



Appendix B. Finding of Effect and SHPO Concurrence



Figure descriptions for the images in this appendix have been provided as alternative text usable by accessibility software. If needed, additional figure interpretation for this appendix is available from the ODOT Senior Environmental Project Manager at (503) 731-4804.



Oregon
Kate Brown, Governor

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January 23, 2019

Ms. Megan Channell
ODOT
123 NW Flanders St
Portland, OR 97209

RE: SHPO Case No. 17-1520
FHWA, ODOT Key 19071, I-5 Rose Quarter Improvement Project
Freeway improvements
, Portland, Multnomah County

Dear Ms. Channell:

We have reviewed the materials submitted on the project referenced above. We concur with all the determinations of eligibility made in the January 2019 *I-5 Rose Quarter Improvement Project Historic Resources Technical Report* and the Determination of Eligibility forms submitted to our office on January 3, 2019. We also concur that the proposed undertaking, as described in the submittal, will result in no adverse effect to historic properties. Our concurrence on project effects is based on the current information available. As construction activities and methods are determined, and as noise and vibration levels can be better assessed, we look forward to continued consultation with FHWA, ODOT, and consulting parties to ensure that levels will not reach thresholds that could damage or diminish the characteristics that qualify these properties for listing in the National Register of Historic Places. We also look forward to continued consultation on the Programmatic Agreement (PA) for this undertaking that will define these ongoing efforts.

This letter refers to above-ground historic resources only. Comments pursuant to a review for archaeological resources will be sent separately. Local regulations, if any, still apply and review under local ordinances may be required. Please feel free to contact me if you have any questions, comments or need additional assistance.

Sincerely,

Tracy Schwartz
Historic Preservation Specialist
(503) 986-0677
tracy.schwartz@oregon.gov

cc: Tobin Bottman, Oregon Department of Transportation
Robert Hadlow, ODOT



**OREGON INVENTORY OF HISTORIC PROPERTIES
Section 106 LEVEL OF EFFECT FORM**

Agency/Project: ODOT/Interstate 5 Rose Quarter Project, ODOT Key No. 19071, Fed.-Aid No. S001 (483)	
Property Name: (Historic) Travelodge at the Coliseum; (Current) Crowne Plaza Hotel	
Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah

Preliminary Finding of Effect:	
<input type="checkbox"/> No Historic Properties Affected	<input checked="" type="checkbox"/> No Historic Properties Adversely Affected
<input type="checkbox"/> Historic Properties Adversely Affected	
State Historic Preservation Office Comments:	
<input type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur:
	<input type="checkbox"/> No Historic Properties Affected
	<input type="checkbox"/> No Historic Properties Adversely Affected
	<input type="checkbox"/> Historic Properties Adversely Affected
Signed _____	Date _____
Comments:	

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

Introduction

This statement of finding discusses the effect of the proposed Interstate 5 Rose Quarter Project (Project) on the Travelodge at the Coliseum located in Portland, Oregon. The building was determined eligible for listing on the National Register of Historic Places (NRHP) by the Oregon Department of Transportation/Federal Highway Administration (ODOT/FHWA).

It is the finding of FHWA, in concurrence with ODOT, that the proposed Project will result in no adverse effects to the characteristics that make the Travelodge at the Coliseum eligible for the NRHP and thus a finding of “no historic properties adversely affected” pursuant to 36 CFR 800.5(d)(1) is appropriate.

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

Project Description

The I-5 Rose Quarter Improvement Project (Project) is located in Portland, Oregon, along the segment of Interstate 5 (I-5) between Interstate 405 (I-405) to the north (MP 303.2) and Interstate 84 (I-84) to the south (MP 301.5). The Project also includes the interchange of I-5 and Northeast (NE) Broadway and NE Weidler Streets (the Broadway/Weidler interchange) and the surrounding transportation network, from approximately NE Hancock Street to the north, North (N) Benton Street to the west, NE Multnomah Street to the south, and NE Second Avenue to the east. The purpose of the Project is to improve the safety and operations on I-5 between I-405 and I-84, the Broadway/Weidler interchange, and adjacent surface streets in the vicinity of the Broadway/Weidler interchange. In achieving the purpose, the Project also will support improved local connectivity and multimodal access in the vicinity of the Broadway/Weidler interchange.

