



# Oregon

Kate Brown, Governor

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June 25, 2019

Emily Cline  
Environmental Program Manager  
Federal Highway Administration—Oregon Division  
530 Center Street NE  
Salem, OR 97301

**Subject: Proposed Section 4(f) *de minimis* Impact Determination for a Historic Site  
Travelodge at the Coliseum  
Interstate 5 Rose Quarter Improvement Project  
Portland, Multnomah County, Oregon  
ODOT Key No. 19071  
Federal-Aid No. S001(483)**

Dear Ms. Cline:

This letter requests Federal Highway Administration (FHWA) approval of a Section 4(f) *de minimis* Impact Determination for the Travelodge at the Coliseum, associated with the Interstate 5 Rose Quarter Improvement Project. The proposed project will improve the safety and operations on Interstate 5 between Interstate 405 and Interstate 84, the Broadway/Weidler interchange, and adjacent surface streets near the Broadway/Weidler interchange. The project also will support improved local connectivity and multimodal access near the Broadway/Weidler interchange. The proposed project will not adversely affect the activities, features, or attributes that qualify the Travelodge at the Coliseum for protection under Section 4(f) of the US Department of Transportation Act (23 CFR Part 774).

The Build Alternative includes Interstate 5 mainline improvements and multimodal improvements to the surface street network near the Broadway/Weidler interchange. The proposed Interstate 5 mainline improvements include the construction of auxiliary lanes (also referred to as ramp-to-ramp lanes) and full shoulders between Interstate 84 to the south and Interstate 405 to the north, in both the northbound and southbound directions.

The Build Alternative will remove the existing N/NE Weidler, N/NE Broadway, and N Williams overcrossings and rebuild them as a single highway cover structure over Interstate 5. The Build Alternative will also remove the existing N Vancouver structure and rebuild it as a second highway cover, including a new roadway crossing connecting N/NE Hancock and N Dixon Streets. The Build Alternative will remove the existing N Flint Avenue structure over Interstate 5. The Build Alternative will relocate the Interstate 5 southbound on-ramp at N Wheeler to N/NE Weidler at N Williams, via the new Weidler/Broadway/Williams highway cover. The Build Alternative will construct a new bicycle and pedestrian bridge over Interstate 5 at NE Clackamas Street, connecting the Lloyd neighborhood with the Rose Quarter. Finally, the Built Alternative will make improvements to surface street improvements, including upgrades to

existing bicycle and pedestrian facilities and a new center-median bicycle and pedestrian path on N Williams between N/NE Weidler and N/NE.

### **Travelodge at the Coliseum**

The 1971 Travelodge at the Coliseum is located at the southwest corner of the NE Weidler and 2nd Avenue intersection on a 2.57-acre (109,207 square-foot) L-shaped parcel in the Lloyd neighborhood. The Y-shaped International-style hotel is 10 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 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. The property is eligible for the National Register of Historic Places under NRHP Criteria A and C. The hotel is eligible under Criterion A for its associations with Community Development. The property reflects historically significant local and national development trends, including the redevelopment of the Albina and the Lloyd neighborhood after the construction of Interstate 5.

The Travelodge at the Coliseum is also eligible for the National Register under Criterion C because of its architectural importance. It is one of the first high-rise hotels that Travelodge International built in the United States and the first in the Pacific Northwest. The Travelodge at the Coliseum reveals how hotel chains created distinctive architectural forms so consumers would associate a hotel’s appearance 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.

The Interstate 5 Rose Quarter Improvement Project will require a permanent easement for 174 square feet of the Travelodge at the Coliseum historic site for roadway improvements. The permanent easement is split between two locations along the perimeter of the Travelodge’s parking lot. One location is along the Travelodge property’s western boundary and is for improvements to the northbound Interstate 5 off-ramp at the Broadway/Weidler interchange. The other is along the Travelodge’s northern boundary and is for improvements along NE Weidler Street.

The project will also temporarily occupy 4,010 square feet of the Travelodge at the Coliseum historic site property. The temporary occupancy is split between two locations along the perimeter of the parking lot, next to the two locations of the permanent easement. One of the temporary easement segments is next to the permanent easement segment along the Travelodge

property's western boundary. The second temporary easement segment is next to the permanent easement segment along the Travelodge property's northern boundary. The project requires the temporary easement segments to construct the improvements in the permanent easement segments along the northbound Interstate 5 off-ramp and along NE Weidler Street.

Maps 2 and 3 in Attachment 1 show, in crosshatching, the two segments of the temporary easements. They also show the two segments of the permanent easement, which are barely discernible in the maps because of their small size. They constitute two thin strips along the west side of the temporary easement segment along the northbound Interstate 5 off-ramp and along the north side of the temporary easement segment along NE Weidler Street.

To summarize, the Section 4(f) use of the Travelodge at the Coliseum historic site will be a *de minimis* use. The project's temporary occupation of portions of the parking lot that is part of the Travelodge at the Coliseum historic site will be for a duration that is less than the time needed for the construction of the project, which is estimated at five years. In addition, the project will also have permanent easements from the parking lot that is part of the Travelodge at the Coliseum historic site.

The Interstate 5 Rose Quarter Improvement Project will minimize the amount of land from the Travelodge at the Coliseum historic site that it temporarily occupies during construction. The Interstate 5 Rose Quarter Improvement Project will also fully restore the land in the Travelodge at the Coliseum historic site that it temporarily occupies during construction.

The transportation use of the Travelodge at the Coliseum historic site will not adversely affect the activities, features, or attributes that qualify the Travelodge at the Coliseum for protection under Section 4(f).

#### **Other Section 4(f) Properties in the Project Area**

There are other Section 4(f) properties in the Interstate 5 Rose Quarter Improvement Project. In addition to the Travelodge at the Coliseum, they include fourteen other historic sites. The project will have no Section 4(f) use of the fourteen other historic sites. There are also four publicly owned park properties. The project will have a temporary occupancy of a segment of the Vera Katz Eastbank Esplanade/Willamette River Greenway Trail (both resources are on the same alignment in the project's Area of Potential Impacts). The temporary occupancies meet the conditions listed in 23 CFR 774.13(d) and will not constitute Section 4(f) uses of the parks.

#### ***Historic Sites:***

10 N. Russell St.  
6 N. Tillamook St.  
214 N. Russell St.  
1130 NE 1st Ave.  
1734 NE 1st Ave.  
240 N. Broadway  
253 N. Broadway

1400 NE 2nd Ave.  
122-140 NE Broadway St.  
2107 N Vancouver Ave.  
2027 N. Williams Ave.  
211 NE Everett St.  
Fremont Bridge  
Eliot Historic District

**Publicly Owned Parks:**

Vera Katz Eastbank Esplanade  
Willamette River Greenway Trail

Lillis-Albina Park  
Portland Peace Memorial Park

The project has developed a programmatic agreement to address potential effects on archaeological resources. The project also developed an inadvertent discovery plan for archaeological resources in conjunction with the programmatic agreement.

**Public Involvement**

The Section 106 process offered the opportunity for the public, including consulting parties, to comment on all Section 106 documents for the project, including the Section 106 Finding of No Adverse Effect on the Travelodge at the Coliseum. ODOT received no comments from consulting parties or the public. On January 17, 2019, the Oregon State Historic Preservation Office (Oregon SHPO) concurred on the Finding of No Adverse Effect for the Travelodge at the Coliseum. On March 11, 2019, ODOT presented the project to the Portland Historic Landmarks Commission. The commission had no comments. (See summary in Attachment 1.)

ODOT also prepared a National Environmental Policy Act (NEPA) Environmental Assessment for the Interstate 5 Rose Quarter Improvement Project. Information supporting a Section 4(f) *de minimis* impact determination for the Travelodge at the Coliseum was part of the NEPA documentation and offered to the public for review and comment during the formal NEPA process. There were no comments on the proposed Section 4(f) *de minimis* impact determination for the Travelodge at the Coliseum.

The Section 106 process and the NEPA process noted here satisfy the requirement for a public review process for FHWA to make a Section 4(f) *de minimis* impact determination for the Travelodge at the Coliseum.


