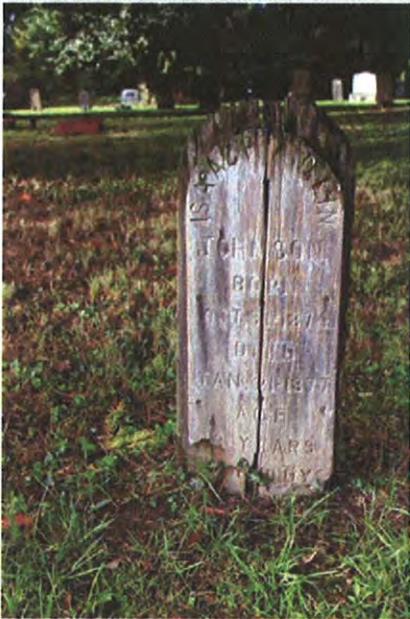


**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Agency/Project: Oregon Department of Transportation/OR212/224: Sunrise Corridor (I-205 to Rock Creek) ODOT Key No. 12454, Federal Aid No. C005(46)	
Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County
USGS Quad Name: Gladstone, Oreg. 1961, Photorevised 1984	Township: 2 S Range: 2 E Sections: 4
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: Funerary - Cemetery	Construction Date: Established circa 1850
Architectural Classification / Resource Type: Mid-nineteenth century funerary site	Alterations & Dates: 1.625-acre cemetery expanded with 0.34 acre addition to western boundary in 1943; trees planted along the new western boundary circa 1970; fencing and sign added circa 1970.
Window Type & Material: N/A	Exterior Surface Materials: Primary: N/A Secondary: N/A Decorative: N/A
Roof Type & Material: N/A	
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
	
A rare surviving wooden headstone erected in 1877 in the Clackamas Cemetery. The view is towards the west.	
Preliminary National Register Findings: <input type="checkbox"/> National Register listed <input 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 _____ Comments:	Date <u>1/28/2010</u>

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County
Architect, Builder or Designer (if known): N/A	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):

Significance Statement

The original 1.625-acre parcel of the Clackamas Cemetery, in addition to land historically used by the cemetery within the SE Ambler Road right-of-way, is recommended to be eligible for listing in the National Register of Historic Places (NRHP) under Criterion A for its association with the early Euroamerican settlement period of Clackamas, Oregon. The cemetery retains six of the seven aspects of integrity: location, design, layout, workmanship, feeling, and association. It has lost integrity of setting, as the historic rural landscape that once surrounded the cemetery has been transformed into a busy industrial area with commercial buildings, a railroad, and major highways. The immediate setting of the cemetery was modified in the 1940s when Oregon 213, which originally skirted east of the cemetery at present-day SE Ambler Road, was realigned to its current location immediately west of the cemetery. Once construction of the realignment was completed in 1943, the State Highway Commission deeded 0.34 acres of unused right-of-way to the Clackamas Cemetery Association, expanding the original western boundary of the cemetery to its current location. This 1943 tract is recommended to be a non-contributing feature of the Clackamas Cemetery, as it is not associated with the Euroamerican settlement period of Clackamas, Oregon.

Despite changes to the historic setting, the historic feeling of the cemetery remains intact, as newer headstones are of a lower profile and hold less prominence than the remaining headstones that mark the graves of influential pioneers who settled Clackamas County in the mid-nineteenth century. Individuals interred at the cemetery range from well-known Baptist missionaries like the Rev. Hezekiah Johnson, who organized some of the earliest Baptist churches in Clackamas County, to William Starkweather, who served in the Oregon Territorial Legislature and represented Clackamas County at the Oregon Constitutional Convention.

As the cemetery retains an acceptable level of integrity, is strongly associated with the overall settlement of Clackamas County, and is one of the oldest cemeteries in the county, it meets Eligibility on the Basis of Age and Eligibility for Association with Events under Criteria Consideration D. The period of significance for the cemetery is 1850 to 1943. Clackamas Cemetery is listed as a historic cemetery with the Oregon Commission on Historic Cemeteries (OCHC). According to Revised Statutes (ORS 97.450 and ORS 97.440), a historic cemetery may not be discontinued, declared abandoned, or have remains removed from the burial ground without prior notice and comment by the OCHC.

The Clackamas Cemetery was established circa 1850 on the Donation Land Claim of William Tindal Matlock, a prominent Clackamas County resident who traveled to Oregon from Indiana in 1847. Its establishment falls within the early Euroamerican settlement period of Clackamas County that lasted from 1847 to 1865 following the initial Euroamerican exploration of Oregon Country by fur traders and missionaries from approximately 1812 to 1846. Few physical remnants remain intact from this settlement era in Clackamas County; a search of the State Historic Preservation Office (SHPO) Historic Sites Database revealed only 68 resources recorded from this time period, six of which were cemeteries. Four of the six cemeteries, including the Clackamas Cemetery, are noted as being recommended eligible for listing in the NRHP, and one cemetery associated with the Rock Creek Methodist Church is listed in the NRHP. Clackamas Cemetery was recommended to be eligible for listing in the NRHP in a 2003 Section 106 evaluation no longer on file at SHPO.

Historic Context

William Matlock was one of a handful of pioneers that claimed land outside of Oregon City during the settlement period of 1847 to 1865. Born in Tennessee to John S. and Eleanor Matlock on February 4, 1806, Matlock and his family eventually moved to Indiana, where in 1825 he married Elizabeth Ballard. The couple crossed the plains together, and filed a Donation Land Claim in Linn County in 1847. Just one year later, the Matlocks had left Linn County to settle upon 640.09 acres in Clackamas County.

Matlock settled into his new community quickly: as early as 1848 he served as a Commissary Agent during the Cayuse Indian War, and from 1849 to 1852 he represented the districts of Champoege and Clackamas in the first four regular sessions of the Oregon Territorial Legislature (Oregon State Archives 2009; Victor 1894). During the first joint convention of the House of Representatives and the Council in 1849, he was elected to be the Territorial Supreme Court's first librarian (Stephens 1996). In 1851, he served as an Attorney of the Territorial Supreme Court, and was later appointed to be the receiver of public moneys for the land office in Oregon City by President Abraham Lincoln in 1861 (Scott 1890; United States Senate 1887). In 1862, Matlock was appointed as U.S. Depository for Oregon by the Secretary of the Treasury (*The Weekly Oregonian* 1862). From the time of his arrival to Oregon Country to the day of his passing in 1872, Matlock was active within the Republican Party at the local, territorial, and state level.

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County
<p>The Clackamas Cemetery was established circa 1850 on the northern portion of the Matlock Donation Land Claim. No archival records detail specifically how Matlock came to an arrangement with the Clackamas Baptist Church to use his land for a meeting place and cemetery, but the Matlocks officially deeded 1.625 acres of the current 1.95-acre cemetery to the Clackamas Baptist Church in 1865. It is unlikely that the cemetery began as a family plot before this transition as the earliest known burials in the cemetery are not those of Matlock family members, but are those of the Capps family, who were interred at the subject parcel from 1859 through 1912 (Warren 2001). Isaac Capps, the head of the family, is noted as one of the earliest settlers in the Rock Creek area of Clackamas County (Koler and Morrison 1990). His Donation Land Claim was located along the Clackamas River south of present-day Oregon 212/224 in Sections 11 and 14 of Township 2 South, Range 2 East, Willamette Meridian (General Land Office 1861).</p> <p>The greater likelihood is that Matlock offered the land for use by Baptist missionaries circa 1850, as was common at that time, to promote the Baptist faith in the growing areas outside of Oregon City. Matlock likely came to this agreement through his association with Baptist Revs. Ezra Fisher and Hezekiah Johnson, who arrived in Oregon via wagon train in 1845. The pair were early missionaries sent to Oregon by the American Home Baptist Society to establish a strong Baptist foothold in emerging townsites throughout the state. Matlock, who had previously been acquainted with the Rev. Fisher in Indiana, established a strong working relationship with both men at the Oregon City Baptist Church. Organized in 1847, it was the first Baptist church established in Clackamas County (Mattoon 1905). The church's meeting house was constructed by the Rev. Johnson on land that he acquired at present-day 13th and Main Streets in Oregon City (Oregon City Planning Department 2009). Rev. Johnson eventually organized a school at the meeting house, where Rev. Fisher served as the Chairman of the Board of Trustees, and Matlock served as the Secretary (Henderson 1918).</p> <p>Six years after the establishment of the Oregon City Baptist Church, Rev. Johnson and Rev. David Hubbard organized the 11-member Clackamas Baptist Church in 1853 (Mattoon 1905). Records indicate that the congregation likely gathered for services at a meeting house that formerly stood on a tract of land adjacent to the Clackamas Cemetery, and which is now included within the current cemetery parcel. The 1865 deed record transferring ownership of two tracts of land from the Matlocks to the Clackamas Baptist Church states that the second tract was intended for use "by the people and congregation for a burial place," and notes that the first tract is that "on which is situated the meeting house of said church," (Deed of sale, W. T. and Elizabeth Matlock to the Clackamas Baptist Church, Book D:767-768, Clackamas Clerk and Recorder, Oregon City). The deed notes that the meeting house was to be used at the discretion of the church as a meeting hall and school once the Matlocks relinquished ownership. The building was likely erected between 1853 and 1855, as in his reports to Rev. Benjamin M. Hill of the American Baptist Home Mission Society, the Rev. Fisher mentioned a Clackamas church separate from the Oregon City church as early as 1854 (Henderson et al. 1918). The church eventually disbanded in 1876 (Mattoon 1905).</p> <p>In addition to the 1.625 acres deeded to the Clackamas Baptist Church in 1865, it appears that the church and subsequently the Clackamas Cemetery Association used land to the east and outside of the deeded parcel for burials and church-related activities within the period of significance. Highway maps from the 1940s show this strip of land, now within the SE Ambler right-of-way, as an approximately 30-foot wide void between the 60-foot road right-of-way that existed at that time and the legal cemetery parcel. As wagon roads historically followed the current alignment of SE Ambler Road, it is likely that the Clackamas Baptist Church exceeded their legal boundaries by utilizing the land up to the roadway that had not yet been acquired for right-of-way or any other use. Due to this historic encroachment, burials from as early as the 1940s are located within the right-of-way for SE Ambler Road. As this portion of the cemetery can be linked to activities within the period of significance, it is recommended to be part of the eligible portion of the cemetery although it is not legally located on the cemetery grounds.</p> <p>The cemetery would see little change from the date of its establishment until the State Highway Commission deeded 0.34-acres of excess right-of-way to the Clackamas Cemetery Association in 1943. The right-of-way was intended for use by the State Highway Commission for the realignment of Oregon 213, which originally skirted the eastern boundary of the cemetery on what is now SE Ambler Road. The alignment of the highway was shifted to its current location west of the cemetery in the early 1940s using existing right-of-way owned by the state. When additional right-of-way adjacent to the Clackamas Cemetery remained unused after construction of the highway was completed in 1943, the additional land was sold to the Clackamas Cemetery Association. The deeded land expanded the western edge of the cemetery to its current location, which abuts the eastern edge of the Oregon 213 right-of-way.</p>	

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: Clackamas Cemetery

Street Address: SE Ambler Road

City, County: Unincorporated Clackamas, Clackamas County

This portion of the cemetery contains headstones dating from the 1960s onward; use of this area for interments was likely delayed through the 1940s and 1950s due to the impending construction of the Lake Road Interchange immediately west of the cemetery. Construction of the interchange began circa 1962, and was not completed until 1966. The project included the construction of an on-ramp to Oregon 213 immediately adjacent to the expanded western boundary of the cemetery. It has been suggested that some burials may have been moved from this area to accommodate the project (Geigle 1996), but no records have been found to substantiate these claims.