Identification and Description of the Historic Resource

The 1971 Travelodge at the Coliseum is located at the southwest corner of the NE Weidler Street and 2nd Avenue intersection on a 2.57-acre L-shaped parcel in the Lloyd District neighborhood of Portland, Oregon. The streetscape includes public sidewalks on NE 2nd Avenue and NE Weidler Street, street trees, wood utility poles, streetlights, and traffic signals. The Y-shaped International-style hotel is ten stories in height and includes a flat roof with a centrally-located corrugated metal elevator overrun. Two rectangular additions are located to the south and west. Collectively, it is constructed out of concrete and is finished with rough-cut and smooth concrete blocks. The hotel displays a distinctive massing and plan consisting of three concave elevations (also known as the “tri-arc design”) with a row of three-light metal picture windows above a concrete-block base and cantilevered concrete awning at each room.

The property is recommended as eligible under NRHP Criteria A and C. The property reflects historically significant local and national development trends including the redevelopment of the Albina and the Lloyd District neighborhood after the construction of I-5. It also reflects one of the first high rise Travelodge facilities the company built in the United States. The hotel would therefore be eligible under Criterion A for its associations with Community Development. The Travelodge at the Coliseum reveals how hotel chains created distinctive architectural forms so consumers would associate a hotel’s appearance

OREGON INVENTORY OF HISTORIC PROPERTIES
Section 106 LEVEL OF EFFECT FORM
Continuation Sheet

Agency/Project: ODOT/I-5 Rose Quarter Project, ODOT Key No. 19071, Fed.-Aid No. S001 (483)	
Property Name: (Historic) TraveLodge at the Coliseum; (Current) Crowne Plaza Hotel	
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with a brand. The distinctive “tri-arc” design, conveys how TraveLodge selected an architectural form that reveals the flexibility of reinforced concrete from the period. Due to its architectural importance it is recommended as eligible under Criterion C.

The TraveLodge at the Coliseum retains historic integrity of location, design, workmanship, setting, feeling, and association due to its retention of location, use of materials and construction techniques common to its build date, 1970s era redevelopment setting, and original function. However, it has lost integrity in materials due to the construction of its two additions and loss of original windows. Changes made after the date of its construction include the construction on the west addition by 1990, the demolition of the adjacent gas station in 2002, and the construction of the south addition in 2005. A basketball court was added in 2006 and a new roof was added in 2007. The tinted, double glazed windows of the hotel also appear to have been inserted sometime after the hotel was initially constructed (date unknown). (See Photographs 1 and 2).

Avoidance Alternatives Considered

No-Build Alternative

Under the No-Build Alternative, I-5, the Broadway/Weidler interchange, and the local transportation network in the Project Area would remain in its current configuration. No improvements to the connection between I-5 and the local street network in the vicinity of the Broadway/Weidler interchange, including bicycle and pedestrian features, would be constructed under the No-Build Alternative. Operational and safety concerns would persist and worsen as future traffic volumes increased.

The No-Build Alternative includes other transportation projects (including road, bicycle, pedestrian, and transit) in or around the Project Area with separate but dedicated funding identified for their implementation through 2040. There are two planned transportation projects in the vicinity of the Project Area that could affect traffic safety and operations in the Project Area include NE Broadway multi-modal improvements (protected bikeways) and N Williams traffic safety operations (enhanced crossing).

Build Alternative

The final I-5 Broadway/Weidler Plan and recommended design concept, herein referred to as the Build Alternative, were unanimously adopted by the Oregon Transportation Commission and the Portland City Council in 2012. The Build Alternative includes I-5 mainline improvements, as well as multimodal improvements to the surface street network in the vicinity of the Broadway/Weidler interchange (Figure 1).

