

**INTERSTATE BRIDGE REPLACEMENT PROGRAM  
SECTION 106 LEVEL OF EFFECT FORM**

<b>Agency/Project:</b> Federal Highway Administration, Federal Transit Administration, Oregon Department of Transportation, Washington State Department of Transportation Interstate Bridge Replacement Program FHWA Federal-Aid No. S001(553), FTA No. XXXX(XXX), ODOT Key No. 21570, WSDOT Work Order No. 400519A		
DAHP Project No. 2020-12-07501	SHPO Case No. 21-0006	
Property Name: House of Providence/Providence Academy (WA 150)	WISAARD Property ID: 18827	
Street Address: 400 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington	

<b>Preliminary Finding of Effect</b>		
<input type="checkbox"/> No Historic Properties Affected	<input checked="" type="checkbox"/> No Historic Properties Adversely Affected	<input type="checkbox"/> Historic Properties Adversely Affected
<b>Oregon State Historic Preservation Office Comments (Washington DAHP comments returned in letter form):</b>		
<input type="checkbox"/> Concur	<input type="checkbox"/> Do Not Concur:	<input type="checkbox"/> No Historic Properties Affected
		<input type="checkbox"/> No Historic Properties Adversely Affected
		<input type="checkbox"/> Historic Properties Adversely Affected
Signed _____	Date _____	
<b>Comments:</b>		



Figure 1. Primary building of the House of Providence and hedge along East Evergreen Boulevard, view facing north (WillametteCRA, 2021).



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**INTRODUCTION**

This recommendation of finding discusses the effect of the proposed Interstate Bridge Replacement (IBR) Program on the House of Providence, an institutional property located at 400 East Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 1). The subject property was listed in the National Register of Historic Places (NRHP) in 1978. Updated documentation, including an evaluation of subsequent alterations to the property, was prepared in 2023 as part of the ongoing Program. This documentation recommended that the NRHP-listed House of Providence is significant under Criteria A, B, and C and revised the boundary proposed in 1978 to account for the loss of historic fabric at the edges of the property.

Based on the following information, it is the recommendation of Architectural Resources Group (ARG) to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that the Program would result in No Adverse Effect on the House of Providence. This recommendation is made to support the FHWA and FTA Finding of Effect for the undertaking, pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, "Protection of Historic Properties" (36 Code of Federal Regulations [CFR] 800).

**PROGRAM DESCRIPTION<sup>1</sup>**

The IBR Program would replace the aging Interstate Bridge across the Columbia River with a modern, seismically resilient multimodal structure. As described by the Program's Purpose and Need statement, the purpose of the IBR Program is to improve Interstate 5 (I-5) corridor mobility by addressing present and future travel demand and mobility needs in the Program area. The specific needs to be addressed by the Program include growing travel demand and congestion; impaired freight movement; limited public transportation operation, connectivity, and reliability; safety and vulnerability to incidents; substandard bicycle and pedestrian facilities; and seismic vulnerability.

The proposed infrastructure improvements, referred to as the Modified Locally Preferred Alternative (LPA), are located along a 5-mile stretch of the I-5 corridor in Portland, Oregon, and Vancouver, Washington, as shown in Figure 2. The Modified LPA is a modification of the LPA for the Columbia River Crossing (CRC) project, which was selected as the preferred alternative following the evaluation of four build alternatives in the CRC Environmental Impact Statement (EIS) in 2011. The CRC project completed its National Environmental Policy Act (NEPA) compliance with a signed Record of Decision (ROD) in 2011 and two re-evaluations that were prepared in 2012 and 2013. The CRC project was discontinued in 2014. While the main components of the preferred alternative have not changed since the CRC EIS, the Modified LPA includes design changes that alter several components.

The basic components of the Modified LPA include:

- A new pair of Columbia River bridges—one for northbound and one for southbound travel—built west of the existing bridges. The new bridges would include three through-lanes, safety shoulders, and one auxiliary lane (a ramp-to-ramp connection on the highway that reduces congestion by giving drivers more space and time to merge safely) in each direction across the river crossing bridge. When all highway,

<sup>1</sup> This section adapted from Interstate Bridge Replacement (IBR) Program, "2. Description of Alternatives," in "Draft Supplemental Environmental Impact Statement" (2023).



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transit, and active transportation would be moved to the new Columbia River bridges, the existing Interstate Bridge (both spans) would be removed.