Once construction of the Lake Road Interchange was completed in 1966, the Clackamas Cemetery Association began to incorporate the 1943 plat with the original 1.625-acre parcel deeded to the Clackamas Baptist Church in 1865. The tree line that currently buffers the cemetery from the visual and audible intrusions of Oregon 213 was planted along the western boundary circa 1970, and fencing was added around the perimeter of the cemetery in its entirety at this time. A sign and gate were also added to mark the main entrance on SE Ambler Road, and are located within the road right-of-way.

Physical Description

The Clackamas Cemetery is located on 1.95 acres of land in Section 4, Township 2 South, Range 2 East, Willamette Meridian. SE Ambler Road borders the cemetery to the east, and Oregon 213 borders it to the west. Before an additional 0.34 acre was deeded in 1943, the cemetery was generally square in shape, and officially spanned 1.625 acres before spilling over the eastern parcel boundary into what is now the SE Ambler Road right-of-way. Several of the headstones currently found at the cemetery date previous to the 1865 deed of ownership from the Matlocks to the Clackamas Baptist Church. A survey of Oregon cemeteries and burial sites conducted by the Oregon Department of Transportation (ODOT) and a later survey compiled in 2001 date the earliest known burials at the cemetery to 1850, making it one of the oldest cemeteries in Clackamas County (Byrd 2001; ODOT 1978). The potentially National Register-eligible property is limited to the original 1.625-acre cemetery that the Matlocks deeded to the church and the additional land associated with the cemetery within the SE Ambler Road right-of-way.

A sign reading "Clackamas Cemetery" greets visitors approaching the cemetery from the east via SE Ambler Road; the sign connects to a chain link fence that surrounds three-quarters of the cemetery perimeter to the north, south, and east. To the west, a fence and tree line provide refuge from the sights and sounds of traffic on nearby Oregon 213. Newer headstones dating from the 1960s to the present day are concentrated along this fence line, although the headstone of William T. Matlock, who died in 1872, is located within close proximity of the western boundary at its southernmost point.

With their basic shapes and short inscriptions, the headstones located within the cemetery reflect the necessity of simplicity during the early settlement period. This simplicity is displayed in the headstone marking Matlock's grave, which stands approximately two feet tall, and displays only "W. T. M." Others display prose emoting the loss of a loved one, or proudly detail their crossing of the plains to Oregon, as many early settlers did not survive the treacherous journey along the Oregon Trail and Barlow Road. Two wooden headstones, one dating to 1877, are notable for their innovative use of materials and their survival to the present day. Headstones range in date from the mid-nineteenth century through the modern era and include tablet and obelisk shapes consisting of wood and marble, as well as granite flush, block, and slant styles. There is thought to be over 800 burials contained within the grounds of the cemetery.

References

Byrd, Dean H. (compiler)

2001 *Oregon Burial Site Guide*. Binford & Mort Publishing, Portland, Oregon.

Geigle, Lucille (compiler)

1996 *Walking Through the Cemeteries; Clackamas County Cemetery Records*. Volume 5. Clackamas County Family History Society, Oregon City, Oregon.

General Land Office

1861 *Plat of Township No. 2 South, Range No. 2 East, Willamette Meridian*. Microfiche on file, U.S. Bureau of Land Management, Oregon State Office, Portland, Oregon.

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

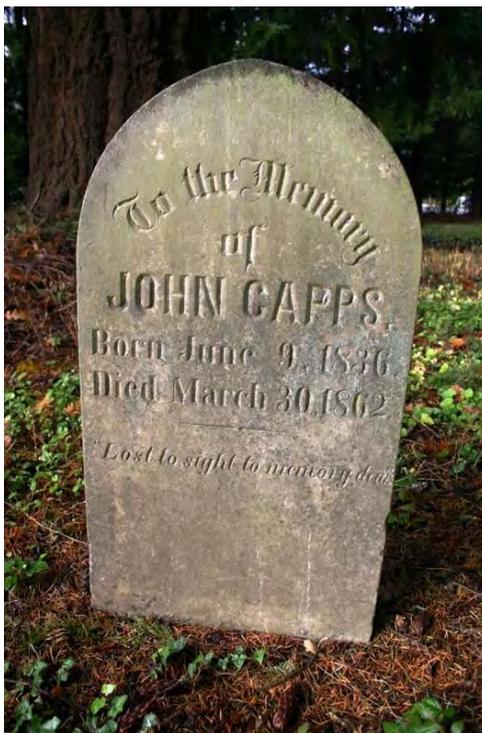
Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County
<p>Henderson, Sarah Fisher, Nellie Edith Latourette, and Kenneth Scott Latourette 1918 Correspondence of Reverend Ezra Fisher. <i>Oregon Historical Quarterly</i> 19(4):351-372.</p> <p>Koler and Morrison 1990 Clackamas County Historic Resources Inventory form for the Ott, Edward, Barn. On file, Oregon State Historic Preservation Office, Salem.</p> <p>Mattoon, Charles Hiram 1905 <i>Baptist Annals of Oregon, 1844-1900</i>. Volume 1. Telephone Register Publishing Company, McMinnville, Oregon.</p> <p>Oregon City Planning Department 2009 <i>819 John Adams Street – First Baptist Church of Oregon City</i>. Electronic document, http://www.orcity.org/planning/819-john-adams-street-first-baptist-church-oregon-city, accessed November 24, 2009.</p> <p>Oregon Department of Transportation (ODOT) 1978 <i>Oregon Cemetery Survey</i>. Oregon Department of Transportation, Salem.</p> <p>Oregon State Archives 2009 <i>Oregon Legislators and Staff Guide</i>. Electronic document, http://arcweb.sos.state.or.us/legislative/histleg/territorial/1849reg.htm, accessed November 20, 2009.</p> <p>Scott, H. W. (editor) 1890 <i>History of Portland, Oregon with Illustrations and Biographical Sketches of Prominent Citizens and Pioneers</i>. D. Mason & Company, Syracuse, New York.</p> <p>Stephens, Joe 1996 Oregon's Supreme Court Library: An Historic Institution in Decline. <i>State, Court & County Law Libraries News</i> 23(1):8.</p> <p><i>The Weekly Oregonian</i> (Portland, Oregon) 1862 U.S. Depository for Oregon. 1 November:2. Portland, Oregon.</p> <p>United States Senate 1887 <i>Journal of the Executive Proceedings of the Senate of the United States of America from December 6, 1858, to August 6, 1861, Inclusive</i>. Volume 11. Government Printing Office, Washington, D.C.</p> <p>Victor, Frances Fuller 1894 <i>The Early Indian Wars of Oregon: Compiled from the Oregon Archives and Other Original Sources with Muster Rolls</i>. State Printer, Salem, Oregon.</p> <p>Warren, Deanna 2001 <i>Clackamas Cemetery, Clackamas, Clackamas County, Oregon</i>. Electronic document, http://www.interment.net/data/us/or/clackamas/clackamas/clackamas.htm, accessed November 19, 2009.</p>	

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County



View: A row of mid- to late-nineteenth century headstones marking multiple generations of the Capps family. The view is towards the west.



View: A representative headstone as viewed towards the north. This stone marks the grave of John Capps, who died in 1862. It is one of many in the cemetery that pre-date the 1865 deed of land from Matlock to the Clackamas Baptist Church for use as a burial place.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County



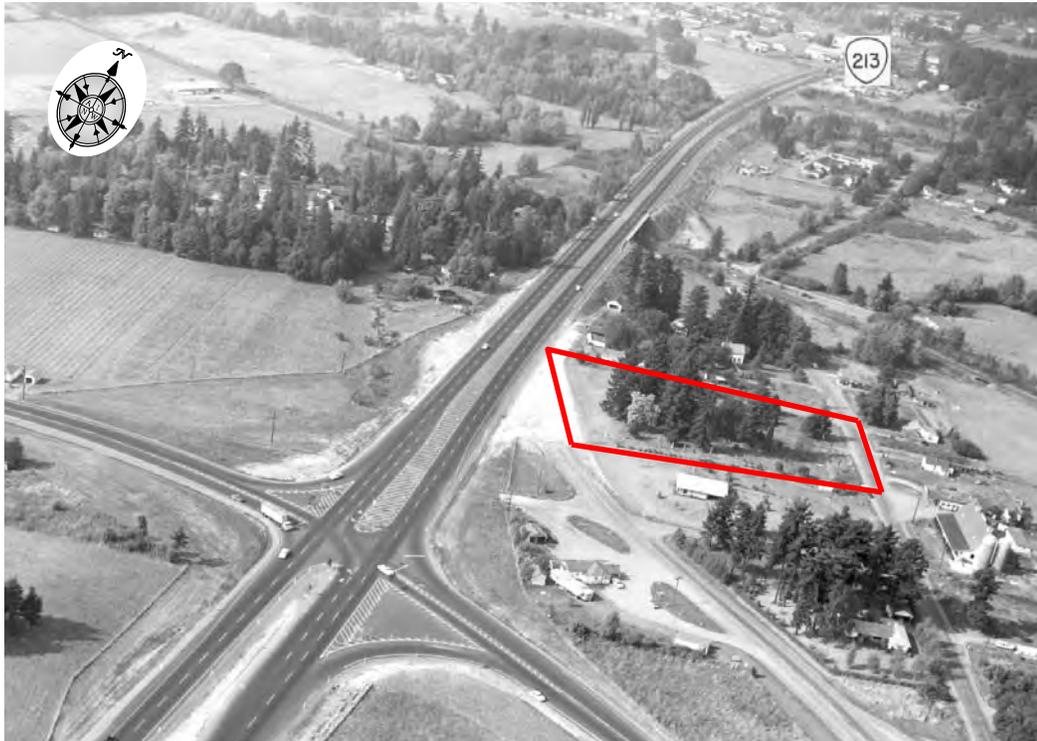
View: The circa 1970 tree and fence line (at right) mark the western boundary of the 1943 portion of the cemetery. Note the newer headstone within close proximity to the boundary. The view is towards the south.