The proposed I-5 mainline improvements include the construction of auxiliary lanes (also referred to as ramp-to-ramp lanes) and full shoulders between I-84 to the south and I-405 to the north, in both the NB and SB directions. Construction of the I-5 mainline improvements would require the rebuilding of the NE Weidler Street, NE Broadway Street, N Williams Avenue, and N Vancouver Avenue structures over I-5. With the Build Alternative, the existing NE Weidler Street, NE Broadway Street, and N Williams Avenue overcrossings would be removed and rebuilt as a single lid structure (also referred to as a highway cover) over I-5. The existing Vancouver structure would be removed and rebuilt as a second lid structure, including a new roadway crossing at N Hancock and N Dixon Streets. The existing N Flint Avenue structure over I-5 would be removed. The I-5 SB on-ramp at Wheeler Street would also be relocated to NE Weidler Street at N Williams Street, via the new NE Weidler Street/NE Broadway/N Williams Avenue highway cover (See Figure 2).

A new bicycle and pedestrian bridge over I-5 would be constructed at NE Clackamas Street, connecting the Lloyd District with the Rose Quarter. Surface street improvements are also proposed, including upgrades to existing bicycle and pedestrian facilities and a new center-median bicycle and pedestrian path on N Williams Avenue between NE Weidler Street and NE Broadway. The Project also includes a water quality treatment facility at the eastern junction of the northbound ramps from the Fremont Bridge leading to I-5.

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Photograph 1. The TraveLodge at the Coliseum southeast corner, looking northwest



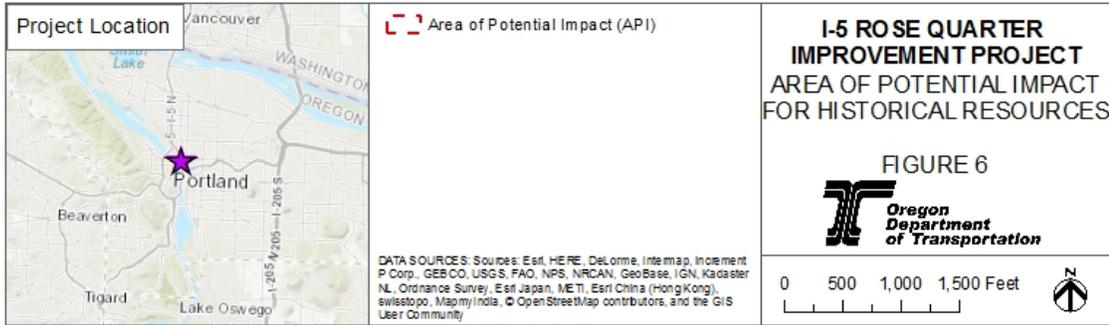
Photograph 2. The TraveLodge at the Coliseum west elevation, looking southeast