**Official with Jurisdiction**

A signed letter of agreement from January 22, 2013, between the FHWA—Oregon Division and the Oregon SHPO documented at a program level the “use of *de minimis* impact findings for historic properties.” By transmittal of the 2013 letter, the FHWA—Oregon Division notified the Oregon SHPO of its “intent to make Section 4(f) *de minimis* impact findings for properties where a determination of ‘no historic properties affected’ or ‘no adverse effect’ have been concurred in by the [Oregon SHPO] or when [the Oregon SHPO] had not replied within the appropriate timeframe with written concurrence.” By signing the “Proposed Section 4(f) *de minimis* Impact Determination for a Historic Site, Travelodge at the Coliseum,” the FHWA—Oregon Division has made a Section 4(f) *de minimis* impact determination for the Travelodge at the Coliseum for the Interstate 5 Rose Quarter Improvement Project. (See the FHWA/Oregon SHPO letter from 2013 in Attachment 3.)

**Additional information**

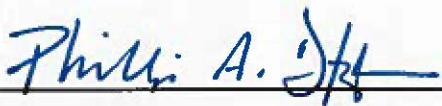
For additional information, please contact Robert W. Hadlow, Ph.D., ODOT Senior Historian, at (503) 731-8239, or Jeff Buckland, ODOT Environmental Project Manager, at (503) 731-8436.

Sincerely,



John A. Raasch  
Environmental Unit Manager

The FHWA makes a Section 4(f) *de minimis* Impact Determination for the **Travelodge at the Coliseum** for the Interstate 5 Rose Quarter Improvement Project described in this document.



6/26/2019

Phillip A. Ditzler  
Division Administrator  
Federal Highway Administration—Oregon Division

Date

**Attachments:**

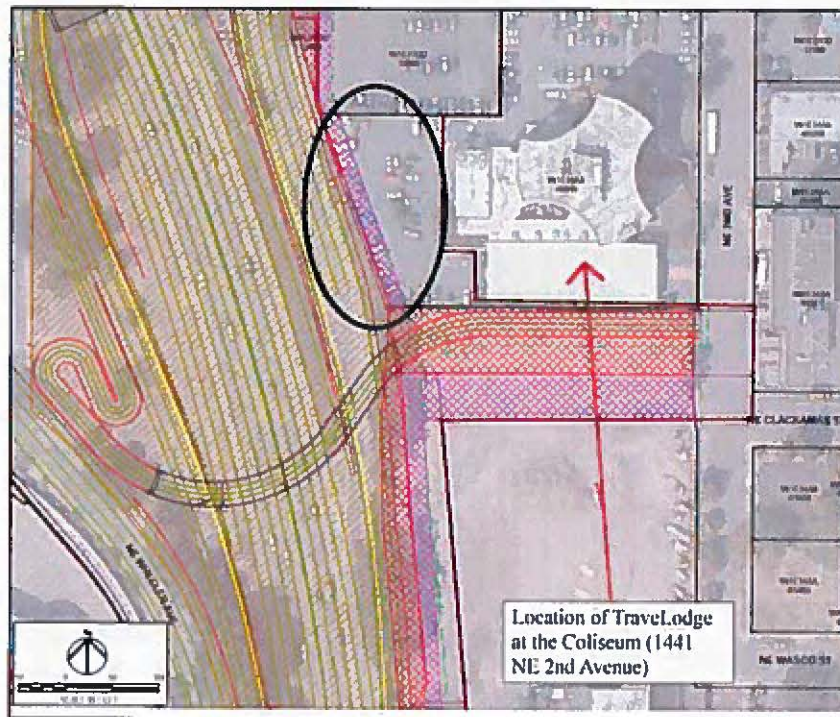
1. Section 4(f) *de minimis* Property and Project Maps.
2. Section 4(f) *de minimis* Public Outreach Summary
3. Concurred Section 106 DOE and FOE for the Travelodge at the Coliseum
4. Program-Level Letter of Agreement between the FHWA—Oregon Division and the Oregon SHPO (the Official with Jurisdiction) regarding the Section 4(f) *de minimis* Impact Determination

**Copies to:**

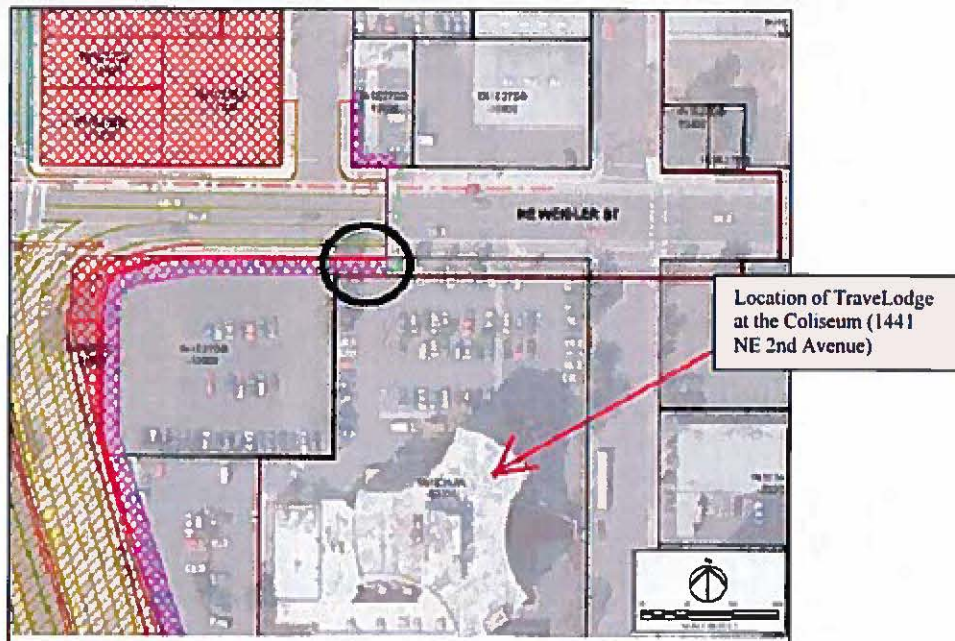
Robert W. Hadlow, ODOT Senior Historian, Portland  
Jeff Buckland, ODOT Region 1 Environmental Project Manager, Portland  
Megan Channell, Rose Quarter Project Director, ODOT Region 1, Portland  
Chris Bell, ODOT Historic Resources Coordinator, Salem  
Denis Reich, ODOT Region 1 Environmental Manager, Portland  
Kirk Ranzetta, Senior Architectural Historian, Aecom  
ODOT Key No. 19071 Project File

**ATTACHMENT 1**  
**Section 4(f) *de minimis* Property and Project Maps and Photos**  
**Interstate 5 Rose Quarter Improvement Project**  
**Travelodge at the Coliseum**  
**ODOT Key No. 19071**  
**Federal-Aid No. S001(483)**





**Map 2. Circled area is the location for a permanent easement and a temporary construction easement from the Travelodge at the Coliseum. The permanent easement is a thin strip along the west side of the crosshatched segment and is barely discernible in this map.**



**Map 3. Circled area is the location for a permanent easement and a temporary construction easement from the Travelodge at the Coliseum. The permanent easement is a thin strip along the north side of the crosshatched segment.**



**Figure 1. The Travelodge at the Coliseum, looking west.**



**Figure 2. The Travelodge at the Coliseum, looking southeast from area to the north where right-of-way easements are needed for the project.**

**ATTACHMENT 2**  
**Public Outreach Summary**  
**Section 4(f) *de minimis* Impact Determination**  
**Interstate 5 Rose Quarter Improvement Project**  
**Travelodge at the Coliseum**  
**ODOT Key No. 19071**  
**Federal-Aid No. S001(483)**

**Section 106 Process:**

1. September 20, 2017, ODOT initiates consultation with the Oregon SHPO, and identifies consulting parties and the project's Area of Potential Effects.
2. July 25, 2018, Oregon SHPO concurs on revised list of consulting parties and revised Area of Potential Effects.
3. January 3, 2019, ODOT makes available a Historic Resources Technical Report
4. January 3, 2019, ODOT submits Section 106 Determinations of Eligibility and Findings of Effect to the Oregon SHPO and to consulting parties.
5. January 23, 2019, Oregon SHPO concurs on the Historic Resources Technical Report, 23 Determinations of Eligibility, and 15 Findings of Effect.
6. March 11, 2019, ODOT presents project to Portland Historic Landmarks Commission (a consulting party, by right).

**Comments received from Consulting Parties on Section 106 documents:** None

**Response to Comments:** None.

**NEPA Process:**

1. February 15—April 1, 2019, 45-day comment period on the Environmental Assessment.
2. March 7, 2019, Project Open House.
3. March 19, 2019, Public Hearing.

