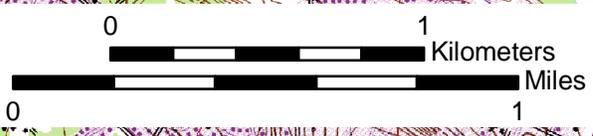


OREGON
QUADRANGLE LOCATION

GLADSTONE, OREG.
45122-D5-TF-024
1961
PHOTOREVISED 1984
DMA 1474 I NE-SERIES V892

Clackamas Elementary School





SE Tolbert Street

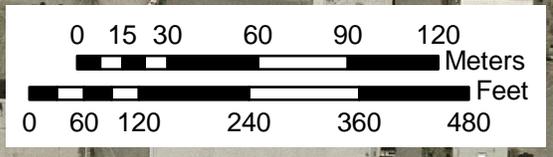
SE 82nd Drive

Clackamas Elementary School

SE 92nd Ave

SE Church Street

SE Clackamas Road



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

Agency/Project: Clackamas County, ODOT/Sunrise Project: I-205 to Rock Creek Junction (Hwy 212/224)	
Property Name: Clackamas School	
Street Address: 15301 SE 92 nd Ave	City, County: Clackamas, Clackamas
USGS Quad Name: Gladstone, Oreg.	Township: 2 South Range: 2 East Section: 9
This property is part of a <input type="checkbox"/> District <input type="checkbox"/> Grouping/Ensemble (see instructions)	
Name of District or Grouping/Ensemble:	
Number and Type of Associated Resources in Grouping/Ensemble:	

Current Use: School	Construction Date 1939:
Architectural Classification / Resource Type: Tudor Style/Building	Alterations & Dates: 1947 addition, 1953 and 1958 classroom annexes
Window Type & Material: 6-over-6 wood sash	Exterior Surface Materials: Primary: concrete Secondary: none Decorative: none
Roof Type & Material: Hipped/asphalt shingle	
Condition: <input checked="" type="checkbox"/> Excellent <input 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



Clackamas Elementary School, front (east) entrance. The view is to the west.

Preliminary National Register Findings: <input type="checkbox"/> National Register listed	
<input checked="" type="checkbox"/> Potentially Eligible: <input checked="" type="checkbox"/> Individually <input type="checkbox"/> As part of District	
<input type="checkbox"/> Not Eligible: <input type="checkbox"/> In current state <input type="checkbox"/> Irretrievable integrity loss <input type="checkbox"/> Lacks Distinction <input type="checkbox"/> Not 50 Years	
State Historic Preservation Office Comments:	
<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur: <input type="checkbox"/> Potentially Eligible Individually <input type="checkbox"/> Potentially Eligible as part of District <input type="checkbox"/> Not Eligible	
Signed <u><i>Jason M. Allen</i></u>	Date <u>5/21/2008</u>
Comments:	

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

Property Name: Clackamas School	
Street Address: 115301 SE 92 nd Avenue	City, County: Clackamas, Clackamas
Architect, Builder or Designer (if known): Unknown	Owner: <input type="checkbox"/> Private <input checked="" 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: 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).</p> <p>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.</p> <p>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.</p> <p>Statement of Significance: The Clackamas Elementary School is recommended to be 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.</p> <p>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).</p> <p>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.</p> <p>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, and McLoughlin Junior High School (Krumm 2007).</p>	

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

Property Name: Clackamas School	
Street Address: 15301 SE 92 nd Avenue	City, County: Clackamas, Clackamas
Sources	
Clackamas Elementary School fourth Grade Class	
1974 <i>Clackamas, Oregon</i> . Prepared by the Fourth Grade Class of Clackamas Elementary School. Self published.	
Krumm, Joe	
2007 Person communication by telephone with Jason M. Allen, June 6, 2007.	
Shearer, Margaret [editor]	
1979 <i>Clackamas, Oregon II: A Walking Tour for Teachers and Students</i> . Instruction Materials Laboratory, North Clackamas School District #12, Clackamas, Oregon.	

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name:	
Street Address:	City, County:



View: Clackamas Elementary School. The 1939 portion is visible at center, the 1947 north wing is at right. The view is to the southwest.



View: Clackamas Elementary School, 1947 south wing. The view is to the northwest.



SE Tolbert Street

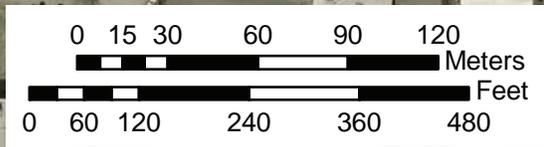
SE 82nd Drive

Clackamas Elementary School

SE 92nd Ave

SE Church Street

SE Clackamas Road





GLADSTONE, OREG.
 45122-D5-TF-024
 1961
 PHOTOREVISED 1984
 DMA 1474 I NE-SERIES V892



Clackamas Elementary School





Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

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

FILE CODE:

DATE: April 20, 2010

TO: Robert W. Hadlow, Senior Historian, ODOT Region 1, Portland
Jeff Buckland, Environmental Project Manager, ODOT, Region 1, Portland
Thomas Picco, Principal Planner, ODOT Region 1, Portland
Becky Crockett, ODOT Environmental Unit Manager, Region 1, Portland
Leslie Howell, Project Manager, Howell Consulting, Portland
Kris Mitchell, NEPA/Cultural Resources Manager, Oregon Military
Department, Salem
Michelle Eraut, Environmental Program Manager, FHWA-Oregon
Division, Salem
Andrea Blaser, Architectural Historian, Archaeological Investigations NW,
Portland
ODOT Key No. 12454 File Type E

FROM: Rebecca Littau, Geo-Environmental Administrative Staff

SUBJECT: **Section 106 Documentation Form**
Camp Withycombe Historic District
Clackamas County
Oregon
ODOT Key No.: 12454, File Type: E
Federal-Aid No.: C005(046)

Attached is the signed **Section 106 Documentation Form** from the State Historic Preservation Office for the above referenced project, **approved on April 14, 2010.**



Oregon

Theodore R. Kulongoski, Governor

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

www.oregonheritage.org

RECEIVED
APR 15 2010
-1000-1
RECEIVED



April 14, 2010

Mr. James Norman
ODOT Environmental
355 Capitol NE Rm 314
Salem, OR 97301

RE: SHPO Case No. 10-0844
ODOT Project 12454 Sunrise Corridor (-205 to Rock Creek
SE Industrial Way/Clackamas Rd), Clackamas County

Dear Mr. Norman:

We have reviewed the materials submitted on the project referenced above and we concur with the determination that Camp Withycombe is no longer eligible as a historic district, but that some individual buildings retain sufficient integrity to be considered eligible for the National Register of Historic Places in accordance with 36 CFR Part 60.4. Because the proposed project will not directly impact any of the still eligible resources there will be no historic properties adversely affected for this undertaking.

As part of this review our office spoke with Kris Mitchell at the Oregon Military Department. Although he agrees that there is no historic district present at Camp Withycombe, he did not agree with some of the statements made pertaining to the significance and eligibility of the camp and individual buildings. While this disagreement does not change the determination, with which all parties agree, SHPO asks that in the future ODOT coordinate with other state agencies to make eligibility determinations on state-owned lands.

Our response here is to assist you with your responsibilities under Section 106 of the National Historic Preservation Act (per 36 CFR Part 800). Please feel free to contact me if you have further questions, comments or need additional assistance.

Sincerely,

Ian P. Johnson, Historian
(503) 986-0678 or ian.johnson@state.or.us

*As of August 2009, a redesigned form is available for Section 106 and ORS 358.653 projects.
Find it on our updated and expanded Review and Compliance website:
www.oregonheritage.org. Click on the "Review and Compliance" link.*



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

March 12, 2010

FILE CODE:

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

ATTENTION: Ian Johnson, Historian

**RE: Section 106 Documentation Form
Camp Withycombe Historic District
Clackamas County
Oregon
ODOT Key No.: 12454, File Type: E
Federal-Aid No.: C005(046)**

Dear Mr. Roper,

Enclosed for your review and concurrence is a Section 106 Documentation Form for Camp Withycombe, Clackamas County, Oregon. The form is submitted in compliance with the requirements of the National Historic Preservation Act of 1966, as amended.