- 5           ○ Three bridge configurations are under consideration: double-deck truss bridges with fixed spans, single-level bridges with fixed spans, and single-level bridges with movable spans over the primary navigation channel. The fixed-span bridges would provide up to 116 feet of vertical navigation clearance, and the movable spans would provide at least 178 feet of vertical navigation clearance depending on the movable span type (such as lift or double leaf bascule). The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline. The primary navigation channel would be relocated approximately 500 feet south (measured by channel centerline) of its existing location near the Vancouver shoreline.
- 10           ○ A two auxiliary lane option (two ramp-to-ramp lanes connecting interchanges) is being evaluated in addition to the one auxiliary lane in each direction of I-5. The second auxiliary lane in each direction of I-5 would be added from approximately Marine Drive to Mill Plain Boulevard.
- 15           ▪ A 1.9-mile light rail transit (LRT) extension of the current Metropolitan Area Express (MAX) Yellow Line from the Expo Center MAX Station in North Portland, where it currently ends, to a terminus near Evergreen Boulevard in Vancouver. Improvements would include new stations at Hayden Island, downtown Vancouver (Waterfront Station), and near Evergreen Boulevard (Evergreen Station), as well as revisions to the existing Expo Center Station. Park and rides to serve LRT riders in Vancouver could be included near the Waterfront Station and Evergreen Station. TriMet, which operates the MAX system, would also operate the Yellow Line extension.
- 20           ○ Potential site options for park and rides include three site options near the Waterfront Station and two near the Evergreen Station (up to one park and ride could be built for each station).
- 25           ▪ Associated LRT improvements such as traction power substations, an overhead catenary system, signal and communications support facilities, an overnight light rail vehicle (LRV) facility at the Expo Center, 19 new LRVs, and an expanded maintenance facility at TriMet's Ruby Junction.
- 30           ▪ Wider shoulders on I-5 from Victory Boulevard to State Route (SR) 500 to accommodate express bus-on-shoulder service in each direction. Associated improvements would include three additional bus bays for eight new electric double-decker buses at the C-TRAN operations and maintenance facility.
- 35           ▪ Improvements to seven interchanges and I-5 mainline improvements between Victory Boulevard in Portland and SR 500 in Vancouver. Some adjacent local streets would be reconfigured to complement the new interchange designs.
  - An option that shifts the I-5 mainline up to 40 feet westward in downtown Vancouver near the SR 14 interchange is being evaluated.
  - An option that eliminates the existing C Street ramps in downtown Vancouver is being evaluated.
- Six new parallel bridges across North Portland Harbor: one on the east side of the existing I-5 North Portland Harbor bridge and five on the west side or overlapping with the existing bridge (which would be removed). The bridges would carry (from west to east) LRT tracks, southbound I-5 off-ramp to Marine





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Drive, southbound I-5 mainline, northbound I-5 mainline, northbound I-5 on-ramp from Marine Drive, and an arterial bridge for local traffic with a shared-use path for pedestrians and bicyclists.

- 5     ▪ A variety of improvements for people who walk, bike, and roll throughout the study area, including a system of shared-use paths, enhanced wayfinding, and facility improvements to comply with the Americans with Disabilities Act. These are referred to as “active transportation” improvements.
- Integration of local bus transit service, including bus rapid transit (BRT), with the proposed new LRT service.
- Variable-rate tolling for motorists using the river crossing as a demand-management and financing tool.

10     Construction of the IBR Program would also require staging areas. Equipment and materials would be staged in the study area throughout construction generally within existing or newly purchased right of way, on land vacated by existing transportation facilities, or on nearby vacant parcels. However, at least one large site would be required for construction offices, to stage the larger equipment such as cranes, and to store materials such as rebar and aggregate. The Program would be constructed in multiple phases: the bridges and approaches are anticipated to be completed in one contract, with the rest of the Program components following in multiple smaller contracts depending on the availability of funding. Construction staging areas for each contract would be identified closer to final design and construction. Two potential major staging sites have been identified. One is located on Hayden Island on the west side of I-5. The second is in Vancouver between I-5 and Clark College. Other staging sites may be identified during the design process or by the contractor. Additionally, some staging activities for construction of the new Columbia River and North Portland Harbor bridges would take place on the river itself.