Figure 1. API Map

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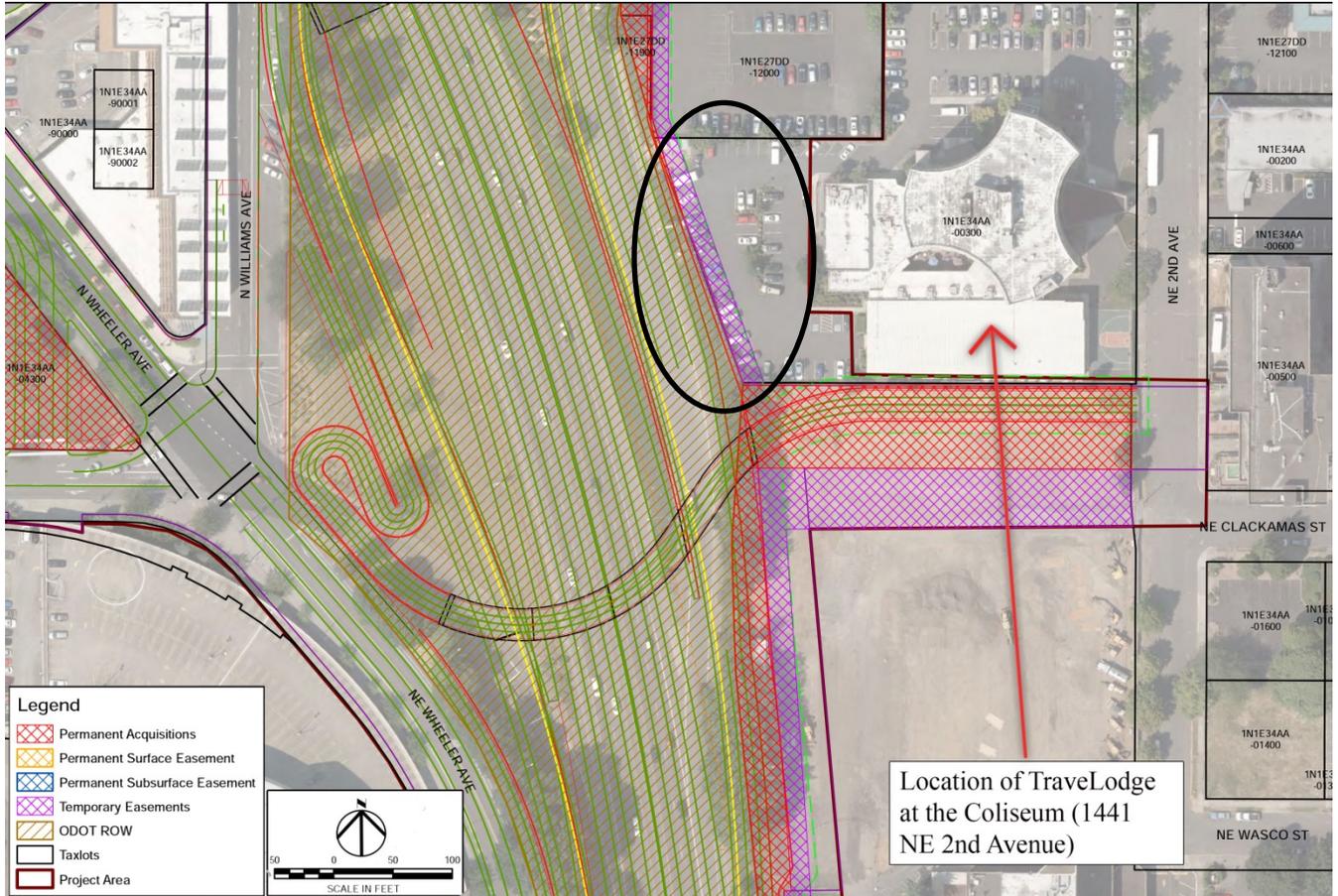
Figure 2. Broadway/Weidler Interchange Area Improvements