Camp Withycombe was established in the early twentieth century as a rifle range for the National Guard, providing target practice facilities for militiamen and other military organizations in the Portland area. In addition to being well-suited for use as a firing range, the camp was also ideal as a supply depot. This role required construction of storage facilities. It took place in several phases.

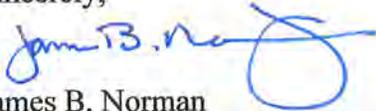
In 1992, the Oregon Military Department sold the Oregon Department of Transportation 178.26 acres of the Camp, including firing ranges and undeveloped land. This left the OMD with 78 acres, which housed the majority of the buildings and structures at the camp.

Over the past two decades, ODOT, the OMD, and your office have evaluated Camp Withycombe to determine whether it was significant either as individual properties or as a historic district. In the meantime, the OMD has undertaken construction of an Armed Forces Reserve Center at the camp. This entails removal or relocation of several National Register-eligible buildings. In addition, a condition of the sale of land to ODOT required a cleanup of lead from the firing ranges. The OMD prepared a memorandum of agreement to resolve the adverse effect of the AFRC project and the firing range cleanup.

At this point, we believe that Camp Withycombe no longer possesses the level of integrity necessary for consideration as a National Register-eligible historic district. The enclosed DOE form demonstrates this. The Federal Highway Administration and the Oregon Department of Transportation request your concurrence on a determination of "Not Eligible" for the Camp Withycombe Historic District.

Your prompt attention to this coordination request is appreciated. If you have questions, please contact Robert W. Hadlow, Ph.D., in Portland, at (503) 731-8239.

Sincerely,



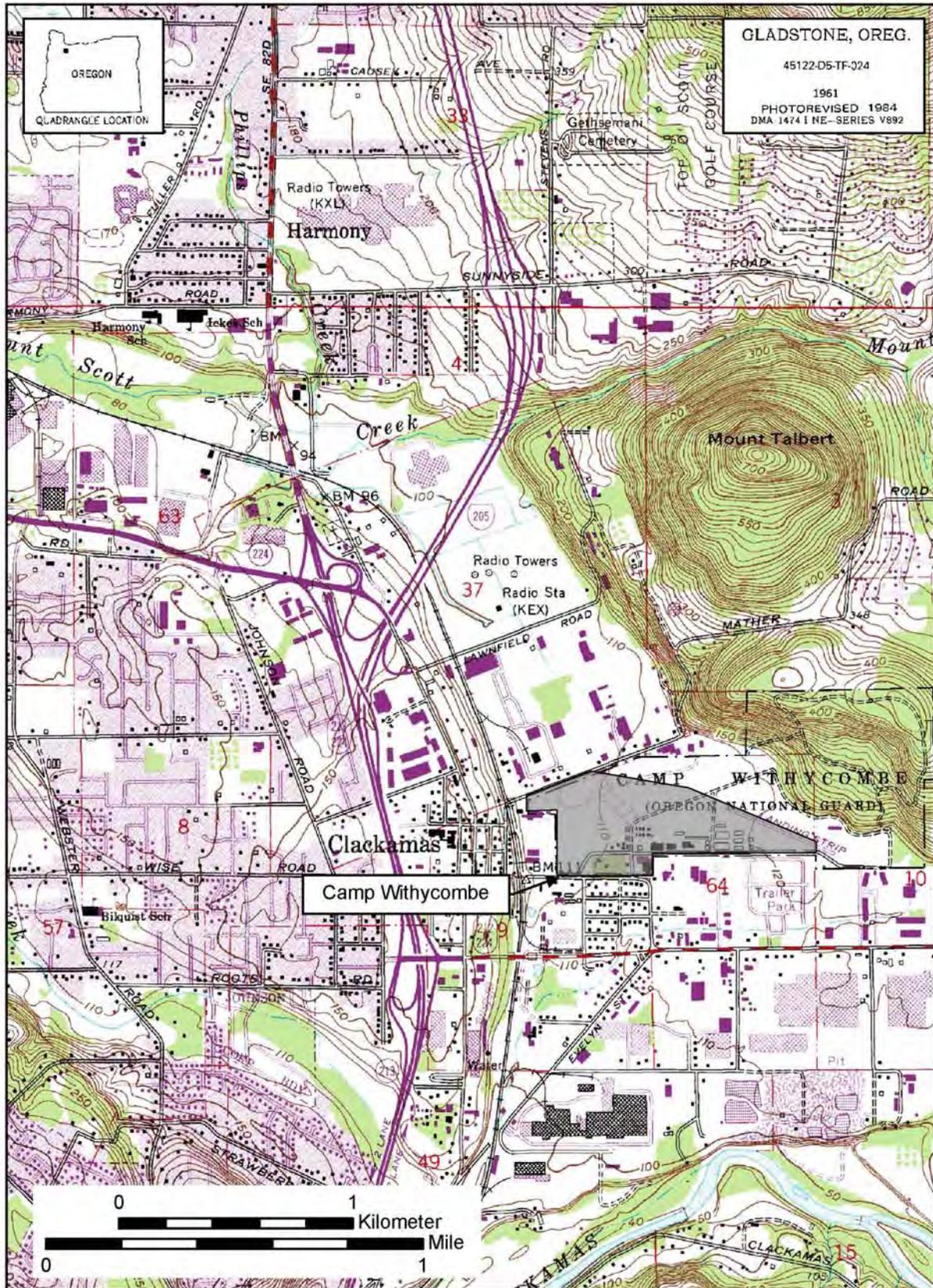
James B. Norman
Environmental Planning Manager

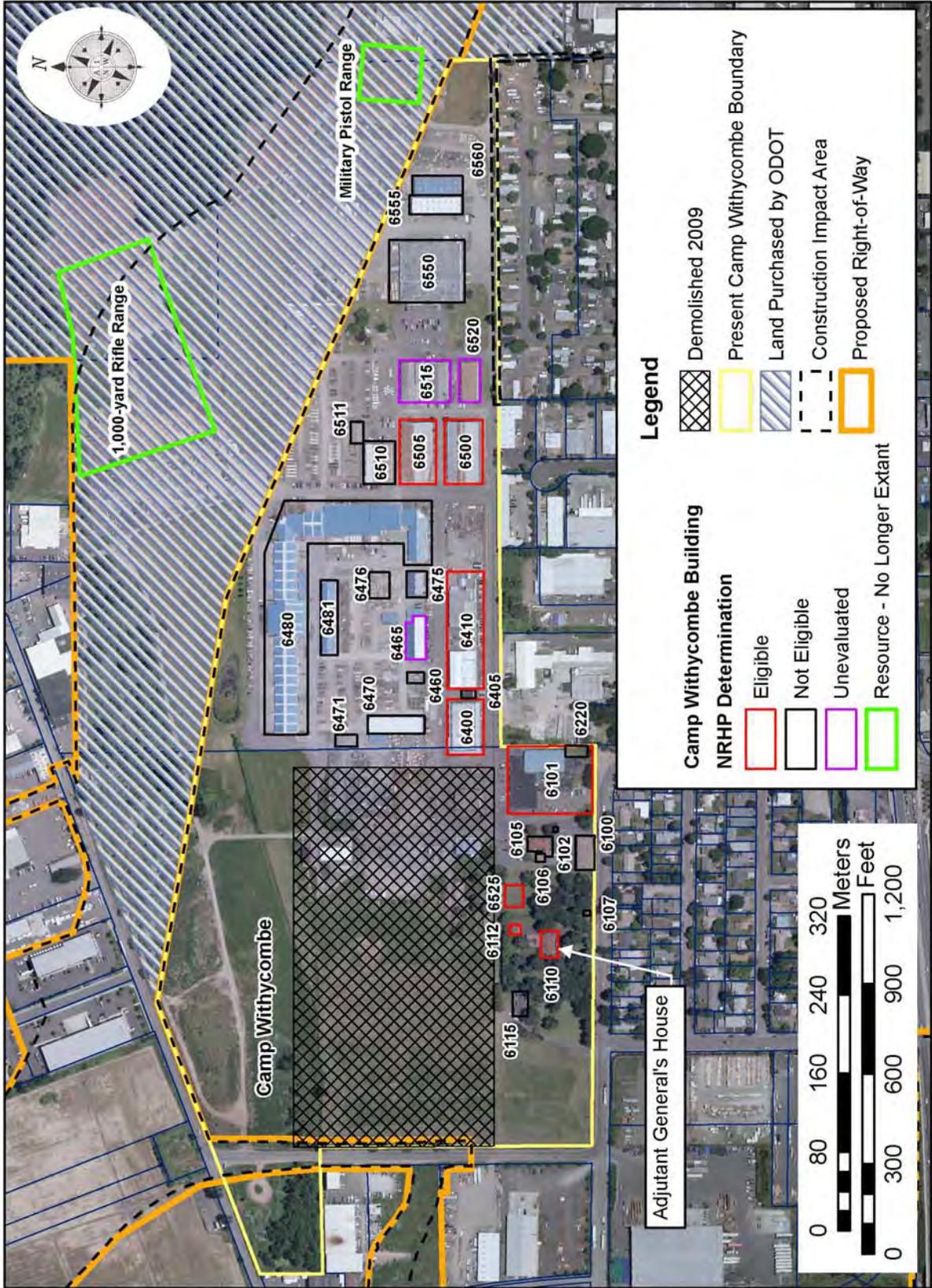
Attachment:

Section 106 Documentation Form, Camp Withycombe Historic District

Copies with attachments:

Robert W. Hadlow, Senior Historian, ODOT Region 1, Portland
Jeff Buckland, Environmental Project Manager, ODOT, Region 1, Portland
Thomas Picco, Principal Planner, ODOT Region 1, Portland
Becky Crockett, ODOT Environmental Unit Manager, Region 1, Portland
Leslie Howell, Project Manager, Howell Consulting, Portland
Kris Mitchell, NEPA/Cultural Resources Manager, Oregon Military Department, Salem
Michelle Eraut, Environmental Program Manager, FHWA-Oregon Division, Salem
Andrea Blaser, Architectural Historian, Archaeological Investigations NW, Portland
ODOT Key No. 12454 File Type E





2008 Aerial Photography provided by Metro.



LEGEND

- LINE OF WORK
- CAMP RETROFIT
- PROPERTY LINE
- ROW LINE
- EXISTING
- PROPOSED
- FENCE
- DME

NEARBY MAP

SCALE 1"=100'

N



41 Infantry Division - AFRC
 Camp Withycombe, Clackamas, Oregon

CAMP PLAN + AERIAL PHOTOGRAPH

ARCHITECTS
 BARRIENTINE
 ARCHITECTS

ARCHITECTS
 WALKER
 ARCHITECTS

ARCHITECTS
 BATES LEE AIA
 ARCHITECTS

ARCHITECTS
 HOFFMAN
 CONSTRUCTION COMPANY

L1.1

Plan and aerial photography for the AFRC project, to be completed by 2016.

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Potential & Listed Historic Districts**

Agency/Project: Oregon Department of Transportation/OR212/224: Sunrise Corridor (I-205 to Rock Creek) ODOT Key No. 12454, Fed.-Aid No. C005(046)	
District Name: Camp Withycombe Historic District	<input checked="" type="checkbox"/> Potential <input type="checkbox"/> Listed
Boundary Description: The potential district is bound by ODOT lands and proposed right-of-way to the east and north, SE Industrial Way to the west, and Clackamas Road to the south. See attached map for boundary location.	City, County: Clackamas, Clackamas County
USGS Quad Name: <i>Gladstone, Oreg.</i> 1961, Photorevised 1984	Township: 2S Range: 2E Sections: 9 and 10
Construction Date Range: 1912 to 2009	Approximate Acreage / Number of Resources: 78 acres/ 31 buildings, 1 object
Architectural Classifications / Resource Types: Colonial Revival, Art Deco, Vernacular, and Utilitarian buildings	
Alterations & Approximate Dates: Camp buildings are currently being reconfigured after a 2002 Base Closure and Realignment law recommended that a new Armed Forces Reserve Center be constructed on the parcel. Once completed, the project will have required the demolition of approximately 25 buildings within the current camp boundary to construct new facilities and upgrade existing utilities and roadways. Firing ranges historically associated with the camp were sold to ODOT in the 1990s for the Sunrise Corridor. The ODOT-owned land, which comprises 178.26 acres, forms the northern boundary of the present-day Camp Withycombe, which is now 78 acres.	
Outbuildings and Landscape Features: The camp is largely devoid of landscape features. A small waterway runs along the northern portion of the parcel, and a stand of trees (which will not be impacted by the base realignment project) is associated with Building 6110. Numerous temporary structures have been placed on the parcel since the 1990s, and serve as storage facilities for various items, including hazardous waste. These temporary structures were not included in the overall resource count for the potential historic district, and are not noted on the attached map.	
Overall Condition: <input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor	Overall Integrity: <input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input checked="" type="checkbox"/> Poor
	
The south (main) entrance to Camp Withycombe. The view is towards the north-northeast.	
Preliminary National Register Findings: <input type="checkbox"/> National Register listed <input type="checkbox"/> Potentially Eligible <input checked="" type="checkbox"/> Not Eligible: <input type="checkbox"/> In current state <input checked="" 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 <input type="checkbox"/> Not Eligible	
Signed _____ Comments:	Date <u>4/14/2010</u>

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Potential & Listed Historic Districts**

District Name: Camp Withycombe Historic District

City, County: Clackamas, Clackamas County

Architects, Builders or Designers (if known): Various

General description of Properties (including district boundaries & approximate dates of development), Significance Statement, and Sources. (Use continuation sheets if necessary):

General Description of Resources

Camp Withycombe was established in the early twentieth century as a rifle range for the National Guard, providing target practice facilities for militiamen and other military organizations in the Portland area (Roulette et al. 1997). Over 100 acres of land was leased in 1909 to erect the rifle range and campground that was initially known as Clackamas Range and later Camp Benson before being renamed after Oregon Governor James Withycombe. The land, which was nestled at the foot of Mt. Talbert, afforded desirable topography for a shooting range, as targets could be erected at the base of the hill, acting as a backstop for bullets.

In addition to being well-suited for use as a firing range, the camp was also ideal as a supply depot. It was situated adjacent to the Southern Pacific Railroad mainline and the city of Clackamas, and was near the major population center of Portland (Roulette et al. 1997). This added role for the camp created the need for its first major building program-- structures to store goods and an office for a quartermaster. Only one building, 6100, remains extant from this period of development. The building, which was historically used as a supply depot and now serves as a classroom, has been determined to be not eligible for listing in the National Register of Historic Places (NRHP), and is slated for demolition in 2011 (Oregon Military Department 2008).

The camp steadily increased in size from its original 100 acres to 256.26 acres by 1914, but border wars and World War I would eventually slow construction activities at the expanding camp. Construction of permanent buildings eventually became a priority in the 1930s, when federal funds intended to reverse public misfortune during the Great Depression were funneled into major projects at the site. Public Works Administration and Works Progress Administration projects were undertaken at the camp as relief workers erected numerous buildings, including the Adjutant General's House (Building 6110), which is a Clackamas County Historic Landmark. In addition to building construction, roads and utilities were updated, and landscaping was addressed.

Permanent construction activities slowed during World War II and the immediate post-war years, but accelerated in the late 1940s and early 1950s as the camp took on an extended role in vehicle maintenance. An armory was constructed in 1956 when the state of Oregon received title to Camp Withycombe from the federal government and stationed troops there for the first time (Roulette et al. 1997). Approximately eight of the extant buildings within the camp boundary date to this era of development (6101, 6105, 6106, 6460, 6465, 6510, 6515, and 6520).

Construction projects undertaken in the modern era include the erection of ten ammunition bunkers in 1971, the creation of a new shooting range (Multnomah Range) in the late 1970s, and the construction of approximately six storage buildings in the late 1970s and early 1980s. Currently, the Oregon Military Department is in the process of constructing a new Armed Forces Reserve Center (AFRC) at the camp, which will require the demolition of ten NRHP-eligible buildings over a seven-year period that began in 2009. A "Historic Area" containing NRHP-eligible resources will be created as part of a mitigation strategy to offset adverse affects stemming from the project (Oregon Military Department 2008).

