cemetery's main (south) entrance (Figures 5–6). The undertaking would require no new right of way from the property, and following completion of construction, no features within the identified boundary of the NRHP-eligible property would be altered from their current conditions as a result of the IBR Program.

Program activities would change the current setting of the St. James Acres Cemetery to an extent by constructing infrastructure improvements southwest of the boundary of the NRHP-eligible property. The new roadway and bridge at E Fourth Plain Boulevard may be visible from the south end of the St. James Acres Cemetery, particularly as viewed across the adjacent Vancouver Barracks National Cemetery. However, it appears that the new bridge at E Fourth Plain Boulevard would be a similar height as the current bridge, and additional modifications in the configuration of travel lanes and pedestrian infrastructure would be surface-level improvements that would result in a negligible change to the visual characteristics of the St. James Acres Cemetery's current setting. Audible characteristics would also be only minimally altered, as the Modified LPA is expected to result in an increase in noise levels from 56 dBA to 58 dBA at the south side of the cemetery; this anticipated increase does not approach or exceed 67 dBA, which is the threshold set by FHWA's Noise Abatement Criteria (NAC) for Section 4(f) sites.[2]

Furthermore, the undertaking proposes to alter only elements constructed outside of the St. James Acres Cemetery's period of significance and that are unrelated to the significance of the resource. The setting features that would be altered do not contribute to the cemetery's ability to convey its association with the early Catholic settlement of Vancouver. Additionally, because Program activities would not involve any ground disturbance within the boundary of the St. James Acres Cemetery, its ability to yield information on nineteenth-century re-

[2] IBR Program, "Noise and Vibration Report" (June 2025), 4-74.

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interment practices would not be impaired. The property would retain its proximity and physical adjacency to the Vancouver Barracks National Cemetery to the southwest.

In conclusion, the Modified LPA would not diminish the St. James Acres Cemetery's integrity of location, design, setting, materials, workmanship, feeling, or association, and it would not have an effect on any features that enable the property to convey its significance under Criteria A or D. Therefore, the Modified LPA is anticipated to have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-eligible St. James Acres Cemetery.

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Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: St. James Acres Cemetery (Mother Joseph Catholic Cemetery of Vancouver) (WA 1320)	WISAARD Property ID: 731277
Street Address: 1401 East 29th Street	City, County, State: Vancouver, Clark County, Washington

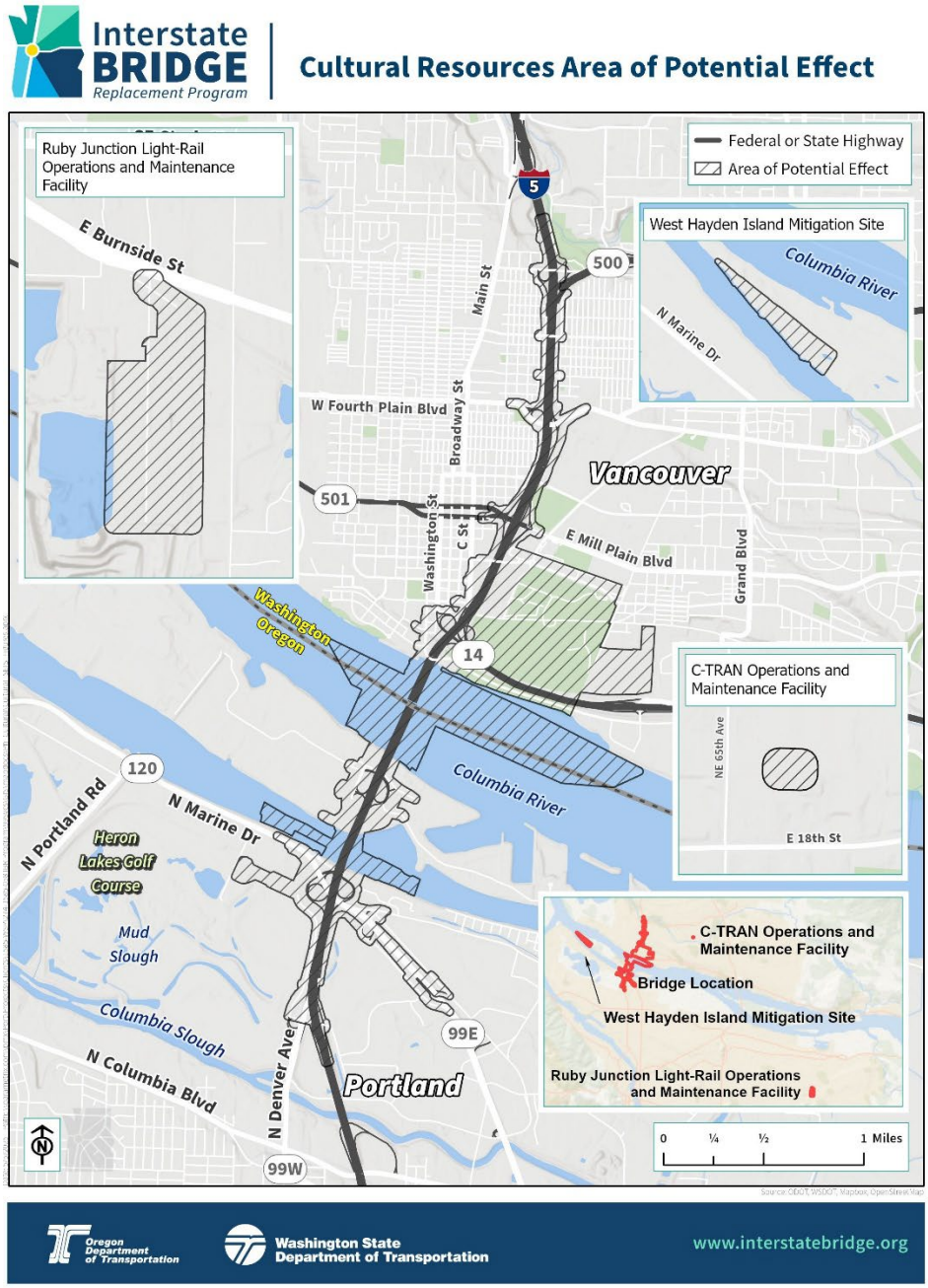


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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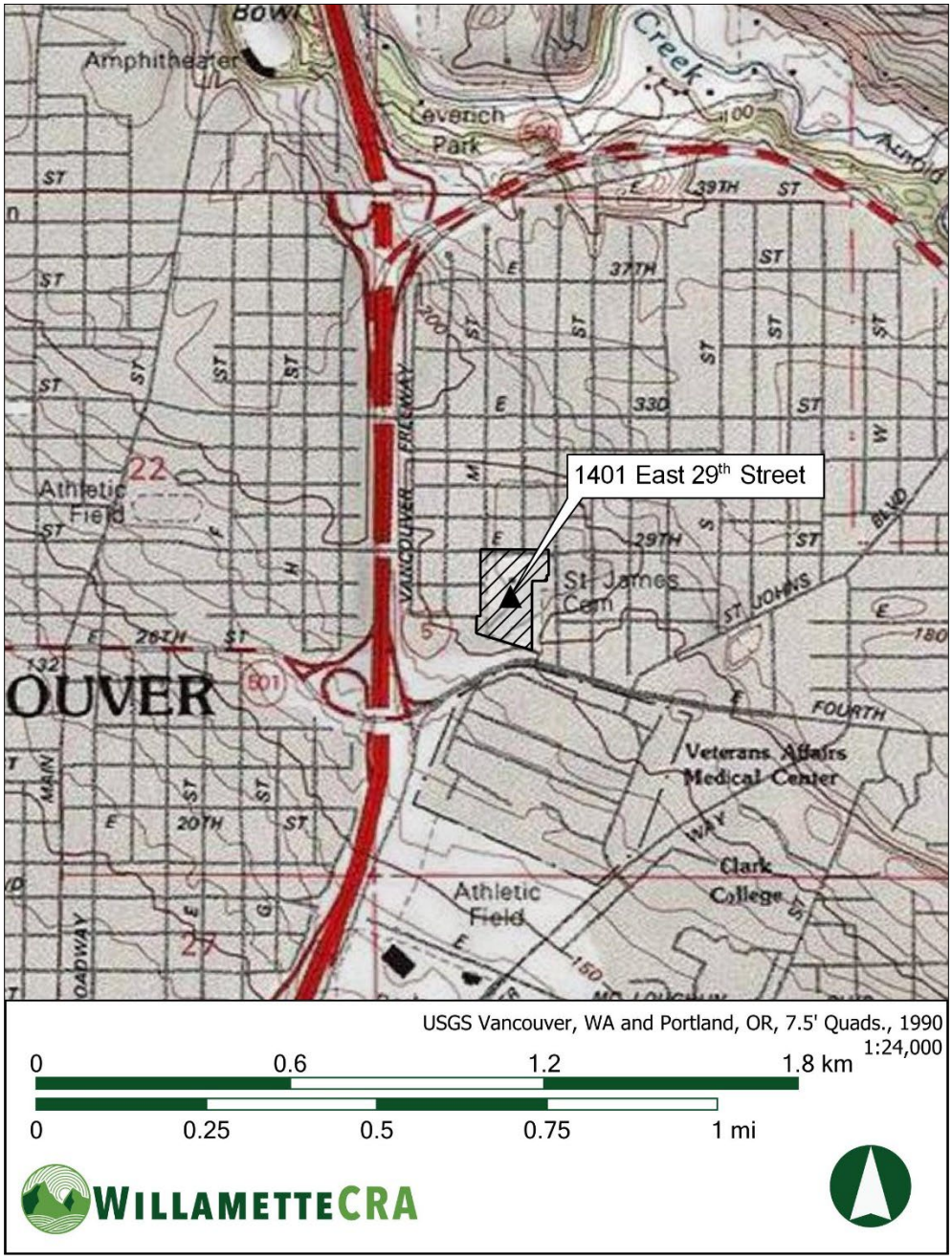


Figure 3. Location map of the St. James Acres Cemetery (1401 E 29th Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Figure 4. Aerial map of St. James Acres Cemetery (1401 E 29th Street), showing the identified boundary of the NRHP-eligible property in white.

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Figure 5. Aerial map showing the proximity of proposed Program activities to St. James Acres Cemetery (1401 E 29th Street), with the identified boundary of the NRHP-eligible property in white.

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Figure 6. View from the southern edge of the St. James Acres Cemetery southwest toward roadway improvements at E Fourth Plain Boulevard and the proposed bridge over I-5 (at right, indicated by yellow arrow); note the intervening Vancouver Barracks National Cemetery (IBR/Bentley Systems, May 26, 2022; screengrab captured June 19, 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: Lower Columbia River Federal Navigation Historic District (WA 1356, OR 165)	WISAARD Property ID: 726809 SHPO Resource ID: TBD
Street Address: Mouth of the Columbia River (River Mile 3) to Bonneville Lock and Dam (River Mile 145)	City, County, State: Pacific, Wahkiakum, Cowlitz, Clark, and Skamania Counties, Washington; Clatsop, Columbia, and Multnomah Counties, Oregon

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:

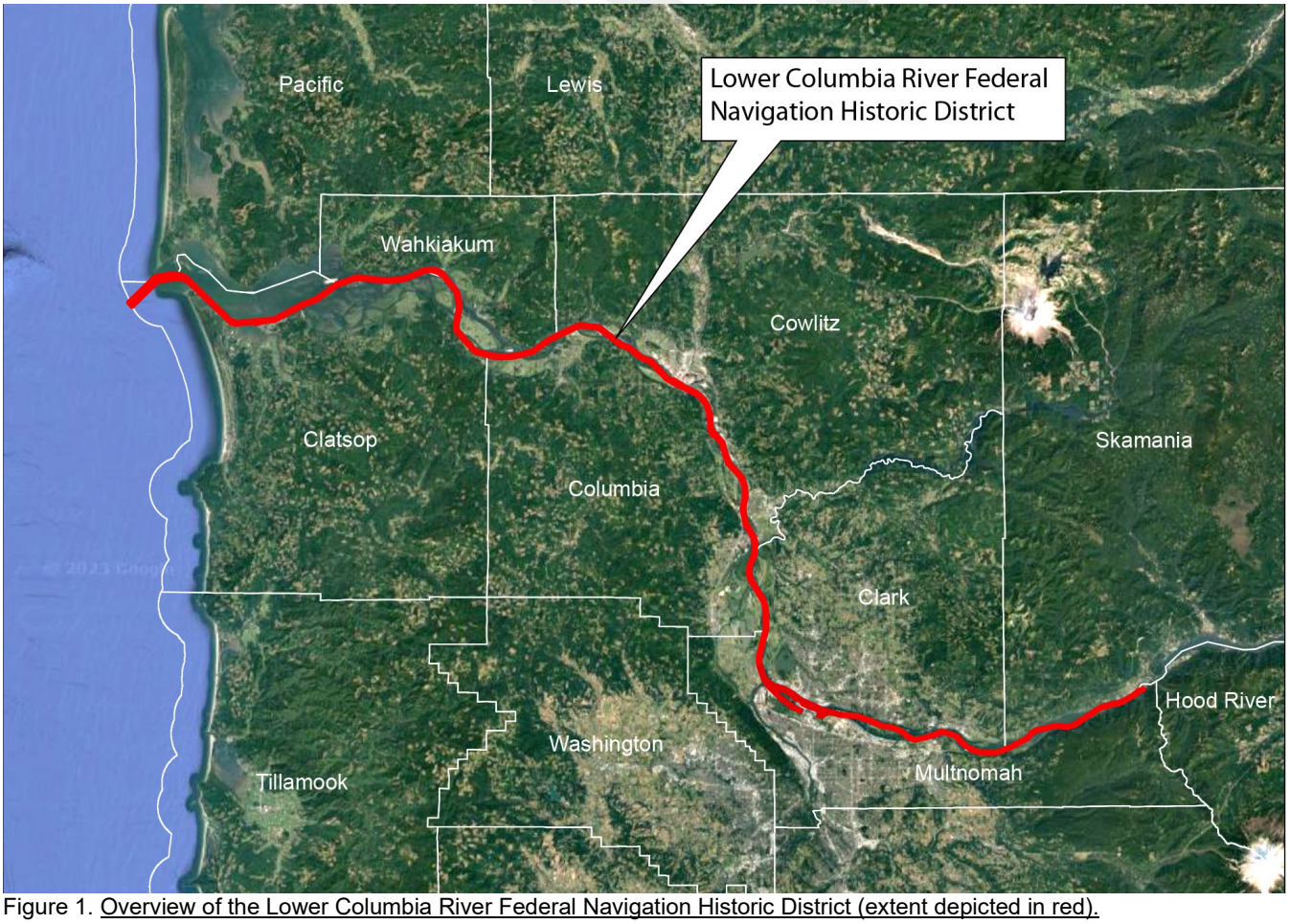


Figure 1. Overview of the Lower Columbia River Federal Navigation Historic District (extent depicted in red).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the Lower Columbia River Federal Navigation Historic District (LCR Nav Historic District), a maritime district stretching from the mouth of the Columbia River (River Mile [RM] 3) to the Bonneville Lock and Dam (RM 145). The historic district includes portions of Pacific, Wahkiakum, Cowlitz, Clark, and Skamania Counties in Washington and Clatsop, Columbia, and Multnomah Counties in Oregon (Figure 1). It was determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and C in documentation prepared by the U.S. Army Corps of Engineers (USACE) and provided to the IBR Program in July 2023.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the LCR Nav Historic District. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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drivers with more space and time to merge, diverge and weave safely) in each direction. When all highway, transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configuration would provide 178 feet of vertical navigation clearance in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.

- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.

  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).

- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.

- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.

- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.

- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.

- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewalks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY[2]

The LCR Nav Historic District comprises a system of structures constructed by the USACE-Portland District between the mouth of the Columbia River (River Mile [RM] 3) and Bonneville Lock and Dam (RM 145) (Figures 3 and 4). USACE was Congressionally authorized to dredge and maintain the LCR with the Rivers and Harbors Act of 1866 and has been conducting ongoing maintenance to two federal navigation channels (FNCs) in the LCR since 1873. The LCR FNC from the mouth of the Columbia River (RM 3) to Vancouver, Washington (RM 106.5), is currently authorized as a shipping channel 600 feet wide and 43 feet deep. The LCR FNC from Vancouver, Washington (RM 106.5), to The Dalles, Oregon (RM 190), is currently authorized as a barge channel 300 feet wide and 27 feet deep, but due to current vessel needs it is only maintained to 17 feet deep between Vancouver

[2] This section adapted from a draft document provided by USACE to the IBR Program in July 2023.