**Comment received on the proposed Section 4(f) *de minimis* Impact Determination for the Travelodge at the Coliseum:** None.

**Response to Comments:** None.

**ATTACHMENT 3**  
**Concurred Section 106 DOE and FOE for the Travelodge at the Coliseum**  
**Section 4(f) *de minimis* Impact Determination**  
**Interstate 5 Rose Quarter Improvement Project**  
**Travelodge at the Coliseum**  
**ODOT Key No. 19071**  
**Federal-Aid No. S001(483)**

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties

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	
Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
USGS Quad Name: Portland	Township: 01N Range: 01E Section: 34
This property is part of a <input type="checkbox"/> District <input type="checkbox"/> Grouping/Ensemble (see instructions)	
Name of District or Grouping/Ensemble: N/A	
Number and Type of Associated Resources in Grouping/Ensemble: N/A	
Current Use: Hotel	Construction Date: 1971
Architectural Classification/Resource Type: International/Hotel	Alterations & Dates: See Description
Window Type & Material: Ribbon, metal	Exterior Surface Materials: Primary: Concrete block Secondary: Concrete block Decorative: Concrete
Rooftop Type & Material: Flat with parapet, unknown	
Condition: <input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor	Integrity: <input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
	
Travelodge at the Coliseum viewing west	
Preliminary National Register Findings: <input type="checkbox"/> National Register listed <input checked="" type="checkbox"/> Potentially Eligible: <input checked="" type="checkbox"/> Individually <input type="checkbox"/> As part of District <input type="checkbox"/> Not Eligible: <input type="checkbox"/> In current state <input type="checkbox"/> Irretrievable integrity loss <input type="checkbox"/> Lacks Distinction <input type="checkbox"/> Not 50 Years	
State Historic Preservation Office Comments: <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Potentially Eligible Individually <input type="checkbox"/> Potentially Eligible as part of District <input type="checkbox"/> Not Eligible	
Signed: 	Date: 1/16/11
Comments:	

OREGON INVENTORY OF HISTORIC PROPERTIES  
 SECTION 106 DOCUMENTATION FORM  
 Individual Properties

Property Name: Travelodge at the Coliseum	
Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
Architect, Builder or Designer (if known):	Owner: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Local Government <input type="checkbox"/> State <input type="checkbox"/> Federal <input type="checkbox"/> Other
Description of Property (including exterior alterations & approximate dates), Significance Statement, and Sources. (Use continuation sheets if necessary):	
<p><b>Description</b>          The 1971 Travelodge at the Coliseum is located at the southwest corner of the NE Weldler Street and NE 2nd Avenue intersection on a 2.57-acre L-shaped parcel in the Lloyd District neighborhood of Portland, Oregon. The site is flat and located within an urban setting. The streetscape includes public sidewalks on NE 2nd Avenue and NE Weldler Street, street trees, wood utility poles, streetlights, and traffic signals. The site includes an asphalt parking lot with concrete paths and trees to the north and east of the property, and a half-size basketball court to the southeast of the property. The site is enclosed with a short black metal fence along NE 2nd Avenue and NE Weldler Street with manicured hedges and mature deciduous trees. A black metal chain link fence encloses the property to the west and south. A 0.68-acre asphalt parking lot is located northwest of the property (Tax Lot 12000) on NE Weldler Street. The Legacy Research Institute (1225 NE 2nd Avenue) is located to the south of the property (Tax Lot 1700).</p> <p>The Travelodge at the Coliseum is a 10-story Y-shaped International-style hotel with a flat roof with a centrally located corrugated metal elevator overrun. Two rectangular additions are located to the south and west of the 10-story form. 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 rooms are divided by a rough-cut concrete pilaster with metal sconce. There are nine rooms per floor. The elevations between the concave window walls are faced with rough-cut concrete blocks with smooth-concrete blocks in the center. The concrete-block center details on the northeast and southeast elevations extend the roofline and feature a decorative concrete-grid detail. The northwest and southeast elevations include signage to the left of the concrete-block center detail.</p> <p>The primary entrance is located on the east elevation at the ground level. It faces NE 2nd Avenue and features a triangular porte-cochère supported by one stripped column and a concrete walkway with a flagpole and manicured lawn with short hedges. The entrance consists of a multi-light metal vestibule with sliding glass doors under the porte-cochère awning. The entrance is flanked by large three-light metal storefront windows to the south, two patios with short rough-cut concrete block walls under awnings to the north, and small trees and bushes. A secondary entrance is located north of the patios and consists of a single-door opening with a multi-light metal door under an awning. The northwest elevation included utility openings at the ground level. Additions are attached to the southwest and west elevations.</p> <p>The south addition is a two-story rectangular form. It is faced with rough-cut concrete blocks at the ground level and stucco panels at the second level. It has a flat roof with a slight eave overhang. The east elevation includes six tall rectangular fixed metal windows at the ground level and seven fixed square-shaped windows separated by sconces at the second level. The south elevation consists of two bays with multi-light overhead metal doors under a corrugated metal awning to the east with two pilasters to the west. The west elevation includes one double-door opening under a fabric awning to the north. The north elevation of the addition is attached to the 10-story form at the ground level creating a half-covered internal patio. The patio features a stone fireplace and wood pergola. The west addition is a one-story rectangular form with a flat roof. Limited views of this addition could be taken from the public right of way during the field investigation.</p> <p>Alterations to the Travelodge at the Coliseum are evident following a field investigation on August 31, 2017, and a review of historic images and documents. Changes made to the hotel after the date of its construction include the construction on the west addition by 1990 (Google Earth 2017), the demolition of the adjacent gas station on Tax Lot 12000 in 2002 (Google Earth 2017), and the construction of the south addition in 2005 (Google Earth 2017). The basketball court was added in 2006 (Google Maps 2017) and a new roof was added in 2007 (Google Earth 2017). The tinted, double glazed windows of the hotel also appear to have been inserted sometime after the hotel was initially constructed (date unknown).</p> <p><b>Boundary</b>          The historic boundary of 1441 NE 2nd Avenue is confined to the tax boundary of Tax Lot 300, which includes lots 1, 2, 3, 4, 5, 6, 7, and 8 of block 213, and lots 1, 2, 7, and 8 of block 60, and is bounded by NE Weldler Street to the north, NE 2nd Avenue to the east, Tax Lot 1700 to the south, and Tax Lot 12000 and the Interstate 5 (I-5) off ramp at NE Victoria Avenue to the northwest.</p>	

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Continuation Sheet

Property Name: Travelodge at the Coliseum

Street Address: 1441 NE 2nd Avenue

City, County: Portland, Multnomah



View: South elevation, viewing northwest



View: East elevation, viewing northwest

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Continuation Sheet

Property Name: TravelLodge at the Coliseum

Street Address: 1441 NE 2nd Avenue

City, County: Portland, Multnomah



View: Northwest elevation, viewing south



View: West elevation, viewing southeast

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Continuation Sheet

Property Name: TravelLodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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**Significance**

**Previous Evaluation**

According to the Oregon Historic Sites Database (HSD), the TravelLodge at the Coliseum was previously recorded as a part of the *Portland Central City Modern Resources Reconnaissance Level Survey 1945-1985*, which was completed on July 21, 2011. The property is noted in the database as being "undetermined." While appearing in the Oregon HSD, no entry for the property is contained in the report. The property has not been formally determined eligible for the National Register of Historic Places by the National Park Service or another federal agency.

**Background**

The TravelLodge at the Coliseum Hotel is located on land first settled by James L. Loring in 1852. By 1873, much of the area surrounding the property became known as "Albina" and was platted on a grid of streets (Snyder 1979:83). Beginning in the early 1880s, the need to transport timber from Oregon's forests brought heavy investments to the area from railroader Henry Villard who "made large-scale investments in building projects in Portland, East Portland, and Albina (Roos 2008:10)." By 1895, Albina's vibrant riverfront included grain warehouses, lumber sheds, and mills, as well as boarding houses and the Albina Hotel. Its "downtown" along N Russell Street and modern-day N Interstate Avenue consisted of hotels such as the Villard Hotel, the Union Hall Skating Rink, boarding houses, shops, grocery stores, a United States Post Office, and fraternal organizations, as well as multiple one- and two-story dwellings (Sanborn Fire Insurance Company 1884 & 1885).