View: The chain link fence and entry gate at SE Ambler Road. The view is towards the west.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: Clackamas Cemetery	
Street Address: SE Ambler Road	City, County: Unincorporated Clackamas, Clackamas County



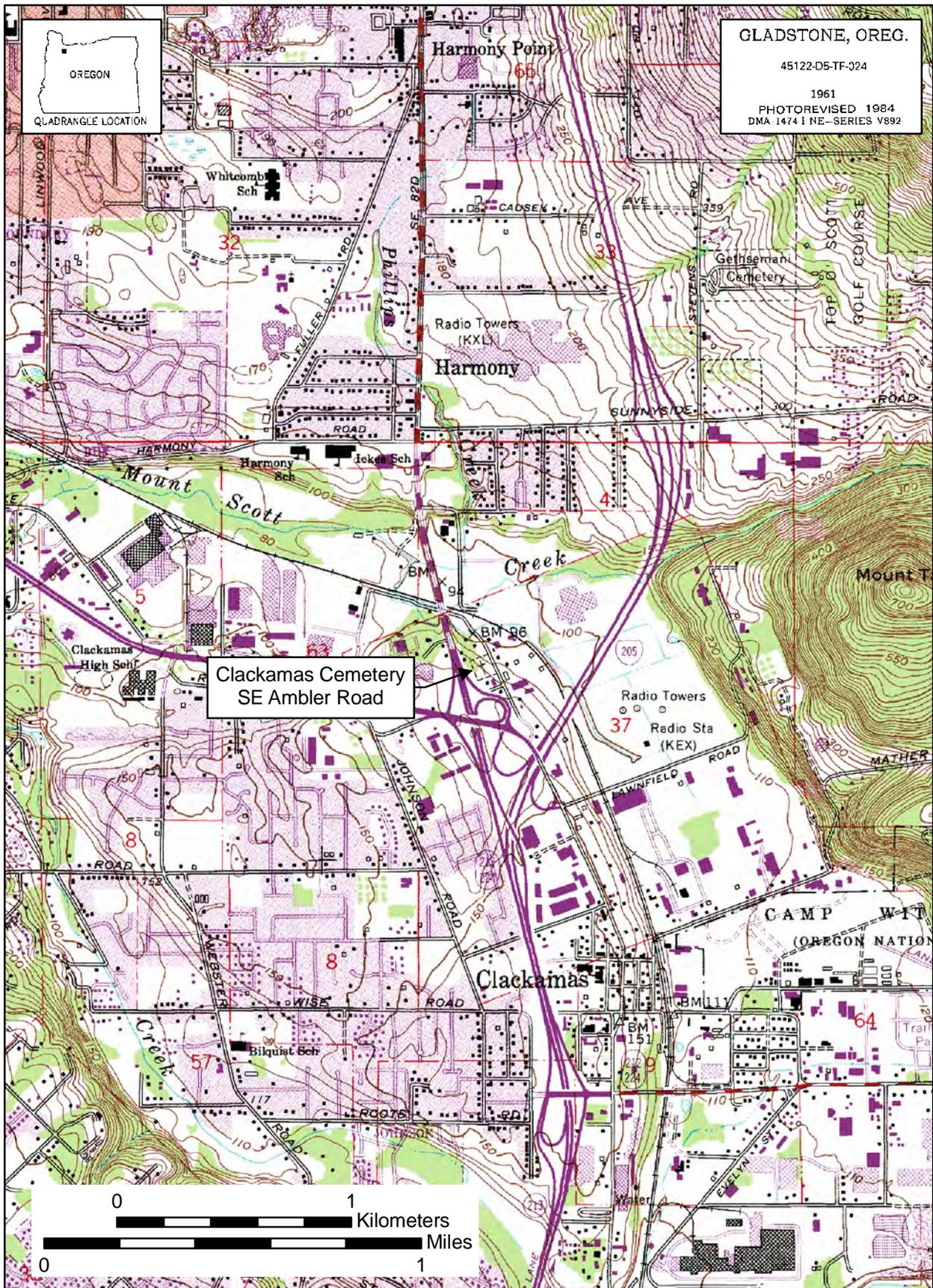
View: Aerial view of the Lake River Interchange under construction in 1962. The cemetery is located within the highlighted area east of an on-ramp under construction. Note the absence of a tree line along the western boundary. Photograph courtesy of ODOT.

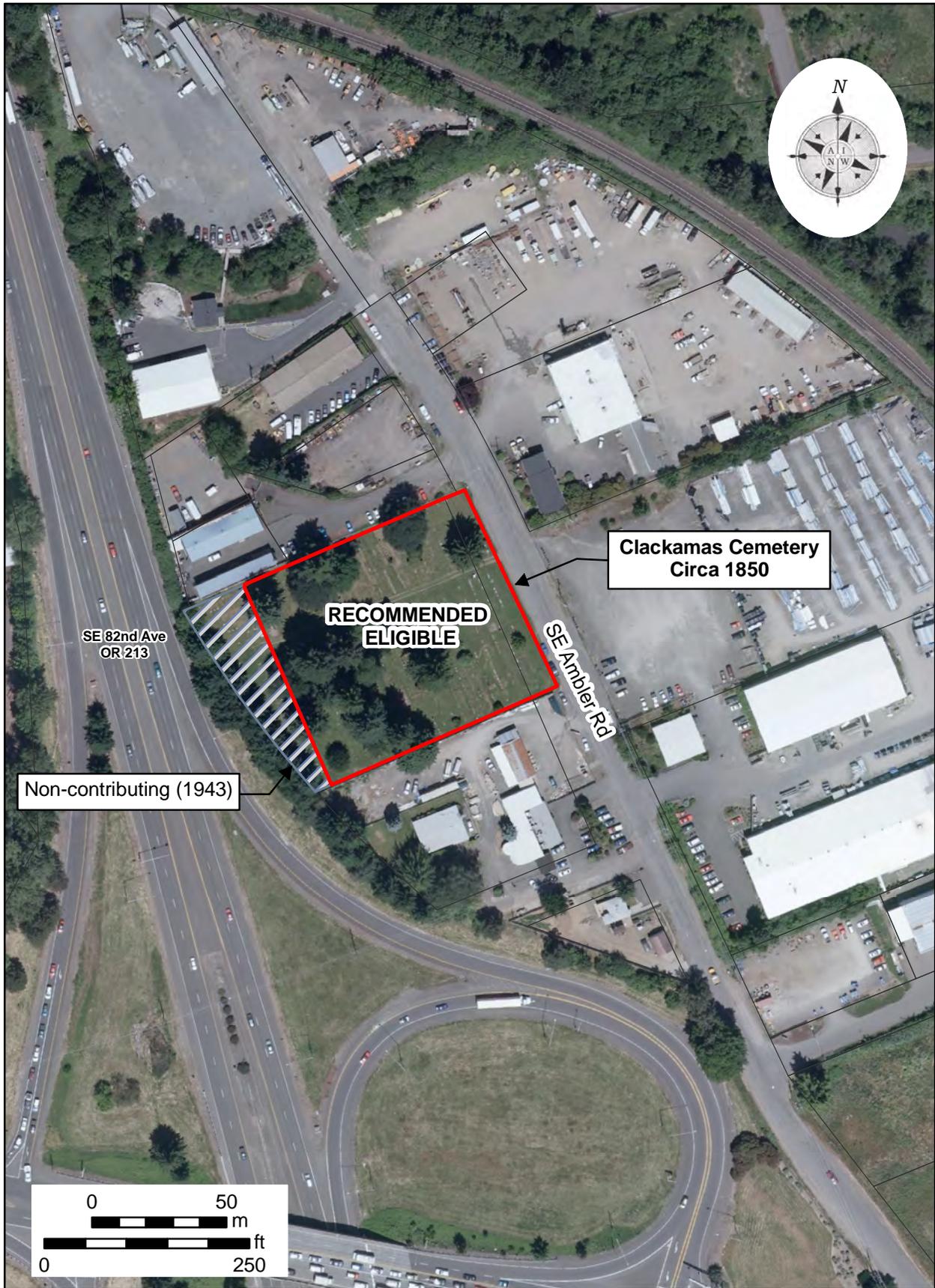


View: Aerial view of the Lake River Interchange in 1981. The cemetery is located within the highlighted area. Note the small tree line that is maturing adjacent to the completed on-ramp. Photograph courtesy of ODOT.



GLADSTONE, OREG.
45122-D5-TF-324
1961
PHOTOREVISED 1984
DMA 1474 I NE-SERIES V892





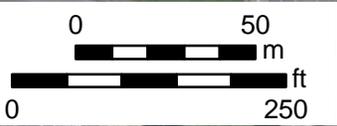
SE 82nd Ave
OR 213

Non-contributing (1943)

**RECOMMENDED
ELIGIBLE**

Clackamas Cemetery
Circa 1850

SE Amber Rd





Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building
355 Capitol St. NE, Rm. 301
Salem, OR 97301-3871

FILE CODE:

DATE: July 6, 2009

TO: Robert W. Hadlow, Senior Historian, ODOT Region 1, Portland
Thomas Picco, Principal Planner, ODOT Region 1, Portland
Emily Moshofsky, Environmental Project Manager, ODOT Region 1, Portland
Becky Crockett, Environmental Unit Manager, ODOT Region 1, Portland
Michelle Eraut, Environmental Program Manager, FHWA, Salem
Key No. #12454, File Type E: Cultural Resource

FROM: Holly Stucker, Geo-Environmental Section 

SUBJECT: **Finding of No Historic Properties Adversely Affected
Boundary Adjustment
KEX Transmitter Facility
Sunrise Corridor, Interstate 205—Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal Aid No. C005(46)PN**

Attached is the signed FOE/DOE on the above referenced project.



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

RECEIVED

JUN 29 2009

STATE HISTORIC
PRESERVATION OFFICE

FILE CODE:

June 26, 2009

Christine Curran
Associate Deputy State Historic Preservation Officer
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97301

SHPO CASE# 08-0861

**Subject: Finding of No Historic Properties Adversely Affected
Boundary Adjustment
KEX Transmitter Facility
Sunrise Corridor, Interstate 205—Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal-Aid No. C005(46)PN**

RECEIVED

JUL 01 2009

Dear Chrissy,

I am writing you to recap a May 21 meeting that you and Ian Johnson of your staff had at your Salem office with Thomas Picco and Robert Hadlow, of the Oregon Department of Transportation's Region 1. Picco and Hadlow met with you to propose an adjustment to the boundary description for KEX Transmitter Facility, which ODOT and the Federal Highway Administration determined eligible for the National Register. (Sarah Jalving of your office concurred on the eligibility on May 21, 2008.)

The existing Section 106 Documentation Form does not describe in detail the boundaries of the eligible property, only stating that it is located in "an open, grassy bottomland." One might assume that the eligible property is the entire parcel in which the transmitter facility is located.

Mr. Picco and Dr. Hadlow presented the case to you that the assumed boundary is much larger than one would expect because the bottomland is much larger than the portion of the parcel devoted to the transmitter facility (towers and their tuning houses, copper grid or mat, and transmitter building). You agreed with this assessment, and noted that creating "buffer zones" around significant historic properties is discouraged and often not justified.

The four of you concluded the meeting by agreeing that a more appropriate boundary description for the National Register-eligible KEX Transmitter Facility would be an encircling line 10 feet beyond the edge of the copper grid and the transmitter building. I asked Dr. Hadlow to prepare a revised Section 106 Documentation Form for the KEX Transmission Facility to reflect the new boundary. It is included with this letter for your

review and concurrence. For clarity, the attached map includes the resource boundary (in green) and 10 and 5 foot setbacks for comparison, however we are proposing the 10 foot setback as is described in the Section 106 Documentation Form.