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and Bonneville Lock and Dam (RM 145) (Figure 5). FNCs are not constructed of humanmade materials but are considered structures because they are human-altered environments maintained to specific depths and widths.

In addition to the two FNCs, USACE has also engineered and constructed six turning basins, 41 pile dike systems, and nine landforms created from dredged material within the LCR Nav Historic District. Turning basins are Congressionally authorized areas dredged beside an FNC to allow additional room for vessels to complete a 180-degree turnaround. The six turning basins within the LCR Nav Historic District are at Astoria, Oregon (RM 13); Longview, Washington (RM 66.5); Kalama, Washington (RM 73.5); Lower Vancouver, Washington (RM 105); Upper Vancouver, Washington (RM 106) (Figure 6); and Camas-Washougal, Washington (RM 121.6). Pile dikes are in-water structures that reduce the velocity of a river along their lengths while increasing velocities channelward; they can be used to center a river current to aid in natural scouring of a riverbed, as well as to protect shorelines from erosion. They are generally constructed of a series of vertical timber piles supported by a horizontal timber spreader, and they can be one of three types: spur dikes, training dikes, or transverse dikes. The 41 pile dike systems in the LCR Nav Historic District are interspersed throughout the district, each composed of between one and 17 individual pile dikes, for a total of 230 pile dikes.

The LCR Nav Historic District is eligible for inclusion in the NRHP at the local level of significance under Criterion A in the areas of commerce and maritime history and under Criterion C in the area of engineering. USACE's federal navigation system along the LCR has helped develop the Pacific Northwest and build its economy by allowing for safe transport of imports and exports, and it also represents a major engineering feat. The design of each FNC turning basin, and pile dike system constructed by USACE in the district addresses unique engineering challenges specific to the structure's location. Together, these structures work together as a system to support and maintain safe and reliable navigation along the LCR.

The period of significance for the LCR Nav Historic District begins with the first USACE dredging operations along the Lower Columbia River in 1873 and ends with completion of the last pile dikes in 1969. Not all of the navigation features located within the LCR Nav Historic District are considered contributing, primarily because some of these structures do not maintain historic integrity. Contributing resources are associated with USACE's navigation mission, with regard to its contributions to local commerce and maritime transportation and the engineering requirements to manage the LCR; are physically located in-water within the LCR; were designed by or under the authority of USACE within the period of significance; specifically aid in the training of either flow or depth of the FNC; and maintain historic integrity. Resources that meet these criteria are the FNCs between the mouth of the Columbia River (RM 3) and Vancouver (RM 106.5) and between Vancouver (RM 106.5) and Bonneville Lock and Dam (RM 145) (Figure 5); the Lower Vancouver Turning Basin (RM 105); the Upper Vancouver Turning Basin (RM 106) (Figure 6); the Hayden Island pile dike system (RM 102.66–106.28); the Vancouver Bar–Washington Side pile dike system (RM 103.81–104.67); and the Upper Vancouver Bar–Oregon Bank pile dike system (RM 107.44–110.28). The character-defining features of the FNCs are their absence of obstructions and presence of navigable water. While character-defining features of the turning basins and pile dike systems have not been formally identified, the character-defining features of the turning basins are presumed to be the absence of obstructions and presence of navigable waters, and the character-defining features of the pile dike systems are presumed to be their type, materials, and general extent.

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ALTERNATIVES CONSIDERED

Because the LCR Nav Historic District has been identified as a historically significant resource that is eligible for listing in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-eligible LCR Nav Historic District, including no direct or indirect impacts on the district's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have an effect on the LCR Nav Historic District, but that effect would not be adverse. Program activities within the district would include construction of two adjacent bridges carrying I-5 across the Columbia River, located immediately downstream (west) of the existing Interstate Bridge; temporary in-water staging/work areas extending up to approximately 1,000 feet upstream (east) of the existing Interstate Bridge and 1,000 feet downstream (west) of the proposed Columbia River bridges (Figures 7 through 9); and ultimate removal of the existing Interstate Bridge. These activities would occur over a small portion of two contributing resources within the historic district: the LCR FNC from Vancouver to Bonneville Lock and Dam (Figure 5) and the Upper Vancouver Turning Basin (Figure 6).[3] The LCR FNC from Vancouver to Bonneville Lock and Dam contains three navigation channel routes (primary, barge, and alternate barge) which would be revised to correspond with the maximum vertical clearance and air draft provided by the proposed bridges.[4] Subject to approval by USACE and U.S. Coast Guard (USCG), the alignment of all three channel routes would be revised slightly, with the centerline of the northernmost channel route shifting slightly south and the centerline of the middle and southernmost channel routes shifting north in order to correspond with the pier locations of the

[3] IBR, "Navigation Impact Report" (rev. 2022), 2-27.
[4] "Navigation Impact Report," 2-29.

proposed bridges. Additionally, the relative locations of the primary channel route (currently the northernmost route) and the barge channel route (currently the middle route) would be switched, so that the barge channel route would become the northernmost route and the primary channel route would become the middle route; the relative location of the alternate barge channel route (the southernmost route) would remain the same, as would the approximate width of the overall FNC (Figure 9).[5] The Upper Vancouver Turning Basin, which marks the west end of the FNC, would be shifted slightly west while maintaining its existing size.[6]

Overall, Program-related alterations to the LCR FNC from Vancouver to Bonneville Lock and Dam and the Upper Vancouver Turning Basin would be minimal and limited to the margins of each structure. The LCR FNC from Vancouver to Bonneville Lock and Dam is a nearly 40-mile-long structure, and construction of the two proposed bridges and their associated staging/work areas would be limited to its westernmost extent. The proposed bridges would be designed with fewer piers than the existing bridges (Figure 10), resulting in an overall reduction of in-water obstructions by the conclusion of the Program. The spacing of the proposed bridges' piers would necessitate realigning the channel routes and switching the relative locations of the primary channel route and the barge channel route, but these alterations would alter traffic patterns only along the westernmost portion of the FNC; they would not alter the structure's depth or function; because of their limited area relative to the nearly 40-mile length of the FNC, they would also have a negligible effect on its overall design. Similarly, construction activities would be limited in area to the easternmost extent of the Upper Vancouver Turning Basin, and the turning basin's overall size would be maintained despite the proposed westward shift; furthermore, the proposed shift would not require any additional dredging, as the water in the area that is proposed to be added to the turning basin is sufficiently deep to accommodate any vessel that currently uses this structure. Both the FNC and turning basin would remain within the LCR and continue to be maintained by USACE, supporting ongoing safe navigation along the river. Although the Modified LPA would also introduce new visual, atmospheric, and audible elements at and above the contributing FNC and turning basin, neither structure relies on above-water features to convey its significance. As such, the Program would not reduce the structures' integrity of location, setting, materials, design, workmanship, feeling, and association, and both would remain contributing to the LCR Nav Historic District.

The LCR Nav Historic District as a whole, which stretches across more than 140 miles of the LCR and is located largely outside of the Program area, would also retain its integrity under the Modified LPA. The portion of the Program's Area of Potential Effect (APE) located within the LCR represents less than one percent of the district's extent (cf. Figures 2 and 3), and as described previously, none of the district's contributing elements would be adversely affected by Program activities. As such, the Modified LPA would not reduce the district's integrity of location, setting, design, materials, workmanship, feeling, and association.

The Modified LPA's options for different bridge types and configurations across the Columbia River would change the nature of project activities within the LCR Nav Historic District by changing the width and design of the bridges. The proposed single-level bridges would be wider than double-decked bridges, for example, and would therefore cover a slightly larger portion of the LCR Nav Historic District (Figure 7). The design option proposing a second auxiliary lane in each direction of I-5, where needed to improve safety and operations, also has the potential to result in wider bridges across the LCR. However, these potential increases in bridge widths are negligible as compared to the overall extent of the LCR FNC from Vancouver to Bonneville Lock and Dam, the Upper Vancouver Turning Basin, and the LCR Nav Historic District as a whole. Effects related to these options would not differ meaningfully from those described above.

In conclusion, the Modified LPA would have an effect on the NRHP-eligible LCR Nav Historic District, but that effect would not be adverse. Regardless of the selected bridge type and configuration option, the Modified LPA would not reduce the historic district's integrity of location, setting, materials, design, workmanship, feeling, and association. The district and its contributing resources would remain able to convey their engineering merit and their significant association with USACE dredging operations and navigation of the LCR. For these reasons, the IBR Program is anticipated to have No Adverse Effect on the LCR Nav Historic District.

[5] "Navigation Impact Report," 2-21.
[6] "Navigation Impact Report," 2-29.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-eligible LCR Nav Historic District.

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——. "Navigation Impact Report." November 2021 (revised June 2024).

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DRAFT

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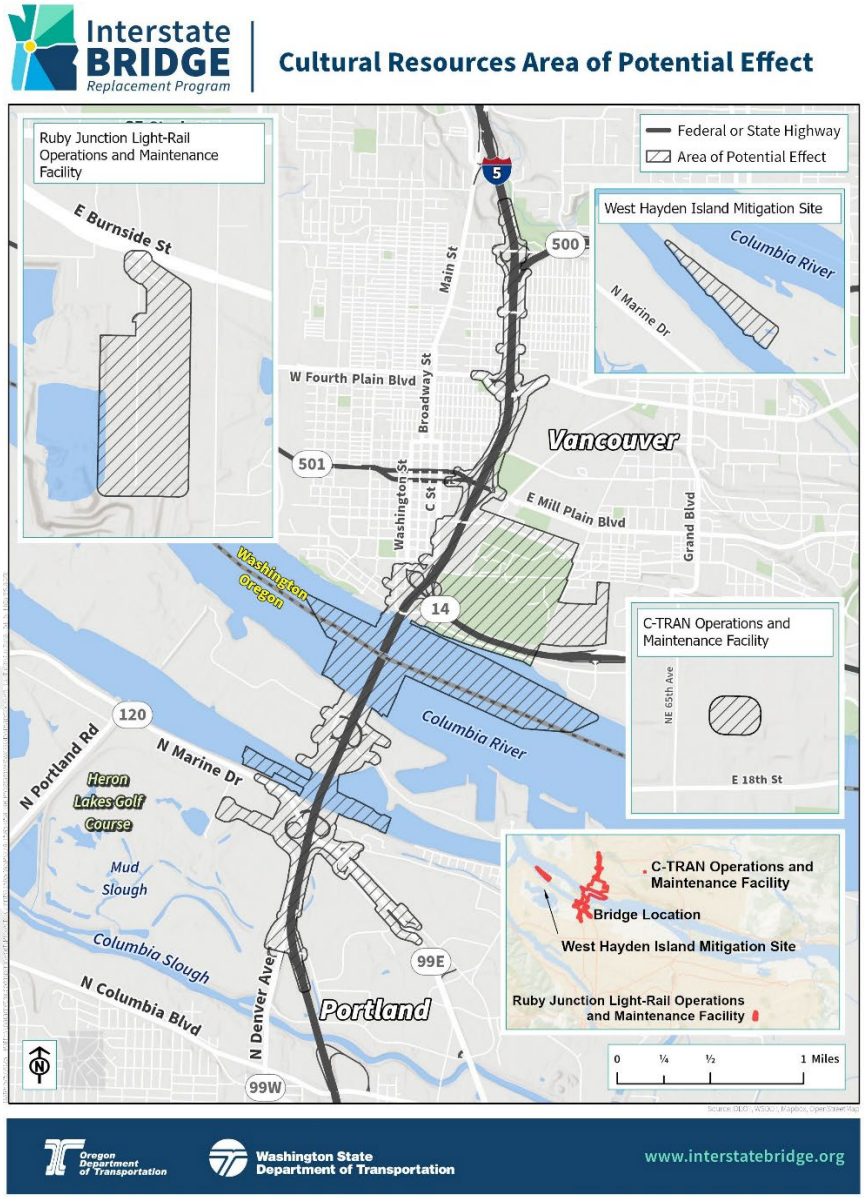


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

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Street Address: Mouth of the Columbia River (River Mile 3) to Bonneville Lock and Dam (River Mile 145)	City, County, State: Pacific, Wahkiakum, Cowlitz, Clark, and Skamania Counties, Washington; Clatsop, Columbia, and Multnomah Counties, Oregon

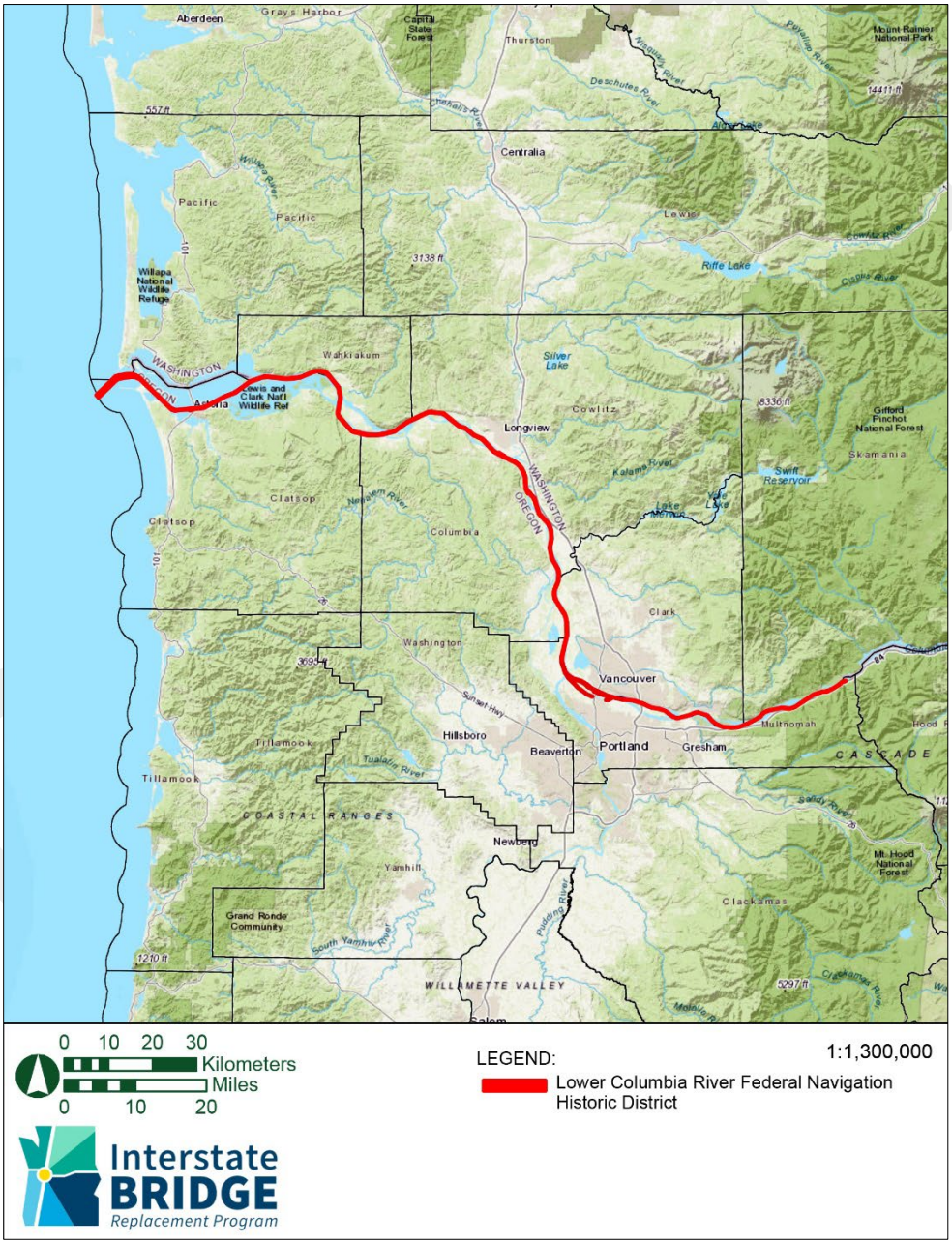


Figure 3. Location map of Lower Columbia River Federal Navigation Historic District, showing the district boundary in red.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Figure 4. Aerial map of Lower Columbia River Federal Navigation Historic District, showing the district boundary in red.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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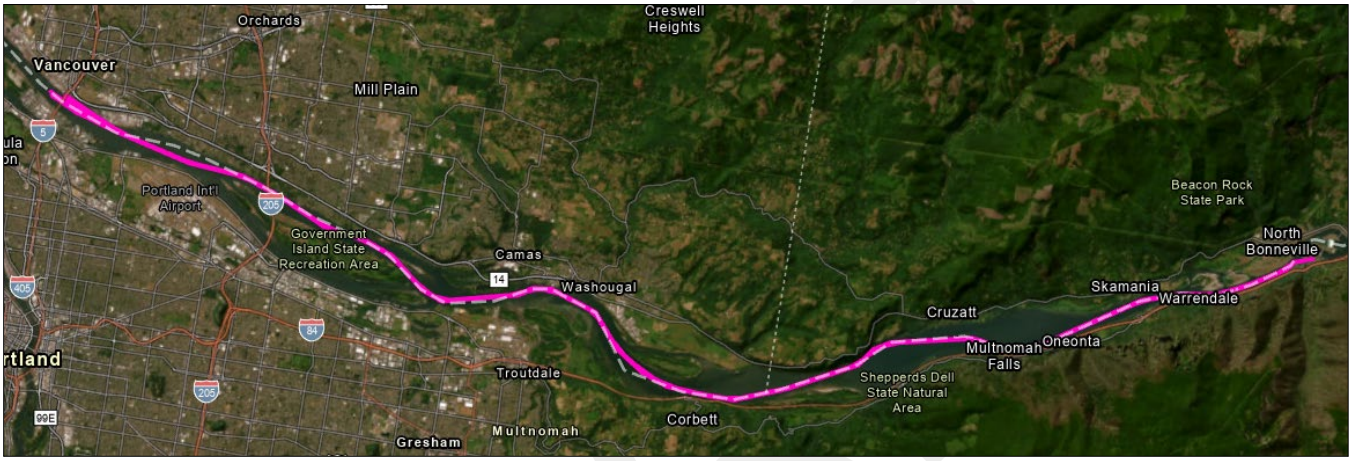