In total, 31 buildings are located on the 78 acres that currently comprise the camp. Eight of the buildings have been determined to be eligible for listing in the NRHP, 20 have been determined to be not eligible for listing in the NRHP or do not meet age requirements for listing in the NRHP, and three historic buildings have not been evaluated for NRHP eligibility. Four objects—a flagpole base, a World War I memorial, an entry gate remnant, and a water fountain—have also been recorded on the parcel, but were determined to be not eligible for listing in the NRHP as part of a potential Camp Withycombe Historic District in 1997 (Carter 1997). Upon a field inspection of the camp on January 29, 2010, only one of the four objects, the World War I memorial, was observed on the parcel. It has been removed from its original location to make way for the AFRC project; further plans for permanent placement of the memorial remain unknown at this time.

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Potential & Listed Historic Districts**

District Name: Camp Withycombe Historic District

City, County: Clackamas, Clackamas County

Buildings located within the proposed district boundary are Vernacular or Utilitarian in style, although some notable examples of the Colonial Revival (Building 6110) and Art Deco styles (buildings 6400 and 6405) are present. Due to the changing mission of the camp since its establishment in 1909, the number and types of buildings located on the parcel have fluctuated as different facility needs were accommodated with demolitions, relocations, and new construction. The current AFRC reorganization project includes the demolition of approximately 15 buildings that are currently extant on the parcel. Four of the eight NRHP-eligible resources that remain on the parcel will be demolished by 2016 (Oregon Military Department 2008). In addition, as part of the AFRC project, the Oregon Military Department and the Oregon Department of Environmental Quality began a soil remediation process to remove lead from former firing ranges at Camp Withycombe. Included in the remediation are sites located on land purchased by ODOT in 1992 for the Sunrise Corridor (National Guard Bureau 2008).

Significance Statement

Camp Withycombe is recommended to be not eligible for listing in the NRHP as a historic district. While the camp was a significant supply depot and training center for the National Guard during World War I, it has incurred numerous alterations over the last 100 years that have detracted from its historic integrity. Past and current demolitions, relocations of NRHP-eligible buildings, and the removal of four NRHP-eligible firing ranges have fundamentally changed the setting, design, and feeling of the camp, significantly degrading its overall integrity while limiting the ability of the remaining NRHP-eligible buildings to express their historic association with themes of state-wide significance, such as national defense. Over time, the size of the camp has been reduced from over 250 acres in 1914 to just 78 acres today. Additional plans for demolitions and the relocation of NRHP-eligible resources for the AFRC project will continue to alter the historic fabric of the site (National Guard Bureau 2008).

To date, at least 10 buildings located on the camp parcel have been demolished for the AFRC project, and two buildings, the NRHP-eligible 6525 and 6220, have been moved to a new "Historic Area" that is being established on a southwest portion of the parcel. The establishment of a "Historic Area" is just one of many mitigation measures that the Oregon Army National Guard agreed to as part of a Memorandum of Agreement to offset adverse impacts caused by the AFRC project and the "Small Arms Firing Range cleanup plan" to NRHP-eligible resources in 2008 (CH2M Hill 2008, National Guard Bureau 2008). The Armory building (6101) and the Adjutant General's House (6110), both of which have been determined to be eligible for listing in the NRHP, are also located within the "Historic Area", and will not be moved or significantly altered for the AFRC project.

Camp Withycombe was determined to be eligible as a single resource in 1994 (Norman 1994). The camp was determined to be not eligible as a historic district in 1997 (Carter 1997), and, again, determined to be eligible for listing in the NRHP as a historic district in 2008 prior to recent activities associated with the AFRC project (Hadlow 2008). At this point, Camp Withycombe no longer possesses the level of integrity necessary for consideration as a National Register-eligible historic district. However, this does not preclude future determination of National Register eligibility or National Register listing for individual extant historic resources at Camp Withycombe.

Sources

Carter, Liz

1997 *Cultural Resource Survey of Camp Withycombe, Clackamas vicinity, Clackamas, Oregon*. Oregon State Historic Preservation Office, Salem, Oregon. Prepared for Oregon Military Department, Salem.

CH2M Hill

2008 *Final Environmental Assessment: Implementation of BRAC Actions at Camp Withycombe, Oregon*. CH2M HILL, Tampa, Florida. Prepared for U.S. Army Corps of Engineers, Portland, Oregon.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Potential & Listed Historic Districts

District Name: Camp Withycombe Historic District

City, County: Clackamas, Clackamas County

Finley, Aimee, and Bill R. Roulette

- 2000 *Evaluations of Select Historical Resources at Two Oregon Army National Guard Facilities: The Delaura Beach Road Complex, Camp Rilea, Clatsop County and The Firing Ranges, Camp Withycombe, Clackamas County.* Applied Archaeological Research Report No. 78. Prepared for Oregon Military Department, Salem.

Hadlow, Robert W.

- 2008 *Historic Resources, Sunrise Corridor, Interstate 205 – Rock Creek Junction, Clackamas County, Oregon, ODOT Key No. 12454, Federal-Aid No. C005(46)PN.* Oregon Department of Transportation, Salem. Prepared for Oregon State Historic Preservation Office, Salem.

National Guard Bureau

- 2008 Memorandum of Agreement among the National Guard Bureau, the Oregon Army National Guard, and the Oregon State Historic Preservation Office for the Camp Withycombe AFRC Construction Project. On file, Oregon State Historic Preservation Office, Salem.

Norman, James

- 1994 Oregon Department of Transportation Request for Determination of Eligibility for Camp Withycombe. On file, Oregon State Historic Preservation Office, Salem.

Oregon Military Department

- 2008 *Final Draft Master Plan, Camp Withycombe.* Oregon Military Department, Salem, Oregon.

Roulette, Bill R., Melissa Darby, and Elizabeth O'Brien

- 1997 *Results of an Above-Ground Cultural Resource Survey at Camp Withycombe, An Army National Guard Facility, Clackamas County, Oregon.* Applied Archaeological Research, Contract Number NGB-35-97-C-3001. Submitted to the Oregon Military Department, Salem, Oregon.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

District Name: Camp Withycombe

City, County: Clackamas, Clackamas County



View: The south façade of the NRHP-eligible Adjutant General's House (Building 6110) and associated garage (Building 6112) at right. Both buildings are located in the "Historic Area" and will not be modified for the AFRC project. The view is towards the north-northwest.



View: The south and west elevations of the NRHP-eligible Building 6400, which is slated for demolition in 2016. The view is towards the northeast.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Continuation Sheet

District Name: Camp Withycombe

City, County: Clackamas, Clackamas County



View: The west façade and north elevation of the NRHP-eligible buildings 6505 (left) and 6500 (right), which were constructed in 1934 and are slated for demolition in 2015. The view is towards the southeast.



View: The south and east elevations of the NRHP-eligible Building 6525. It was moved to its current location in the "Historic Area" in 2009. The view is towards the northwest.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Potential & Listed Historic Districts

District Name: Camp Withycombe

City, County: Clackamas, Clackamas County



View: The new AFRC building under construction on the western portion of the parcel. The view is towards the northwest.



View: A World War I Memorial that was previously determined to be not eligible for listing in the NRHP has been removed from its location and is being stored on the parcel. The view is towards the northeast.

Tribal Consultation

At the start of the Sunrise Project SDEIS effort contact was initiated with Native American tribal representatives with historic interests in the project area of Clackamas County. Three tribes were contacted: Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, and Confederated Tribes of Warm Springs Reservation of Oregon. Contact was initiated to apprise them of the proposed project and upcoming environmental process; ascertain what their specific issues and concerns might be; and determine how they might wish to engage in the on-going EIS process. In 2009, ODOT initiated consultation with the Confederated Tribes and Bands of the Yakama Nation.

All tribes expressed their involvement in a number of major on-going projects that would likely limit their direct involvement in the Sunrise Project SDEIS. They all indicated interest in the results and recommendations of the SDEIS and FEIS, particularly on potential project impacts to natural and cultural resources in the project area. While recognizing that the proposed project traversed a largely urbanized area that had already experienced significant degradation, they expressed concerns that the project team provide as much protection as possible to existing riparian and wildlife habitat in the corridor. A specific concern raised by representatives of the Grande Ronde tribes was for a tribal representative to be present on-site during any ground disturbing fieldwork by project consultant archaeologists.