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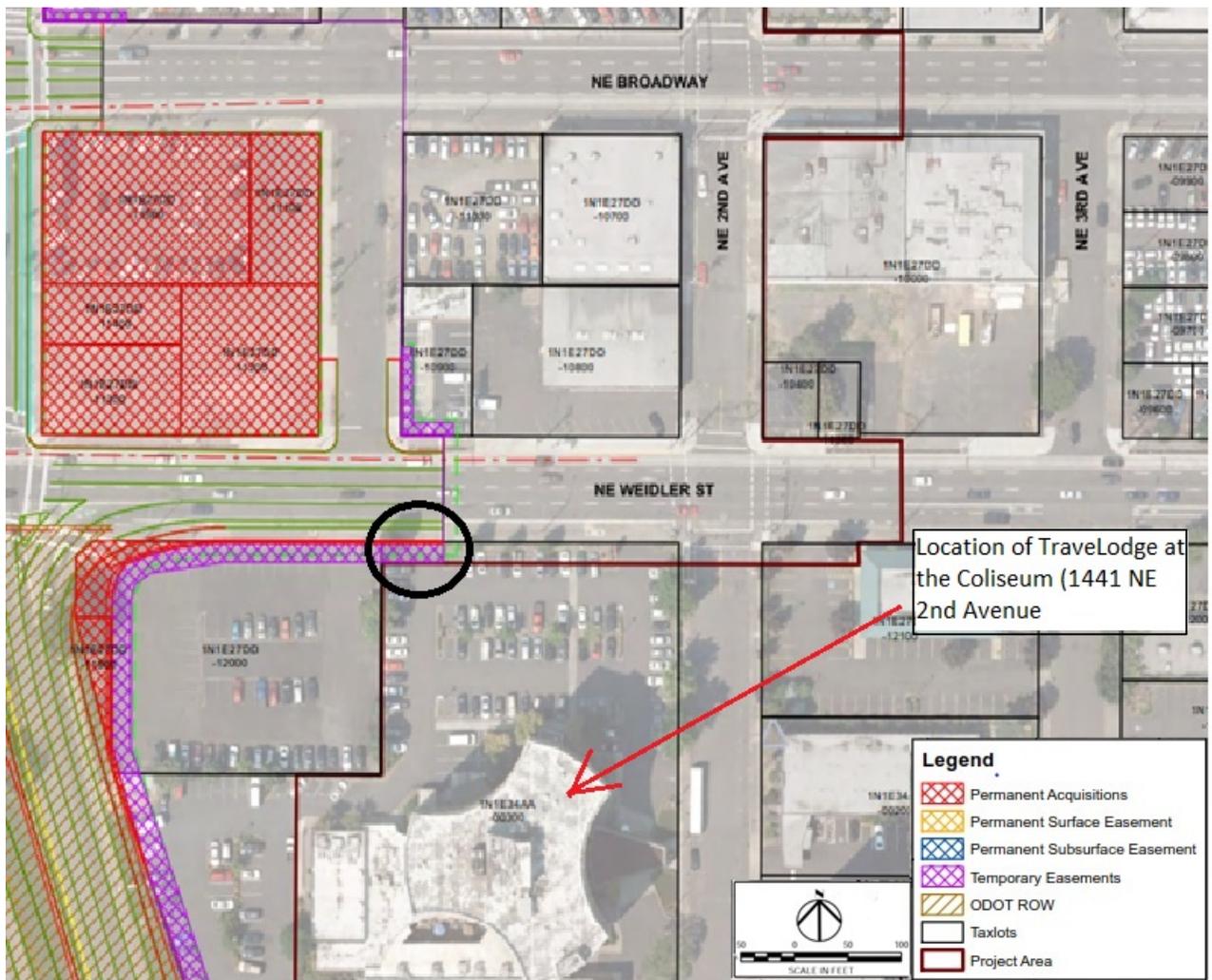
Figure 3. Project acquisitions and easements near the TraveLodge at the Coliseum (West) (Area of historic property to be subject to project acquisition and/or easement circled in black)



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Figure 4. Project acquisitions and easements near the TraveLodge at the Coliseum (North) (Area of historic property to be subject to project acquisition and/or easement circled in black)



OREGON INVENTORY OF HISTORIC PROPERTIES
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Figure 5. Proposed Clackamas Bicycle and Pedestrian Crossing (Travelodge is marked by arrow)



Evaluation of Effects

As noted above, the proposed project consists of I-5 Mainline Improvements as well as multimodal improvements to the surface street network in the vicinity of the Broadway/Weidler interchange. Figures 2, 3, 4, and 5 provide an overview of potential project improvements in the vicinity of the Travelodge at the Coliseum. Figures 3 and 4 also illustrate potential acquisitions and easements in the vicinity of the resource as well as on the property of the resource. The figures show that moderate changes to the setting and general environment surrounding the building would occur. The proposed Clackamas Bicycle & Pedestrian Bridge would occur directly to the south and modifications to I-5 would occur within one block to west of the historic property and would be highly visible. The construction of the bridge and modifications to I-5 would require a permanent taking of undeveloped land directly to the south of the property and a small tract of land currently being used as a parking lot to the northeast. This may cause an increase in construction vehicle traffic in the area for the duration of construction.

The Build Alternative would also require a temporary easement of 4009.5 sq. ft. and a permanent acquisition of 173.74 sq. ft. of the 109,206.5 sq. ft. (2.57 acres) lot. The acquisitions and easements would take place along the west and north perimeter of the parking lots that surround the Travelodge at the Coliseum (Figures 3 and 4). The temporary easement would consist of approximately 3.6% of the total space of the lot while the permanent acquisition would consist of 0.2% of the lot. The historic building would not be physically impacted and no physical features that contribute to the hotel's historical significance would be affected.