Figure 5. Aerial map of the Lower Columbia River federal navigation channel (FNC) from Vancouver, Washington (RM 106.5) to Bonneville Lock and Dam (RM 145), a contributing resource in the Lower Columbia River Federal Navigation Historic District. The pink line denotes where USACE is authorized to maintain the width and depth of the channel (USACE 2023).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
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Figure 6. Aerial map depicting the Upper Vancouver Turning Basin (RM 106), a contributing resource in the Lower Columbia River Federal Navigation Historic District, with a red outline. The green outlines denote the location of the Lower Columbia River federal navigation channel (including its three channel routes) from Vancouver, Washington (RM 106.5) to Bonneville Lock and Dam (RM 145) (USACE 2023).

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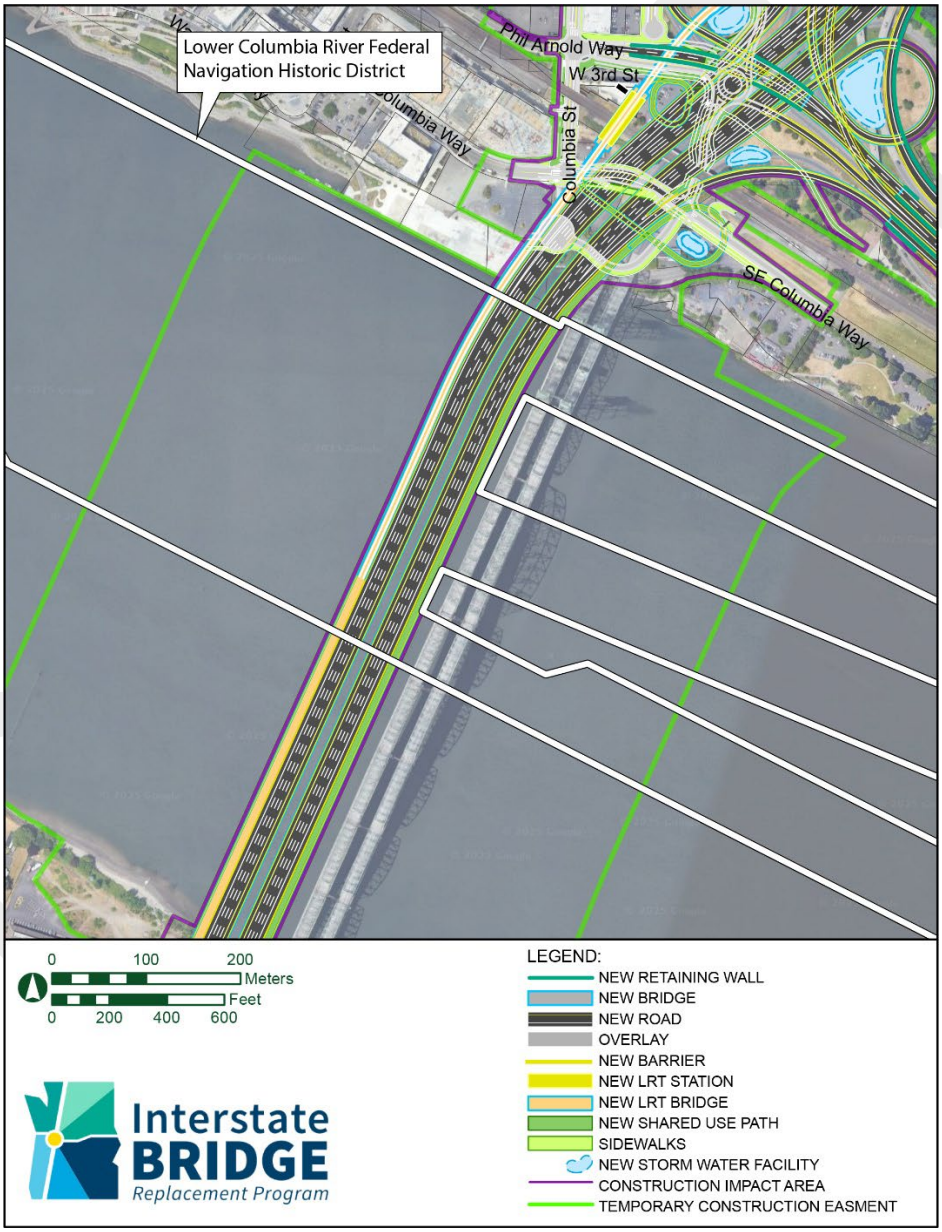


Figure 7. Aerial map showing the Modified LPA with single-level bridges over the Columbia River, with the boundary of the Lower Columbia River Federal Navigation Historic District in white.

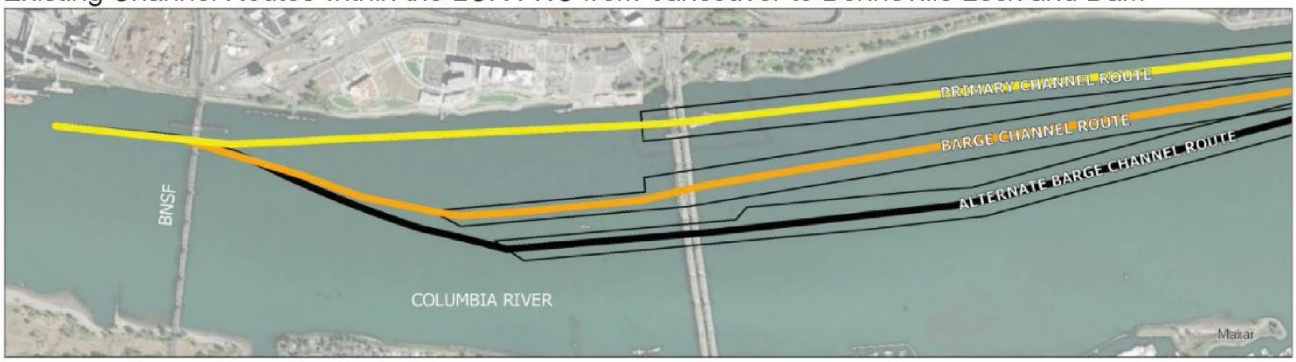
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Figure 8. Aerial map showing the in-water temporary construction easement, with the boundary of the Lower Columbia River Federal Navigation Historic District in white.

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Existing Channel Routes within the LCR FNC from Vancouver to Bonneville Lock and Dam



Proposed Channel Routes within the LCR FNC from Vancouver to Bonneville Lock and Dam

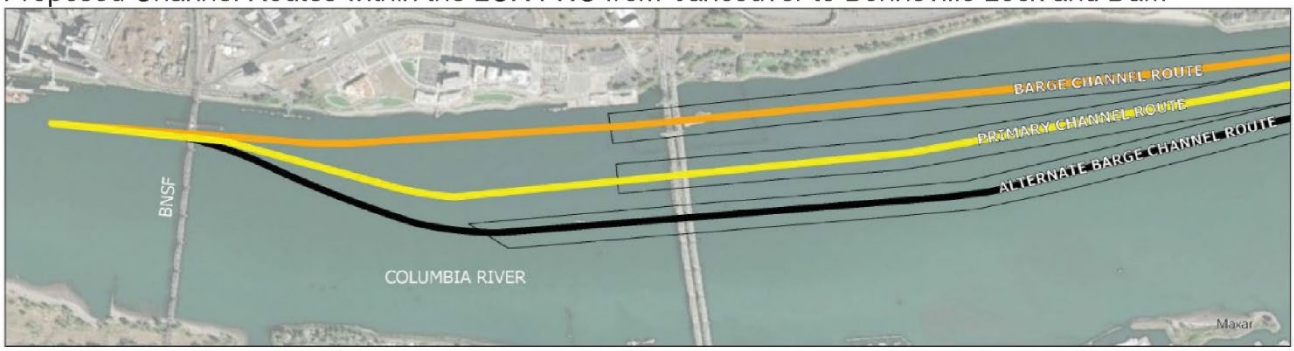


Figure 9. Existing and proposed channel routes within the Lower Columbia River federal navigation channel from Vancouver to Bonneville Lock and Dam; note proposed realignment and exchange of the relative location of the barge channel route (orange) and the primary channel route (yellow) (IBR, "Navigation Impact Report," rev. May 2022, 2-21).

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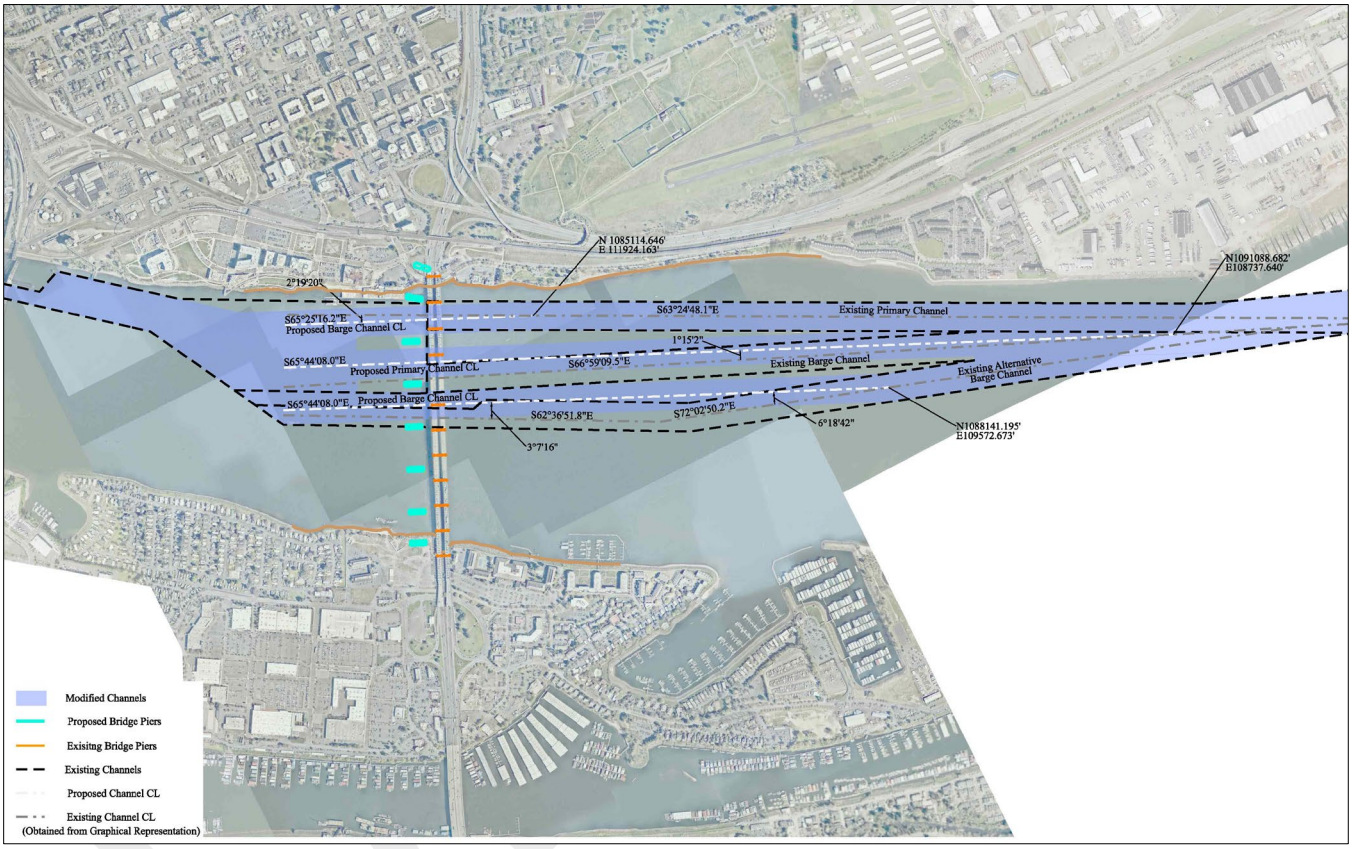


Figure 10: Existing and proposed channel routes within the Lower Columbia River federal navigation channel from Vancouver to Bonneville Lock and Dam, with the centerlines of the existing channel routes denoted in grey and the centerlines of the proposed, realigned channel routes denoted in white. The piers of the existing Interstate Bridge are shown in orange, and the piers of the proposed bridges are shown in aqua; note that comparatively fewer piers support the proposed bridges (IBR Program, October 2023).

INTERSTATE BRIDGE REPLACEMENT PROGRAM

SECTION 106 LEVEL OF EFFECT FORM

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: John P. and Mary Kiggins House (WA 1360)		WISAARD Property ID: 18828
Street Address: 2404 H Street	City, County, State: Vancouver, Clark County, Washington	

Preliminary Finding of Effect

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

Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):

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

Signed _____ Date _____

Comments:



Figure 1. The Kiggins House (2404 H Street), view southwest (WillametteCRA, April 1, 2025).

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INTRODUCTION

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the John P. and Mary Kiggins House (Kiggins House), a single-family Craftsman-style residence located at 2404 H Street in Vancouver, Clark County, Washington (Figure 1). The subject property, which was constructed in 1907 at 411 East Evergreen Boulevard, was moved in 2008 to a site along the H Street alignment north of E 24th Street and south of E 4th Plain Boulevard. The subject property was listed in the National Register of Historic Places (NRHP) in 1995, at which time the property contained two contributing buildings: the primary residence and its associated automobile garage. The contributing garage has subsequently been demolished.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the IBR Program would result in No Effect to the Kiggins House. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

PROGRAM DESCRIPTION[1]

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridge. The new bridges would each include three through-lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that improves interchange safety by providing drivers more space and time to merge, diverge and weave safely) in each direction. When all highway,

[1] This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Final Supplemental Environmental Impact Statement" (2025).