After Albina was consolidated with Portland and East Portland in 1891, this area quickly grew due to the expansive network of street cars and trolleys, which allowed for the dramatic growth in housing and businesses. This expansion was supported by the City & Suburban Railway Company trolley line that ran through the Lloyd District, Eliot, and Boise, in addition to the Portland Railway Company and Oregon Water Power & Railway trolley that ran north on what is today NE Martin Luther King Jr. Boulevard in 1904 (Thompson 2014). The Albina neighborhoods thrived given their central location and access to trolley lines. By 1908, the Lloyd District was heavily residential with one- and two-story street-facing dwellings, two-story flats, and a row of stores on NE Holladay Street (Sanborn Fire Insurance Company 1908). At this time, Albina's blocks were partitioned and developed with one, one-and-one-half, and two-story street-facing dwellings, as well as commercial storefronts, churches, and boarding houses along NE Russell Street (Sanborn Fire Insurance Company 1908).

By the 1920s, affordable automobiles, rising labor costs, and improved roads led to the gradual downfall and demobilization of Portland's trolley lines with the final removal of the Broadway tracks in 1948 (Thompson 2006:108). By 1924, the larger businesses such as the Mack International Motor Truck Corporation, manufacturing companies, and garages situated themselves next to bridge landings. Apartment buildings also became more prevalent and new two and two-and-one-half story street-facing dwellings were constructed. Much of the area around the present-day Leftbank Annex became more densely developed (Sanborn Fire Insurance Company 1924). In 1929, the popularity of the automobile triggered the widening of NE Martin Luther King Jr. Boulevard (Union Avenue). To accommodate this change, buildings were moved, cut back, and demolished, and large department stores, auto-supply stores, and other businesses were constructed along major thoroughfares. This also occurred with the improvement of N Interstate Avenue in 1939, which greatly facilitated interstate overland commerce and freight transport.

During World War II, Portland's wartime industries fostered significant population growth and economic. At the peak of wartime production (1943-44), the federal government identified 140,000 defense workers in the city and 100,000 in the metropolitan area. This substantial growth placed a strain on public facilities such as transportation, housing, schooling, and recreation (City of Portland Bureau of Planning and Sustainability 2009:47-48). During this time, as Albina's Black community continued to grow, more than 21,000 whites left the area for the suburbs or other Portland neighborhoods between 1940 and 1960 (Gibson 2007:7-8). This drastic change in demographics, in addition to the short-lived post-war economy and the decline in the shipbuilding industry, contributed to Albina's high unemployment rates after the war, reframing its image in the public eye.

Through the 1950s, 1960s, and 1970s, Portland undertook several urban renewal projects that significantly altered the urban landscape and displaced and removed the center of the African American community in the Albina area. Major infrastructure projects conducted during this time include the construction of Memorial Coliseum (1960), Lloyd Center (1960), I-5 (1966), and Fremont Bridge (1973) and the expansion of Emanuel Hospital (1970s).

Beginning with the construction of the Memorial Coliseum in 1960, the area surrounding the TravelLodge at the Coliseum was subsequently cleared for hotels to service the Convention Center and the Coliseum. After the construction of I-5 in 1966, the Lloyd District neighborhood continued to change. These changes include the completion of the Metropolitan Area Express (MAX) light rail on NE Holladay Street in 1986, the Oregon Convention Center in 1990, the Rose Quarter in 1995, and the Portland Streetcar on NE Broadway in 2012. Collectively, this transportation infrastructure and new development have transformed this area into an entertainment district that has supported the function of the TravelLodge at the Coliseum since its date of construction in 1971.

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Continuation Sheet

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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**Travelodge at the Coliseum**

The Travelodge at the Coliseum was built in 1971 for \$3 million as the Travelodge at the Coliseum motor hotel. Construction began in 1970 at the cost of \$80,000 for excavation and foundation work (*The Oregonian* 1970). It opened on February 2, 1971. When opened, the hotel had 243 rooms, the Raphael Restaurant and Lounge, a coffee shop, meeting rooms, ADA rooms, and a swimming pool (*The Oregonian* 1971). It was also "said to be the first high-rise Travelodge in the Pacific Northwest and the second Travelodge in Portland, Oregon" (*The Oregonian* 1971). An additional advertisement called it "America's tallest Travelodge you've ever seen" (*The Oregonian* 1971). The hotel's first manager was Anthony Geata who, prior to taking the manager position in Portland, was the general manager of the Travelodge at the Seattle-Tacoma International Airport (*The Oregonian* 1971).

Between 1971 and 1984, the hotel was known as the Travelodge at the Coliseum. A historic photograph from that period shows its appearance (see historic photograph in supplemental photographs section). After 1984, it was named the Viscount Hotel, and by the 1990s it was a Ramada Inn. In 2001, it was rebranded as a Radisson Hotel, and by 2007, it was a Holiday Inn. It is currently a Crowne Plaza Hotel and Resort. It is likely that once Wyndham Worldwide acquired Travelodge in 2006, they sold the Crowne Plaza Hotel to InterContinental Hotels Group (IHG), who owns Holiday Inn and Crowne Plaza Hotels among other hotel and resort chains (IHG 2017).

Since its date of construction, the Travelodge at the Coliseum has hosted class reunions, public meetings, and political party conventions, as well as other events. Little information about specific persons or architect associated with hotel or its history was discovered in historic newspaper, genealogy databases, and online research.

Travelodge was founded by Scott King after he recognized a need for lodging near event spaces in 1940 (Wyndham 2017). Originally based out of El Cajon, California, Travelodge opened as a budget motel chain with simple amenities. In 1987, it was purchased by Skylight Inn of America. It continued to change hands between 1990 and 2006. It is currently owned by Wyndham Worldwide, which also owns similar tier hotels, such as Days Inn, Super 8, and Ramada.

Travelodge first patented its unique design on March 16, 1970 (see <https://www.trademarkia.com/triarc-73446335.html>). The company apparently utilized the "tri-arc" design as a way of differentiating its brand of hotels from other hotel chains. The design was developed by and implemented across the world by Travelodge (Wong 2018). The design featured many advantages over more traditional rectangular box shapes: each room had a view, the wedge shape of guest rooms allowed them to have unusually large bath and dressing areas, and the central core could house the central hotel functions including elevators, linen rooms, utilities, and ice cube machines that all facilitated economies in construction and operation. Other hotel chains employed similarly distinctive architectural forms into their brand in an effort to "gain the loyalties of American travelers" (Jakle et al. 1996). The 1978 downtown Portland Marriott (1401 SW Naito), for instance, featured a distinctive concave front that distinguished the design by Zimmer, Gunsul, and Frasca Partnership (*Oregonian* 1977).

Crowne Plaza was founded in 1983. Originally labeled as Holiday Inn Crowne Plaza, it was later sold to IHG in 1990.

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Continuation Sheet

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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**Evaluation**

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. Although these additions use similar materials, their style and form deviate from its original International-style detailing. The Travelodge at the Coliseum is found significant at the local level in the area of Community Planning and Development and Architecture.

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 built in the United States. Despite multiple changes in corporate ownership and branding, the hotel is nonetheless reminiscent of the trends in urban renewal that re-shaped the landscape of the Albina community into the 1970s. The hotel would therefore be eligible under Criterion A for its associations with Community Development.

The property does not appear to be associated with historically significant persons. Therefore, the property is recommended as not eligible under Criterion B.

Although exhibiting some additions and alterations over time, the Travelodge at the Coliseum reveals how hotel chains created distinctive architectural forms so consumers would associate a hotel's appearance 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 physical characteristics of the Travelodge at the Coliseum are aboveground and visible, and existing documentary sources discuss little to no additional information about the property. The Travelodge at the Coliseum therefore holds little to no potential to yield information significant to the past and is recommended as not eligible under Criterion D. Surface and/or subsurface archaeological survey/testing would be necessary to verify whether archaeological remains would be significant under Criterion D.

The recommended period of significance for the Travelodge at the Coliseum is 1971, the date of its construction.

The building would meet the requirements for Criterion Consideration G, as it is less than 50 years old and exceptionally important due to its innovative, patented, "tri-arc" architectural form and as one of the tallest expressions of that form in the United States when it was constructed in 1971.