The project team endeavored to accommodate the concerns raised by the tribal representatives. Alternative alignments and design options were developed to avoid or minimize impacts to natural and cultural resources, particularly riparian and wildlife habitat. A Wildlife Corridor Habitat Enhancement and Mitigation Strategy was developed by ODOT and ODFW staff for the Sunrise Project, to protect, enhance, and mitigate wildlife and wetlands habitats in the corridor; to preserve and enhance connections in the corridor for wildlife passage; and, to assess conditions for habitat enhancement and wildlife passage, as an integrated component of preserving connections to the larger regional habitat system.

Some miscommunication occurred between the project consultant archaeologists (AINW) and tribal representatives of the Grand Ronde, regarding advance notice being provided to the tribes to allow tribal representatives to participate in shovel-probe fieldwork and the discovery of any potential archaeological discoveries. Site field work occurred without notification being provided to appropriate tribal representatives. Dennis Griffin, State Archaeologist with the State Historic Preservation Office (SHPO) determined that a permit violation did not occur. This issue was discussed further with Grand Ronde tribal representatives by State ODOT Archaeologist Kurt Roedel and SHPO Archeologist Mollie Manion, and efforts made to improve communication and prevent similar oversights.

Kurt Roedel, ODOT GeoEnvironmental Unit, Archaeologist, is the primary contact with tribal representatives. Thomas Picco, ODOT Project Manager for the Sunrise Project, coordinates with Kurt Roedel on current developments in the project SDEIS, in advance preparation for his periodic meetings with tribal representatives. These periodic meetings with tribal representatives provide an effective supplement to the direct correspondence provided the tribes on the project progress (newsletters, milestones, decision points, release of DEIS materials, etc.).

A more detailed chronology of consultation with tribal representatives on the Sunrise Project SDEIS follows.

Key 12454, Sunrise Corridor, I-205–172nd Section Project, Region 1

Kurt Roedel, GeoEnvironmental, Archaeologist, [KR]

Thomas Picco, Region 1 Major Projects, Sunrise Project Manager [TP]

Project Start – Initiation of Contact with Tribes

- 9/09/04 [TP]: Initiated contact with Steve Harry, [ODOT] Region 1 Community Affairs Manager to solicit contact names of representatives of the Grand Ronde and Warm Springs Indian Tribes.
- 9/16/04 [TP]: Steve Harry spoke with Matt Garrett, Region 1 Manager, and identified designated contact persons for the two tribes: Justin Martin (Grande Ronde), and Louie Pitt (Warm Springs)
- 9/20/04 [TP]: Initiated telephone contact with tribal contacts, on behalf of Matt Garrett. County staff was unable to speak directly with either contact, and left voice messages describing project, requesting a call-back to assess their level of interest in continued involvement.
- 10/05/04 [TP]: Mailed letter to each of the tribal contacts, providing a brief overview of project, process, and schedule, and listing various ways for them to stay abreast of the study, including project website address. They were added to project mailing list.
- 1/07/05 [TP]: Having not received any response to my enquiries from representatives of the two tribes, initiated additional efforts to make contact. Spoke to Julie Schablitsky, ODOT Cultural Resources staff, a principal Agency contact with Native American tribes in Oregon, for assistance in making contact with Grande Ronde and Warm Springs Tribes.
- 1/14/05 [TP]: Julie Schablitsky responded with names and telephone numbers of additional contact persons at Warm Springs (Sally Bird) and Grande Ronde (Khani Schultz).
- 1/19/05 [TP]: Telephoned both contacts but was unable to make direct contact. Left voice messages.
- 1/27/05 [TP]: Having not received any callback from tribal representatives, contacted Julie Schablitsky to ask if she could assist in making contact.
- 1/28/05 [TP]: Julie Schablitsky stated that she would be meeting with Khani Schultz (Grande Ronde) on 1/31/05 and she would discuss my interest in contacting her, as well as forward project information to Sally Bird (Warm Springs). E -mailed Julie S. letters addressed to both contacts, as well as the most recent project newsletter, providing a brief overview of project, process and schedule, and listing various ways for them to stay abreast of the study, including project website address.
- 7/17/06 [TP]: Contacted Kurt Roedel by e-mail, ODOT Geo-Environmental Unit, Archaeologist, and principal ODOT contact with tribes, to apprise him of project objectives, and background, and to solicit assistance in communicating with tribes. ODOT archaeologists coordinate tribal meetings on projects/issues of interest to tribes in Oregon. Henceforth, Kurt R. to serve as principal contact with tribes for this project.

Confederated Tribes of the Grand Ronde Community of Oregon

- 1/31/05 [TP]: Received telephone call from Khani Schultz (Grande Ronde). We held a 15-minute conversation in which I provided a further description of the project, and requested the level of tribal interest in tracking the Sunrise Project. Khani S. indicated that the tribe was very busy responding/tracking various projects, so were unlikely to wish to be too directly involved, but would like to keep abreast of the project through newsletter and e-mail updates. She indicated she would also track the project periodically through the Sunrise Project website. She stated they would be interested in the results and recommendations of the SDEIS and FEIS, when final design alternatives were selected. Her interest would be focused on impacts of project to natural and cultural resources, recognizing that the Sunrise Project, I-205 to Rock Creek Junction, traversed a largely urbanized area that had already been significantly degraded by development. They would be interested in providing as much protection as possible to existing riparian and wildlife habitat in the corridor. She was to reply by e-mail with her mailing and e-mail address. I stated we would add her addresses to the project mailing and e-mail lists.
- 11/22/05 [TP]: E-mailed Range of Alternatives materials to Khani Schultz (Grande Ronde).
- 11/28/05 [TP]: E-mail received from Khani Schultz (Grande Ronde) acknowledging receipt of 11/22/05 e-mail, and recommending, in regard to cultural resource portion of the SDEIS, “that the summary of alternatives include wording that will include consultation with appropriate Tribes regarding any issues on cultural resources.” Further, “1.) Avoid impacting cultural sites and resources where practicable. Where impacts are unavoidable, consult with appropriate tribes to provide recordation, salvage, and/or mitigation as appropriate.” And “2.) Look for and consider opportunities to incorporate enhancements to existing natural and cultural resources within the project area.”
- As noted in the opening discussion of project tribal consultations at the beginning of this appendix, although it was the intent of project team to engage tribal representatives in consultation on impacts to cultural resources, some miscommunication occurred regarding advance notification of tribes of cultural field work planned by project staff. The difficulty in initially engaging tribal representatives in the project start did not allow these comments to be fully incorporated into the Project and Need Statement/Goals and Objectives (CETAS Concurrence occurred 9/21/04). However Goal 4, Objective 4 stated its intent to “Avoid impacting cultural sites and resources where practicable. Where impacts are unavoidable, provide recordation, salvage, and/or mitigation as appropriate.”
- All subsequent planned cultural/archaeological field work will include prior contact with tribal representatives, and provide full opportunity for consultation on impacts to cultural resources.
- Although timely input by tribal representatives in the formation of the project Goals and Objectives did not occur, project team objectives to “avoid impacting cultural sites and resources where practicable” are consistent with stated tribal objectives. Alternative alignments and design options were developed to avoid or minimize impacts to natural and cultural resources, particularly riparian and wildlife habitat.
- A Wildlife Corridor Habitat Enhancement and Mitigation Strategy was developed by ODOT and ODFW staff for the Sunrise Project as a pro-active plan for avoiding or minimizing impacts to wildlife.