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transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- Two bridge configurations are under consideration: (1) single-level bridges with fixed spans, and (2) single-level bridges with movable spans over the primary navigation channel. The fixed-span configurations would provide up to 116 feet of vertical navigation clearance, and the movable-span configurations would provide 178 feet of vertical navigation clearance depending in the open position. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) across the Columbia River is also being evaluated. The second auxiliary lane in each direction of I-5 would be added from approximately Interstate Avenue/Victory Boulevard to State Route (SR) 500/39th Street.

- A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as reconstructions of the existing Expo Center MAX Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
  - Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station location in Vancouver).
- Associated LRT improvements such as traction power substations, overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's existing Ruby Junction Operations and Maintenance Base.
- Integration of local bus transit service, including bus rapid transit (BRT) and express bus routes, in addition to the proposed new LRT service.
- Wider shoulders on I-5 from Interstate Avenue/Victory Boulevard to SR 500/39th Street to accommodate express bus-on-shoulder service in each direction.
- Associated bus transit service improvements would include three additional bus bays for eight new electric double-decker buses at the existing C-TRAN operations and maintenance facility.
- Improvements to seven I-5 interchanges and I-5 mainline improvements between Interstate Avenue/Victory Boulevard in Portland and SR 500/39th Street in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs, and improve local east-west connections.

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- An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver between the SR 14 interchange and Mill Plain Boulevard interchange is being evaluated.
- An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.

- Six new adjacent bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.
- A variety of active transportation improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, bicycle lanes, sidewlaks, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, equipment maintenance and storage, maintenance of traffic equipment, employee parking, and construction material storage and other needs. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. Both sites are located on Hayden Island on the west side of I-5. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself. Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges' construction period.

IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY

The Kiggins House (2404 H Street) is a two-and-one-half-story, highly decorated Craftsman-style residence located in Vancouver, Clark County, Washington (Figure 3). The current tax lot contains the dwelling as well as a landscaped yard along its primary (east) and south elevations. The yard is surrounded by a perimeter fence and includes grass turf, paved walkways, and ornamental shrubs and bushes in planting beds. The residence occupies a sloped site, such that its basement level is exposed at the rear (west) elevation facing a paved access drive shared with several adjoining properties. The Kiggins House stands in close proximity to the neighboring Craftsman-style residence to the south at 2400 H Street and Arnada Park to the north at 610 E 25th Street.

The Kiggins House has a rectangular plan that measures approximately 60 feet long by 30 feet wide. It has a prominent front-facing gable, and the primary roof form intersects with large gabled dormers on the north and south roof slopes. The residence is clad in horizontal wood clapboard siding, and the front gable features false half-timbering set in stucco. The roof is currently covered in asphalt composition shingles. A first-story porch supported by battered piers is present at the primary elevation and contains the main entry, which features a glazed wood-frame door. Other decorative elements on the residence include elaborate shaped brackets

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underneath the overhanging eaves in the front gable and dormers, notched rafter ends exposed along the north and south elevations, paired scrolled brackets supporting a cornice at the porch roof, and a jetty with modillion blocks above the second story at the east elevation. A tapered brick chimney rises along the north elevation near the front of the residence. A non-historic, unenclosed structure, similar in appearance to a porte-cochère, projects from the south elevation. The residence features various window sizes and configurations. Although it generally retains its historic fenestration pattern, windows at the primary elevation appear to be modern replacements that replicate the design of the original windows. Multiple additions have been constructed at the rear of the building and have extended its footprint to the west. The most recent rear addition, which appears to date to the residence's relocation in 2008, introduced additional living space, recessed porches at the first and second stories, and two basement-level garage stalls.

The Kiggins House was listed in the NRHP in 1995 (NRHP Reference No. 95000804). The NRHP nomination identified that the property met the requirements of Criteria B and C in the areas of commerce, politics/government, and architecture. The building was evaluated as significant at the local level for its association with original and long-term residents John and Mary Kiggins, who were prominent figures in Vancouver during the first half of the twentieth century. John Kiggins, in particular, achieved local influence through his involvement in regional real estate development, civic boosterism, and politics. Kiggins built and operated a series of moving picture exhibition venues, which notably included the extant Kiggins Theatre at 1011 Main Street in Vancouver (completed 1936). Additionally, John Kiggins served in various local elected offices, including nine terms as mayor of Vancouver between 1909 and 1939. Furthermore, the NRHP nomination acknowledged the architectural significance of the Kiggins House as an unusually large and ornate example of a Craftsman-style residence in Vancouver. The NRHP documentation specified that the nominated property contained two contributing buildings: the primary residence and a detached two-car garage located to the rear, which shared some of the residence's architectural characteristics.

The Kiggins House's period of significance under Criteria B and C is 1907-1941, beginning with the construction of the residence for the Kiggins family and ending the year of John Kiggins's death. The building has undergone numerous alterations since 1941, including several relatively minor changes prior to the preparation of the NRHP nomination in 1995. These included the construction of a disability access ramp connecting to the front porch, as well as a rear addition enclosing a fire escape. (The design of this rear addition, however, closely matched the residence's original architectural style). A few original windows were removed or had their original wood sashes replaced.

Further changes have occurred subsequent to the completion of the NRHP nomination. Most notably, the building was moved to its current location in 2008 to accommodate the construction of a new municipal library at the intersection of E Evergreen Boulevard and C Street. The residence's original detached garage appears to have been demolished at this time, and the portion of the front porch that extended along the side elevation was removed. Metal tiles that originally covered the roof of the residence were removed and replaced with asphalt composition shingles, and some original wood-sash windows appear to have been replaced with new windows of similar configurations. Additionally, a rear addition expanded the residence to its rear and introduced the basement-level garage, although this addition is not clearly discernible from the front of the residence.

Despite these changes, the Kiggins House retains moderate integrity of design, materials, workmanship, feeling, and association, and it remains a highly decorated example of a Craftsman-style residence. The 1995 NRHP nomination identified the historic property boundary as the tax lot that contained the Kiggins House at the time of

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its designation. However, the residence is no longer located within that boundary. For the purposes of analyzing potential effects to the residence, this FOE considers the current historic property boundary of the Kiggins House to be limited to the residence's footprint in its current location at 2404 H Street (Figure 4).

The Kiggins House's character-defining features include the following: rectangular footprint; front-gabled primary roof form with two perpendicular gabled dormers; wood clapboard siding; decorative half-timbering; decorative carved brackets and shaped rafter ends; extant portion of the front porch with battered piers and bracketed cornice; modillion blocks along a jetty above the second story, and original window configuration, extant wood sashes, and wood window trim. The site elements within the parcel now containing the residence, such as paved walkways and plantings, do not date to the property's period of significance and are not character-defining features.

ALTERNATIVES CONSIDERED

Because the Kiggins House has been identified as a historically significant resource that is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts.

No-Build Alternative

With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

The No-Build Alternative would result in No Effect to the NRHP-listed Kiggins House, including no direct or indirect impacts on the property's character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative therefore fails to meet the Program's Purpose and Need.

ASSESSMENT OF EFFECTS

Application of the Criteria of Adverse Effect (36 CFR 800.5)

As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As currently proposed, the Modified LPA would have No Effect on the NRHP-listed Kiggins House. Program activities within the vicinity of the property would include the reconfiguration of the E Fourth Plain Boulevard roadway, which leads atop a raised earthen embankment as it approaches its overpass over I-5 from the west. In this location, E Fourth Plain Boulevard passes approximately 85 feet northeast of the Kiggins House (Figure 5), and the embankment rises between 12 and 18 feet above grade. The proposed changes to E Fourth Plain Boulevard would not widen the existing roadway but rather would alter the existing configuration of travel lanes. The two existing eastbound travel lanes would be reduced to a single travel lane, which would accommodate the introduction of active transportation facilities along the southern edge of the roadway. No changes would be made to the existing embankment or overpass structure.

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Furthermore, a temporary construction easement (TCE) would extend south of E Fourth Plain Boulevard to reach the base of the overpass embankment. At its nearest point, the TCE would be located approximately 35 feet northeast of the Kiggins House. Furthermore, a new noise wall constructed along the west side of the I-5 right of way would terminate on the embankment slope north of I Street, in a location approximately 300 feet southeast of the Kiggins House.

The proposed E Fourth Plain Boulevard reconfiguration is not anticipated to be visible from the Kiggins House, given that the roadway improvements would be located above eye level along the top of the raised embankment. The changes would occur within the existing E Fourth Plain Boulevard right of way, and the total dimensions of the roadway would not change. The south-facing slope of the overpass embankment, which would be designated a TCE and could be occupied by construction activities, is currently characterized by grasses, shrubs, and trees; a metal chain link fence runs along its base. None of these features belongs to the Kiggins House's historic setting, and the IBR program commits to restoring areas designated as TCE following construction.

Furthermore, the north end of the noise wall following the I-5 corridor would be located a substantial distance from the Kiggins House, and it would be partially screened from view from the Kiggins House by intervening vegetation lying between H Street and I Street. Although the noise wall may remain visible from the Kiggins House to a limited extent, this negligible change in setting would not have an effect on any of the property's character-defining features. The relocation of the Kiggins House in 2008 removed the residence from its historic setting, and consequently its significance under Criteria B and C now relies upon its integrity of design, materials, workmanship, feeling, and association. None of these aspects of integrity would be further altered by the Program. The residence's design and palette of materials would not be altered from their current conditions. Furthermore, because the residence does not rely upon a quiet setting to convey its significance, program activities do not have the potential to reduce any significant atmospheric or audible qualities.

In conclusion, the Modified LPA would not affect the Kiggins House's remaining integrity of design, materials, workmanship, feeling, or association, nor would it alter any physical features that enable the property to convey its significance under NRHP Criteria B and C. Therefore, the Modified LPA would have No Effect on the NRHP-eligible property.

CONCLUSION

It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Effect on the NRHP-listed Kiggins House.

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——. "Noise and Vibration Technical Report." June 2025.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: John P. and Mary Kiggins House (WA 1360)	WISAARD Property ID: 18828
Street Address: 2404 H Street	City, County, State: Vancouver, Clark County, Washington

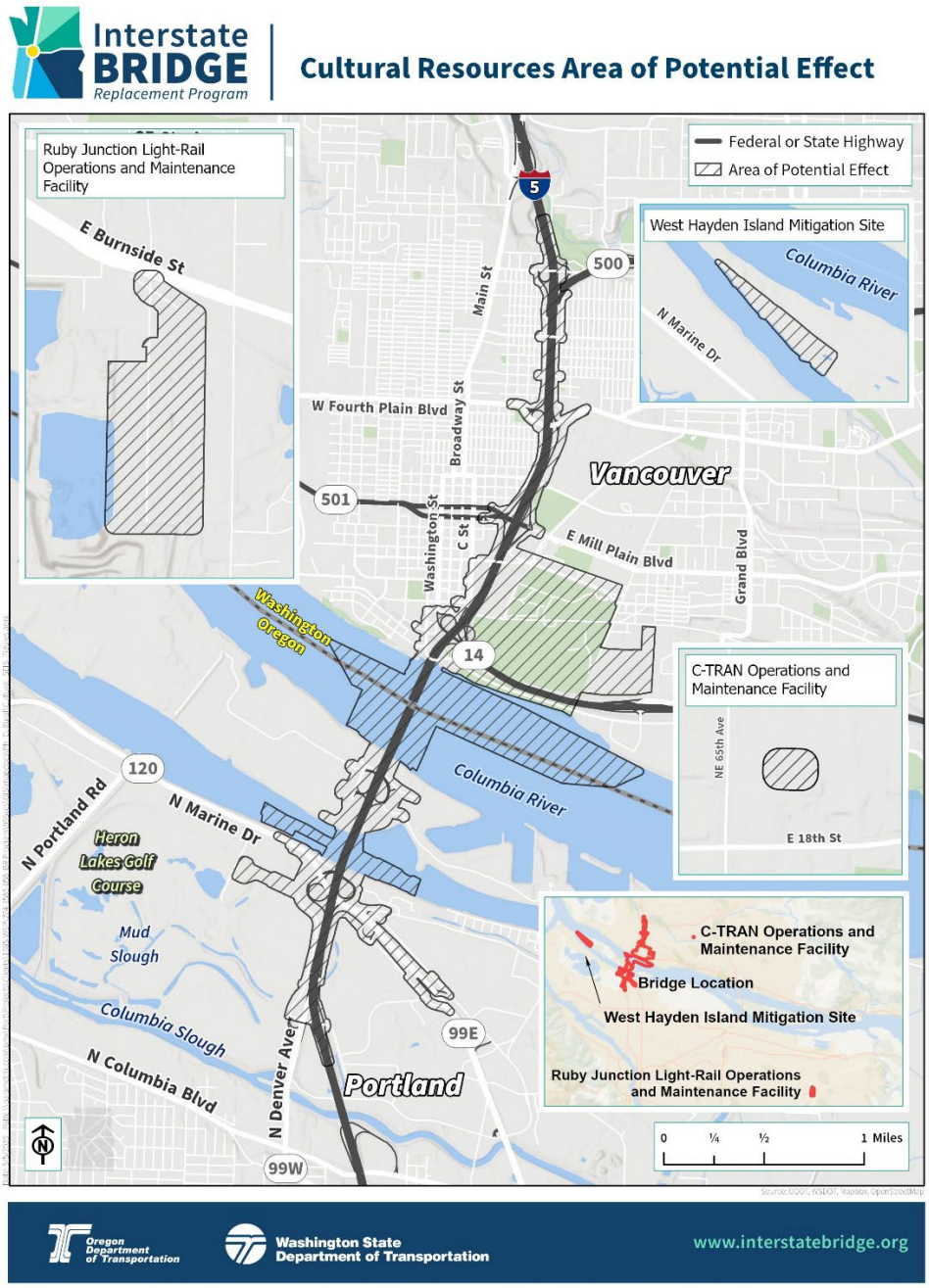


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, May 2025).

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: John P. and Mary Kiggins House (WA 1360)	WISAARD Property ID: 18828
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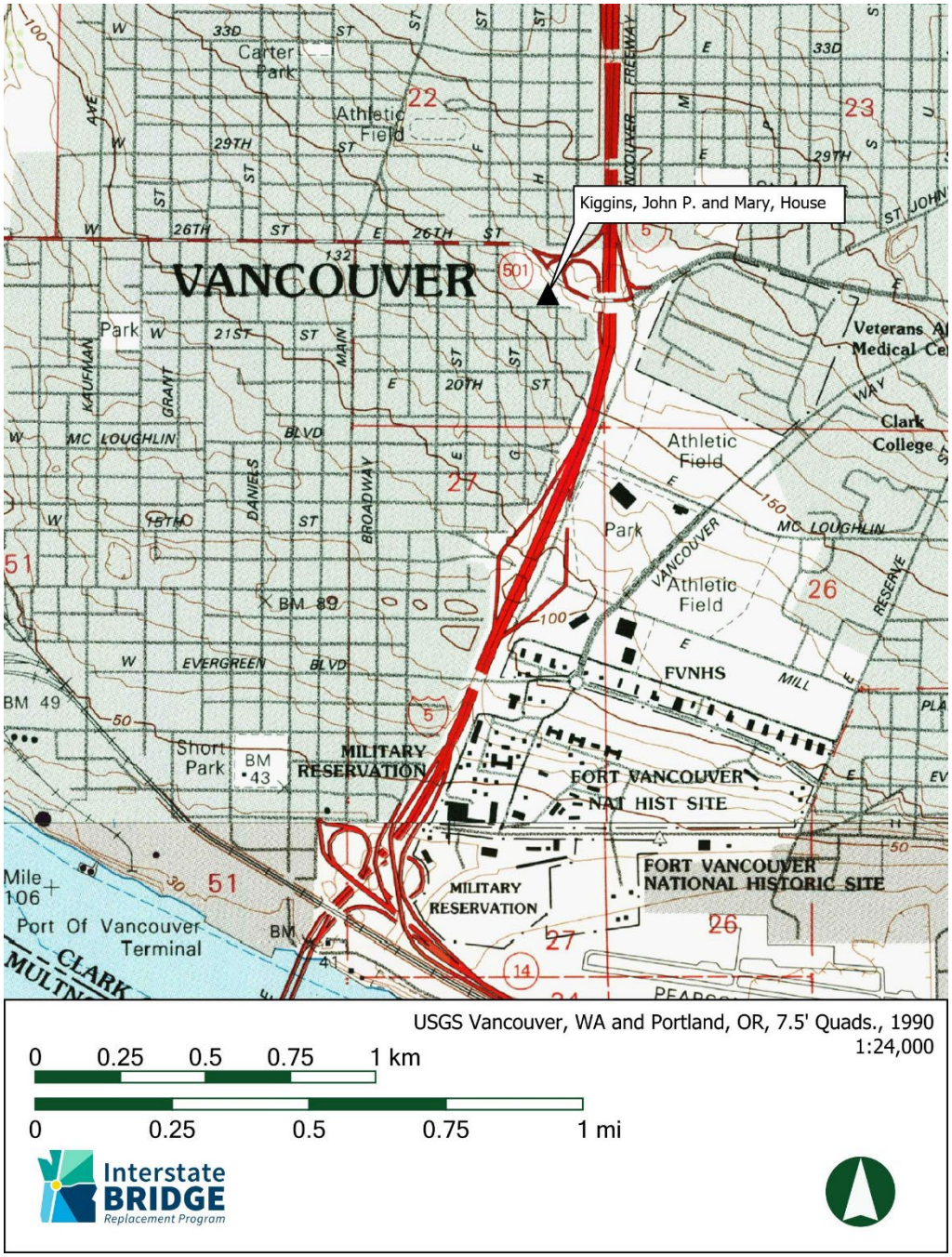


Figure 3. Location map of the Kiggins House (2404 H Street), Vancouver, Clark County, Washington.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: John P. and Mary Kiggins House (WA 1360)	WISAARD Property ID: 18828
Street Address: 2404 H Street	City, County, State: Vancouver, Clark County, Washington



Figure 4. Aerial map of the Kiggins House (2404 H Street), showing the identified boundary of the NRHP-listed property in white.