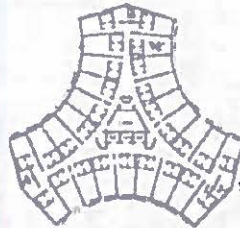
OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Supplemental Photos

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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Travelodge "Tri-Arc" design capitalizes on economy and versatility of load-bearing lightweight masonry unit.

Until another tradition has been shattered by the "Tri-Arc" design introduced by Travelodge International, whose graceful, contemporary curves and planes dispel any notion that lightweight masonry structures have to adhere to a box-like design.

A new design concept has triggered a major expansion program in the large motor hotel field. Significantly, the new concept provides material cost savings in construction but, equally important, provides a basic design which can be used in almost any kind of site orientation and thus holds design and construction costs to a minimum. Called "Tri-Arc," the design concept derives its name in part from the floor plan created when three equally placed wings radiate outward from a central core.



Tri-Arc design developed by Travelodge International is construction standard for chain, offers numerous advantages over conventional rectangular shapes. Design was selected from among 14 designs on basis of feasibility, cost, compliance with building codes, adaptability and esthetics.

It was developed by Travelodge International for building new localities worldwide, and makes extensive and innovative use of load bearing lightweight concrete masonry walls. Because it lends itself well to fast, economical construction with good insulation, fireproofing and acoustical damping qualities, lightweight block is becoming almost a standard for work in buildings with receptive floor plans. The Tri-Arc design, however, represents its first use in a curved configuration. In this case the concave sides of each wing.

According to Travelodge chief executive officer Roger Marlett, the Tri-Arc design was selected from among 14 designs which were thoroughly investigated as to "feasibility, cost, adhering to a variety of building codes, adaptability, business qualities and other vital standards." Standards alone will permit numerous economies in planning, and yet modifications are relatively simple. By adding or deleting rooms at the end of the wings the overall size of the building can be adjusted to the site without impairing the architectural integrity or symmetry of the structure.

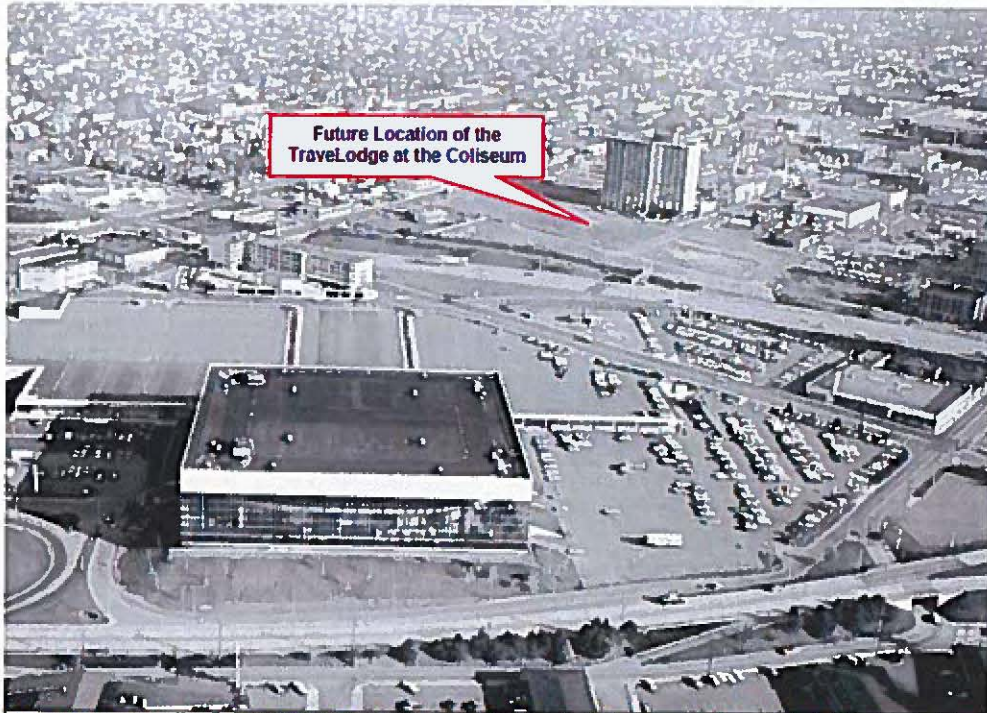
Because of its shape, the Tri-Arc building can be oriented in an infinite number of positions on a site with none of the problems encountered in dealing with rectangular buildings. A typical construction program will see Tri-Arc construction progressing in a "concentric" fashion - as pre-cast concrete floor slabs are being positioned on one of the three arcs, masons are completing load bearing walls on a second, while other trades are following the masons and working on the third. In one such application, a story was completed every six working days.

The Houston Travelodge exemplifies the Tri-Arc design and reflects the economy and versatility of load bearing lightweight masonry construction. In all, some 100,000 expanded shale aggregate lightweight masonry units were used in this striking nine-story structure.

As it appears in Marcus Wong, "Waking up in Geelong: Travelodge 'tri-arc' hotels around the world." Author notes that this text appears in a 1970s-era fact sheet on concrete distributed by the Expanded Shale Clay and Slate Institute but the author-provided link is no longer operational. Accessed on January 30, 2018, at <https://wongm.com/2017/10/travelodge-tri-arc-hotels/>.

OREGON INVENTORY OF HISTORIC PROPERTIES  
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Supplemental Photos

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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View: Historic photograph from 1969 prior to construction of the Travelodge but showing its proximity to Interstate 5 and the Memorial Coliseum. City of Portland Archives as viewed at <https://vintageportland.files.wordpress.com/2010/05/aerial-of-memorial-coliseum-looking-east-1969.jpg>.

OREGON INVENTORY OF HISTORIC PROPERTIES  
 SECTION 106 DOCUMENTATION FORM  
 Individual Properties  
 Supplemental Photos

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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**I DON'T LEAP IT.**

**Weidler and 2nd.**

America's tallest Travel Lodge is open.

And it's like no other Travelodge you've ever seen. Ten stories, 252 rooms and suites, each with a panoramic view of the city. Plus, a 74' long air space with hotel to an luxurious atmosphere, coffee shop, heated pool and sandy beach and golf shop.

We have meeting rooms, too. They'll hold from 25 to 125 people for conferences and from 24 to 140 for banquets.

Speaking of food, try our highest restaurant. Specialty of the house is steak and lobster. Tempers. But we have all your other favorite steak cuts as well.

Last night, consider our luncheon. Lunch, too. Or a late snack on your way home from the Coliseum. Or a drink in the Lounge. We have live entertainment every night too. Dinning.

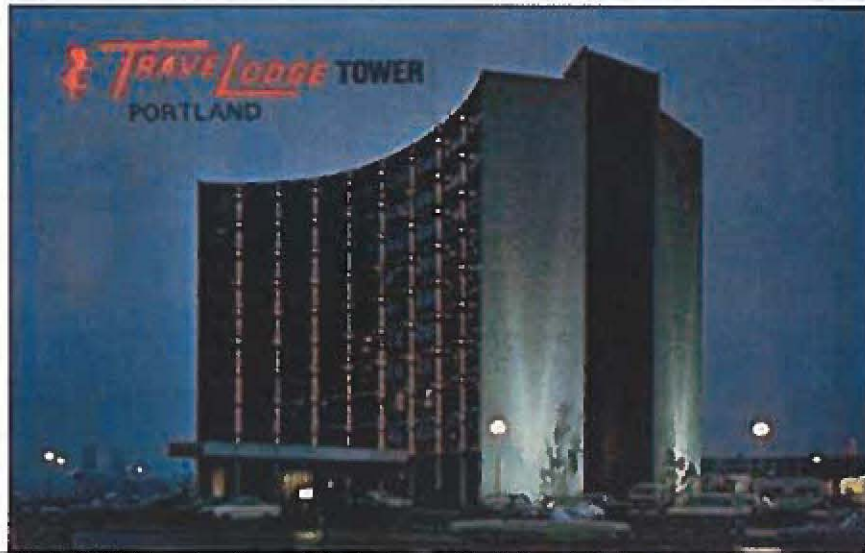
Second and Weidler Streets, right across from the Coliseum. Drop by. Never can tell who you might see.