- 6/22/06 [TP]: E-mailed update of Sunrise Project SDEIS to Khani Schultz, with following attachments: Project Schedule, Range of Alternatives, and Wetlands Technical Memo (CC). Also included ODOT ftp site link for current maps, and Wildlife Corridor Strategy Report (MT). Noted that newsletter would likely be forthcoming shortly.
- 7/12/06 [KR]: E-mailed Khani Schultz (Khani), Cultural Protection Specialist, with project information and maps.
- 7/13/06 [KR]: Khani e-mailed, "I would like a Tribal representative for any ground disturbing field work."
- 9/15/06 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Informed him of upcoming Open House to focus on the eastern segment of the Sunrise Project, from Rock Creek through transition area to SE 172nd Avenue. Provided project website address with latest design option maps.
- 12/6/06 [KR]: Meeting with Khani. Provided project information and maps. No comments received.
- 5/14/07 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Informed him of changes in project organizational/committee structure (*expanded PRC*); initiation of parallel planning studies (toll pricing study; lane evaluation/performance; phasing and design strategies; Interchange Area Management Plans); and revised project schedule.
- 7/13/07 [KR]: E-mailed Khani with results of AINW's fieldwork. Khani e-mailed, stated she believes that she placed conditions on the archaeological permit to be notified of any prehistoric discovery. E-mailed Khani with the archaeological site numbers where AINW placed shovel probes. Khani e-mailed, stating that she reviewed her phone and calendar records for September and October 2006. Permit AP920 was issued in October with conditions that she would receive a call with a prehistoric discovery and would send representation as needed. Khani continued that she had no record of any contact from AINW for this project.
- In conversations regarding the permit violation with Mollie Manion, Archaeologist, and Dennis Griffin, State Archaeologist, State Historic Preservation Office (SHPO), Dennis Griffin stated that a permit violation did not occur. Mollie Manion stated she would follow up with Khani regarding this matter.
- 7/17/07 [KR]: E-mailed Khani informing her that Mollie Manion would follow regarding AINW permit violation. No comments received.
- 10/10/07 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Updated him on work to date on parallel planning studies (toll pricing study; lane evaluation/performance; phasing and design strategies; Interchange Area Management Plans). Provided him the PowerPoint presentation used at the 10/3/07 PRC meeting; a revised project schedule, and preliminary phasing strategies. Apprised him of the findings of forecast noise impacts to residents along the "bluff", and the difficulties encountered in trying to identify feasible and reasonable noise mitigation measures.
- 11/26/07 [KR]: Meeting with Eirik Thorsgard (Eirik), Cultural Protection Specialist. Provided project information and maps. No comments received.

- 12/11/07 [TP]: Provided Kurt Roedel, ODOT, a PowerPoint slide show presented to 12/5/07 PRC meeting summarizing the environmental impacts/findings from the 15 DEIS Technical Reports, in preparation for his periodic meeting with Native American tribal representatives. Informed him that these impact findings will be compiled in the Supplemental Draft EIS document, to be published/released in March/April, 2008.
- 12/12/07 [KR]: E-mailed Eirik, with results of Environmental Summary Impacts (including archaeology). Eirik e-mailed, "If you could forward me the sections pertaining to the Cultural Resources from AINW I would appreciate it. Has a mitigation plan been considered for this project in relation to the impacts to the Cultural Resources?"
- 12/13/07 [KR]: E-mailed Eirik AINW draft archaeological and built environment sections. Stated fieldwork is in identification phase only and a mitigation plan has not been considered. Eirik e-mailed, "If you could inform me after the additional work is completed and when a desire is to discuss some kind of mitigation plan regarding the impacts to these sites. This may be a while away but I think it would be better to have that conversation when we have a better understanding of what is there."
- 12/14/07 [KR]: E-mailed Eirik, stating that I would keep him updated as project progressed.
- 4/25/08 [KR]: E-mailed Eirik project update for May 12, 2008, meeting. No comments received.
- 5/12/08 [KR]: Meeting with Eirik and Don Day (Don), Cultural Resources Site Protection Monitor. Provided project information and project area map. Eirik requested fieldwork dates.
- 10/28/08 [KR]: E-mailed Eirik and Don link to SDEIS, stated hard copy also sent, and more fieldwork planned. E-mailed Eirik and Don project update for November 5, 2008, meeting. No comments received.
- 10/29/08 [KR]: Eirik e-mailed, hard copy SDEIS received.
- 10/30/08 [KR]: E-mailed Eirik archaeological-specific pages of SDEIS, provided rough timeline for upcoming fieldwork. No comments received.
- 11/5/08 [KR]: Meeting with Eirik and Don Day, Cultural Resources Site Protection Monitor. Provided project information and project area map. No comments received.
- 11/12/08 [KR]: E-mailed Eirik and Don project update and fieldwork locations. No comments received.
- 12/9/08 [KR]: E-mailed Eirik and Don project update and fieldwork locations and dates. No comments received.
- 2/2/09 [KR]: E-mailed Eirik and Don project update and fieldwork locations/figure. No comments received.
- 8/12/09 [KR]: E-mailed Eirik and Don project update for August 27, 2009, meeting. No comments received.
- 8/27/09 [KR]: Meeting with Eirik and Don. Provided project information and project area map. Eirik requested to be involved in testing methodology.

- 8/31/09 [KR]: E-mailed Eirik and Don AINW information and map regarding impacts to Site 35CL330. Eirik replied, “Do we know the components of the site composition? Specifically is this just a lithic scatter or is there something more to this site?” KR responded, “I have the site form from November 2007, which states that four stone tools, 30 pieces of debitage, and two fire modified rocks were recorded in five shovel probes. However, this was before the most recent, and more extensive, field work. So there may be more to the site. I am waiting to review that information.” Eirik replied, “Sounds good let me know what we have.”
- 11/9/09 [KR]: E-mailed Eirik and Don additional information for testing at Sites 35CL329/330. No comments received.
- 11/20/09 [KR]: E-mailed Eirik and Don information on potential burial ground. Eirik replied, “We have nothing recorded on our databases indicating this burial, but I would not be surprised if there is as part of a pioneer cemetery.”
- 12/1/09 [KR]: E-mailed Eirik and Don project update for December 11, 2009, meeting. No comments received.
- 12/11/09 [KR]: Meeting with Eirik, Don, and Brandy Humphreys, Environmental Resources Specialist, Natural Resources Division. Provided project spreadsheet and project area map. Explained Sites 35CL329/330, upcoming fieldwork, archaeological material identified thus far. Eirik suggested vegetation management plan to prevent future site disturbance (looting). Stated that details could be discussed at a later date. No TCP concerns.
- 12/14/09 [KR]: E-mailed Eirik and Don update on potential burial ground, including AINW report.
- 12/15/09 [KR]: Eirik replied, “How far will the excavations take place and the report didn’t mention any excavations that AINW may have done, was there any shovel test probes and were they negative?” KR responded with additional information, and stated that impacts associated with construction did not justify shovel test probes. In addition, the proposed project would avoid any direct impacts to this area. No comments received.
- April 19, 2010, e-mailed Eirik, Don, Brandy, and Michael Karnosh (Michael), Ceded Lands Coordinator, Natural Resources Division, project information for 5/20/10 meeting. No comments received.
- May 6, 2010, e-mailed Eirik, Don, Brandy, and Michael Karnosh (Michael), Ceded Lands Coordinator, Natural Resources Division, project information for 5/20/10 meeting. No comments received.
- May 17, 2010, e-mailed/mailed Eirik and Don unsigned No Adverse Effect for Historic Properties Affected (Archaeology) and technical reports. No comments received.
- May 20, 2010, meeting with Eirik and Michael. Provided project information. No comments received. No comments received, no TCP comments.
- June 3, 2010, e-mailed Eirik and Don signed No Adverse Effect for Historic Properties Affected (Archaeology).

Confederated Tribes of Siletz Indians

- 7/12/06 [KR]: E-mailed Robert Kentta (Robert), Cultural Resources Director, with project information and maps. No comments received.
- 11/2/06 [KR]: Meeting with Robert. Provided project information and maps. No comments received.
- 5/14/07 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Informed him of changes in project organizational/committee structure (*expanded PRC*); initiation of parallel planning studies (toll pricing study; lane evaluation/performance; phasing and design strategies; Interchange Area Management Plans; and revised project schedule).
- 7/13/07 [KR]: E-mailed Robert with results of AINW's fieldwork. No comments received.
- 10/10/07 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Updated him on work to date on parallel planning studies (toll pricing study; lane evaluation/performance; phasing and design strategies; Interchange Area Management Plans). Provided him the PowerPoint presentation used at the 10/3/07 PRC meeting; a revised project schedule, and preliminary phasing strategies. Apprised him of the findings of forecast noise impacts to residents along the "bluff", and the difficulties encountered in trying to identify feasible and reasonable noise mitigation measures.
- 11/20/07 [KR]: Meeting with Robert. Provided project information and maps. No comments received.
- 12/11/07 [TP]: Provided Kurt Roedel, ODOT, a PowerPoint slide show presented to 12/5/07 PRC meeting summarizing the environmental impacts/findings from the 15 DEIS Technical Reports, in preparation for his periodic meeting with Native American tribal representatives. Informed him that these impact findings will be compiled in the Supplemental Draft EIS document, to be published/released in March/April, 2008.
- 12/12/07 [KR]: E-mailed Robert with results of Environmental Summary Impacts (including archaeology). No comments received.
- 10/28/08 [KR]: E-mailed Robert link to SDEIS, stated hard copy also sent, and more fieldwork planned.
- 10/29/08 [KR]: Robert e-mailed, hard copy SDEIS received.
- 10/30/08 [KR]: E-mailed Robert archaeological-specific pages of SDEIS, provided rough timeline for upcoming fieldwork. No comments received.
- 11/12/08 [KR]: E-mailed Robert project update and fieldwork locations. No comments received.
- 11/21/08 [KR]: E-mailed Robert project update for December 8, 2008, meeting. No comments received.
- 12/8/08 [KR]: Meeting with Robert. Provided project information and project area map. No comments received.