Agency/Project: Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A	
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006
Property Name: John P. and Mary Kiggins House (WA 1360)	WISAARD Property ID: 18828
Street Address: 2404 H Street	City, County, State: Vancouver, Clark County, Washington

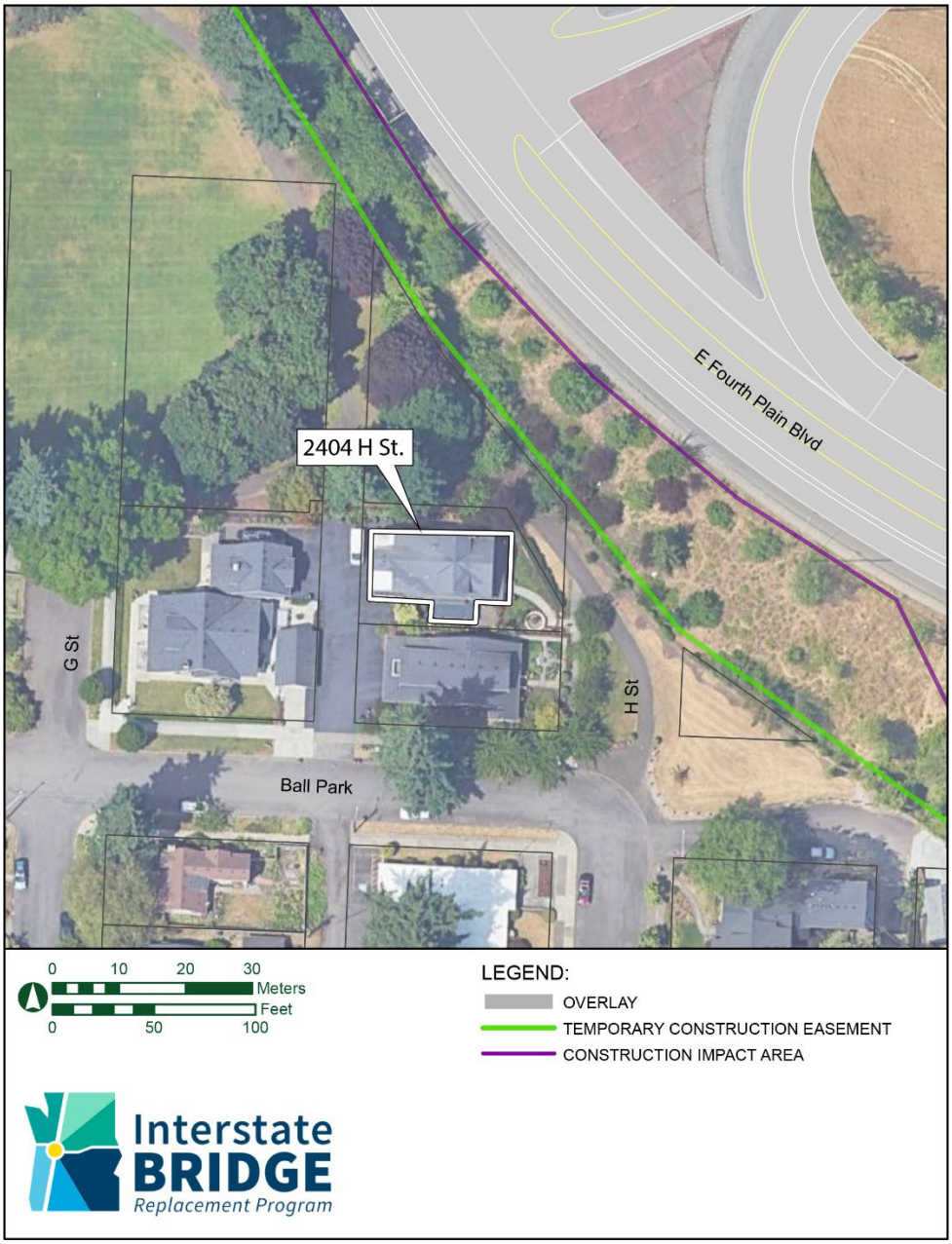


Figure 5. Aerial map showing the proximity of proposed Program activities to the Kiggins House, with the identified boundary of the NRHP-listed property in white.

Appendix E. Survey Inventory

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 1	TBD	Totem Pole Marina No. 2 (Pier 99)	Y	2023 IBR Recommendation: Not Eligible 2008 OR SHPO: Eligible, Criteria A and C	1960	1415 N Pier 99 St	Modern, Northwest Regional style marina commercial building with extensive modifications designed by architect John Storrs.
OR 2	663154	Columbia Slough Drainage Districts Historic District	Y	2023 IBR Recommendation: Eligible, Criteria A and C 2019 Draft NRHP Nomination: Eligible, Criteria A and C 2011 OR SHPO: Eligible, Criterion A	1916–1960	Multnomah County, OR	Extensive system of levees, dikes, and ditches along Columbia Slough without a discernible form or style.
OR 50 (WA 381a)	49361	Northbound Interstate 5 Columbia River Bridge (Bridge WA No. 5/1E, OR No. 1377A)	Y	1982: Listed	1917	I-5 over the Columbia River	Steel Through Truss (Parker and Pennsylvania [Petit]) bridge with vertical lift span designed by firm Waddell and Harrington.
OR 51 (WA 381b)	18781	Southbound Interstate 5 Columbia River Bridge (Bridge WA No. 5/1W, OR No. 07333)	Y	2023 IBR Recommendation: Eligible, Criteria A and C 2008 OR SHPO: Eligible, Criteria A and C	1956–1958	I-5 over the Columbia River	Steel Through Truss (Parker and Pennsylvania [Petit]) bridge with vertical lift span designed by the Oregon State Highway Department.
OR 53	648251	Waddle's Drive-In Coffee Shop (JayBee's Chicken Palace)	Y	2023 IBR Recommendation: Not Eligible	1945	11875 N Jantzen Dr	Modern, Roadside style restaurant designed by architect Pietro Belluschi and remodeled by architect Frank Green.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 54	TBD	Gault Residence	N	2023 IBR Recommendation: Not Eligible	ca. 1943	1425 N Pier 99 St	Minimal Traditional style residence associated with a commercial moorage on the Columbia River.
OR 55	TBD	Westerlund Residence / Westerlund Boat and Machine Shop / Westerlund's Moorage	N	2023 IBR Recommendation: Not Eligible	ca. 1936	1610 N Pier 99 St	Minimal Traditional style residence and utilitarian boat shop and moorage docks associated with a maritime industry on the Columbia River.
OR 56	50293	Portland Assembly Center (Portland Expo Center; Pacific International Livestock Association Building)	Y	2023 IBR Recommendation: Eligible, Criterion A 2009 OR SHPO: Not Eligible	1919	2060 N Marine Dr	Largescale civic and commercial complex with no discernable style. Complex is strongly associated with the incarceration of Japanese Americans during WWII.
OR 101	TBD	Thunderbird Hotel (Rodeway Inn & Suites Portland - Jantzen Beach)	N	2023 IBR Recommendation: Not Eligible	1971	1401 N Hayden Is Dr	Northwest Regional style hotel with Polynesian style elements. Central lobby and two east wings lost in 2012 fire.
OR 102	TBD	Montgomery Ward Automotive Center (Duluth Trading Post)	N	2024 IBR Recommendation: Not Eligible	1973	12300 N Parker Ave	Cowboy/Western style specialty shop heavily remodeled since its original construction.
OR 104	TBD	Engine House Pizza Co. #1 (BJ's Restaurant & Brewhouse)	N	2023 IBR Recommendation: Not Eligible	1976	12105 N Center Ave	Postmodern/Roadside style restaurant designed by architect Ralph C. Bonadurer for a local pizza chain.
OR 105	TBD	Jantzen Beach McDonald's	N	2023 IBR Recommendation: Not Eligible	1976	12005 N Center Ave	Restaurant with no discernable style heavily remodeled since its original construction.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 106	TBD	Sailboats Unlimited Building	N	2023 IBR Recommendation: Not Eligible	1979	12055 N Center Ave	Postmodern style commercial building designed by architect David L. Hickman and heavily remodeled since its original construction.
OR 107	TBD	Harbor Shops	N	2023 IBR Recommendation: Eligible, Criteria A and C	1978	11915 N Center Ave	Postmodern style commercial strip mall designed by architect David L. Hickman.
OR 108	TBD	Jantzen Newport Bay Restaurant (Riverbend Family Steakhouse, Denny's)	N	2023 IBR Recommendation: Not Eligible	1980	11950 N Center Ave	Roadside-side restaurant building designed by architect Donald "Don" Eby and remodeled since its original construction.
OR 109	TBD	Jantzen Beach Water Tank and Pump House	N	2023 IBR Recommendation: Eligible, Criteria A and C	ca. 1968	N Center Ave & N Jantzen Ave	Utilitarian public waterworks including a water tank and associated pump house constructed to support midcentury development on Hayden Island.
OR 110	TBD	Northwest Marine Brokers	N	2023 IBR Recommendation: Not Eligible	1973	11850 N Center Ave	Northwest Regional/Shed style commercial building heavily altered since its original construction.
OR 111	TBD	Jantzen Beach Moorage	N	2023 IBR Recommendation: Eligible, Criterion A	1958	1501 N Jantzen Ave	Largescale collection of floating homes in a planned development associated with the midcentury development of Hayden Island.
OR 112	TBD	Red Lion Hotel on the River Jantzen Beach (Holiday Inn Portland Columbia Riverfront)	N	2023 IBR Recommendation: Not Eligible	1979	909 N Hayden Island Dr	Largescale Northwest Regional style hotel building designed by Vancouver firm Nelson Walla and Dolle (NWD).
OR 113	TBD	First Interstate Bank (Wells Fargo)	N	2023 IBR Recommendation: Not Eligible	1982	12240 N Jantzen Dr	Northwest Regional style prefabricated bank branch designed and constructed by Modern Building Systems Inc.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 114	TBD	Hayden Island Plaza	N	2023 IBR Recommendation: Not Eligible	1981	700 N Hayden Island Dr	Modern style multistory commercial office building developed by Hayden Island Inc.
OR 115	TBD	Hayden Island Inc.	N	2023 IBR Recommendation: Not Eligible	1972	909 N Tomahawk Island Dr	Commercial office with no discernable style designed as the corporate headquarters of Hayden Island, Inc and heavily altered since its original construction.
OR 116	TBD	Jantzen Beach Village Condominiums	N	2023 IBR Recommendation: Not Eligible	ca. 1973	N Jantzen Beach Ave	Largescale complex of townhome residences developed by Hayden Island Inc with no discernable style.
OR 117	TBD	Jantzen Bay Marina / Mattress World	N	2023 IBR Recommendation: Not Eligible	ca. 1960–1970	11950 N Jantzen Dr	One-story reinforced concrete commercial building with no discernable style.
OR 118	TBD	Jantzen Bay Marina / Stateline Liquor Store	N	2023 IBR Recommendation: Not Eligible	ca. 1970–1981	11980 N Jantzen Dr	One-story commercial building with mansard roof.
OR 119	TBD	Jantzen Bay Marina / Menjiro	N	2023 IBR Recommendation: Not Eligible	ca. 1970–1981	12006 N Jantzen Dr	Small-scale restaurant building with no discernable style heavily altered since its original construction.
OR 120	TBD	Hayden Island Yacht Club Clubhouse / The Clubhouse	N	2023 IBR Recommendation: Eligible, Criterion A	1972	12050 N Jantzen Dr	Yacht club clubhouse designed by engineer Dirk W. Koopman combining elements of the Modern, Northwest Regional, and Shed styles.
OR 121	52457	Swift Meat Packing Company Pumphouse	Y	2023 IBR Recommendation: Not Eligible	1924	2061 N Marine Dr	Largescale, utilitarian concrete tank with cylindrical footprint and no discernable style and altered since its original construction through the loss of character-defining features.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 122	TBD	Diversified Marine Incorporated	N	2023 IBR Recommendation: Not Eligible	1975	1801–1809 N Pier 99 St	Two-story, gabled commercial building with no discernable style and heavily altered since its original construction.
OR 123	TBD	EcoLube Recovery	N	2023 IBR Recommendation: Not Eligible	1956–1981	11535 N Force Ave	Largescale, utilitarian industrial complex with no discernable style.
OR 124	TBD	Rudy Yost Equipment (Diamond West, Anderson Signs)	N	2023 IBR Recommendation: Not Eligible	1970	11077 N Vancouver Wy	Utilitarian warehouse with no discernable style.
OR 125	TBD	Commercial Building	N	2023 IBR Recommendation: Not Eligible	1981	11021 N Vancouver Wy	Utilitarian commercial building with no discernable style.
OR 126	TBD	Crystal Greens Landscape Inc.	N	2023 IBR Recommendation: Not Eligible	1982	10931 N Vancouver Wy	Utilitarian commercial building with no discernable style.
OR 145	TBD	City of Portland Urban Forestry Offices	N	2023 IBR Recommendation: Not Eligible	1936–1943	10890 N Denver Ave	Side-gabled, Minimal Traditional style residence altered since its original construction. No clear association was found with historic Vanport or East Vanport housing developments.
OR 145b	TBD	City of Portland Urban Forestry Barn	N	Demolished since the start of the project.	ca. 1940	10890 N Denver Ave	N/A
OR 146	TBD	Lazer-Trac Heavy Truck Alignment	N	2023 IBR Recommendation: Not Eligible	1954	10149 N Vancouver Wy	Complex of interconnected utilitarian buildings with no discernable style.
OR 152	TBD	Market Express	N	2023 IBR Recommendation: Not Eligible	1980	10400 N Vancouver Wy	Complex of single-story utilitarian buildings with no discernable style.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 153	TBD	GCR Tires and Service	N	2023 IBR Recommendation: Not Eligible	ca. 1970–1981	10360 N Vancouver Wy	Complex of commercial buildings with no discernable style.
OR 154	TBD	Jubitz Truck Service Center	N	2023 IBR Recommendation: Not Eligible	1958	10205 N Vancouver Wy	Commercial building and automotive service garage with no discernable style.
OR 155	TBD	East Vanport Commercial Center (Delta Park Sports Office)	N	2023 IBR Recommendation: Eligible, Criterion A	1943–1944	10850 N Denver Ave	Northwest Regional style commercial building designed by architects Arthur Glenn Stanton and Hollis Eugene Johnston for the East Vanport.
OR 156	TBD	Pro Steering Systems	N	2023 IBR Recommendation: Not Eligible	1968	11051 N Vancouver Wy	Two-story utilitarian commercial building and automotive service in no discernable style.
OR 157	TBD	Jantzen Beach Denny's Sign	N	2023 IBR Recommendation: Not Eligible	1967	N Center Ave	Googie style restaurant sign heavily altered since construction.
OR 158	TBD	Jantzen Beach Ice Center	N	2023 IBR Recommendation: Not Eligible	ca. 1970–1981	12305 N Starlight Ave	Largescale dual front commercial building with originally constructed as an ice arena and converted to department stores all heavily altered since construction.
OR 159	TBD	REI CO-OP (Michaels)	N	2023 IBR Recommendation: Not Eligible	1976	12255 N Starlight Ave	Commercial building in no discernable style that was the first known purpose-built REI and has been altered since its original construction.
OR 160	TBD	Burlington	N	2023 IBR Recommendation: Not Eligible	ca. 1970–1981	12045 N Parker Ave	One-story commercial building with no discernable style.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 161	TBD	Vanport Pier	N	2023 IBR Recommendation: Not Eligible	ca. 1954–1955	1835 N Marine Dr	Utilitarian cement transfer facility originally built for the Ross Island Sand and Gravel Company with no discernable form or style.
OR 162	TBD	Jantzen Pedestrian Tunnel	N	2023 IBR Recommendation: Not Eligible	1929	I-5 M.P. 307.93	Art Deco style pedestrian tunnel beneath I-5 designed by George Washington Buck for the Jantzen Beach Amusement Park and repeatedly altered and since its original construction.
OR 163	TBD	Delta Park	N	2023 IBR Recommendation: Not Eligible	ca. 1960	10850 N Delta Ave	Largescale park with sports fields, picnic areas, and gazebo in no discernable style and heavily altered since initial development.
OR 165 (WA 1356)	TBD	Lower Columbia River Federal Navigation Historic District	Y	2023 USACE Recommendation: Eligible, Criteria A and C	1873–1969	Columbia River	Largescale historic district including navigation channels, turning basins, pile dike systems, and artificial landforms associated with maritime navigation on the Lower Columbia River.
OR 166	TBD	Warehouse	N	2023 IBR Recommendation: Not Eligible	1979	2127 NW Eleven Mile Ave	Utilitarian warehouse with no discernible style.
OR 167	TBD	Residence	N	2023 IBR Recommendation: Not Eligible	1922	2227 NW Eleven Mile Ave	Minimal Traditional style side-gabled residence heavily altered since construction.
OR 168	TBD	Lewis Automotive	N	2023 IBR Recommendation: Not Eligible	1982	2303–2363 NW Eleven Mile Ave	Commercial strip mall with Modern style detailing.

