



Oregon

Kate Brown, Governor

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January 10, 2022

Christine Curran
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State Historic Preservation Office
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Lane County

*Eugene West Quad
Eugene East Quad*

*T17S, R4W
Sections 11-14
T17S, R3W
Section 18*

**SUBJECT: Request for Concurrence (Archaeology & Built)
Finding of No Adverse Effect
OR569: River Road–Delta Highway Development Project
Lane County, Oregon
ODOT Key No. 16223
Federal-Aid No. S069(018)
SHPO Case No. 20-0856**

Introduction:

The Oregon Department of Transportation (ODOT) prepared the following letter in compliance with Section 106 of the National Historic Preservation Act. The letter includes a combined Finding of No Adverse Effect to historic properties (built environment and archaeological resources) for the OR569: River Road–Delta Highway Development Project (Figure 1).

Project Description:

The Federal Highway Administration (FHWA) and ODOT propose to make road improvements through repairs and expansions along OR569 (the Beltline Highway) in Eugene. The project would modernize an approximately three-mile-long section of Beltline Highway to provide needed repairs and expansion to resolve operational and safety deficiencies, and to more adequately serve forecast regional travel growth.

Consulting Parties:

The following federally recognized Tribes were consulted during project development:

- Confederated Tribes of the Grand Ronde Community of Oregon
- Confederated Tribes of Siletz Indians
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Confederated Tribes and Bands of the Yakama Nation

ODOT archaeologists Kurt Roedel and Jessica Curteman consulted with the Confederated Tribes of the Grand Ronde Community of Oregon (CTGRCO), the Confederated Tribes of Siletz

Indians (CTSI), the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), Confederated Tribes and Bands of the Yakama Nation (CTBYN). The CTGRCO provided an automated response, stating that due to COVID-19, the Tribal government has been under a limited closure since March 13, 2020, and that the historic preservation office has operated in a decentralized format, but continues with review and compliance. No other comments were received.

Summary of Known Resources Present:

Archaeological Resources – Sheldon (2020) from Jacobs Engineering Group Inc. conducted background research, pedestrian surveys, and shovel probe testing to consider archaeological resources within the project’s Area of Potential Effects (APE, Figure 1). The initial pedestrian survey was conducted October 11, 2018. Much of the APE is covered by commercial, industrial, and residential development. Areas not covered by modern development were intensively surveyed and subsurface tested via shovel probes. No archaeological or cultural resources were identified during the pedestrian survey and shovel probing. No additional archaeological work is recommended.

Built Resources – Architectural historians from Jacobs Engineering Group Inc. conducted background research and onsite surveys for built historic properties in the project’s APE. They recommended that four houses within the APE were not eligible for the National Register. In May 2021, your staff concurred on the eligibility calls for those four properties. Subsequently, Jacobs’ staff evaluated Lee’s Mobile Home Park, at 500 Division Avenue for National Register eligibility. They believe that this housing development, which dates from 1962, is significant under National Register Criterion A because it reflects the expansion of affordable housing and suburbanization of the Santa Clara neighborhood during the post-World War II era. They also believe that it is significant under National Register Criterion C because it typifies mobile home park design dating to this period. ODOT recommends that Lee’s Mobile Home Park is eligible for the National Register. We have included a copy of the Section 106 Documentation Form for Lee’s Mobile Home Park for your review and concurrence.

Evaluation of Effects:

Built Resources -

Lee’s Mobile Home Park

The Build Alternative with minimization efforts will include construction of a landscaping strip and a shared-use path north of Division Avenue in front of Lee’s Mobile Home Park in a grassy area that is within roadway right-of-way. A non-historic evergreen hedge, both arborvitae and laurel, forms the southern border of the mobile home park and is within the boundaries of the historic property. However, the project may need to trim portions of the hedge segments that have grown into roadway right-of-way to make room for construction of the shared-use path and landscaping strip. The project will require no land from the historic property. It will require three 440 square-foot temporary construction easements at the three entryways to the mobile home park to complete the repaving of the driveways that are on roadway right-of-way. Construction of the shared-use path and landscape strip will not interrupt the flow of pedestrian

or vehicular movement within the mobile home park and will have only a minor effect on the historic setting and feeling of the property.