15     Temporary work structures, barges, barge-mounted cranes, derricks, and other construction vessels and equipment would be present on the river during most or all of the bridges’ construction period.

**IDENTIFICATION AND DESCRIPTION OF HISTORIC PROPERTY**

25     The House of Providence (Providence Academy) is an institutional property located at 400 East Evergreen Boulevard in Vancouver, Clark County, Washington (Figure 3). The property contains an ornate, three-story building that is clad in brick and shows the influence of the Georgian/Federal and French Colonial architectural styles. The building has a generally T-shaped plan and a roof form composed of numerous intersecting gables and dormers. At the center of the roof is a domed belltower surmounted by a lantern. Constructed in 1873-1874, the original building consisted of an east-west volume with a rear wing extending to the north. An addition constructed in 1891 extended the front portion of the building to the west. Most of the building’s elevations are characterized by slightly projecting, gabled pavilions that alternate with open, balustraded galleries. The elevations are further articulated by brick pilasters and corbelled belt courses that frame the regularly spaced window openings.

35     Numerous outbuildings were also constructed on the grounds of the House of Providence to support the institution’s operations. A barn, root cellar, convent building, schoolhouse, and wellhouse have been removed, as have the ca. 1873 laundry and ca. 1910 boiler house and polygonal smokestack that stood northeast of the primary building. The Kindergarten Building (also referred to as the gymnasium) to the east of the primary building is the only outbuilding associated with the House of Providence that remains, although it was constructed in the 1940s and therefore dates to after the property’s initial period of development in the late nineteenth century. Additionally, the school grounds originally consisted of neatly laid lawns, garden plots, walks, and parterres among the outbuildings. Over time, many of the landscape elements of the House of Providence grounds have



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5 been altered or removed, including garden plots and parterres. Paved parking lots were introduced across much of the original property during the second half of the twentieth century, and two parcels have been subdivided from the western portion of the parcel (along C Street) and are currently being redeveloped with five- and six-story mixed-use commercial and residential buildings. A grass lawn and walks adjacent to the Kindergarten Building have also been removed. As of 2023, extant landscape elements include the grass lawn, central walkway with circular flower bed, and oval approach drives in front of the primary building, as well as a short hedge, concrete curb, and mortared stone gate posts along East Evergreen Boulevard that date to before the 1920s. The hedge and curb, however, remain intact along only the center of the historic grounds' southern boundary at East Evergreen Boulevard. The intact sections of the hedge and curb span a distance of approximately 250 feet (generally aligning with the primary House of Providence building), whereas they historically were present at East Evergreen Boulevard over a distance of more than 500 feet between C Street and the I-5 right-of-way. The western section of the hedge and curb was removed to accommodate construction of the mixed-use buildings along C Street, and the eastern section of these features was altered and ultimately removed to accommodate an expanded parking lot in the parcel's southeastern corner (Figures 7 and 8).

15 The House of Providence was listed in the NRHP in 1978 (NRHP Reference No. 78002738). The nomination form addressed the entire 7-acre site of the House of Providence, including the primary building and five outbuildings that remained at the time of listing: the boiler house, laundry, wellhouse, Kindergarten Building (at that time used as a school), and restaurant. The nomination form also briefly described extant landscape elements, specifically vegetation and the oval-shaped drive that approaches the primary entrance. The 1978 NRHP nomination did not specify the significance criteria under which the property was listed but did identify several areas of significance, including Architecture, Education, Exploration/Settlement, Religion, and Social/Humanitarian. These areas of significance generally correspond to Criteria A and C. Accordingly, the nomination form provides a detailed discussion of the history of the Sisters of Providence and their work in Washington, and it also notes that the property has exceptional architectural importance in the Pacific Northwest. At the time of its NRHP listing, the boundary of the property was defined as the historic extent of the grounds, corresponding to the city block bounded by 12th Street to the north, C Street to the west, East Evergreen Boulevard to the south, and Reserve Street and the I-5 right of way to the east.

30 Furthermore, the 1978 nomination did not provide a comprehensive inventory of features on the property or clearly identify all contributing elements. However, a site map included in the nomination form noted that the property's historic components were the primary building, boiler house, laundry, wellhouse, and landscaping in front of the primary building's entrance. "Intrusions" were noted as the restaurant building and 1940s-era Kindergarten Building (then occupied by a Montessori school). The nomination form associated the property's significance with the era 1800-1899 but did not identify a more specific period of significance. The identification of the Kindergarten Building as an intrusion suggests that the evaluator considered the property's significant period to have ended before the 1940s.