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OR 169a	TBD	Residence	N	2023 IBR Recommendation: Not Eligible	1947	2371 NW Eleven Mile Ave	Minimal Traditional residence
OR 169b	TBD	Specialty Store	N	2023 IBR Recommendation: Not Eligible	ca. 1970–1981	2371–2395 NW Eleven Mile Ave	Modern style store somewhat altered since construction.
OR 170	TBD	Specialty Store	N	2023 IBR Recommendation: Not Eligible	1976	2441–2451 NW Eleven Mile Ave	Utilitarian store with Mansard style detailing.
OR 171	TBD	Precision Body & Paint	N	2023 IBR Recommendation: Not Eligible	1977	2515 NW Eleven Mile Ave	Utilitarian store with no Mansard style detailing somewhat altered since construction.
OR 172	683331	Jalisco Auto Services	Y	2023 IBR Recommendation: Not Eligible 2020 OR SHPO Determination: Not Eligible	1966	2360–2368 NW Burnside Rd	Utilitarian store with no discernible style.
OR 173	TBD	Delta AV	N	2023 IBR Recommendation: Not Eligible	1974	2450 NW Eleven Mile Ave	Commercial strip mall with no discernible style heavily altered since construction
OR 174	TBD	Warehouse	N	2023 IBR Recommendation: Not Eligible	1972	2410 NW Burnside Ct	Modern style warehouse altered since construction.
OR 175	TBD	Warehouse	N	2023 IBR Recommendation: Not Eligible	1974	2406 NW Eleven Mile Ave	Utilitarian warehouse with no discernible style.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 176a	TBD	Residence	N	2023 IBR Recommendation: Not Eligible	1964	1806 NW Eleven Mile Ave	Minimal Traditional style ranch house altered since construction.
OR 176b	TBD	Specialty Store	N	2023 IBR Recommendation: Not Eligible	ca. 1964–1970	1806 NW Eleven Mile Ave	Utilitarian store with no discernible style.
OR 176c	TBD	Warehouse	N	2023 IBR Recommendation: Not Eligible	ca. 1964–1970	1806 NW Eleven Mile Ave	Utilitarian warehouse with no discernible style.
OR 177	TBD	Residence	N	2023 IBR Recommendation: Not Eligible	1966	1801 NW Birdsdale Ave	Modern style residence altered since construction
OR 178	TBD	Residence	Y	2023 IBR Recommendation: Not Eligible 2009 ODOT Recommendation: Not Eligible	1954	1905 NW Birdsdale Ave	Minimal Traditional style residence altered since construction.
OR 179	TBD	Residence	N	2023 IBR Recommendation: Not Eligible	1956	2131 NW Birdsdale Ave	Contemporary style ranch house altered since construction.
OR 180	TBD	Priestly & Sons Moving & Storage	N	2023 IBR Recommendation: Not Eligible	1978	2255 NW Birdsdale Ave	Commercial building constructed in the mansard style altered since construction.
OR 181	TBD	Warehouse	N	2023 IBR Recommendation: Not Eligible	1962	2303 NW Birdsdale Ave	Utilitarian warehouse with no discernible style.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
OR 182	TBD	Vance Pit	N	2023 IBR Recommendation: Not Eligible	ca. 1907	1300 SE 190th St	149 acre site including two primary surface quarries originally developed as a gravel pit and dramatically expanded after midcentury.
OR 183	TBD	Birdsdale Transmission Line	Y	2023 IBR Recommendation: Not Eligible 2009 ODOT Recommendation: Not Eligible	1959	Various	7 mile long transmission line constructed by Pacific Power & Light.
OR 184	TBD	Linnemann to Troutdale Interurban Railroad	Y	2023 IBR Recommendation: Segment within the APE—Not Eligible 2009 ODOT Recommendation: Not Eligible	1906	Various	Corridor of interurban rail line turned to freight rail after 1927 and abandoned ca. 1986. Rails removed and paved for bike use in 2007.
OR 185	TBD	Portland International Raceway	N	2025 IBR Recommendation: Not Eligible	1961	1940 North Victory Boulevard	Asphalt paved racing track with irregular turns at the northwest end, enclosing a grassy area with a narrow pond.
OR 186a	53460	Jubitz Truck Stop - Ponderosa Lounge & Grill, Portlander Inn	Y	2025 IBR Recommendation: Not Eligible	1979	10350 North Vancouver Way	1 to 4 story early truck stop with no discernible style altered since its original construction.
OR 186b	TBD	Jubitz Truck Stop - East Building	N	2025 IBR Recommendation: Not Eligible	1970	1970–1981	Utilitarian multi-unit hotel building with rubble masonry accents.
OR 186c	TBD	Jubitz Truck Stop - East Building	N	2025 IBR Recommendation: Not Eligible	1981	10310 North Vancouver Way	Multistory service center constructed from textured and flush concrete masonry units and added canopies.

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OR 187	TBD	Jantzen Bay Marina	N	2025 IBR Recommendation: Not Eligible	1950–1957	12050 North Jantzen Drive	Largescale commercial marina with eight piers for mooring recreational vessels and some floating homes and floating boathouses.
WA 7	33716	Fendrich's Furniture / Gemé Art Gallery	Y	2023 IBR Recommendation: Eligible, Criterion C	1947	209 W 6th St	Two-part commercial block in modernistic style designed by architect Donald J. Stewart for longstanding local company.
WA 8	89098	Loowit Brewing Company	Y	2023 IBR Recommendation: Not Eligible	1940	507 Columbia St	Utilitarian warehouse with no discernable style altered since its original construction.
WA 10	2124	Smith Tower	Y	2023 IBR Recommendation: Eligible, Criteria A, B, and C	1966	515 Washington St	Modern style cylindrical multifamily senior apartment tower designed by Henry Greybrook and developed and occupied by local labor leader W.B. Smith.
WA 21	20430	The Evergreen Hotel	Y	1979: Listed, Criterion A	1928	500 Main St	Italian Renaissance Revival style hotel designed by Portland Architects Tourt, Elliotte, and Hummel and later altered with a compatible annex structure constructed onto the building's north side in 1950.
WA 28	20437	Engleman – Sparks Building	Y	2023 IBR Recommendation: Not Eligible	1903	605–609 Main St	Two-part commercial block with cast iron storefront that once included an early movie house heavily altered since its original construction.
WA 29	20436	U.S. National Bank Building	Y	1984: Listed, Criterion C	1912	601–603 Main St	Multistory Classical Revival style commercial building built by C.S. Voorhees.

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WA 52	89112	Residence	Y	2023 IBR Recommendation: Not Eligible 2013 FHWA Determination: Not Eligible	1916	2000 W Reserve St	Craftsman style bungalow with updated cladding and fenestration.
WA 58	89117	Residence	Y	2023 IBR Recommendation: Not Eligible 2013 FHWA Determination: Eligible, Criteria unknown	1946	901 E 28th St	Minimal Traditional style ranch residence with Dutch gable roof and updated fenestration.
WA 59	89118	Camets, Jennie, House	Y	2023 IBR Recommendation: Not Eligible	ca. 1914	3110 K St	Workingman's foursquare residence in Folk Victorian style with intact ornamentation and some alterations since its original construction.
WA 61	89120	Porter House	Y	2023 IBR Recommendation: Eligible, Criterion C 2013 FHWA Determination: Eligible, Criteria unknown	ca. 1912	3000 K St	Craftsman style bungalow with intact ornamentation.
WA 62	25537	Hall House	Y	2023 IBR Recommendation: Eligible, Criterion C	1912	903 E 31st St	Craftsman style modified bungalow with complex M-shaped roof and association with early business leader and suffragette.
WA 149	89160	Normandy Apartments	Y	2023 IBR Recommendation: Eligible, Criteria A and C	1928	318 E 7th St	Tudor style U-court multifamily apartment building with skintled brick walls.
WA 150	18827	House of Providence (Providence Academy)	Y	2025 IBR Recommendation: Eligible, Criteria A, B, and C 1978: Listed, Criteria A and C	1873, 1891	400 E Evergreen Blvd	Largescale complex of Georgian/Federal and French Colonial buildings designed by "Mother Joseph" and associated with the development of Catholicism in the Northwest.

Map ID	OR SHPO/ WA DAHP Property ID	Resource Name	Previously Identified (Y/No)	NRHP Eligibility Status	Year Built	Address	Description
WA 150d	732294	Kindergarten Building	N	2025 IBR Recommendation: Eligible, Criterion A	1943–1944	404 E Evergreen Blvd	Astylar single-story educational building constructed during WWII to accommodate children of new defense workers.
WA 165	89173	Residence	Y	2023 IBR Recommendation: Not Eligible	1929	1901 H St	Craftsman style front-gabled residence heavily altered since its original construction.
WA 168	33589	Fort Motel (Fort Apartments)	Y	2023 IBR Recommendation: Not Eligible	1957–1962	500 E 13th St	Modern International style multi-story hotel and apartment block designed by Day Walter Hilborn for Larry O. Collins and altered since its original construction.
WA 169	89175	Econo Lodge	Y	2023 IBR Recommendation: Not Eligible	1956–1957	601 Broadway St	Modern style motel altered since its original construction.
WA 188	89186	Residence	Y	2023 IBR Recommendation: Not Eligible	1925	2501 F St	Cape Cod style residence altered since its original construction.
WA 189	89187	Residence	Y	2023 IBR Recommendation: Not Eligible	1911	604 E 25th St	Craftsman style bungalow heavily altered since its original construction.
WA 191	89189	Hood, William H. and Myrtle, Residence	Y	2023 IBR Recommendation: Eligible, Criterion C	ca. 1919	3405 K St	Craftsman style bungalow.
WA 192	89190	Residence	Y	2023 IBR Recommendation: Not Eligible 2011 DAHP Determination: Not Eligible	1920	3317 K St	Craftsman style bungalow.
WA 195	89193	Residence	Y	2023 IBR Recommendation: Not Eligible	1939	901 E 32nd Ave	Minimal Traditional style residence altered since its original construction.

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WA 228	25528	Swan House	Y	2023 IBR Recommendation: Not Eligible	1906	714 E 26th St	Queen Anne style residence with gambrel roof associated with the prominent Swan family and heavily altered since its original construction.
WA 229	89226	Residence / Commercial Building	Y	2023 IBR Recommendation: Not Eligible	ca. 1900	804 E 26th St	Folk Victorian style residence and one-part commercial block heavily altered since their original construction.
WA 367	90516	Spokane, Portland and Seattle Railway	Y	2023 IBR Recommendation: Segment within the APE—Not Eligible 2009 DAHP Determination: Eligible, Criterion A	1908–1909	Vancouver, WA	Rail segment consisting of standard-gauge double track. Segment within APE has been re-aligned since its period of significance.
WA 369	674448	Pearson Field Historic District	Y	2006: Listed as Contributing Resources to the Vancouver National Historic Reserve Historic District, Criteria A, C, and D	ca. 1904–1929	1105 E 5th St	Historic district consisting of three built environment resources associated with the development of Pearson Field.
WA 381a (OR 50)	18781	Interstate Bridge (Vancouver-Portland Interstate Bridge) (northbound)	Y	Interstate resource. See entry under OR 50	1917	Columbia River	Interstate resource. See entry under OR 50.
WA 381b (OR 51)	TBD	Interstate Bridge (Vancouver-Portland Interstate Bridge) (southbound)	N	Interstate resource. See entry under OR 51	1956–1958	Columbia River	Interstate resource. See entry under OR 51.

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WA 382	44853	Radio Transmission Building	Y	2023 IBR Recommendation: Eligible, Criteria A and C	1940	1601 E Fourth Plain Blvd	Stripped Classical style radio building constructed to support army flight operations at Pearson Field.
WA 477	89357	Residence	Y	2023 IBR Recommendation: Not Eligible 2013: FHWA Determination: Eligible, Criteria Unclear	ca. 1930	800 E 39th St	Minimal Traditional style workingman's foursquare residence with characteristic local masonry bond and updated fenestration.
WA 478	89358	Residence	Y	2023 IBR Recommendation: Not Eligible	1937	3915 I St	Minimal Traditional style residence with unusual stucco cladding all altered since its original construction.
WA 520	89391	Hankel Building (Lucky Lager Warehouse)	Y	2023 IBR Recommendation: Not Eligible	1919	215 W 4th St	One-part block commercial building with no discernable style associated with the local automotive sector and later the Lucky Lager Brewery. Heavily altered since its original construction.
WA 900	20458	Covington House	Y	1972: Listed, Criterion C	ca. 1848	4201 Main St	Hall-and-Parlor Pioneer Log style residence moved since its original construction.
WA 918	674654 (District)	Officers Row Historic District	Y	2006: Listed as Contributing Resources to the Vancouver National Historic Reserve Historic District, Criteria A, C, and D 1974: Listed, Criteria A, and C	1849–1903	601–1607 E Evergreen Blvd	Historic district consisting of 21 residential buildings constructed in a variety of late-nineteenth and early-twentieth century styles.
WA 993	89684	Kiggins Bowl	Y	2023 IBR Recommendation: Not Eligible	1933–1937	800 E 40th St	Streamline Moderne style stadium designed by architect Day Walter Hilborn and altered since its original construction.