Finally, you stated that with appropriate documentation, your office would concur on a finding of no historic properties adversely affected for the preferred alternative's impacts to the KEX Transmitter Facility with the revised boundary description.

If you believe that this letter captures the discussion and outcome of the meeting, please sign the box below and forward a copy of the letter to me for our files.

Thanks, again, for agreeing to meet with ODOT staff regarding this coordination request. If you have any questions or require additional information, please contact Dr. Hadlow at (503) 731-8239.

Sincerely,


James B. Norman
Environmental Planning Unit Manager

I agree that this letter captures the discussion and the outcome of the meeting described above.


Christine Curran
Associate Deputy State Historic Preservation Officer

6-29-2009

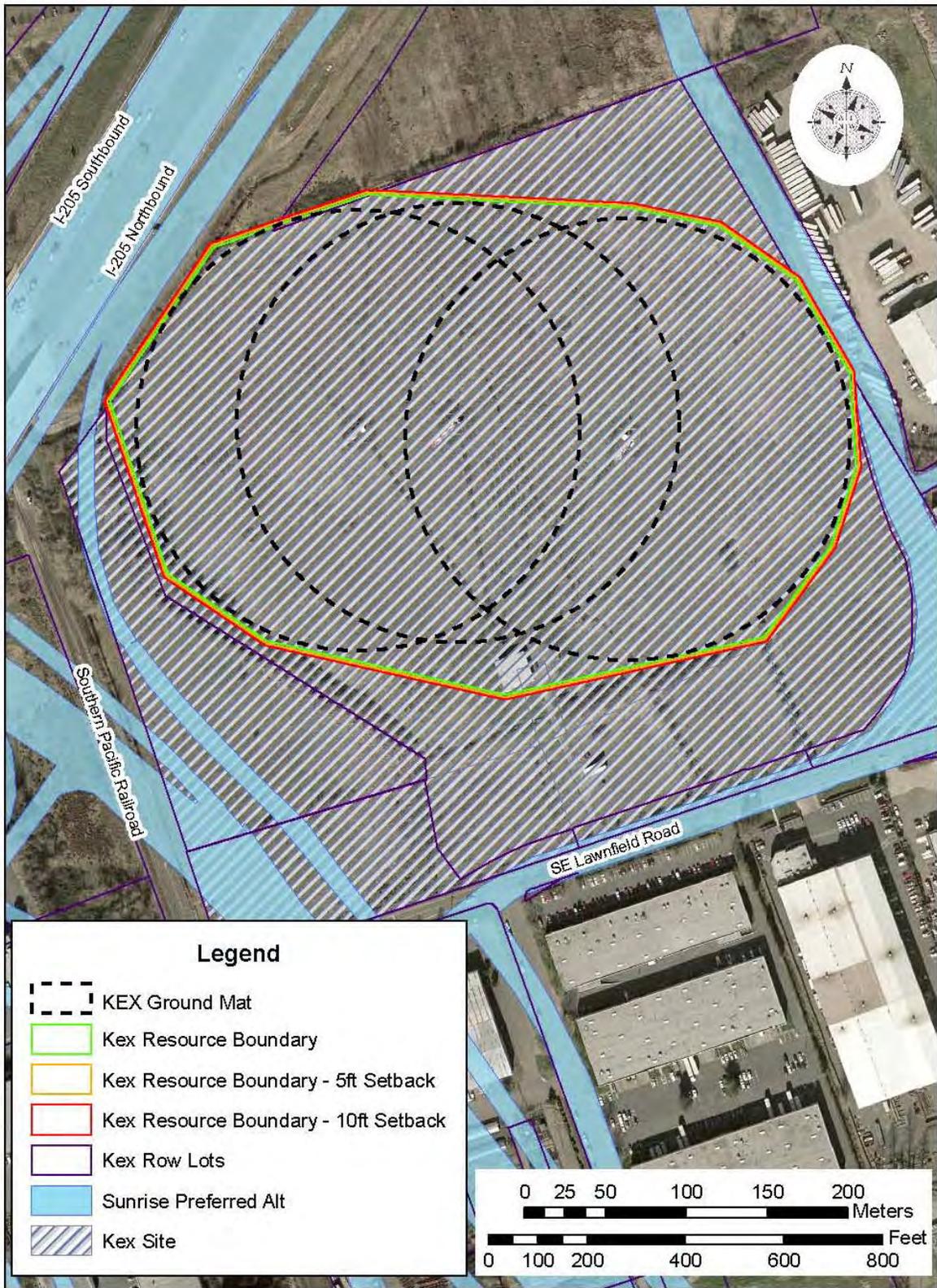
Date

Attachments:

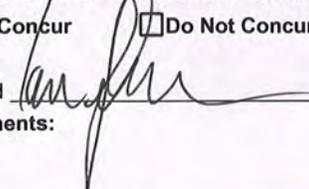
Map, KEX Transmitter Facility with 5-foot and 10-foot setbacks

Copies:

Robert W. Hadlow, Senior Historian, ODOT Region 1, Portland
Thomas Picco, Principal Planner, ODOT Region 1, Portland
Emily Moshofsky, Environmental Project Manager, ODOT Region 1, Portland
Becky Crockett, Environmental Unit Manager, ODOT Region 1, Portland
Michelle Eraut, Environmental Program Manager, FHWA—Oregon Div., Salem



**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Agency/Project: Clackamas County, ODOT/Sunrise Project: I-205 to Rock Creek Junction (Oregon 212/224) ODOT Key No. 12454, Federal-Aid No. C005(46)PN	
Property Name: KEX Transmitter Facility REVISED DOCUMENT, June 23, 2009 (revisions in bold)	
Street Address: 9415 SE Lawnfield Road	City, County: Clackamas, Clackamas
USGS Quad Name: Gladstone, Oregon 7.5-minute	Township: 2S Range: 2E Section: 4
This property is part of a <input type="checkbox"/> District <input checked="" type="checkbox"/> Grouping/Ensemble (see instructions) Name of District or Grouping/Ensemble: KEX Radio Transmitter Facility	
Number and Type of Associated Resources in Grouping/Ensemble: One transmitter building, 3 transmission towers, 3 equipment sheds, 3 underground copper mats	
Current Use: Radio Transmitter Facility	Construction Date: 1947
Architectural Classification / Resource Type: Moderne/Building, Structures	Alterations & Dates: New interior transmitter - 1992
Window Type & Material: Multi-light, steel	Exterior Surface Materials: Primary: Concrete Secondary: Decorative:
Roof Type & Material: Flat with eaves, unknown material	
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
	
KEX Transmitter Building, south elevation. The view is to the north.	
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: 6/29/09 Comments:	

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: KEX Transmitter Facility	REVISED DOCUMENT, June 23, 2009
Street Address: 9415 SE Lawnfield Road	City, County: Clackamas, Clackamas
<p>Historical Background</p> <p>Broadcast radio technology began in the late nineteenth century, but public radio broadcasting did not begin in earnest until after World War I, when a ban on amateur broadcasts was lifted. The first licensed public broadcasting station was KDKA in Pennsylvania in 1920. By the end of 1922, there were 500 to 600 licensed stations in the United States. This was the year of the “great radio boom” (Douglas 1987:69), when KGW in Portland began broadcasting as the twelfth licensed station on the west coast (Chapman, Ellis, and Evans-Hatch 1998:1-3).</p> <p>Most of the early stations were run by newspapers, department stores, colleges and municipalities. Broadcasts were made from homes, schools or stores. The transmission equipment and antennas were typically in or near the broadcast station. Some of the stations began building separate transmission buildings and antennas between the 1920s and 1940s (Chapman, Ellis, and Evans-Hatch 1998:1-3).</p> <p>KEX radio station entered into the broadcasting world before radio broadcasting’s “Golden Age” (generally between 1930 and 1950). It was established in 1926 by the Western Broadcasting Company, which was owned by Vincent I. Kraft’s Northwest Radio Supply Company in Seattle. The station went on-air in late December, 1926, operating on 670 kiloHertz wavelength with 2,500 watts of broadcasting power. Initially, the radio station was located in downtown Portland at the Terminal Sales Building and the transmitter was positioned five miles east on NE Glisan St. and 122nd Avenue. The brick transmitter building (no longer standing) was probably the first building in Portland specifically constructed for a large radio transmitter (Chapman, Ellis and Evans-Hatch 1998:17). Although the station was authorized to operate, it had not yet obtained a license because new radio laws were pending regarding the government’s control of radio broadcasting. Due to this gap in government authority, the station was able to pick the optimal wave-length location at 670 kiloHertz. The station operated only several hours a day, and was unable to sell commercial time. Other difficulties centered on complaints that the station’s broadcasts interfered with other station’s broadcast frequencies and the station was suspected of using more power than it was authorized to use. The KEX frequency was changed many times in the next several years (Patillo 1994:1-4).</p> <p>Probably the most prominent and nationally recognized KEX radio personality was Mel Blanc. He and his wife Estelle produced a popular radio program on KEX between 1933 and 1935 called “Cobwebs and Nuts.” Because of a limited program budget, Blanc performed most of the characters on the show. He later credited the program for bolstering his repertoire of voices and characters. Blanc moved to Hollywood in 1935 and eventually achieved fame as the “man of a thousand voices” in radio and television broadcasting, and cartoons (Los Angeles Times 1989).</p> <p>As the radio industry expanded and evolved, KEX station ownership, its broadcast frequency, and affiliations changed. The Oregonian Publishing Company acquired the station in 1933 as a sister station to their KGW radio station. As a part of the acquisition, KEX radio station was moved to the Oregonian Building, and the radio transmitter was moved to the North Portland transmitter station site used by KGW (recently demolished). The radio’s transmission frequency was changed to 1190 kiloHertz due to frequency relocations resulting from the 1941 North American Radio Broadcasting Agreement (NARBA) treaty (Patillo 1994:1-4).</p> <p>Oregonian Publishing Company sold KEX to Westinghouse Radio Stations, Inc. in 1944 and plans were started to build a new transmitting facility. A 46-acre parcel was purchased in Clackamas, Oregon in 1944, located on flat, wet ground to facilitate conductivity for the underground copper grid required for AM transmission. The intent was to convert the 5,000-watt station into a 50,000-watt, full-time directional broadcasting operation. Westinghouse had the building constructed in 1947, and all new Westinghouse equipment was installed including a Westinghouse (type 50-HG) transmitter. The original transmitter was replaced by a Harris DX 50 transmitter in 1992 (Weiss 2006).</p> <p>To operate at the higher power, three Blaw-Knox 455 foot guy-wired towers were erected. Blaw-Knox towers such as the ones at the KEX transmitting facility were designed and fabricated by the Blaw-Knox company based in Pittsburgh, Pennsylvania. The Blaw-Knox company introduced towers to the market in 1927 and many were installed in the 1930s as the radio broadcasting industry expanded. The KEX towers are Blaw-Knox Vertical Radiators and they were erected by Tower Sales and Erecting Company of Portland, Oregon (Patillo 1-4:1994; Wikipedia 2006: Neilson 2006).</p> <p>KEX continues to generate in the Clackamas location, using the original building and radiator towers. KEX is the only station in the Portland area that operates at 50,000 watts during the day and night, which categorizes it as a Class A radio station. The center tower functions 50,000 watts during the day, and all three are used at night. KPOJ also uses the towers; the end towers operate at 25,000 watts during the day and the center and east towers transmit KPOJ broadcasts during the night (Nielsen 2006).</p>	

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: KEX Transmitter Facility REVISED DOCUMENT, June 23, 2009	
Street Address: 9415 SE Lawnfield Road	City, County: Clackamas, Clackamas

Sources

Chapman, Judith S., David V. Ellis, and Gail Evans-Hatch

1998 *Cultural Resources Investigations for A Proposed New Multnomah County Correctional Facility, Portland, Oregon*. Archaeological Investigations Northwest, Inc. Report No. 155. Prepared for Adolfson Associates, Inc. and Multnomah County, Portland, Oregon.