40 To account for the original NRHP nomination's lack of detail and alterations that have occurred within the House of Providence grounds since the property's original NRHP listing, a Determination of Eligibility (DOE) was prepared for the House of Providence as part of the current undertaking. The updated DOE formally establishes the NRHP criteria under which the property is listed, proposes a period of significance and character-defining features, and reconsiders the previously identified historic property boundary. The DOE recommends the House of Providence meets the significance threshold established by Criterion B in addition to Criteria A and C, in recognition of the property's close association with the significant achievements of Mother Joseph of the Sacred Heart, who was the leader of the Sisters of Providence in the late nineteenth century and the architect of the



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5 House of Providence’s primary building. The proposed period of significance spans 1873 to 1924, beginning the year the Sisters of Providence constructed the House of Providence in Vancouver and ending the year that the order relocated its headquarters to Seattle. The DOE finds that the property retains sufficient integrity to convey its significance under Criteria A, B, and C, despite the House of Providence’s grounds having undergone numerous alterations during the twentieth and early twenty-first centuries.

10 Although the original boundary proposed in the NRHP nomination encompassed the full extent of the House of Providence’s historic grounds, the DOE recommends a smaller boundary corresponding to the current tax lot that contains the House of Providence (Figure 4). This proposed boundary excludes portions of the historic grounds along C Street and E 12th Street that now contain surface parking lots and new mixed-use development that do not contribute to the historic character of the property. The proposed historic property boundary encompasses all extant historic features that convey the institution’s original campus-like qualities. Character-defining features are considered to be the original T-shaped House of Providence building and its west addition, including its brick cladding, intersecting gabled roof forms and dormers, alternating pavilions and wood galleries, pilasters, belt courses, fenestration pattern, wood windows and doors, projecting entrance, sculpture niche, and domed cupola.

15 Character-defining landscape elements include the grass lawn that remains in front of the primary entrance, central walkway with circular flower bed, oval-shaped approach drives, mature trees, stone gateposts (concrete pylons not contributing), and extant section of the concrete curb and low hedge that define the southern parcel boundary along East Evergreen Boulevard. Features within the historic property boundary that do not contribute to its significance include the southeastern surface parking lot and the 1940s Kindergarten Building.

20 **ALTERNATIVES CONSIDERED**

Because the House of Providence is listed in the NRHP, Program alternatives were considered to eliminate or minimize potential impacts to the property.

No-Build Alternative

25 With a No-Build Alternative, the existing infrastructure would remain the same and the existing Interstate Bridge would continue to operate as it does today. Projected increases in traffic volumes would result in increased congestion and delays for all travelers, as well as additional costs and uncertainty for all businesses that rely on this corridor for freight movement. Additionally, needs for repair and maintenance would potentially increase as the bridge ages, and the bridge would remain vulnerable to mechanical failure or damage from a seismic event.

30 The No-Build Alternative would result in No Effect to the House of Providence, including no direct or indirect impacts on the property’s character-defining features or integrity. However, it would also fail to address present and future travel demand, mobility needs, and safety considerations in the IBR Program area. The No-Build Alternative, therefore, fails to meet the Program’s Purpose and Need.

**ASSESSMENT OF EFFECTS**

Application of the Criteria of Adverse Effect (36 CFR 800.5)

35 As defined in 36 CFR 800.5(a)(1), an Adverse Effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.



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5 As currently proposed, the Modified LPA would reconstruct and widen the I-5 corridor to the east of the House of Providence. Although the widened interstate right of way would not encroach into the identified boundary of the NRHP-listed property, the Program would require one subsurface easement along the eastern edge of the property to accommodate tie-back anchors for a proposed retaining wall along I-5 (Figure 5). The subsurface easement would extend approximately 100 feet into the property boundary but would remain more than 100 feet from the primary building and its associated landscaping. The reconstruction of the interstate would additionally require the reconstruction of the I-5 overcrossing at East Evergreen Boulevard, involving improvements to pedestrian and bicycle facilities along East Evergreen Boulevard adjacent to the House of Providence’s southern boundary (Figure 5). These improvements would take place within the current East Evergreen Boulevard roadway and public sidewalk.