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WA 1107	731286	Black Angus Steakhouse	N	2023 IBR Recommendation: Not Eligible	1974	415 E 13th St	Modern style restaurant constructed for Black Angus in an atypical design for the chain.
WA 1110	N/A	Davies Homes / United Building	N	None	Post–1982	404 E 15th St	Out of Period
WA 1123	731289	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1974	905 E 29th St	Contemporary style duplex altered since its original construction.
WA 1124	731290	Residence	N	2023 IBR Recommendation: Not Eligible	ca. 1900	814 E 29th St	Foursquare residence with no discernable style topped by a Dutch-gabled-roof all heavily altered since its original construction.
WA 1125	731291	United Pentecostal Church	N	2023 IBR Recommendation: Not Eligible	1970	1110 E 33rd St	Contemporary style church altered since its original construction.
WA 1127a	551888	Duplex Residence	Y	2023 IBR Recommendation: Not Eligible	1969	1108-1110 E 37th St	Modern style two-story duplex altered since its original construction.
WA 1127b	551888	Duplex Residence	Y	2023 IBR Recommendation: Not Eligible	1969	1112-1114 E 37th St	Modern style two-story duplex associated with WA 1127a altered since its original construction.
WA 1133	729874	Pacific First Federal Savings and Loan Association	N	2024 IBR Recommendation: Eligible, Criterion C	1975	915 Broadway St	Late-Modern style four-story commercial building.
WA 1137	89672	Joe's Crab Shack	Y	Demolished since the start of the project.	1980	101 SE Columbia Wy	N/A

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WA 1138	731246	Who Song and Larry's	N	2023 IBR Recommendation: Eligible, Criterion C	1980	111 SE Columbia Wy	Roadside style restaurant building constructed with fanciful Victorian forms and ornamentation.
WA 1142	731293	Commercial Building	N	2023 IBR Recommendation: Not Eligible	1977	1500 D St	Late Modern style, strip commercial building altered since its original construction.
WA 1144	731267	Office Building	N	2023 IBR Recommendation: Eligible, Criterion C	1977	1514 E St	Postmodern and Northwest Regional style commercial building designed by architect Roger Herndon for local developer Al Angelo and designed for compatibility with surrounding residential neighborhood.
WA 1148	731279	Washington State Patrol District Five Headquarters	N	2023 IBR Recommendation: Eligible, Criterion C	1975	605 E Evergreen Blvd	Late Modern style police headquarters designed by architectural firm Herndon/Rogowski & Associates for District Five of the Washington State Patrol.
WA 1159	731320	Apartment Building	N	2023 IBR Recommendation: Not Eligible	1981	3921 I St	Contemporary style fourplex with unusual design and updated fenestration.
WA 1160	731311	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1981	3919 I St	Contemporary style duplex related to WA 1159 with unusual design and updated fenestration.
WA 1162	731283	Snyder, Bob, Duplex	N	2023 IBR Recommendation: Not Eligible	1968	3601 I St	Contemporary style duplex relocated to its present location and heavily updated since its original construction.
WA 1163	731294	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1971	3405 I St	Mansard style duplex altered since its original construction.

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WA 1164	731280	Pierce & Pierce Duplex	N	2023 IBR Recommendation: Not Eligible	1979	2601-2603 K St	Side-gabled duplex with no discernable style designed by husband-and-wife development team Falen and Rene Pierce of Pierce & Pierce Construction.
WA 1165a	731295	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1973	2714 K St	Contemporary style duplex altered since its original construction.
WA 1165b	731296	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1973	2716 K St	Contemporary style duplex related to WA 1165a and altered since its original construction.
WA 1166	731281	Ost Duplex	N	2023 IBR Recommendation: Not Eligible	1971	3505 K St	Contemporary style duplex.
WA 1167	731297	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1971	3501 K St	Contemporary style duplex altered since its original construction.
WA 1168a	731275	Duplex Residence	N	2023 IBR Recommendation: Eligible, Criteria A and C	1968	2901 K St (north)	Contemporary style duplex within two-building complex associated with the local boom in duplex construction at midcentury.
WA 1168b	731276	Duplex Residence	N	Eligible as complex with WA 1168a	1968	2901 K St (south)	Contemporary style duplex related to WA 1168a and associated with the boom in duplex construction at midcentury.
WA 1182a	731321	Marshall Center	N	2023 IBR Recommendation: Not Eligible	1973	1009 E McLoughlin Blvd	Northwest Regional style sports and community facility designed by Vancouver firm Nelson Walla and Dolle (NWD) and heavily altered since its original construction.

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WA 1182b	731284	Rudy Luepke Senior Center	N	2023 IBR Recommendation: Eligible, Criterion A	1979	1009 E McLoughlin Blvd	Northwest Regional style meeting hall designed by Vancouver firm Nelson Walla and Dolle (NWD) and associated with the growth of facilities nationally to support senior citizens.
WA 1182c	731322	Marshall Park	N	2023 IBR Recommendation: Not Eligible	1963	1069 E McLoughlin Blvd	Largescale 14 acre park with no discernable style heavily altered since its original development.
WA 1183	561244	716 East McLoughlin Apartments	Y	2023 IBR Recommendation: Not Eligible	1969	716 E McLoughlin Blvd	Modern style dingbat apartment building altered since its original construction.
WA 1190	731298	Apartment Building	N	2023 IBR Recommendation: Not Eligible	1978	1800 W Reserve St	Contemporary style apartment building altered since its original construction.
WA 1191	731299	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1977	1920 W Reserve St	Garrison Revival style duplex with Contemporary style elements altered since its original construction.
WA 1192	89097	Bridge Substation	Y	2023 IBR Recommendation: Eligible, Criterion C	ca. 1918	100 SE Columbia Blvd	Classical Revival style energy facility associated with the development of electrical transmission in Clark County.
WA 1200	33607	Lineham Motor Company (Hannah Motor Company)	Y	2023 IBR Recommendation: Not Eligible	1930	210 West 3rd St, 300 Washington St	One-part block in no discernable style associated with the development of local automotive sector and heavily altered since its original construction.
WA 1201	33608	Business	Y	Demolished since the start of the project.	1890	210 W 4th St	N/A

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WA 1202	N/A	Business	N	Demolished since the start of the project.	ca. 1981–1990	412 Washington St	N/A
WA 1203	33638	Webber Machine Works	Y	2023 IBR Recommendation: Not Eligible	1919–1920	400 Columbia St	Two-part block in loose Commercial style originally used for industrial machine works and heavily altered for later conversion of commercial offices.
WA 1204	89382	Night & Day Market	Y	2023 IBR Recommendation: Not Eligible	1920	514 Washington St	One-part block commercial building with no discernable style heavily altered since its original construction.
WA 1205a	33692 / 89099	DuBois Motors Company Building	Y	2023 IBR Recommendation: Not Eligible	1920	202 W 5th St / 500 Washington St	One-part block Commercial style building altered since its original construction.
WA 1205b	33566	Business	Y	2023 IBR Recommendation: Not Eligible	ca. 1910	502–504 Washington St	Two-part block Commercial style building altered since its original construction.
WA 1206	89381	Commercial Building	Y	2023 IBR Recommendation: Not Eligible	1910	506 Washington St	Two-part block Commercial style building altered since its original construction.
WA 1207	33666	Evergreen Hotel Annex	Y	2023 IBR Recommendation: Not Eligible	1950	510 Main St	Two-part vertical block Italian Renaissance Revival style hotel building added onto original Evergreen Hotel.
WA 1208	33714	Commercial Building	Y	2023 IBR Recommendation: Not Eligible	1920/ 1950	114 E 6th St	One-part block Streamlined Moderne style commercial building heavily altered since its original construction.
WA 1209	33615	Sparks Motor Car Company	Y	2023 IBR Recommendation: Not Eligible	1919/ 1935	606 Broadway St	One-part block Commercial style building altered since its original construction.

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WA 1210	33613	Fraternal Order of Eagles	Y	2023 IBR Recommendation: Not Eligible	1920/ 1955	107 E 7th St	One-part block meeting hall / commercial building with no discernable style heavily altered since its original construction.
WA 1211b	55507	Federal Highway Administration	Y	2023 IBR Recommendation: Not Eligible 2008 DAHP Determination: Not Eligible	ca. 1932–1949	1200 E Fourth Plain Blvd	Two-story brick commercial / institutional building with no discernable style altered since its original construction.
WA 1212	N/A	M.H. Zoller Co.	N	None	Post–1982	415 E Mill Plain Blvd	Out of Period
WA 1213	33605	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1911–1928	608 E 15th St	Craftsman style bungalow altered since its original construction.
WA 1214	731323	Commercial Building	N	2023 IBR Recommendation: Not Eligible	ca. 1981–1990	611 E 16th St	One-part block, Shed style building originally used for drive-through banking and heavily altered for conversion to commercial office.
WA 1215	49709	Residence / Commercial Building	Y	2023 IBR Recommendation: Not Eligible	1925/ 1947	1601 G St	Minimal Traditional style residence heavily altered since its original construction for use as a commercial office.
WA 1216	49649	Residence	Y	2023 IBR Recommendation: Not Eligible	1943	705 E 17th St	Modest Minimal Traditional style residence associated with wartime residential construction in Vancouver.
WA 1217	49646	Residence	Y	2023 IBR Recommendation: Not Eligible 2007 DAHP Determination: Not Eligible	1901 (likely older)	701 E 17th St	Folk Victorian style residence heavily altered since its original construction.

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WA 1218	49753	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1907–1911	714 E 17th St	Folk Victorian style residence altered since its original construction.
WA 1219	49650	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1928–1955	712 E 17th St	Upright and wing/Gable front and wing residence with no discernable style altered since its original construction.
WA 1220	49648	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1901–1905	704 E 17th St	Folk Victorian style residence altered since its original construction.
WA 1221	89144	Residence	Y	2023 IBR Recommendation: Not Eligible	1939	1812 W Reserve St	Minimal Traditional style residence altered since its original construction.
WA 1222	89398	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	1814 W Reserve St	Residence with no discernable style heavily altered since its original construction.
WA 1223	89403	Residence	Y	2023 IBR Recommendation: Not Eligible	1908	1904 W Reserve St	Folk Victorian style residence altered since its original construction.
WA 1224	89404	Residence	Y	2023 IBR Recommendation: Not Eligible	1920	1908 W Reserve St	Folk Victorian style residence altered since its original construction.
WA 1225	89405	Residence	Y	2023 IBR Recommendation: Not Eligible	1915	1918 W Reserve St	Folk Victorian style residence altered since its original construction.
WA 1226	89406	Residence	Y	2023 IBR Recommendation: Not Eligible	1908	1924 W Reserve St	Folk Victorian style residence altered since its original construction.
WA 1227	25505	Residence	Y	2023 IBR Recommendation: Not Eligible	1901	815 E 20th St	Queen Anne style residence altered since its original construction.

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WA 1228	89429	Residence	Y	2023 IBR Recommendation: Not Eligible	1928	1907 H St	Craftsman style residence altered since its original construction.
WA 1229	89172	Residence	Y	2023 IBR Recommendation: Not Eligible	1919	1911 H St	Folk Victorian style, workingman's foursquare residence altered since its original construction.
WA 1230	89408	Residence	Y	2023 IBR Recommendation: Not Eligible	1925	812 E 20th St	Craftsman style "Portland Bungalow" altered since its original construction.
WA 1231	89415	Residence	Y	2023 IBR Recommendation: Not Eligible	1938	821 E 22nd St	Cape Cod style, Williamsburg Revival substyle residence altered since its original construction.
WA 1232	89411	Residence	Y	2023 IBR Recommendation: Not Eligible	1938	817 E 22nd St	Minimal Traditional style residence altered since its original construction.
WA 1233	89149	Earls House	Y	2023 IBR Recommendation: Eligible, Criterion C	1938	815 E 22nd St	Minimal Traditional style residence minimally altered since its original construction.
WA 1234	89422	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1920	810 E 22nd St	Craftsman style bungalow residence moved to its present location and heavily altered since its original construction.
WA 1235	89423	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1920	2204 I St	Craftsman style American foursquare residence moved to its present location and altered since its original construction.
WA 1236	89424	Residence	Y	2023 IBR Recommendation: Not Eligible	1916	2208 I St	Craftsman style residence altered since its original construction.
WA 1237	89425	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	2212 I St	Minimal Traditional style, WWII era cottage altered since its original construction.

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WA 1238	731300	Residence	N	2023 IBR Recommendation: Not Eligible	ca. 1950	2220 I St	Nested-gable residence with recessed porch and no discernable style heavily altered since its original construction.
WA 1239	97181	Marshall House	Y	2023 IBR Recommendation: Not Eligible 2009 DAHP Determination: Not Eligible	1915	2221 H St	Craftsman style residence heavily altered since its original construction.
WA 1240	89632	Religious Facility	Y	2023 IBR Recommendation: Not Eligible	1920	517 E Fourth Plain Blvd	Tudor Revival style religious facility heavily altered since its original construction.
WA 1241	89633	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	513 E Fourth Plain Blvd	Minimal Traditional style residence altered since its original construction.
WA 1242	N/A	Former WSDOT Rest Area	N	None	Post–1982	NE Corner I-5 and E McLoughlin Blvd	Out of Period.
WA 1243	89213	Duplex Residence	Y	2023 IBR Recommendation: Not Eligible	1927	600 E Fourth Plain Blvd	Spanish Mission Revival style duplex altered since its original construction
WA 1244	20321	Residence	Y	2023 IBR Recommendation: Not Eligible	1923	608 E Fourth Plain Blvd	Craftsman style bungalow residence with intact ornamentation all altered since its original construction.
WA 1245	731282	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1978	607 E 27th St	Contemporary style duplex.
WA 1246	89473	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1938 (likely wrong)	611 E 27th St	Craftsman style bungalow residence altered since its original construction.

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WA 1247	89474	Residence	Y	2023 IBR Recommendation: Not Eligible	1915	617 E 27th St	Craftsman style bungalow residence altered since its original construction.
WA 1248	89475	Residence	Y	2023 IBR Recommendation: Not Eligible	1936	701 E 27th St	Tudor Composite style residence altered since its original construction.
WA 1249	89476	Residence	Y	2023 IBR Recommendation: Not Eligible	1929	711 E 27th St	Tudor Composite style residence altered since its original construction.
WA 1250	89491	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1900	814 E 26th St	Folk Victorian style residence altered since its original construction.
WA 1251	89490	Residence	Y	2023 IBR Recommendation: Not Eligible	1939	2611 I St	Minimal Traditional style, WWII era cottage altered since its original construction.
WA 1252	89489	Residence	Y	2023 IBR Recommendation: Not Eligible	1941	2613 I St	Minimal Traditional style, WWII era cottage altered since its original construction.
WA 1253	89488	Schuller, William H., House	Y	2023 IBR Recommendation: Not Eligible	1942	900 E 27th St	Minimal Traditional style, WWII era cottage altered since its original construction.
WA 1254	89487	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	2707 I St	Minimal Traditional style, WWII era cottage altered since its original construction.
WA 1255	89486	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	2709 I St	Minimal Traditional style, WWII era cottage altered since its original construction.
WA 1256	89485	Deane House	Y	2023 IBR Recommendation: Not Eligible	1947	904 E 28th St	Cross Hipped residence with no discernable style altered since its original construction.
WA 1257	89484	Residence	Y	2023 IBR Recommendation: Not Eligible	1945	900 E 28th St	Minimal Traditional style residence altered since its original construction.

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WA 1258	89483	Mickler House	Y	2023 IBR Recommendation: Eligible, Criterion A	ca. 1908	901 E 29th St	Early example of Victorian Folk style workingman's foursquare residence in Shumway neighborhood.
WA 1259	89482	Residence	Y	2023 IBR Recommendation: Not Eligible	1945	904 E 29th St	Minimal Traditional style, WWII era cottage altered since its original construction.
WA 1260	89481	Residence	Y	2023 IBR Recommendation: Not Eligible	1950	900 E 29th St	Minimal Traditional style ranch residence altered since its original construction.
WA 1261	89479	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	903 E 30th St	Minimal Traditional style residence altered since its original construction.
WA 1262	89480	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	901 E 30th St	Craftsman style Bungalow residence altered since its original construction.
WA 1263	89191	Holcomb House	Y	2023 IBR Recommendation: Not Eligible	1941	902 E 30th St	Minimal Traditional style, WWII era cottage constructed from masonry clad in stucco and relocated from its original location.
WA 1264	89507	Residence	Y	2023 IBR Recommendation: Not Eligible	1937	904 E 31st St	Minimal Traditional style residence altered since its original construction.
WA 1265	89192	Residence	Y	2023 IBR Recommendation: Not Eligible	1939	902 E 31st St	Minimal Traditional style residence altered since its original construction.
WA 1266	89508	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	3201 I St	Craftsman style bungalow residence altered since its original construction.
WA 1267	89509	Residence	Y	2023 IBR Recommendation: Not Eligible	1925	3205 I St	Craftsman style bungalow residence altered since its original construction.