1999

Douglas, George H.

1987 *The Early Days of Radio Broadcasting*. McFarland & Company, Jefferson, North Carolina, and London.

Hairston, W. Watt

2006 *Blaw-Knox Diamond Radio Towers*. Electronic document. Available, <http://hawkins.pair.com/blaw-know.html>, accessed October 31, 2006.

Los Angeles Times [Los Angeles, California]

1989 Mel Blanc Obituary. 11 July. Los Angeles, California.

Patillo, Craig

1994 *History of Portland Radio Stations*. Ms. on file, Multnomah County Library, Portland, Oregon.

Wikipedia

2006 *Blaw-Knox tower*. Electronic document. Available, http://en.wikipedia.org/wiki/Blaw_Knox_Tower, accessed October 31, 2006.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: KEX Transmitter Facility **REVISED DOCUMENT, June 23, 2009**

Street Address: 9415 SE Lawnfield Road

City, County: Clackamas, Clackamas



View: Transmitter Building (1947), south (left) and east (right) elevations. The view is to the northwest.



View: Three KEX Blaw-Knox vertical radiator towers (1947), view to the northwest.

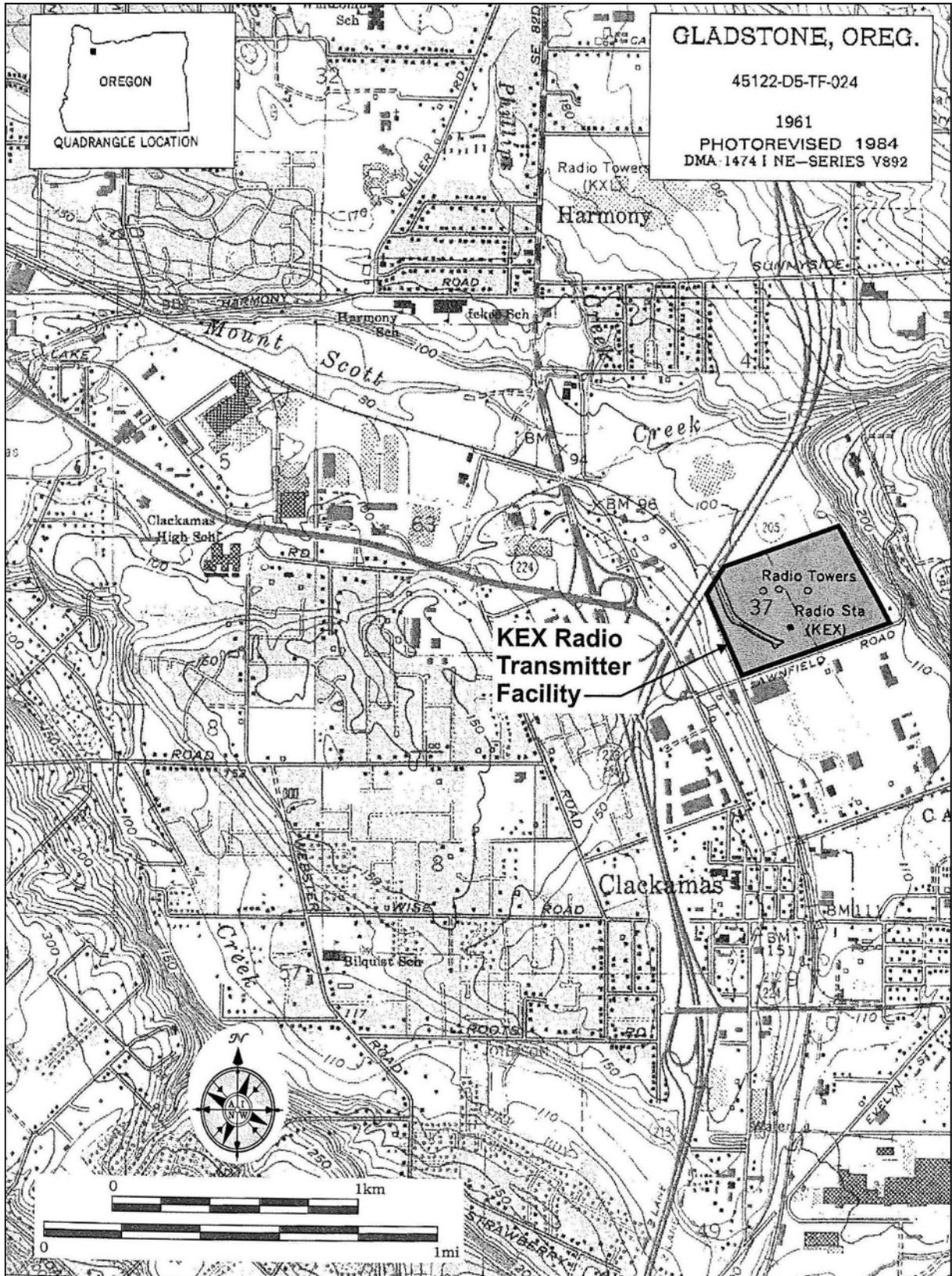
**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: KEX Transmitter Facility REVISED DOCUMENT, June 23, 2009	
Street Address: 9415 SE Lawnfield Road	City, County: Clackamas, Clackamas



View: Equipment sheds at bases of transmission towers. The view is to the northwest.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties





Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building
355 Capitol St. NE
Salem, Oregon 97301

FILE CODE:

April 18, 2008

Roger Roper
Deputy State Historic Preservation Officer
Assistant Director, Heritage Programs
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97301

Attn: Sarah Jalving

**Subject: Section 106 Coordination
Sunrise Corridor, Interstate 205—Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal-Aid No. C005(46)PN**

Dear Mr. Roper,

Please find the enclosed Cultural Resources Technical Report for the Sunrise Corridor. We have included separate printed Section 106 documentation forms for six properties (see Appendix C) and findings of effect for two properties (see Appendix D) for signature. These documents are supplemental to work carried out several years ago during the original Sunrise Corridor environmental process. The proposed project will address congestion and safety problems in the five-mile-long Oregon 212/224 corridor between its interchange with Interstate 205 and Rock Creek Junction, and to serve the growing demand for regional travel and access to the state highway system.

Three of the six resources addressed in the documentation forms are recommended to be eligible for listing in the National Register of Historic Places. They are the Southern Pacific Railroad Willamette Valley Main Line, the Clackamas Elementary School, and the KEX Transmitter Facility. Section 106 Findings of Effect have been prepared for the railroad and the school. The finding for the KEX facility will be transmitted to you separately.

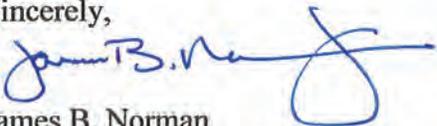
The Southern Pacific Railroad Willamette Valley Main Line is recommended eligible for listing in the NHPA under Criterion A as a historic linear district that draws its significance through its association with the development of railroads in Oregon and the Pacific Northwest. Contributing elements include the historical alignment of the railroad and its continued use as the primary rail line through the Willamette Valley.

The Clackamas Elementary School, located at 15301 SE 92nd Avenue in Clackamas, Oregon, is recommended eligible for listing in the NRHP under Criterion C as a relatively well-preserved, intact example of a late 1930s/1940s school building. A 1953/58 classroom annex and recreational fields associated with the school are not considered to be contributing features to the historic Clackamas Elementary School.

Two build alternatives and one design option will affect the rail line and the school. An application of the Criteria of Adverse Effect indicates findings of no adverse effect for this undertaking for both historic properties. In addition, ODOT believes that a Section 4(f) *De Minimis* Finding for impacts to the school is consistent with Section 6009(A) of SAFETEA-LU. The FHWA will consider the SHPO's concurrence with the Finding of Effect on the Mortuary in reaching its decision regarding the applicability of *de minimis* Section 4(f) on this project. Under this provision, a Section 4(f) avoidance alternative analysis is not required.

Your prompt attention to this coordination request is appreciated. If you have any questions regarding the use of *de minimis* Section 4(f) for the project area, or need further information, please contact Robert W. Hadlow, in our Region 1 headquarters, at (503) 731-8239, or Michelle Eraut, with FHWA, at (503) 587-4716.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

Attachments:

Cultural Resources Report, Sunrise Corridor, Interstate 205—Rock Creek Junction, 2007

Copies to:

Robert W. Hadlow, Ph.D., ODOT Region 1 Interim Environmental Manager
Emily Moshofsky, ODOT Region 1 Environmental Project Manager
Michelle Eraut, FHWA—Oregon Division Environmental Program Manager
Key No. 12454, File Type E: Cultural Resources

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT**

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)

Property Name: Southern Pacific Railroad Willamette Valley Main Line

Street Address: N/A

City, County: Clackamas, Clackamas

Preliminary Finding of Effect:

No Historic Properties Affected No Historic Properties Adversely Affected Historic Properties Adversely Affected

State Historic Preservation Office Comments:

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

Signed *Sarah Johnson*
Comments:

Date 5/21/2008

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 addresses the effect of the proposed road improvements and new highway interchange between Highways 212/224 and I-205 (and associated access ramps, etc.) on the Southern Pacific Railroad Willamette Valley Main Line in the vicinity of Clackamas, Clackamas County (Figure 1 in Appendix A). The Southern Pacific Railroad Willamette Valley Main Line (Oregon & California Railroad, 1870) has been determined to be eligible for listing in the National Register of Historic Places (NRHP) by the Oregon Department of Transportation (ODOT), and concurrence by the Oregon State Historic Preservation Office (SHPO) is pending (refer to Section 106 Documentation Form in Appendix A).

It is the finding of ODOT that the project will have No Adverse Effect on the Southern Pacific Railroad Willamette Valley Main Line. This statement of finding is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36CFR800), Executive Order 11593, and the National Environmental Policy Act.

Project Description

The proposed project is located in the western, urbanized portion of Clackamas County in the vicinity of State Highway 212/224 (see Figure 1, Project Vicinity, and Figure 2, Project Area). The project limits extend approximately 4.9 miles from SE Johnson Road to SE 172nd Avenue, just beyond Rock Creek Junction where Highways 212 and 224 diverge. The purpose of this project is to effectively address congestion and safety problems in the Highway 212/224 corridor between its interchange with Interstate 205 (I-205) and Rock Creek Junction, and to serve the growing demand for regional travel and access to the state highway system.

The proposed action will provide a new limited-access expressway between I-205 and the Rock Creek Junction. The facility would be comprised of six lanes, plus auxiliary lanes, and would include an improved interchange at I-205. This new expressway would become the designated State Highway 212/224, with the existing route reverting to a county arterial.