The Project-related construction impacts to historic properties would be impacts to the vicinity of the resource or indirect impacts that include noise and vibration due to nearby construction activities, increased truck traffic, traffic congestion and changes to access, increased dust, and short-term visual changes due to construction equipment, staging areas, material storage, etc.

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Short-term noise levels for construction activities are expected to range from approximately 70 to 100 A-weighted decibels (dBA). Long-term operational indirect impacts to the Travelodge would include visual, atmospheric, or audible impacts or alterations. The Clackamas Bicycle and Pedestrian Crossing will be built immediately to the south of the hotel. The property to the south of the hotel was a vacant lot during the period of significance and has undergone changes since the time it was built as it currently functions as a parking lot. The crossing would not affect the visual characteristics of the Travelodge that make it eligible for the NRHP.

A noise analysis performed reveals that the building would experience a barely perceptible increase in operations-related noise generated by traffic (from 61 dBA to 62 DBA; noise difference of +1dBA). The proposed noise condition would not exceed the ODOT Noise Abatement Approach Criteria (NAAC) of 65 dBA. Since the noise threshold was not exceeded, no additional analysis was performed to determine the effectiveness of noise reduction structures (ODOT 2018).

Several effect minimization measures will be employed for the Travelodge. ODOT specifications and best management practices will be followed to help minimize high noise levels during construction (ODOT 2018). If construction-related vibration exceeds certain thresholds within the applicable screening distance, effect avoidance and minimization measures would be recommended. These measures would include pre- and post-construction assessments, on-site monitoring during construction, and stop work authorization (Wilson, Ihrig & Associates, Inc., 2012; Johnson and Hannen 2015). If a resource is affected by vibration, a treatment plan consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and thus consistent with the requirements of 36 CFR 800.5(b), would be prepared to make the applicable repairs.

Therefore these proposed modifications and improvements would not substantially compromise the setting. Noise levels near the building may increase over the period of construction and during operation, but they would not be sufficient to diminish the historical integrity of the building as the significance of the building is not linked to a sense of quiet or solitude, but rather as it exists within an urban context and immediately beside a major highway system. The minimal size of the acquisitions and permanent easements would also not physically affect the building or important characteristics of the resource. Construction related vibration is not expected to exceed levels that could potentially damage the integrity of materials and workmanship related to the Travelodge at the Coliseum. If vibration generating activities occur within the applicable screening distance, however, measures noted above are proposed as means of minimizing the potential for effects. The Project features and construction-related activities, therefore, would not adversely affect the characteristics of the Travelodge at the Coliseum that make the building eligible for the NRHP.

Coordination and Public Output

Coordination with the Oregon SHPO is ongoing. Meetings with Section 106 compliance team at SHPO are anticipated to review and provide preliminary input on the project identification efforts and preliminary assessment of potential project effects. In addition to public meetings, ODOT has notified several consulting parties including the Architectural Heritage Center, Oregon Black Pioneers, and others. This section will be updated as consultation is conducted and completed.

Conclusion

It is the determination of ODOT and FHWA that the project, which involves improvements to the Interstate 5 and surface street network improvements would result in no adverse effects to the characteristics that make the Travelodge at the Coliseum eligible for the NRHP. A finding of "No Historic Properties Adversely Affected" pursuant to 36 CFR 800.5(d)(1) is therefore appropriate. Consultation with the SHPO remains in progress and the views of the public are being considered during project planning.

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Sources

Johnson, Arne P., and W. Robert Hannen. 2015. "Vibration Limits for Historic Buildings and Art Collections." *APT Bulletin Journal of Preservation Technology*, vol. 46, pp. 2-3.

ODOT. 2018. Draft Noise Study Technical Memorandum I-5 Rose Quarter Improvement Project. April 3.

Wilson, Ihrig & Associates, Inc., ICF International, and Simpson, Gumpertz & Heger, Inc. 2012. "Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects." Available: [http://onlinepubs.trb.org/onlinepubs/nchrp/docs/NCHRP25-25\(72\)_FR.pdf](http://onlinepubs.trb.org/onlinepubs/nchrp/docs/NCHRP25-25(72)_FR.pdf) (accessed April 30, 2018).