10 To accommodate construction of these new transportation facilities, the Program would impose a temporary construction easement along the southern property boundary at East Evergreen Boulevard. The easement would extend approximately 10 feet into the House of Providence’s identified boundary, overlapping character-defining landscape features such as gate posts, hedge, and concrete curb along the public sidewalk. However, it appears that construction would not require the permanent use of this portion of the House of Providence property, and the IBR Program commits to restoring to pre-construction conditions the character-defining features located within the temporary construction easement, including preservation of the gate posts and replacement in-kind of the hedge and curb consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Furthermore, Program activities would not prevent vehicular access to the parking lot at the southeastern corner of the House of Providence property, which supports the operations of the property’s current tenants, either during construction or after construction has been completed.

15 Other activities in the vicinity of the House of Providence include the construction of a community connector land bridge capping the I-5 right of way south of East Evergreen Boulevard, which would incorporate the new at-grade Evergreen LRT station. The Program also contemplates constructing a park and ride for the LRT station on an existing surface parking lot and undeveloped parcels that are located within the city block immediately south of the subject property. This site does not contain any features that contribute to the historic setting of the House of Providence. Furthermore, the reconstruction of I-5 to the east of the property boundary would reinforce the existing I-5 corridor, which was built after the end of the House of Providence’s period of significance, and as such these activities would not further diminish the property’s historic setting. Therefore, the various Program activities occurring in the vicinity of the House of Providence would alter its setting to an extent but generally would replace existing transportation infrastructure with elements of a similar design or related visual character, and no elements of setting that date to the property’s period of significance would be affected. The Program would thus not diminish the property’s ability to convey the Sisters of Providence’s significant history in Vancouver or the property’s rich aesthetic character. Furthermore, because the property does not rely upon a quiet setting to convey its significance, the introduction of new atmospheric and audible intrusions would not diminish any character-defining features of the property.

20 Under the Modified LPA’s various bridge design options and under its two auxiliary lane option, the Program would involve the same activities in the vicinity of the House of Providence as described above. However, Program activities would differ under the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard. The shifting of the I-5 mainline would expand the I-5 corridor into the eastern portion of the House of Providence’s identified boundary (Figure 6). Program activities would generally be similar to those described above (including the temporary construction easement along East Evergreen Boulevard), but certain features would be constructed in different locations. Specifically, the westernmost lanes of I-5 and the retaining





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5 wall would cross into the parcel containing the House of Providence, which corresponds to the historic property boundary. Therefore, the westward shift of I-5 would reduce the size of the area that historically contained the institution's grounds. However, no features of the House of Providence that contribute to the property's significant historic character would be altered. Program elements would instead replace portions of the non-historic surface parking lots located at the southeastern corner of the parcel, where the historic curb and hedge have already been removed (Figures 7 and 8). Program elements within the identified boundary of the NRHP-listed resource would be located within 25 feet of the east end of the Kindergarten Building, which was constructed after the end of the period of significance and is not a character-defining feature of the property. Program elements would remain approximately 80 feet east of the extant section of the historic hedge and curb along East Evergreen Boulevard, and approximately 185 feet from the House of Providence's primary building. Similarly, although the I-5 mainline shift would extend the subsurface easement farther west into the parcel, the easement would not affect any of the property's character-defining features; its western extent would remain more than 50 feet from the House of Providence building and its extant historic landscape features. Therefore, the Modified LPA would have No Adverse Effect on the NRHP-listed House of Providence, regardless of whether the I-5 mainline shift is implemented. Should the proposed design require permanent changes to the landscape elements within the temporary construction easement along the southern boundary of the property, this Finding of Effect would need to be revisited to determine the Program's level of effect.

**CONCLUSION**

20 It is the recommendation of ARG to FHWA and FTA that the IBR Program would have No Adverse Effect on the NRHP-listed House of Providence.

**SOURCES/BIBLIOGRAPHY**

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25 Lentz, Florence K. House of Providence. National Register of Historic Places Nomination Form. NRHP Reference No. 78002738. Washington, DC: U.S. Department of the Interior, National Park Service. Prepared by Washington Office of Archaeology and Historic Preservation, 1978.