**TRAVEL/ODGE at The Coliseum**  
 503-525-5200

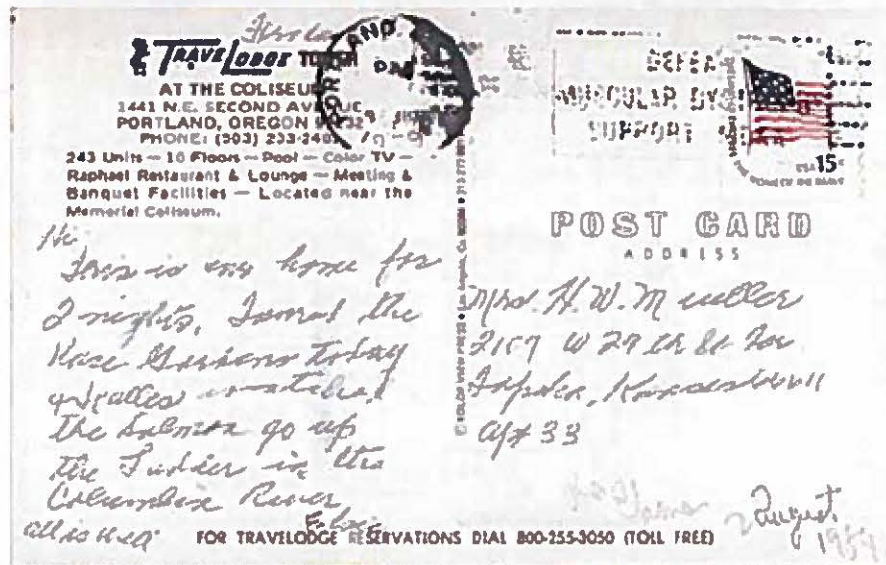
Newspaper advertisement for the Travelodge at the Coliseum. It asserts that the building is "America's tallest Travelodge." *The Oregonian*, February 1971.

OREGON INVENTORY OF HISTORIC PROPERTIES  
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Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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View: Looking west. Historic postcard image of the Travelodge at the Coliseum in Portland, Oregon. Courtesy of <https://wongm.com/2017/10/travelodge-tri-arc-hotels/>.



View: Reverse of historic postcard image of the Travelodge at the Coliseum in Portland, Oregon. Courtesy of <https://www.amazon.com/Travelodge-Portland-Original-Vintage-Postcard/dp/B00P9L7IS2>.

## Individual Properties Supplemental Photos

**Street Address:** 1441 NE 2nd Avenue

City, County: Portland, Multnomah



# BUSINESS



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The \$2 million, 18-story rooms, swimming pool and Travelodge of the Coliseum wheelchair units.

will open Tuesday, Feb. 2. It is at 1441 NE 2nd Ave.

Inc., El Cajon, Calif. post as general manager of the

The motor Travelodge is an international

high-rise

Northwest, has Anthony Gasta

Lounge, coffee shop, meeting the first at 845 E. Burnside St.

1000

[illegible]

Properties

TEHRAN, Iran (AP) — The world's major oil companies

"Negotiations are continuing, and we have succeeded in narrowing our differences in some areas," said John Collins, spokesman for the companies. "We hope there are prospects of an agreement soon."

The companies want the agreement to be binding for five years. In addition to a 20-cent increase in the posted price of crude from the Persian Gulf, the companies offered an annual per cent price rise to offset inflation, beginning July 1, 1977.

WEDNESDAY, FEBRUARY 22, 1961

The following Washington, D.C. candidates  
 are running on  
 the same ballot as the California 11th District

12- [REDACTED] Japan via British [REDACTED]  
[REDACTED] of [REDACTED]

History from H. Zerkow via Seattle  
Terminal

David A. Cox, from Service at 4:00  
TO DEPART

Exotic Lander, Inc. California Open House

**Figure 1**

11/10/2019 10:10 AM

Article about the opening the Travelodge at the Coliseum from *The Oregonian*, February 2, 1971

OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
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Supplemental Photos

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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Travelodge "Tri-Arc" design capitalizes on economy and versatility of load-bearing lightweight masonry unit.

Like a mother lode has been shattered by the "Tri-Arc" design introduced by Travelodge International, whose graceful, contemporary curves and planes dispel any notion that lightweight masonry structures have to adhere to a box-like design.

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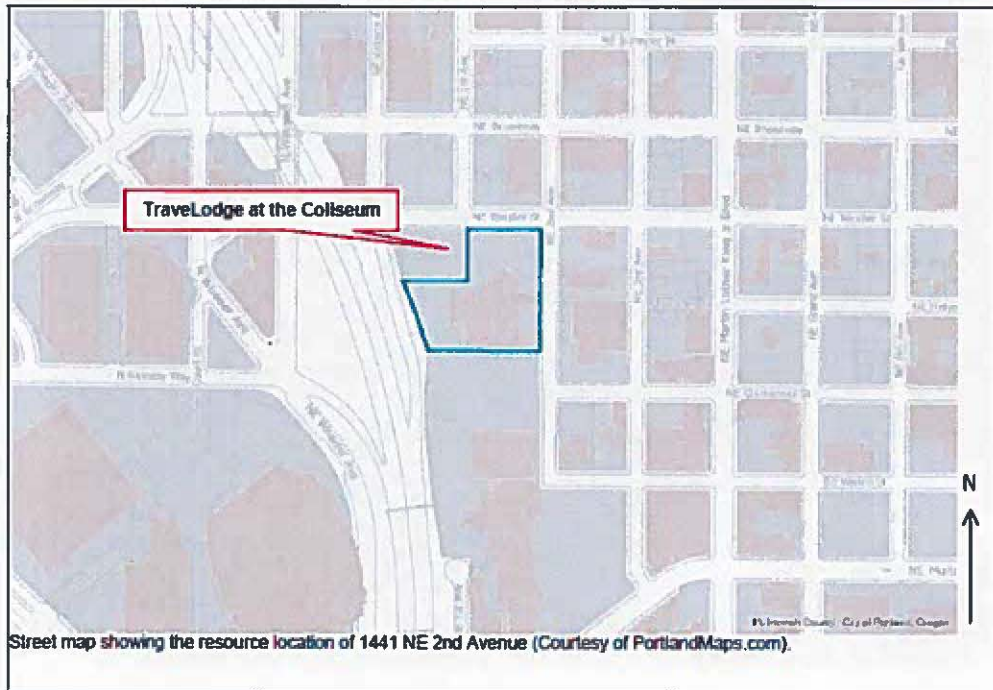
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OREGON INVENTORY OF HISTORIC PROPERTIES  
 SECTION 106 DOCUMENTATION FORM  
 Individual Properties  
 Supplemental Maps

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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OREGON INVENTORY OF HISTORIC PROPERTIES  
SECTION 106 DOCUMENTATION FORM  
Individual Properties  
Supplemental Maps

Property Name: Travelodge at the Coliseum	Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah
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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 checked="" 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: 11/17/19
Comments: See letter dated 11/23/19	

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 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

Surveyor/Agency: Kirk Ranzetta/Arissa Becker/Tim Wood/AECOM  
Section 106 Level of Effect

Date Recorded: May 2018

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Rev. 03/03

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. 9001 (483)		
Property Name:	(Historic) TravelLodge at the Coliseum; (Current) Crowne Plaza Hotel		
Street Address:	1441 NE 2nd Avenue	City, County:	Portland, Multnomah

with a brand. The distinctive "tri-arc" design, conveys how TravelLodge 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 TravelLodge 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).

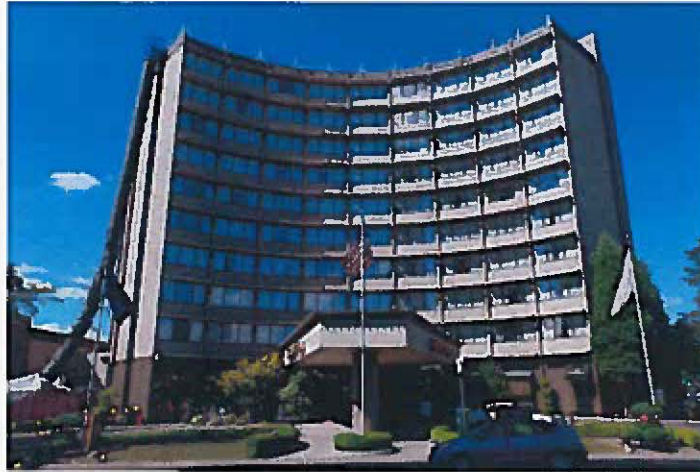
The proposed I-5 mainline improvements include the construction of auxiliary lanes (also referred to as ramp-to-ramp lanes) and full shoulders between I-84 to the south and I-405 to the north, in both the NB and SB directions. Construction of the I-5 mainline improvements would require the rebuilding 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.