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WA 1268	89121	Adams, Cranston Fuller, House	Y	2023 IBR Recommendation: Not Eligible	1930	3211 I St	Craftsman style bungalow residence altered since its original construction.
WA 1269	89510	Residence	Y	2023 IBR Recommendation: Not Eligible	1950	3215 I St	Minimal Traditional style residence altered since its original construction.
WA 1270	556655	Residence	Y	2023 IBR Recommendation: Not Eligible	1910	815 E 33rd St	Folk Victorian style residence relocated to its present location.
WA 1271	554789	Residence	Y	2023 IBR Recommendation: Not Eligible	1936	814 E 33rd St	Minimal Traditional style residence altered since its original construction.
WA 1272	89194	Residence	Y	2023 IBR Recommendation: Not Eligible	1936	904 E 33rd St	Minimal Traditional style residence altered since its original construction.
WA 1273	89516	Pearson, Walter E. and Leona M., House	Y	2023 IBR Recommendation: Not Eligible	1931	905 E 34th St	Tudor Composite style residence constructed by developer Larry O. Collins and modestly altered since its original construction.
WA 1274	89515	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	901 E 34th St	Tudor Composite style residence constructed by developer Larry O. Collins and occupied by architect Day Walter Hilborn. The residence was not designed by Hilborn and other extant residences (3715 Clark Ave) bear a stronger association with his productive life as his studio is no longer extant. The residence has been altered since its original construction.
WA 1275	89514	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1930	900 E 34th St	Minimal Traditional style residence altered since its original construction.

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WA 1276	731301	Residence	N	2023 IBR Recommendation: Not Eligible	1930	3400 I St	Side-gabled residence with no discernable style altered since its original construction.
WA 1277	89242	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1930	3409 I St	Craftsman style bungalow residence altered since its original construction.
WA 1278	89513	Residence	Y	2023 IBR Recommendation: Not Eligible	1925	3415 I St	Two-story, side-gabled residence with no discernable style heavily altered since its original construction.
WA 1279	731302	Residence	N	2023 IBR Recommendation: Not Eligible	1930	3410 I St	Craftsman style bungalow residence altered since its original construction.
WA 1280	731303	Residence	N	2023 IBR Recommendation: Not Eligible	1930	3414 I St	Minimal Traditional style residence altered since its original construction.
WA 1281	544826	Residence	Y	2023 IBR Recommendation: Not Eligible	1947	814 E 35th St	Modern style ranch residence altered since its original construction.
WA 1282	89511	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	900 E 35th St	Tudor Composite style residence altered since its original construction.
WA 1283	89512	Rosegard, Peter, House	Y	2023 IBR Recommendation: Not Eligible	1930	904 E 35th St	Minimal Traditional style residence altered since its original construction.
WA 1284	731304	Residence	N	2023 IBR Recommendation: Not Eligible	1953	3504 I St	Minimal Traditional style residence altered since its original construction.
WA 1285	731305	Residence	N	2023 IBR Recommendation: Not Eligible	1942	3508 I St	Minimal Traditional style residence altered since its original construction.

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WA 1286	567195	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	811 E 36th St	Minimal Traditional style residence relocated to its present location and heavily altered since its original construction.
WA 1287	89379	Green, Vernon L., House	Y	2023 IBR Recommendation: Not Eligible	ca. 1950	3515 I St	Minimal Traditional / Contemporary style residence relocated to its present location and altered since its original construction.
WA 1288	550857	Residence	Y	2023 IBR Recommendation: Not Eligible	1950	810 E 36th St	Minimal Traditional style residence altered since its original construction.
WA 1289	89378	Larson, Oddie, House	Y	2023 IBR Recommendation: Not Eligible	1955	3605 I St	Contemporary style ranch residence altered since its original construction.
WA 1290	89377	Residence	Y	2023 IBR Recommendation: Not Eligible	1928–1938	3609 I St	Clipped/Jerkinhead gable residence with no discernable style altered since its original construction.
WA 1291	89376	Residence	Y	2023 IBR Recommendation: Not Eligible	1924	3615 I St	Craftsman style residence relocated to its present location and altered since its original construction.
WA 1292	89375	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	3701 I St	Minimal Traditional style residence relocated to its present location and altered since its original construction.
WA 1293	89353	Residence	Y	2023 IBR Recommendation: Not Eligible	1948	3712 I St	Minimal Traditional style residence altered since its original construction.
WA 1294	89354	Hershey, John J., House	Y	2023 IBR Recommendation: Not Eligible	1938	811 E 38th St	Clipped/Jerkinhead gable residence with no discernable style altered since its original construction.

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WA 1295	89359	Residence	Y	2023 IBR Recommendation: Not Eligible	1949	3917 I St	Minimal Traditional style residence altered since its original construction.
WA 1296	731306	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1958	3615 K St	Contemporary style ranch duplex heavily altered since its original construction.
WA 1297	89571	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	3607 K St	Craftsman style residence altered since its original construction.
WA 1298	89572	Residence	Y	2023 IBR Recommendation: Not Eligible	1963	3601 K St	Ranch house with no discernable style altered since its original construction.
WA 1299	89573	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	3511 K St	No discernable style residence heavily altered since its original construction.
WA 1300	89574	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	3509 K St	Minimal Traditional style residence heavily altered since its original construction.
WA 1301	731307	Residence	N	2023 IBR Recommendation: Not Eligible	1960	3213 K St	Minimal Traditional style ranch residence altered since its original construction.
WA 1302	89498	Residence	Y	2023 IBR Recommendation: Not Eligible	1928	3214 K St	Mansard style residence altered since its original construction
WA 1303	48989	Residence	Y	2023 IBR Recommendation: Not Eligible	1921	3208 K St	Craftsman style residence altered since its original construction.
WA 1304	89500	Residence	Y	2023 IBR Recommendation: Not Eligible	1913	3204 K St	Craftsman style bungalow residence altered since its original construction.
WA 1305	89501	Residence	Y	2023 IBR Recommendation: Not Eligible	1939	3200 K St	Minimal Traditional style WWII era cottage altered since its original construction.

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WA 1306	89502	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	3114 K St	Minimal Traditional style residence altered since its original construction.
WA 1307	89503	Duplex Residence	Y	2023 IBR Recommendation: Not Eligible	1966	3106–3108 K St	Contemporary style duplex altered since its original construction.
WA 1308	89504	Residence	Y	2023 IBR Recommendation: Not Eligible	1910	3100 K St	Queen Anne style residence altered since its original construction.
WA 1309	89505	Residence	Y	2023 IBR Recommendation: Not Eligible	1925	3014 K St	Tudor Composite style residence altered since its original construction.
WA 1310	89506	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1925	3012 K St	Cape Cod style, Williamsburg Revival substyle residence altered since its original construction.
WA 1311	89119	Duplex Residence	Y	2023 IBR Recommendation: Not Eligible	1961	3004 K St	Contemporary style duplex altered since its original construction.
WA 1312	89659	Kinney, William and Belle, House	Y	2023 IBR Recommendation: Not Eligible	1909	2914 K St	Eclectic style, American 3-bay foursquare residence altered since its original construction.
WA 1313	89660	Residence	Y	2023 IBR Recommendation: Not Eligible	1959	2816 K St	Contemporary style, split-level residence altered since its original construction.
WA 1314	89661	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1920	2800 K St	Craftsman style bungalow residence altered since its original construction.
WA 1315	89662	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1917	2700 K St	Craftsman style bungalow residence relocated to its present site and altered since its original construction

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WA 1316	89663	Erhardt, Maude, House	Y	2023 IBR Recommendation: Not Eligible	1938	2614 K St	Minimal Traditional style residence altered since its original construction.
WA 1317	89664	Residence	Y	2023 IBR Recommendation: Not Eligible	1942	2610 K St	Cape Cod Revival style residence altered since its original construction.
WA 1318	89665	Residence	Y	2023 IBR Recommendation: Not Eligible	ca. 1920	2600 K St	Craftsman style residence altered since its original construction.
WA 1319	20317	Vancouver Barracks National Cemetery (Post Cemetery)	Y	Eligible (2016 DAHP determination); Criterion A	1882	1200 E Fourth Plain Blvd	Military cemetery associated with the growth of Vancouver Barracks.
WA 1320	731277	St. James Acres Catholic Cemetery (Mother Joseph Catholic Cemetery of Vancouver)	N	2023 IBR Recommendation: Eligible, Criteria A and D	1871	1401 E 29th St	Religious cemetery associated with the development of Vancouver and its Catholic residents.
WA 1321	545211	Clark County Utilities	Y	2020 DAHP Determination: Not Eligible	1956	1200 Fort Vancouver Wy	Three-story, Modern style public works building heavily altered since its original construction.
WA 1322	731325	Vancouver Land Bridge	N	2023 IBR Recommendation: Not Eligible under Criterion Consideration G	2008	WA-14	Largescale reinforced concrete pedestrian bridge constructed over SR 14 by the Confluence project designed by landscape architect JohnPaul Jones in consultation with artist Maya Lin and with installations from artist Lillian Pitt.

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WA 1323	33243	SR 14, State Road No. 8, North Bank Highway	Y	2023 IBR Recommendation: Segment within the APE—Not Eligible 2009 FHWA Determination: Eligible, Criterion A	ca. 1905 / 1984	Various	Four-lane, paved roadway constructed along the north bank of the Columbia River. Segment within APE has been re-aligned since its period of significance.
WA 1325	721495	Port of Vancouver Terminal 1 Dock	Y	2022 DAHP Determination: Not Eligible	1921	100 Columbia St	Largescale utilitarian dock with no discernable style.
WA 1326	33604	Residence	Y	2021 DAHP Determination: Not Eligible	1920	514 E 15th St	Craftsman style residence altered since its original construction.
WA 1327	731278	Arnada Park	N	2023 IBR Recommendation: Not Eligible	1921	610 E 25th St	Open recreation field and playground originally built as a baseball diamond and re-developed through collaborative neighborhood efforts.
WA 1328	559445	Residence	Y	2023 IBR Recommendation: Not Eligible	1945	815 E 29th St	Front-gabled residence with no discernable style altered since its original construction.
WA 1329	544798	Pauley House	Y	2023 IBR Recommendation: Not Eligible	1951	809 E 29th St	Minimal Traditional residence altered since its original construction.
WA 1330	544804	Residence	Y	2023 IBR Recommendation: Not Eligible	1941	810 E 29th St	Hipped-roof residence with no discernable style but ornamented with modern Victorian elements showing its heavy alteration since its original construction.
WA 1331	731308	Residence	N	2023 IBR Recommendation: Not Eligible	1907	815 E 30th St	Craftsman style residence altered since its original construction.

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WA 1332	552704	Residence	Y	2023 IBR Recommendation: Not Eligible	1910	2805 K St	Gable Front and Wing residence with no discernable style altered since its original construction.
WA 1333	551453	Residence	Y	2023 IBR Recommendation: Not Eligible	1965	2811 K St	Prairie Ranch style residence altered since its original construction.
WA 1334	551887	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	1105 E 29th St	Gable Front and Wing residence with no discernable style altered since its original construction.
WA 1335	557001	Residence	Y	2023 IBR Recommendation: Not Eligible	1915	2911 K St	Craftsman style residence altered since its original construction.
WA 1336	N/A	Residence	N	N/A	1930	3200 I St	Demolished since the start of the project.
WA 1337	561282	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	809 E 33rd St	Minimal Traditional style residence altered since its original construction.
WA 1338	557060	Residence	Y	2023 IBR Recommendation: Not Eligible	1950	3306 I St	Minimal Traditional style, Workingman's Foursquare residence altered since its original construction.
WA 1339	554087	Residence	Y	2023 IBR Recommendation: Not Eligible	1930	815 E 34th St	Craftsman style "Portland Bungalow" residence altered since its original construction.
WA 1340	552755	Crawford, Harry E., House	Y	2023 IBR Recommendation: Not Eligible	1910	3207 K St	Dutch Colonial Revival style residence with gambrel roof and decorative windows all somewhat altered since its original construction.

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WA 1341	89497	Residence	Y	2023 IBR Recommendation: Not Eligible	1925	3307 K St	Craftsman style bungalow residence updated since its original construction.
WA 1342	89496	Residence	Y	2023 IBR Recommendation: Not Eligible	1920	3309 K St	Front-gabled, L-shaped residence with no discernable style with updated cladding and fenestration.
WA 1343	89495	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	3401 K St	Minimal Traditional style residence with updated cladding.
WA 1344	89494	Residence	Y	2023 IBR Recommendation: Not Eligible	1920	3409 K St	Craftsman style bungalow residence altered since its original construction.
WA 1345	89188	Residence	Y	2023 IBR Recommendation: Not Eligible	1928	3415 K St	Relocated Craftsman style bungalow residence with updated porch and fenestration.
WA 1346	561930	Duplex Residence	Y	2023 IBR Recommendation: Not Eligible	1967	3708-3710 L St	Modern style duplex with updated fenestration.
WA 1347	89374	Residence	Y	2023 IBR Recommendation: Not Eligible	1910	3708 I St	One-story, side-gabled residence with no discernable style with updated cladding and fenestration.
WA 1348	89269	Residence	Y	2023 IBR Recommendation: Not Eligible	1940	3721 H St	Minimal Traditional style residence heavily altered since its original construction.
WA 1349	89355	Residence	Y	2023 IBR Recommendation: Not Eligible	1928	3801 H St	French Norman style residence with rounded corner entry all remodeled since its original construction.
WA 1350	731309	Duplex Residence	N	2023 IBR Recommendation: Not Eligible	1971	3803 H St	Contemporary style duplex with stacked brick construction and some updated fenestration.

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WA 1351	89268	Residence	Y	2023 IBR Recommendation: Not Eligible	1928	3809 H St	Minimal Traditional style, Workingman's Foursquare residence with brick construction and updated fenestration.
WA 1352	558526	Commercial Building	Y	2023 IBR Recommendation: Not Eligible	1967	3811 H St	Modern style strip commercial building with associated parking lot.
WA 1353	89360	Residence	Y	2023 IBR Recommendation: Not Eligible	1931	3814 H St	Tudor Composite style residence with catslide roof heavily remodeled since its original construction.
WA 1354a	565119	Residence	Y	2023 IBR Recommendation: Not Eligible	1917	3907 H St (south)	Front-gabled residence with no discernable style heavily remodeled since its original construction.
WA 1354b	731310	Residence	N	2023 IBR Recommendation: Not Eligible	1920	3907 H St (north)	Front-gabled residence with no discernable style heavily remodeled since its original construction.
WA 1355	731324	Leverich Park	N	2023 IBR Recommendation: Not Eligible	1954	4400 NE Leverich Park Wy	Park in no discernable style with fields, paths, mature vegetation, a picnic shelter designed by landscape architect David E. Thompson, heavily remodeled since its original construction.
WA 1356	TBD	Lower Columbia River Federal Navigation Historic District	Y	Interstate Resource. See entry under OR 165	1873–1969	Columbia River	Interstate resource. See entry under OR 165.
WA 1357	674732	Vancouver National Historic Reserve Historic District	Y	2007: Listed, Criteria A, C, and D with Criterion Consideration G	1824–1966	Vancouver, Washington	Largescale historic district including four subdistricts with buildings and archaeological sites associated with the growth of Fort Vancouver.

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WA 1358	674435	Vancouver Barracks Historic District	Y	1979: Eligible, Criterion A	1888-1981	Vancouver, Washington	Historic district with 23 contributing buildings associated with the development of Vancouver Barracks.
WA 1359	674436	Fort Vancouver National Historic Site	Y	1966: Listed, Criterion A	1844	Vancouver, Washington	Historic site centered upon the reconstructed stockade of Fort Vancouver.
WA 1360	18828	Kiggins, John P. and Mary, House	Y	1995: Listed, Criteria B and C	1907	2404 H St	Arts and Crafts style residence constructed by former mayor of Vancouver John P. Kiggins and relocated to current location after listing.