While no preferred alternative has yet been selected for this project, two Build Alternatives and one Design Option are proposed for the vicinity of the Southern Pacific Railroad Willamette Valley Main Line. The overall Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224) is divided into four geographical zones. The zone in which the Southern Pacific Railroad Willamette Valley Main Line is found is Zone A, which is defined as the westernmost portion of the corridor and represents the I-205 Interchange Area and the Lawnfield Business Area, with a western terminus aligned with SE Johnson Road and an eastern terminus bisecting Camp Withycombe. The north and south boundaries extend from Clackamas Town Center to SE Jennifer Street.

Build Alternatives 2 and 3 are identical in the area of the Southern Pacific Railroad Willamette Valley Main Line. Both Build Alternatives include the construction of ten new overpasses and one expansion of an existing overpass carrying automobile traffic over the Southern Pacific Railroad Willamette Valley Main Line. These include (from south to north):

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT
Continuation Sheet

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)

Property Name: Southern Pacific Railroad Willamette Valley Main Line

Street Address: N/A	City, County: Clackamas, Clackamas
---------------------	------------------------------------

- Expansion of an existing overpass (built in 2004) carrying traffic east and west bound on the present Highway 212/224 over the Southern Pacific Railroad Willamette Valley Main Line;
- New two-lane overpass carrying traffic from southbound SE 82nd Avenue to the eastbound lanes of the proposed realignment of Highway 212/224 (this new overpass is the southernmost of two new overpasses on this proposed connector);
- New two-lane overpass carrying traffic from southbound I-205 to the eastbound lanes of the proposed realignment of Highway 212/224 (this new overpass is the southernmost of two new overpasses on this proposed connector);
- New six-lane overpass carrying traffic eastbound (3 lanes) and westbound (3 lanes) on the proposed realignment of Hwy 212/224;
- New one-lane overpass carrying traffic from the westbound realignment of Highway 212/224 to northbound SE 82nd Avenue;
- New one-lane overpass carrying traffic from the westbound realignment of Highway 212/224 to northbound I-205;
- New two-lane overpass carrying traffic from southbound I-205 to the eastbound lanes of the proposed realignment of Highway 212/224 (this new overpass is the northernmost of two new overpasses on this proposed connector);
- New one-lane overpass carrying traffic from southbound I-205 to the westbound realignment of Highway 212/224;
- New two-lane overpass connecting SE Ambler Road south of the Southern Pacific Railroad Willamette Valley Main Line with SE Ambler Road north of the Southern Pacific Railroad Willamette Valley Main Line, creating a connection between SE 84th Avenue and SE 82nd Drive (via SE Ambler Road);
- New three-lane (one northbound, one southbound, plus one northbound on-ramp lane) overpass carrying traffic from the westbound realignment of Highway 212/224 to northbound SE 82nd Avenue;
- New single-lane overpass carrying traffic from southbound SE 82nd Avenue to the eastbound realignment of Highway 212/224 (this new overpass is the northernmost of two new overpasses on this proposed connector).

Design Option A-2, if selected, will introduce one additional overpass, extending SE Tolbert Street to the east, and carrying eastbound and westbound local traffic over the Southern Pacific Railroad Willamette Valley Main Line. The east end of this proposed extension of SE Tolbert Street will connect to SE Industrial Way.

Description And Significance Of The Historic Property

The Southern Pacific Railroad Willamette Valley Main Line is a standard-gauge railroad extending along the east side of the Willamette River from Portland, south through Clackamas, Oregon City, Woodburn, Salem, and Albany before crossing to the west side of the Willamette River between Harrisburg and Junction City, then continuing on south to Eugene, Cottage Grove, Roseburg, Grants Pass, Medford, and Ashland, and California.

The Southern Pacific Railroad Willamette Valley Main Line, established by the Oregon Central Railroad Company, was one of the first railroads built in Oregon and became one of the first two main lines of the Southern Pacific Railroad. The two lines began construction in 1868; one on the west side of the Willamette River, the Westside Company, and another on the east side of the Willamette River, the Eastside Company. The eastside line began in southeast Portland and was to continue towards the Clackamas River and onward to Salem and Eugene. The project nearly collapsed until the work was taken over by businessman Ben Holladay. He rallied to gather cash and the support of the Oregon Legislature to make the project work while he competed against Joseph Gaston's west side line to win the land grant, which was necessary to operate the railroad legitimately. To succeed, Holladay had to complete the first twenty miles of line and be operational.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT
Continuation Sheet

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)	
Property Name: Southern Pacific Railroad Willamette Valley Main Line	
Street Address: N/A	City, County: Clackamas, Clackamas

Holladay succeeded by completing the railroad to New Era (south of Oregon City) in 1869, despite losing the Clackamas River railroad bridge to flooding and having to replace it. Gaston and Holladay continued to compete for land rights for other segments of rail line through Oregon. Holladay's claim to the Oregon Central Railroad Company was challenged in court, and so it was reorganized as the Oregon and California Railroad Company in 1870. This maneuver allowed Holladay to clear his rights to the land grants and in that same year, he took control of Gaston's Westside Railroad. By 1871, the railroad extended from Portland to Eugene, and by 1872 within 160 miles of the California border (Austin and Dill 1987:10-14).

Holladay's financial situation had deteriorated, and Henry Villard took over the control of the Oregon and California Company, continuing the line to California in 1884 and expanding the railroad throughout Oregon. Villard's connections to the Oregon and California Railroad Company ended in 1884, and the Southern Pacific acquired the railroad in 1887 (Austin and Dill 1987:15). In 1996, Southern Pacific merged with Union Pacific Railroad under the UP name, and that company continues to operate this active line today (Union Pacific 2004).

The Southern Pacific Railroad Willamette Valley Main Line is eligible for listing in the National Register of Historic Places (NRHP) under Criterion A through its association with the historical development of railroads in Oregon and the subsequent economic development of the state. This railroad alignment represents a portion of the first railroad built in the State of Oregon, the Oregon & California Railroad (1870), which ran along the east side of the Willamette River from Portland to northern California. It continues to follow its original alignment through this portion of the Willamette Valley.

Avoidance Alternatives Considered

The Southern Pacific Railroad Willamette Valley Main Line has been determined eligible for listing in the NRHP (Appendix A). To meet all the project objectives, two Build Alternatives, one Design Option, and a No-Build Alternative are being considered. None have yet been selected as the preferred alternative. Both build alternatives would include an improved interchange at I-205 and a folded diamond interchange at Rock Creek Junction. The alignment of the facility would generally follow a natural bluff-line. Associated improvements to address local circulation are also included.

Build Alternative 2: Build with Midpoint Interchange

This alternative is distinguished by the inclusion of a midpoint interchange in the vicinity of SE 122nd Avenue, which would connect the expressway to the existing Highway 212/224. Implementation of Build Alternative 2 would result in the introduction of eleven new vehicular overpasses spanning the Southern Pacific Railroad Willamette Valley Main Line. In terms of effects to the historic resource, Build Alternative 2 is identical to Build Alternative 3.

Build Alternative 3: Build with No Midpoint Interchange

In contrast to Alternative 2, this alternative would not have a midpoint interchange, resulting in no access to the expressway between I-205 and Rock Creek Junction. Implementation of Build Alternative 3 would result in the introduction of eleven new vehicular overpasses spanning the Southern Pacific Railroad Willamette Valley Main Line. In terms of effects to the historic resource, Build Alternative 3 is identical to Build Alternative 2.

Design Option A-2: Modified 1996 Design

This Design Option A-2 is identical to Build Alternatives 2 and 3, except that it provides for the extension of SE Tolbert Street to the east, connecting to SE Industrial Way. This provision would include the construction of one additional overpass (for a total of twelve).

No-Build Alternative

The National Environmental Policy Act (NEPA), ODOT, and Federal Highway Administration (FHWA) guidelines require that a no-build option be evaluated as an alternative. The no-build alternative would maintain the existing roadway except for committed improvements scheduled in ODOT's six-year Statewide Transportation Improvement Program (STIP) and Metro's Financially Constrained Projects listed in the Regional Transportation Plan (RTP). These listed projects include widening SE 82nd Drive (Lawnfield Road to Highway 212/224), extension of the climbing lane on Highway 212 (Rock Creek Junction to SE 172nd Avenue), and widening SE 172nd Avenue (Foster Road to Highway 212). None of these planned improvements would affect the historic resource Southern Pacific Railroad Willamette Valley Main Line.

Evaluation Of Effects

An application of the criteria of effect indicates a finding of No Adverse Effect on the integrity of the Southern Pacific Railroad Willamette Valley Main Line. The Southern Pacific Railroad Willamette Valley Line in the vicinity of the project area draws its historical significance from the continued use of the original alignment for rail transportation, and the project will not affect the

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT
Continuation Sheet

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)	
Property Name: Southern Pacific Railroad Willamette Valley Main Line	
Street Address: N/A	City, County: Clackamas, Clackamas

ability of the railroad to continue to do so. Although the setting of the railroad will be impacted through the implementation of any of the proposed Build Alternatives or the Design Option, the setting around the resource in this area has already been heavily compromised through the development of I-205 in the mid-1960s, and the introduction of four overpasses currently carrying traffic over the railroad within the project area. This part of Clackamas continues to be developed for industrial and commercial use, further compromising the historic setting of the railroad in this area.

Conclusion

It is the determination of ODOT that the project would not adversely affect the Southern Pacific Railroad Willamette Valley Line, an historic linear resource determined eligible for listing in the NRHP in 2006. An application of the Criteria of Effect results in a finding of "No Historic Properties Adversely Affected."

Sources

Austin, Ed, and Tom Dill

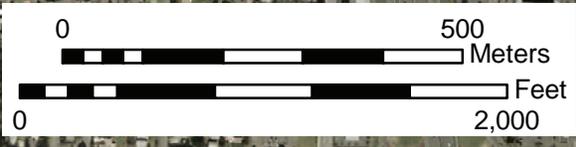
1987 *The Southern Pacific in Oregon*. Pacific Fast Mail, Edmonds, Washington.

Union Pacific Railroad Company

2004 *Union Pacific Railroad Chronological History*. Electronic document, <http://www.uprr.com/aboutup/history/uprr-chr.shtml>, accessed November 26, 2004.



Southern Pacific Railroad
Willamette Valley Main Line





GLADSTONE, OREG.