- 12/9/08 [KR]: E-mailed Robert project update and fieldwork locations and dates. No comments received.
- 2/2/09 [KR]: E-mailed Robert project update and fieldwork locations/figure. No comments received.
- 8/21/09 [KR]: E-mailed Robert AINW fieldwork summary and map. No comments received.
- 8/31/09 [KR]: E-mailed Robert AINW information and map regarding impacts to Site 35CL330. No comments received.
- 11/9/09 [KR]: E-mailed Robert additional information for testing at Sites 35CL329/330. No comments received.
- 11/20/09 [KR]: E-mailed Robert information on potential burial ground. No comments received.
- 12/8/09 [KR]: E-mailed Robert project update for December 16, 2009, meeting. No comments received.
- 12/14/09 [KR]: E-mailed Robert update on potential burial ground, including AINW report. No comments received.
- 12/16/09 [KR]: Meeting with Robert. Provided project information and project area map. Explained Sites 35CL329/330, upcoming fieldwork, archaeological material identified thus far. No comments received, no TCP concerns.
- May 17, 2010, e-mailed/mailed Robert unsigned No Adverse Effect for Historic Properties Affected (Archaeology) and technical reports. No comments received.
- June 3, 2010, e-mailed/mailed Robert signed No Adverse Effect for Historic Properties Affected (Archaeology).

Confederated Tribes of Warm Springs Reservation of Oregon

- 11/22/05 [TP]: E-mailed Range of Alternatives materials to Sally Bird (Warm Springs).
- 6/22/06 [TP]: E-mailed update of Sunrise Project SDEIS to Sally Bird, with following attachments: Project Schedule, Range of Alternatives, and Wetlands Technical Memo (CC). Also included ODOT ftp site link for current maps, and Wildlife Corridor Strategy Report (MT). Noted that newsletter would likely be forthcoming shortly.
- 7/12/06 [KR]: E-mailed Sally Bird (Sally), Cultural Resources Manager, Geo Visions, with project information and maps. No comments received.
- 9/15/06 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Informed him of upcoming Open House to focus on the eastern segment of the Sunrise Project, from Rock Creek through transition area to SE 172nd Avenue. Provided project website address with latest design option maps.
- 5/14/07 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Informed him of changes in project

organizational/committee structure (*expanded PRC*); initiation of parallel planning studies (toll pricing study; lane evaluation/performance; phasing and design strategies; Interchange Area Management Plans); and revised project schedule.

- 7/13/07 [KR]: E-mailed Sally with results of AINW's fieldwork.
- 10/10/07 [TP]: Provided Kurt Roedel, ODOT, an update on Sunrise Project in preparation for his periodic meeting with Native American tribal representatives. Updated him on work to date on parallel planning studies (toll pricing study; lane evaluation/performance; phasing and design strategies; Interchange Area Management Plans). Provided him the PowerPoint presentation used at the 10/3/07 PRC meeting; a revised project schedule, and preliminary phasing strategies. Apprised him of the findings of forecast noise impacts to residents along the "bluff", and the difficulties encountered in trying to identify feasible and reasonable noise mitigation measures.
- 12/11/07 [TP]: Provided Kurt Roedel, ODOT, a PowerPoint slide show presented to 12/5/07 PRC meeting summarizing the environmental impacts/findings from the 15 DEIS Technical Reports, in preparation for his periodic meeting with Native American tribal representatives. Informed him that these impact findings will be compiled in the Supplemental Draft EIS document, to be published/released in March/April, 2008.
- 12/12/07 [KR]: E-mailed Sally results of Environmental Summary Impacts (including archaeology).
- 7/9/08 [KR]: E-mailed Sally project update for July 17, 2008, meeting. No comments received.
- 7/17/08 [KR]: Meeting with Sally and Tribal Elders. Provided project information and project area map. No comments received.
- 10/28/08 [KR]: E-mailed Sally link to SDEIS, stated hard copy also sent, and more fieldwork planned.
- 11/12/08 [KR]: E-mailed Sally project update and fieldwork locations. No comments received.
- 12/9/08 [KR]: E-mailed Sally project update and fieldwork locations and dates. No comments received.
- 2/2/09 [KR]: E-mailed Sally project update and fieldwork locations/figure. Sally replied with thanks for update.
- 8/21/09 [KR]: E-mailed Sally AINW fieldwork summary and map. No comments received.
- 8/31/09 [KR]: E-mailed Sally AINW information and map regarding impacts to Site 35CL330.
- 10/13/09 [KR]: Sally replied, "Has AINW produced a report for this project yet? If yes, could you send me the reference, please? Also, what is the mitigation plan for 35CL330?"
- 10/14/09 [KR]: I replied to Sally and Roberta Kirk (Roberta), Review and Compliance Coordinator, with AINW reference. Stated Site 35CL330 has been evaluated, but a mitigation plan has not been developed.
- 10/15/09 [KR]: Sally e-mailed with thanks.
- 11/9/09 [KR]: E-mailed Sally and Roberta additional information for testing at Sites 35CL329/330. No comments received.

- 11/20/09 [KR]: E-mailed Sally and Roberta information on potential burial ground. No comments received.
- 12/14/09 [KR]: E-mailed Sally and Roberta update on potential burial ground, including AINW report. No comments received.
- 12/16/09 [KR]: Tobin Bottman, ODOT Archaeologists, stated that Roberta left a voice mail for him concerning human remains. Roberta is probably referring to the Sunrise Corridor Project.
- 12/17/09 [KR]: Left voice mail for Roberta regarding human remains. No comments received.
- May 17, 2010, e-mailed/mailed Roberta unsigned No Adverse Effect for Historic Properties Affected (Archaeology) and technical reports. No comments received.
- June 3, 2010, e-mailed Roberta signed No Adverse Effect for Historic Properties Affected (Archaeology).

Confederated Tribes and Bands of the Yakama Nation

- 10/27/09 [KR]: E-mailed Johnson Meninick (Johnson), Cultural Resources Manager, project and archaeology update. No comments received.
- 11/9/09 [KR]: E-mailed Johnson and Casey Barney (Casey), Cultural Resources, additional information for testing at Sites 35CL329/330. No comments received. No TCP comments.
- 11/20/09 [KR]: E-mailed Johnson and Casey information on potential burial ground. Johnson called, requested better maps to discuss potential burial ground. E-mailed Johnson and Casey better maps. No comments received.
- 12/14/09 [KR]: E-mailed Johnson and Casey update on potential burial ground, including AINW report. No comments received.
- May 17, 2010, e-mailed/mailed Johnson and Casey unsigned No Adverse Effect for Historic Properties Affected (Archaeology) and technical reports. No comments received.
- June 3, 2010, e-mailed Johnson and Casey signed No Adverse Effect for Historic Properties Affected (Archaeology).

FEIS Coordination – Historic & Archaeological Resources

9/18/08 [TP]: Provided Kurt Roedel, ODOT, a recently-executed amendment to the current Sunrise Project SDEIS Work Order Contract (WOC), including excerpts from that statement of work (SOW) related to additional archaeological and historic work tasks that we intend to pursue over the next few months. Informed him that we had made a point of informing AINW that they should contact appropriate tribal representatives of any planned shovel testing/field work, so that tribal reps may accompany consultants in their field work.