Application of the Criteria of Adverse Effect

The project will have an effect on one National Register-eligible historic property, Lee’s Mobile Home Park, but the effect is not adverse. Project engineers were able to minimize the project’s impacts on Lee’s Mobile Home Park with a design that will not require land from the historic property. It will also maintain the three existing and historic access roads from Division Avenue.

Therefore, when applying the Criteria of Adverse Effect, as set forth in 36 CFR 800.5, the actions proposed as part of this project will not adversely affect the historic character-defining features of Lee’s Mobile Home Park historic property

Coordination and Public Involvement:

- ODOT has a project webpage where it publishes updates on the project and its schedule: <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=16223>
- In addition to project updates, the project webpage provides contact information for key personnel including the Project Manager and the Public Information Officer.
- The project’s Community Advisory Committee has conducted public meetings to review the project designs, and slide show presentations from the 2018 meeting are available at the website listed above.
- ODOT is coordinating the project with the City of Eugene and Lane County.

Finding of Effect:

Application of Section 106 Criteria for Identification and Evaluation of Historic Properties (36 CFR 800.4 and 5) indicates a finding of No Adverse Effect for the OR569: River Road–Delta Highway Development Project. The Oregon Department of Transportation, acting as an agent of the Federal Highway Administration, requests your concurrence with a FINDING OF NO ADVERSE EFFECT on historic properties for the OR569: River Road-Delta Highway Development project. All supporting documentation is attached.

If you have any questions, please contact Robert W. Hadlow, Ph.D., senior historian, at (503) 731-8239, or Jessica Curteman, M.A., archaeologist and tribal liaison, at (503) 949-0842.

Sincerely,



John Raasch
Statewide Environmental & Cultural Resources Manager
ODOT Environmental & Hydraulic Engineering Section

The State Historic Preservation Office concurs that the OR569: River Road–Delta Highway Development Project will have No Effect to Historic Properties (Archaeology).



01/30/2022

SHPO Official Signature (Archaeology)

Date

The State Historic Preservation Office concurs that the OR569: River Road–Delta Highway Development Project will have No Adverse Effect on Historic Properties (Built Environment).



1/20/2022

SHPO Official Signature (Built Environment)

Date

Attachments:

Montgomery, Marcia. “Section 106 Documentation Form, Lee’s Mobile Home Park, OR569: River Road–Delta Highway Development Project, Eugene, Lane County, Oregon, ODOT Key No 16223. May 2021, revised, January 2022.

Montgomery, Marcia. “Section 106 Level of Effect Form, Lee’s Mobile Home Park, OR569: River Road–Delta Highway Development Project, Eugene, Lane County, Oregon, ODOT Key No 16223. December 2021, revised January 2022.

Sheldon, David. *Archaeological Baseline Reconnaissance Report for Beltline Highway (OR 569): River Road to Delta Highway Project, Eugene, Lane County, Oregon.* Jacobs Engineering Group Inc., Portland. Submitted to the Oregon Department of Transportation, Salem. October 2020. [Includes Shapefiles associated with report.]

Copies with Attachments to:

Tribal Historic Preservation Office, Confederated Tribes of the Grand Ronde Community of
Oregon

Robert Kentta, Confederated Tribes of Siletz Indians

Peter Hatch, Confederated Tribes of Siletz Indians

Robert Brunoe, Confederated Tribes of Warm Springs Reservation of Oregon

Tribal Historic Preservation Office, Confederated Tribes of Warm Springs Reservation of
Oregon

Christian Nauer, Archaeologist, Confederated Tribes of Warm Springs Reservation of
Oregon

Copies without Attachments to:

Daniel Ohrn, Environmental Manager, ODOT Region 2

Jessica Curteman, Archaeologist, ODOT

Robert W. Hadlow, Senior Historian, ODOT

Adam Roberts, Environmental Coordinator, ODOT Region 2

Denis Reich, Environmental Manager, ODOT Region 1

SHPO Tracking File

References Cited:

Sheldon, David. *Archaeological Baseline Reconnaissance Report for Beltline Highway (OR 569): River Road to Delta Highway Project, Eugene, Lane County, Oregon*. Jacobs Engineering Group Inc., Portland. Submitted to the Oregon Department of Transportation, Salem. October 2020.



Figure 1. Project APE.