45122-D5-TF-024

1961

PHOTOREVISED 1984
DMA 1474 I NE-SERIES V892



**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

RECEIVED

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Agency/Project: Clackamas County, ODOT/Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)	
Property Name: Southern Pacific Railroad Willamette Valley Main Line	
Street Address: Willsburg Junction (MP 765.2) to Eugene (MP 647.3)	City, County: Clackamas, Clackamas
USGS Quad Name: Gladstone, Oregon 7.5-minute	Township: 2 South Range: 2 East Section: 4,9
This property is part of a <input checked="" type="checkbox"/> District <input type="checkbox"/> Grouping/Ensemble (see instructions)	
Name of District or Grouping/Ensemble: Southern Pacific Railroad Willamette Valley Main Line Linear District	
Number and Type of Associated Resources in Grouping/Ensemble: Historic alignment	

Current Use: Railroad	Construction Date: 1868-1869
Architectural Classification / Resource Type: N/A/Linear district	Alterations & Dates: 1871
Window Type & Material: N/A	Exterior Surface Materials: Primary: rock ballast Secondary: steel tracks Decorative:
Roof Type & Material: N/A	
Condition: <input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor	Integrity: <input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor

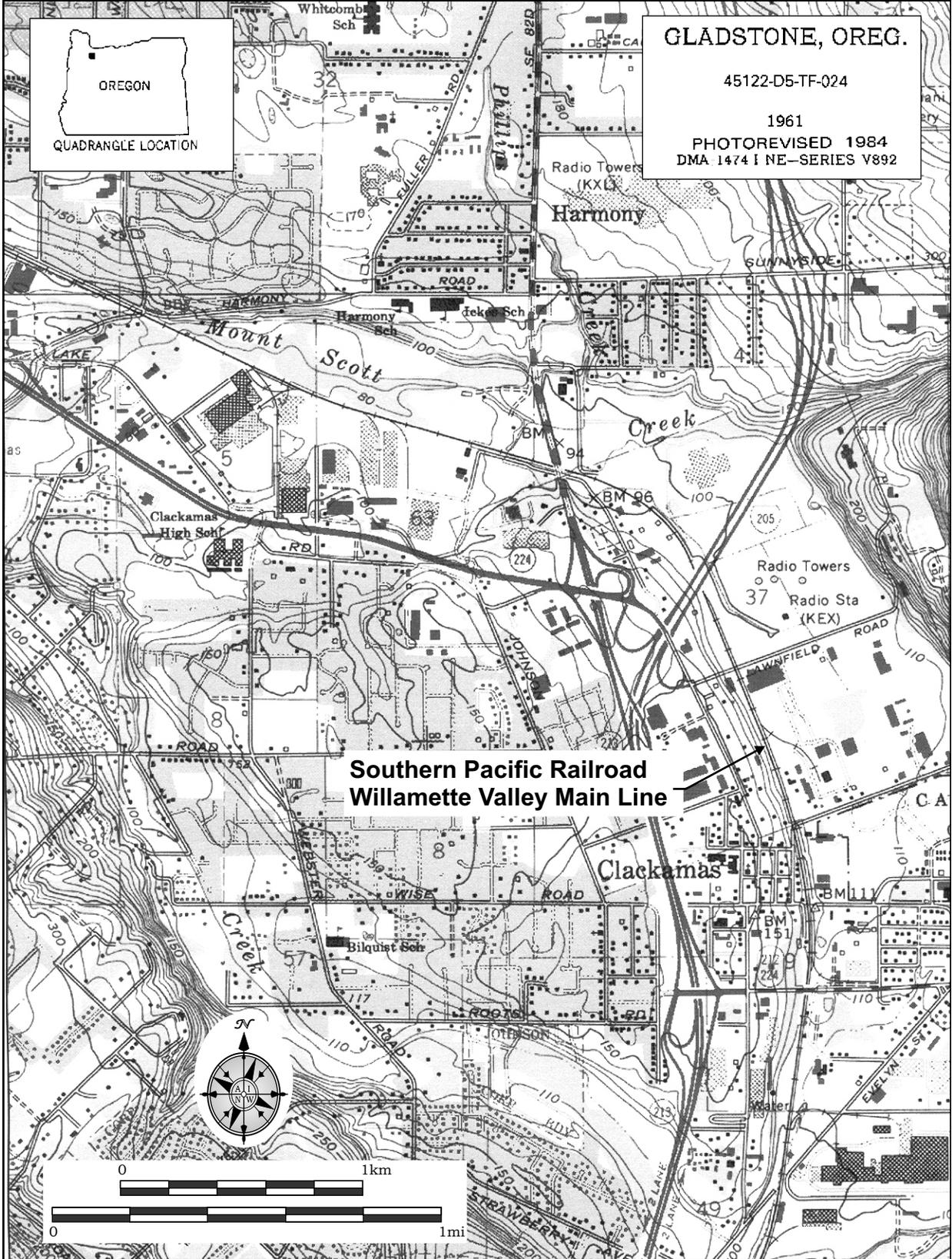


Southern Pacific Railroad Willamette Valley Main Line Linear District viewed to the north from Highway 212/224 overpass.

Preliminary National Register Findings: <input type="checkbox"/> National Register listed	
<input checked="" type="checkbox"/> Potentially Eligible: <input type="checkbox"/> Individually <input checked="" 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 <u><i>Sarah Johnson</i></u>	Date <u>5/21/2008</u>
Comments:	

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: Southern Pacific Railroad Willamette Valley Main Line	
Street Address: Willsburg Junction (MP 765.2) to Eugene (MP 647.3)	City, County: Varies
Architect, Builder or Designer (if known): Oregon Central Railroad Co.	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>Physical Description</p> <p>The Southern Pacific (SP) Railroad Willamette Valley Main Line generally runs south from southeast Portland (Willsburg Junction [MP 765.2]) to Eugene (MP 647.3). Within the project area it approaches from the northwest, crosses beneath I-205, then extends south parallel to I-205, east of the highway in Clackamas, Oregon. The Willamette Valley line corridor essentially remains intact except for minor changes. The tracks have been upgraded over time and more recently are 136-pound steel (Austin and Dill 1987:69). There are three sets of main tracks on a flat bed of rock ballast. The former railroad stop at Clackamas was moved and later demolished. The immediate setting within the project area is mostly a mix of commercial and industrial uses.</p>	
<p>Significance Statement</p> <p>The Southern Pacific Railroad Willamette Valley Main Line is recommended to be eligible for listing in the National Register of Historic Places under Criterion A for its association with the economic development of the Willamette Valley, and as the first railroad to service the major cities of Portland, Oregon City, Salem, and Eugene. Expansion of the railroad to California and connections with eastern transcontinental lines ensured Oregon's place in the competitive economic marketplace.</p> <p>The historic alignment of the 1869 railroad corridor remains intact. In the project area, the line has been upgraded with modern overpasses and other features, and the setting has changed from rural to industrial/suburban.</p>	
<p>Historical Background</p> <p>The SP Main line was established by the Oregon Central Railroad Company as one of the first rail lines built in Oregon. Construction began in 1868 with two competitive lines; one on the west side of the Willamette River by the Westside Company and another on the east side of the Willamette River by the Eastside Company. The eastside line, the subject of this form, began in southeast Portland and continued towards the Clackamas River and onward to Salem and Eugene. The project nearly collapsed until the work was taken on by businessman Ben Holladay. He rallied to gather cash and the support of the Oregon Legislature to make the project feasible, and competed against Joseph Gaston's westside line to win the land grant, which was necessary to operate the railroad legitimately. To succeed, Holladay had to complete the first twenty miles of his eastside line and be operational. Holladay accomplished this by completing the railroad to New Era, south of Oregon City, in 1869, despite losing the Clackamas River railroad bridge to flooding and having to replace it.</p> <p>Holladay's claim to the Oregon Central Railroad Company was challenged in court, and so it was reorganized as the Oregon and California Railroad Company in 1870. This maneuver allowed him to clear his rights to the land grants. In that same year he had also taken over Gaston's Westside Railroad Company.</p> <p>By 1871, Holladay's eastside railroad extended from Portland to Eugene, and by 1872 within 160 miles of the California border (Austin and Dill 1987:10-14). After Holladay's financial situation had deteriorated, Henry Villard took over the control of the Oregon and California Railroad Company and continued the line to Ashland near the California border in 1884. Southern Pacific acquired the railroad in 1887, since then continual improvements and upgrades to the line have been made (Austin and Dill 1987:15, 69).</p>	
<p>Sources</p> <p>Austin, Ed, and Tom Dill 1987 <i>The Southern Pacific in Oregon</i>. Pacific Fast Mail, Edmonds, Washington.</p>	



GLADSTONE, OREG.

45122-D5-TF-024

1961

PHOTOREVISED 1984
DMA 1474 I NE-SERIES V892



**Southern Pacific Railroad
Willamette Valley Main Line**



Southern Pacific Railroad
Willamette Valley Main Line





Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building
355 Capitol St. NE
Salem, Oregon 97301

FILE CODE:

April 18, 2008

Roger Roper
Deputy State Historic Preservation Officer
Assistant Director, Heritage Programs
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97301

Attn: Sarah Jalving

**Subject: Section 106 Coordination
Sunrise Corridor, Interstate 205—Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal-Aid No. C005(46)PN**

Dear Mr. Roper,

Please find the enclosed Cultural Resources Technical Report for the Sunrise Corridor. We have included separate printed Section 106 documentation forms for six properties (see Appendix C) and findings of effect for two properties (see Appendix D) for signature. These documents are supplemental to work carried out several years ago during the original Sunrise Corridor environmental process. The proposed project will address congestion and safety problems in the five-mile-long Oregon 212/224 corridor between its interchange with Interstate 205 and Rock Creek Junction, and to serve the growing demand for regional travel and access to the state highway system.

Three of the six resources addressed in the documentation forms are recommended to be eligible for listing in the National Register of Historic Places. They are the Southern Pacific Railroad Willamette Valley Main Line, the Clackamas Elementary School, and the KEX Transmitter Facility. Section 106 Findings of Effect have been prepared for the railroad and the school. The finding for the KEX facility will be transmitted to you separately.

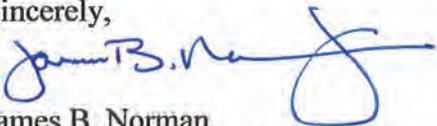
The Southern Pacific Railroad Willamette Valley Main Line is recommended eligible for listing in the NHPA under Criterion A as a historic linear district that draws its significance through its association with the development of railroads in Oregon and the Pacific Northwest. Contributing elements include the historical alignment of the railroad and its continued use as the primary rail line through the Willamette Valley.

The Clackamas Elementary School, located at 15301 SE 92nd Avenue in Clackamas, Oregon, is recommended eligible for listing in the NRHP under Criterion C as a relatively well-preserved, intact example of a late 1930s/1940s school building. A 1953/58 classroom annex and recreational fields associated with the school are not considered to be contributing features to the historic Clackamas Elementary School.

Two build alternatives and one design option will affect the rail line and the school. An application of the Criteria of Adverse Effect indicates findings of no adverse effect for this undertaking for both historic properties. In addition, ODOT believes that a Section 4(f) *De Minimis* Finding for impacts to the school is consistent with Section 6009(A) of SAFETEA-LU. The FHWA will consider the SHPO's concurrence with the Finding of Effect on the Mortuary in reaching its decision regarding the applicability of *de minimis* Section 4(f) on this project. Under this provision, a Section 4(f) avoidance alternative analysis is not required.