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) TravelLodge at the Coliseum, (Current) Crowne Plaza Hotel		
Street Address:	1441 NE 2nd Avenue	City, County:	Portland, Multnomah

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



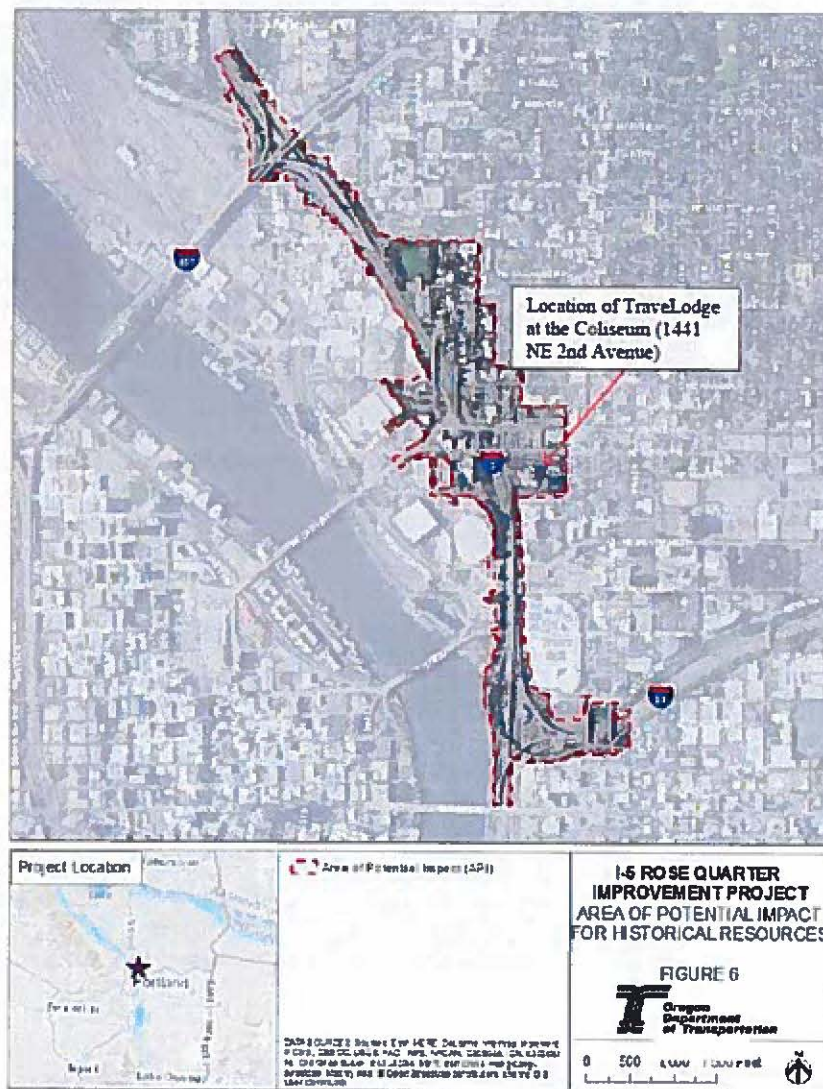
Photograph 2. The TravelLodge at the Coliseum west elevation, looking southeast



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	
Street Address: 1441 NE 2nd Avenue	City, County: Portland, Multnomah

Figure 1. API Map



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

Agency/Project:	ODOT/5 Rose Quarter Project, ODOT Key No. 19071, Fed -Aid No. S001 (483)		
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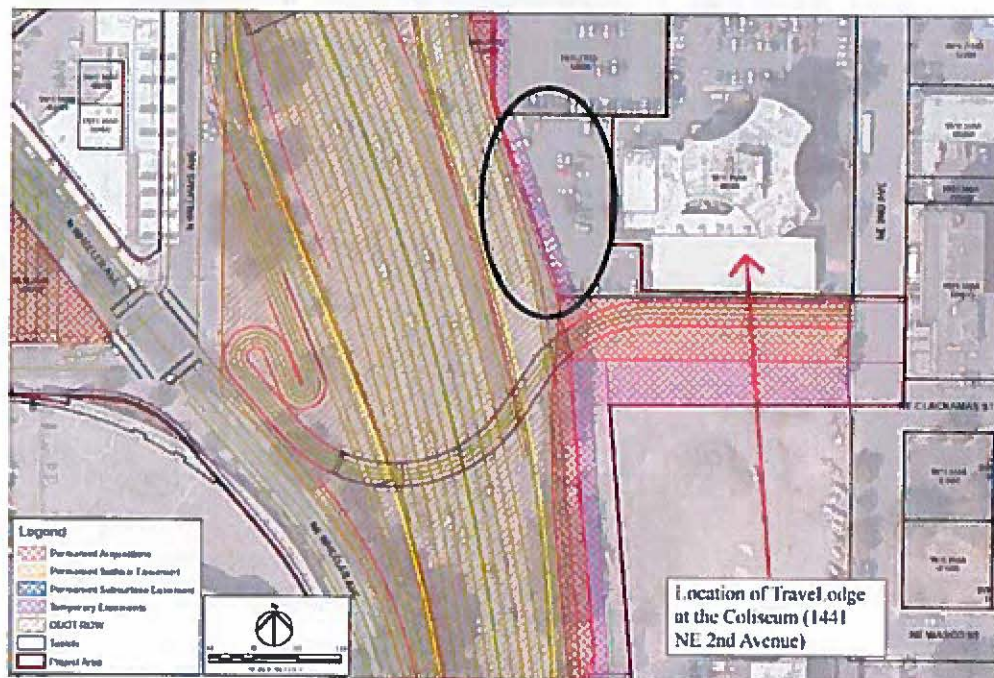
**Figure 2. Broadway/Weidler Interchange Area Improvements**



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

Agency/Project:	ODOT/1-5 Rose Quarter Project, ODOT Key No. 19071, Fed.-Aid No. S001 (483)		
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Street Address:	1441 NE 2nd Avenue	City, County:	Portland, Multnomah

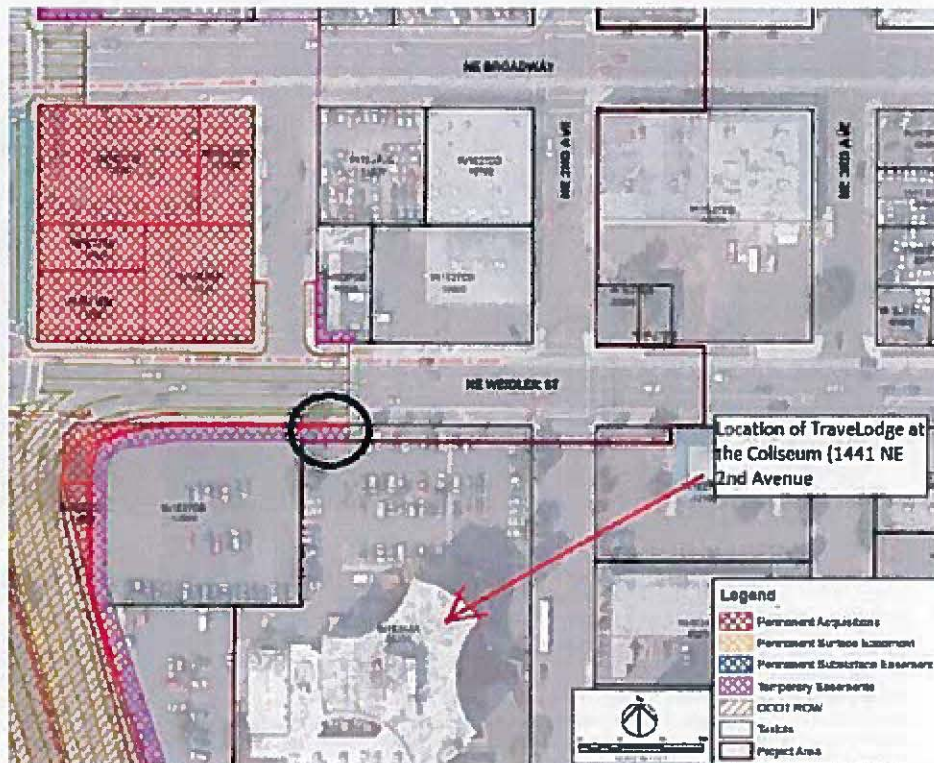
Figure 3. Project acquisitions and easements near the Travelodge at the Coliseum (West) (Area of historic property to be subject to project acquisition and/or easement circled in black)



OREGON INVENTORY OF HISTORIC PROPERTIES  
Section 106 LEVEL OF EFFECT FORM  
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Agency/Project: ODOT/I-5 Rose Quarter Project, ODOT Key No. 19071, Fed.-Aid No. S001 (483)	
Property Name: (Historic) TravelLodge at the Coliseum; (Current) Crowne Plaza Hotel	
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Figure 4. Project acquisitions and easements near the TravelLodge 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  
 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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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.