10/28/08 [TP]: Contacted Kurt Roedel, ODOT, to update him on preparation of the Sunrise Project SDEIS document for public release. Release of SDEIS occurred on 10/13/08. Public comment period will run through 11/28/08. Public hearings/open house on November 12 & 13. Informed him that we would be mailing hard copies to the tribal representatives this date. The agency partners Policy Review Committee (PRC) and citizen stakeholder Project Advisory Committee (PAC) will be developing a Preferred Alternative in winter/spring 2009. CETAS group will be briefed on the Preferred Alternative likely in spring, 2009. I informed him I would provide an updated schedule through the remainder of the EIS process as it becomes finalized.

1/30/09 [TP]: A brief summary report by AINW was prepared at the completion of archaeological fieldwork for the Sunrise Corridor project, and was submitted to Kurt Roedel, ODOT, among others. The summary report provided information about the work completed at all of the HPAs for which SHPO permits or landowner permission were granted to conduct shovel testing work. The summary included testing and evaluation fieldwork at sites 35CL329 and 35CL330.

Prehistoric resources were found in HPA-2 and HPA-4, and AINW recommend that they be evaluated if they cannot be avoided. Laboratory work that involves cleaning and processing the artifacts for analysis was conducted. Analysis of the recovered artifacts will follow, and information from the analysis and fieldwork will be incorporated into the draft report.

2/02/09 [TP]: Discussed with Kurt Roedel the findings of AINW evaluation of one site (35CL330), which recommended the site as eligible for listing in the National Register of Historic Places. It was determined that if we are unable to avoid or significantly minimize project impacts to this site, we would likely have an adverse effect and may involve expensive and time-consuming data recovery. Project design team to review project design in vicinity of subject site, and determine whether avoidance or minimization of impacts possible.

2/05/09 [TP]: Project design team reviewed proposed plan for I-205 interchange area in light of AINW findings of (pre)historic evidence in vicinity (site 35CL330), and determined that avoidance of site was not feasible. Reasonable avoidance opportunities do not appear feasible, given extremely high costs to alter existing highway facilities in area to accommodate new design work, and likely impacts to existing Section 4(f) sites to south/east (KEX Radio Towers site), and to west (Sabin-Schellenberg recreation fields). AINW and project environmental task leader to coordinate with Kurt Roedel on assessment of how to proceed on this issue, so that tribal representatives will have opportunity for input on minimizing and/or mitigating impacts of construction on this site.

2/17/09 [TP]: Informed AINW, Kurt Roedel, project environmentalists and designers, that ODOT staff recalled that this area (the triangle between I-205 and Ambler Rd./82nd Dr.) may have received a good deal of fill material during original construction of I-205 and 82nd Ave./82nd Dr. connection, as well as used as a construction staging area for I-205 construction. As-Built Construction Drawings, and Grading As-Built records (how much fill dumped on site, how deep, how much grading) were being researched to see how substantial this area may have been impacted from earlier construction work. The question this raised is whether the field work findings reflected artifacts *originating* at this site, or might they be *imported* artifacts from earlier construction fill.

2/18/09 [TP]: Notified AINW and project environmentalist that ODOT designers had reviewed the As-Built Construction plans (incl. fill/grading) for I-205 and 82nd Ave./82nd Dr. construction. The designers

stated that they would be willing to go over their findings with AINW and tribal representatives, if they thought that would be helpful, in assessing how disturbed this site may be, and how that may relate to the integrity of the site from where these artifacts were found.

2/23/09 [TP]: Notified Kurt Roedel of offer of ODOT project designers to go over their findings with AINW and tribal representatives of their review of As-Built Construction plans, in assessing how disturbed this site may be, and how that may relate to the integrity of the site from where these artifacts were found.

3/4/09 [TP]: Met with Kurt Roedel, project team designers (Mark Johnson, Canh Lam), and environmental/archaeological consultants (John Fagin, AINW, & Leslie Howell, Howell Consulting) to review As-Built Construction Plans, and construction photographs, for HCA site 35CL330, to ascertain extent of construction disturbance. Further review of plans and photographs indicate there was less site disturbance than assumed, and project designers instructed to pursue ramp viaduct span design adjustments to avoid and/or minimize impacts to HCA site.

7/29/09 [TP]: Notified Kurt Roedel of meeting with CETAS on 7/21/09 for concurrence point discussion of Preferred Alternative. Provided meeting summary minutes of that meeting. Noted that alignment of North Lawnfield Rd. Extension was adjusted to avoid KEX Radio Tower ground mat, as well as avoid potential archaeological site near proposed span of ravine.

8/18/09 [TP]: Facilitated coordination between AINW consultants and Kurt Roedel regarding AINW efforts at archaeological site evaluations. AINW prepared table with updated information about the archaeological resources, survey areas completed, and areas needing survey work but where access has not be obtained from landowners for the Sunrise Corridor project.

10/27/09 [TP]: Discussed with Kurt Roedel issues regarding archaeological site 35CL330. Ramp viaduct span design adjustments were implemented that will effectively avoid any direct impacts to HCA site 35CL330. Kurt R. expressed some dissatisfaction with lack of clear communication with AINW. I, and Leslie Howell, Consultant Environmental Team Leader, discussed this issue with John Fagin, AINW, and impressed upon AINW the need to be more responsive and communicative with Kurt R. Mutual understanding reached. AINW provided Kurt Roedel with an update/status report of all current and outstanding archaeological investigations.

11/2/09 – 1/13/10 [TP]: Issues regarding the Clackamas Pioneer Cemetery near Ambler Rd., 82nd Ave., and I-205, as well as anecdotal evidence of suspected Native American burial grounds to the west of the Pioneer Cemetery, prompted extended conversations and research. Site visits confirmed that the project would not impact the cemetery. A revised DOE and FOE for the Clackamas Cemetery was submitted to SHPO on 1/8/10 proposing No Effect of project on this historic cemetery.

AINW undertook additional research on the issue of whether Native American burial grounds may exist just outside the SW border of the Clackamas Pioneer Cemetery. Discussions with the cemetery sexton, and review of historic papers, did not provide any confirmation of the anecdotal stories raised about possible burial grounds near the cemetery. It is believed the anecdotal rumors of nearby gravesites may have been confused with known Native American burial grounds further south, near Oregon City.

A review of As-Built Construction Plans (grading/fill records) for I-205 and 82nd Ave. (OR 213S) indicated significant cuts occurring west of the cemetery in the area rumored to hold possible gravesites. AINW staff prepared a comprehensive report on the evidence, and submitted to Kurt Roedel for his review. Kurt R. concurred that sufficient documentation was provided by AINW to show the area had been heavily disturbed during construction of I-205/82nd Ave., resulting in a low likelihood of encountering human remains. Furthermore, Kurt R. indicated he had not received any additional comments from the Tribes regarding the potential for human remains. However, Kurt R. re-iterated that human remains are a very sensitive topic, and it is possible the Tribes might comment in the future.

2/3/10 - 3/04/10 [TP]: On-going coordination among ODOT project team, AINW, and Kurt Roedel regarding refinement of site protection and avoidance measures for HCA site 35CL330. AINW recommended a portion of site 35CL330 be eligible for listing in the NRHP, with a determination that the remainder of site 35CL330, does not contribute to its NRHP eligibility. Adjacent HCA site 35CL329 was determined to be not eligible for listing in the NRHP. All parties concurred that preparation of DOEs for these sites are not required insofar as neither site required data recovery. However, AINW provided DOE-like information for archaeology sites, including a statement of significance, a discussion of integrity, and an evaluation of the property against *all* four National Register of Historic Places eligibility criteria. A more detailed description of the types of construction impacts anticipated to these HCA sites, and the avoidance, minimization, and mitigation measures proposed to address these impacts was submitted to Kurt Roedel on 3/04/10.

Traditional Cultural Properties

Traditional Cultural Properties have been defined as properties that are eligible for inclusion in the National Register of Historic Places because of an association with practices or beliefs of a living community that are rooted in the community's history, or are considered important to continuing the community's cultural identity. Ceremonial sites, traditional homes, or locations of historic, artistic or economic practices are examples of such properties.

No Traditional Cultural Properties have been identified in the Sunrise project area. Therefore the project would not affect any Traditional Cultural Properties.