Your prompt attention to this coordination request is appreciated. If you have any questions regarding the use of *de minimis* Section 4(f) for the project area, or need further information, please contact Robert W. Hadlow, in our Region 1 headquarters, at (503) 731-8239, or Michelle Eraut, with FHWA, at (503) 587-4716.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

Attachments:

Cultural Resources Report, Sunrise Corridor, Interstate 205—Rock Creek Junction, 2007

Copies to:

Robert W. Hadlow, Ph.D., ODOT Region 1 Interim Environmental Manager
Emily Moshofsky, ODOT Region 1 Environmental Project Manager
Michelle Eraut, FHWA—Oregon Division Environmental Program Manager
Key No. 12454, File Type E: Cultural Resources

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT**

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)	
Property Name: Clackamas School	
Street Address: 15301 SE 92 nd Avenue	City, County: Clackamas, Clackamas

Preliminary Finding of Effect:
 No Historic Properties Affected No Historic Properties Adversely Affected Historic Properties Adversely Affected

State Historic Preservation Office Comments:
 Concur Do Not Concur: No Historic Properties Affected
 No Historic Properties Adversely Affected
 Historic Properties Adversely Affected

Signed  Date 5/21/2008

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 addresses the effect of the proposed road improvements and new highway interchange between Highways 212/224 and I-205 (and associated access ramps, etc.) on the Clackamas Elementary School, located at 15301 SE 92nd Avenue, Clackamas, Clackamas County (Figure 1 in Appendix A). The Clackamas Elementary School has been determined to be eligible for listing in the National Register of Historic Places (NRHP) by the Oregon Department of Transportation (ODOT), and concurrence by the Oregon State Historic Preservation Office (SHPO) is pending (refer to Section 106 Documentation Form in Appendix A).

It is the finding of ODOT that the project will have No Adverse Effect on the Clackamas Elementary School. This statement of finding is made pursuant to the requirements of the National Historic Preservation Act of 1966 (36CFR800), Executive Order 11593, and the National Environmental Policy Act.

Project Description

The proposed project is located in the western, urbanized portion of Clackamas County in the vicinity of State Highway 212/224 (see Figure 1, Project Vicinity, and Figure 2, Project Area). The project limits extend approximately 4.9 miles from SE Johnson Road to SE 172nd Avenue, just beyond Rock Creek Junction where Highways 212 and 224 diverge. The purpose of this project is to effectively address congestion and safety problems in the Highway 212/224 corridor between its interchange with Interstate 205 (I-205) and Rock Creek Junction, and to serve the growing demand for regional travel and access to the state highway system.

The proposed action will provide a new limited-access expressway between I-205 and the Rock Creek Junction. The facility would be comprised of six lanes, plus auxiliary lanes, and would include an improved interchange at I-205. This new expressway would become the designated State Highway 212/224, with the existing route reverting to a county arterial.

While no preferred alternative has yet been selected for this project, two Build Alternatives and one Design Option are proposed for the vicinity of the Southern Pacific Railroad Willamette Valley Main Line. The overall Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224) is divided into four geographical zones. The zone in which the Southern Pacific Railroad Willamette Valley Main Line is found is Zone A, which is defined as the westernmost portion of the corridor and represents the I-205 Interchange Area and the Lawnfield Business Area, with a western terminus aligned with SE Johnson Road and an eastern terminus bisecting Camp Withycombe. The north and south boundaries extend from Clackamas Town Center to SE Jennifer Street.

- Build Alternatives 2 and 3 are identical in the area of the Clackamas Elementary School. Both Build Alternatives include the construction of a new northbound ramp connecting I-205 to Highway 212/224 via a new signaled interchange. The new ramp would pass between the current alignment of I-205 and the Clackamas Elementary School, requiring the taking of a small piece of land in the southwest corner of the grounds associated with the school.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT
Continuation Sheet

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)

Property Name: Clackamas School

Street Address: 15301 SE 92 nd Avenue	City, County: Clackamas, Clackamas
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- Design Option A-2, which differs from Design Option A-1 (incorporated in both Build Alternatives 2 and 3) only by introducing a direct connection between Lawnfield Road and Tolbert Street, would have the same effect on the Clackamas Elementary School as Design Options 2 and 3.

Description And Significance Of The Historic Property

Clackamas Elementary School is a single-story school with Tudor-style design elements, including the castellated entryway with crenellated parapet and Tudor-arched doorway. The main portion of the school, built in 1939 and expanded in 1947, is "H" shaped with a centered wing on the rear elevation. The rear portions between the end wings and center rear wing have been infilled with later construction. Attached to the northwest corner of the original building, is a 1953 classroom annex, connected to the main structure by a glassed-in breezeway and extended to the west in 1958 (Krumm 2007).

The main portion of the building has a hipped roof, both over the main mass and over the projecting end wings, all clad with asphalt shingle. The building is constructed in concrete with incised seams, giving the building the appearance of large-block, ashlar-finish masonry construction. The windows are intact, 6-over-6, wood sash windows. The open spaces at the rear of the building, between the wings and the center rear wing, were infilled at an unknown date, but are not visible from the east (front), north or south elevations.

The 1953/1958 classroom annex attached to the rear of the north wing is a single-story classroom wing built in two episodes. The roof across the entire structure is a low-pitched, gable roof clad in asphalt shingle. The walls are clad in concrete with a stucco finish. The eastern 1953 portion of the addition has fixed, steel-framed windows. Above the windows and doors are steel-framed, multi-light windows with frosted lights. The western 1958 portion of the addition has large, fixed steel-framed windows with small, operable lower sashes. This portion does not carry the upper frosted-glass windows.

The Clackamas Elementary School is eligible for listing in the NRHP under Criterion C as a relatively well-preserved, intact example of a late 1930s school building with well-matched 1940s additions, originally built by the Public Works Administration (PWA) (Shearer 1979:20). The 1953/1958 classroom annex and the recreational fields associated with the school are not considered to be contributing elements to the historic Clackamas Elementary School.

Following a fire that destroyed the previous structure, the PWA was engaged to construct a new school to serve the community of Clackamas. The original building was rectangular and contained four classrooms, with two grades located in each. In 1947, the school was expanded to accommodate additional students due to a merger with the East Clackamas School. The additional six classrooms were added at the north and south ends (3 classrooms in each) in the form of projecting wings (Shearer 1979:21). Established design motifs and window designs were carried into the new wings, creating a near seamless transition between the 1939 and 1947 build events. In 1953, the expanding student population led to the construction of three new classrooms in a single-story classroom annex, attached to the rear of the north wing. In 1958, this annex was extended to the west, adding an additional three classrooms (Clackamas Elementary School 1974:52).

Because the alterations were all done during the historic period and during a relatively short timespan (19 years between original construction and final, current layout), and because the 1953/1958 classroom annex is attached to the original building through a glass-enclosed breezeway allowing for easy differentiation between older construction and more recent construction, the additions do not diminish the integrity of the school to the point as to render it ineligible. The main portion of the school maintains good integrity, with intact, original design elements and intact, original windows dating to the 1939 construction of the original school and the 1947 expansion.

The Clackamas Elementary School (originally known as Clackamas School) was built in 1939 to serve the primary-school children in the town of Clackamas. Prior to the 1972 formation of the North Clackamas School District, Clackamas Elementary School was a part of Clackamas District No. 64, which included Bilquist School, Carver School, McLoughlin Junior High School (Krumm 2007).

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT
Continuation Sheet

Agency/Project: Clackamas County, Oregon Department of Transportation/ Sunrise Project: I-205 to Rock Creek Junction (Highway 212/224)	
Property Name: Clackamas School	
Street Address: 15301 SE 92 nd Avenue	City, County: Clackamas, Clackamas

Avoidance Alternatives Considered

The Clackamas Elementary School has been determined eligible for listing in the NRHP (Appendix A). To meet all the project objectives, two Build Alternatives, one Design Option, and a No-Build Alternative are being considered. None have yet been selected as the preferred alternative. The placement of the proposed ramp between northbound I-205 and Hwy 212/224 is limited by the existing alignment of I-205 and existing development in the town of Clackamas along the east side of I-205.

Build Alternative 2: Build with Midpoint Interchange

This alternative is distinguished by the inclusion of a midpoint interchange in the vicinity of SE 122nd Avenue, which would connect the expressway to the existing Highway 212/224. Implementation of Build Alternative 2 would result in the introduction of a new northbound ramp connecting I-205 to Highway 212/224 via a new signaled interchange. The new ramp would pass between the current alignment of I-205 and the Clackamas Elementary School, requiring the taking of a small piece of land in the southwest corner of the grounds associated with the school. In terms of effects to the historic resource, Build Alternative 2 is identical to Build Alternative 3.

Build Alternative 3: Build with No Midpoint Interchange

In contrast to Alternative 2, this alternative would not have a midpoint interchange, resulting in no access to the expressway between I-205 and Rock Creek Junction. Implementation of Build Alternative 2 would result in the introduction of a new northbound ramp connecting I-205 to Highway 212/224 via a new signaled interchange. The new ramp would pass between the current alignment of I-205 and the Clackamas Elementary School, requiring the taking of a small piece of land in the southwest corner of the grounds associated with the school. In terms of effects to the historic resource, Build Alternative 3 is identical to Build Alternative 2.

Design Option A-2: Modified 1996 Design

This Design Option A-2 is identical to Build Alternatives 2 and 3, except that it provides for the extension of SE Tolbert Street to the east, connecting to SE Industrial Way. In terms of effects to the historic resource, Design Option A-2 is identical to Build Alternatives 2 and 3.

No-Build Alternative

The National Environmental Policy Act (NEPA), ODOT, and Federal Highway Administration (FHWA) guidelines require that a no-build option be evaluated as an alternative. The no-build alternative would maintain the existing roadway except for committed improvements scheduled in ODOT's six-year Statewide Transportation Improvement Program (STIP) and Metro's Financially Constrained Projects listed in the Regional Transportation Plan (RTP). These listed projects include widening SE 82nd Drive (Lawnfield Road to Highway 212/224), extension of the climbing lane on Highway 212 (Rock Creek Junction to SE 172nd Avenue), and widening SE 172nd Avenue (Foster Road to Highway 212). None of these planned improvements would affect the historic resource Clackamas Elementary School.

Evaluation Of Effects

An application of the criteria of effect indicates a finding of No Adverse Effect on the integrity of the Clackamas Elementary School. The Clackamas Elementary School draws its historical significance from the design and integrity of the main portion of the building (1939-1947 build episodes), and the project will not affect these qualities. Although the setting of the school will be impacted through the implementation of any of the proposed Build Alternatives or the Design Option, the setting around the resource in this area has already been heavily compromised through the development of I-205 in the mid-1960s.

Conclusion

It is the determination of ODOT that the project would not adversely affect the Clackamas Elementary School, an historic building determined eligible for listing in the NRHP in 2007. An application of the Criteria of Effect results in a finding of "No Historic Properties Adversely Affected."

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: FINDING OF EFFECT
Continuation Sheet

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Street Address: 15301 SE 92 nd Avenue	City, County: Clackamas, Clackamas

Sources

Clackamas Elementary School Fourth Grade Class

1974 *Clackamas, Oregon*. Prepared by the Fourth Grade Class of Clackamas Elementary School, Self-Published.

Krumm, Joe

2007 Personal Communication by telephone with Jason M. Allen, June 6, 2007.

Shearer, Margaret (ed.)

1979 *Clackamas, Oregon II: A Walking Tour for Teachers and Students*. Instructional Materials Laboratory, North Clackamas School District #12.