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)		
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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 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, Irig & 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 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.

#### 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, Irig & 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).

**ATTACHMENT 4**

**Program-Level Letter of Agreement between the FHWA—Oregon Division and the  
Oregon SHPO (the Official with Jurisdiction) regarding the  
Section 4(f) *de minimis* Impact Determination  
Interstate 5 Rose Quarter Improvement Project  
Travelodge at the Coliseum  
ODOT Key No. 19071  
Federal-Aid No. S001(483)**



U.S. Department  
of Transportation  
Federal Highway  
Administration

Oregon Division  
January 22, 2013

530 Center Street NE, Suite 420  
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503-399-5749  
503-399-5838 (fax)  
[www.fhwa.dot.gov/ordiv](http://www.fhwa.dot.gov/ordiv)

In Reply Refer To:  
HDA-OR

Mr. Roger Roper  
Deputy State Historic Preservation Officer  
Oregon State Historic Preservation Office  
725 Summer Street, NE, Suite C  
Salem, OR 97301

Subject: Section 4(f) *de minimis* Impact Finding; pursuant to SAFETEA-LU Section 6009 in conjunction with December 23, 2011 Section 106 Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the Oregon State Historic Preservation Office and the Oregon Department of Transportation

Dear Mr. Roper:

This letter provides an avenue for the Oregon Division of the Federal Highway Administration (FHWA) and the Oregon State Historic Preservation Office (SHPO) to document, in a program-level agreement, the use of Section 4(f) *de minimis* impact findings for historic properties. Section 6009(a) of the 2006 Safe, Accountable, Flexible, Efficient Transportation Equity: A Legacy for Users (SAFETEA-LU) Act, Public Law 109-59, outlined alternative Section 4(f) compliance methods for minor transportation impacts to Section 4(f) properties, including historic properties, called Section 4(f) *de minimis* impact findings. This portion of the law has since been codified in 23 Code of Federal Regulations Part 774. For historic properties eligible for or listed in the National Register, a Section 4(f) *de minimis* impact finding may be made by FHWA when Section 106 consultation results in the *written* concurrence of the SHPO with the determination of "no adverse effect" or "no historic properties affected".

SAFETEA-LU has no new Section 106 implications other than the requirement for written SHPO concurrence with Section 106 findings of effect for individual historic Section 4(f) properties. SAFETEA-LU requires FHWA to notify the SHPO of FHWA's intent to utilize the finding of "no historic properties affected" or "no adverse effect" for individual Section 4(f) properties as a basis for making a Section 4(f) *de minimis* impact finding.

Following passage of SAFETEA-LU, FHWA through Oregon Department of Transportation's (ODOT) Section 106 documentation has provided this notification on a project-by-project basis. In drafting the December 23, 2011, Section 106 programmatic agreement, ODOT, SHPO and FHWA agreed to program-level Section 4(f) *de minimis* impact finding language; however, this language was not acceptable to ACIP and was removed from the programmatic agreement. This letter fulfills the intent of a program-level notification to SHPO for FHWA's intended use of the Section 4(f) *de minimis* impact findings.

On July 20, 2012, FHWA updated the Section 4(f) Policy Paper. The following questions and answers provide specific points of relevant direction regarding the Section 4(f) *de minimis* impact findings and coordination with SHPO.

**Question 12A: What are the requirements for *de minimis* impact on a historic site?**

**Answer:** A finding of *de minimis* impact on a historic site may be made when:

1. FHWA has considered the views of any consulting parties participating in the consultation required by Section 106 of the NHPA, including the Secretary of the Interior or his representative if the property is a NHL;
2. The SHPO/THPO, and Advisory Council on Historic Preservation (ACHP), if participating in the Section 106 consultation, are informed of FHWA's intent to make a *de minimis* impact finding based on their written concurrence in the Section 106 determination of "no adverse effect;" and
3. The Section 106 process results in a determination of "no adverse effect" with the written concurrence of the SHPO/THPO, and ACHP if participating in the Section 106 consultation.

(See 23 CFR 774.5(b)(1) and the definition of *de minimis* impact in 23 CFR 774.17.)

**Question 12B: How should the concurrence of the SHPO/THPO, and ACHP if participating in the Section 106 determination of effect, be documented when the concurrence will be the basis for a *de minimis* impact finding?**

**Answer:** Section 4(f) requires that the SHPO/THPO, and ACHP if participating, must concur in writing in the Section 106 determination of no adverse effect (See 23 CFR 774.5(b)(1)(ii)). The request for concurrence in the Section 106 determination should include a statement informing the SHPO/THPO, and ACHP if participating, that FHWA or FTA intends to make a *de minimis* impact finding based upon their concurrence in the Section 106 determination.

Under the Section 106 regulation, if a SHPO/THPO does not respond within a specified time frame FHWA may move forward to the next step of the Section 106 process, but Section 4(f) explicitly requires their written concurrence (See 23 CFR 774.5(b)(1)(ii)). It is therefore recommended that transportation officials share this guidance with the SHPOs and THPOs in their States so that these officials fully understand the implication of their concurrence in the Section 106 determinations and the reason for requesting written concurrence.

**Question 12D: Certain Section 106 programmatic agreements (PAs) allow the lead agency to assume the concurrence of the SHPO/THPO in the determination of *no adverse effect* or *no historic properties affected* if a response to a request for concurrence is not received within the time period specified in the PA. Does such concurrence through non-response, in accordance with a written and signed Section 106 PA, constitute the written concurrence needed to make a *de minimis* impact finding?**

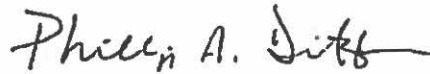
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**Answer:** In accordance with the provisions of a formal Section 106 programmatic agreement (PA), if the SHPO/THPO does not respond to a request for concurrence in the Section 106 determination within a specified time frame, the non-response together with the written PA, will be considered written concurrence in the Section 106 determination that will be the basis for the *de minimis* impact finding by FHWA. FHWA must inform the SHPO/THPO who are parties to such PAs, in writing, that a non-response which is treated as a concurrence in a no adverse effect or no historic properties affected determination will also be treated as the written concurrence for purposes of the FHWA *de minimis* impact finding (See 23 CFR 774.5(b)(1)(ii)). It is recommended that this understanding of the parties be documented via formal correspondence or other written means and appended to the existing PA. There is no need to amend the PA itself.

By transmittal of this letter, FHWA is notifying your office of our intent to continue to make Section 4(f) *de minimis* impact findings for properties where a determination of "no historic properties affected" or "no adverse effect" have been concurred in by your office or when your office has not replied within the appropriate timeframe with written concurrence.

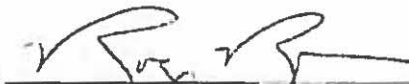
By the following SHPO signature, the SHPO acknowledges it has been notified of FHWA's intent to make Section 4(f) *de minimis* impact findings based on Section 106 determinations of effect for specific historic properties. We very much appreciate and value the strong Section 106 partnership we have with your office. If you have any questions or would like to discuss further, please contact Michelle Eraut, Program Development Team Leader at 503-316-2559 or via e-mail at [Michelle.Eraut@dot.gov](mailto:Michelle.Eraut@dot.gov).

Sincerely,



Phillip A. Ditzler  
Division Administrator

Concurrence:



Roger Roper, State Historic Preservation Officer

1/24/13  
Date

cc:

ODOT (Chris Bell, Historian)  
(Carolyn Holthoff, Archaeology Program Coordinator)  
(Darlene Weaver, Operations & Policy Analyst, Program Support Unit)  
(James Norman, Environmental Planning Unit Manager)

ME/m