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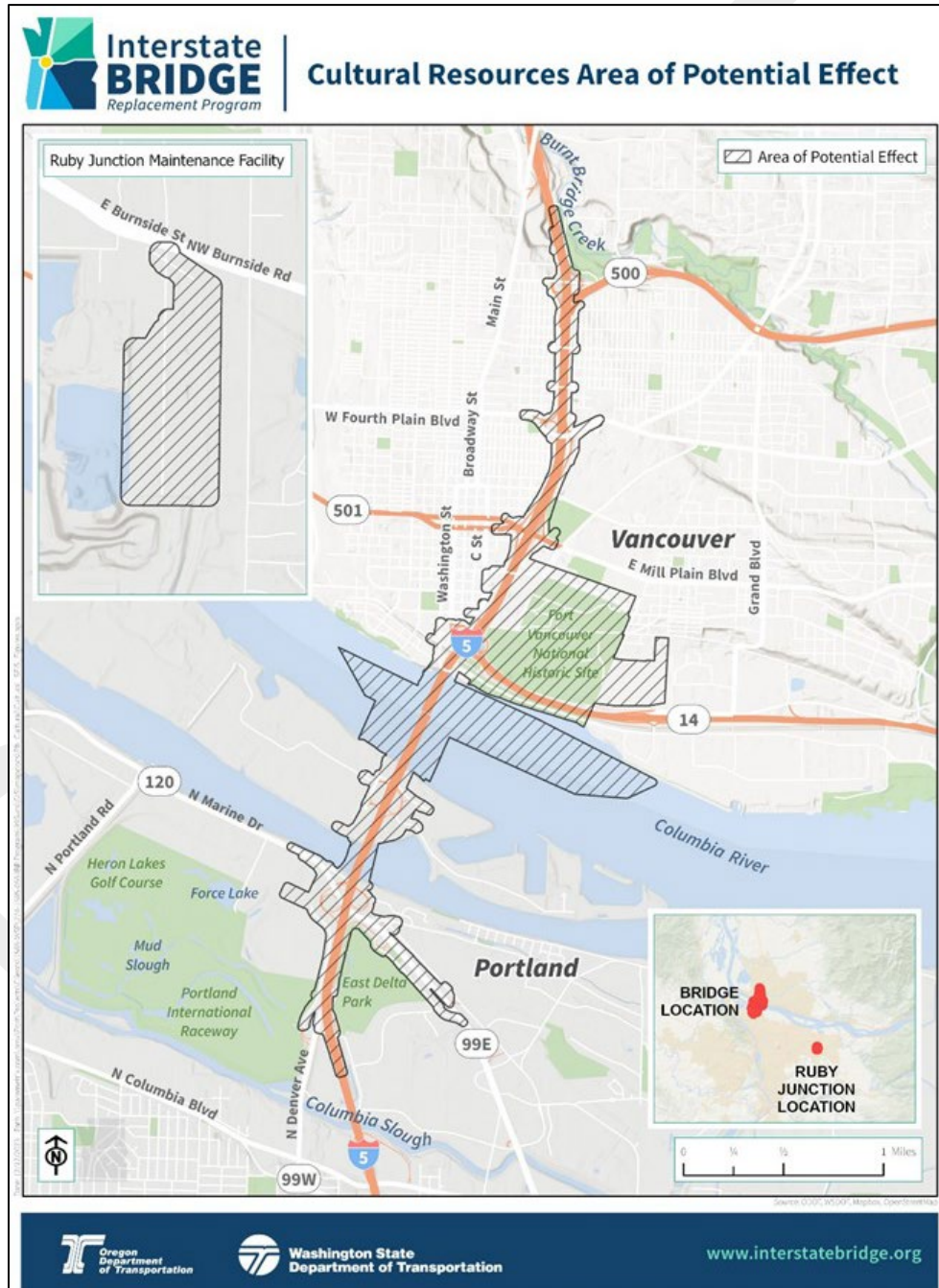


Figure 2. Map showing the Cultural Resources Area of Potential Effect (APE) for the IBR Program (Interstate Bridge Replacement Program, December 2023).

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Figure 3. Location map of the House of Providence (400 East Evergreen Boulevard), Vancouver, Clark County, Washington.



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Figure 4. Aerial map of the House of Providence (400 East Evergreen Avenue), showing the identified boundary of the NRHP-listed property in white. Note that some buildings and landscaped areas east of the primary building have been demolished since the date of the aerial photograph background image.

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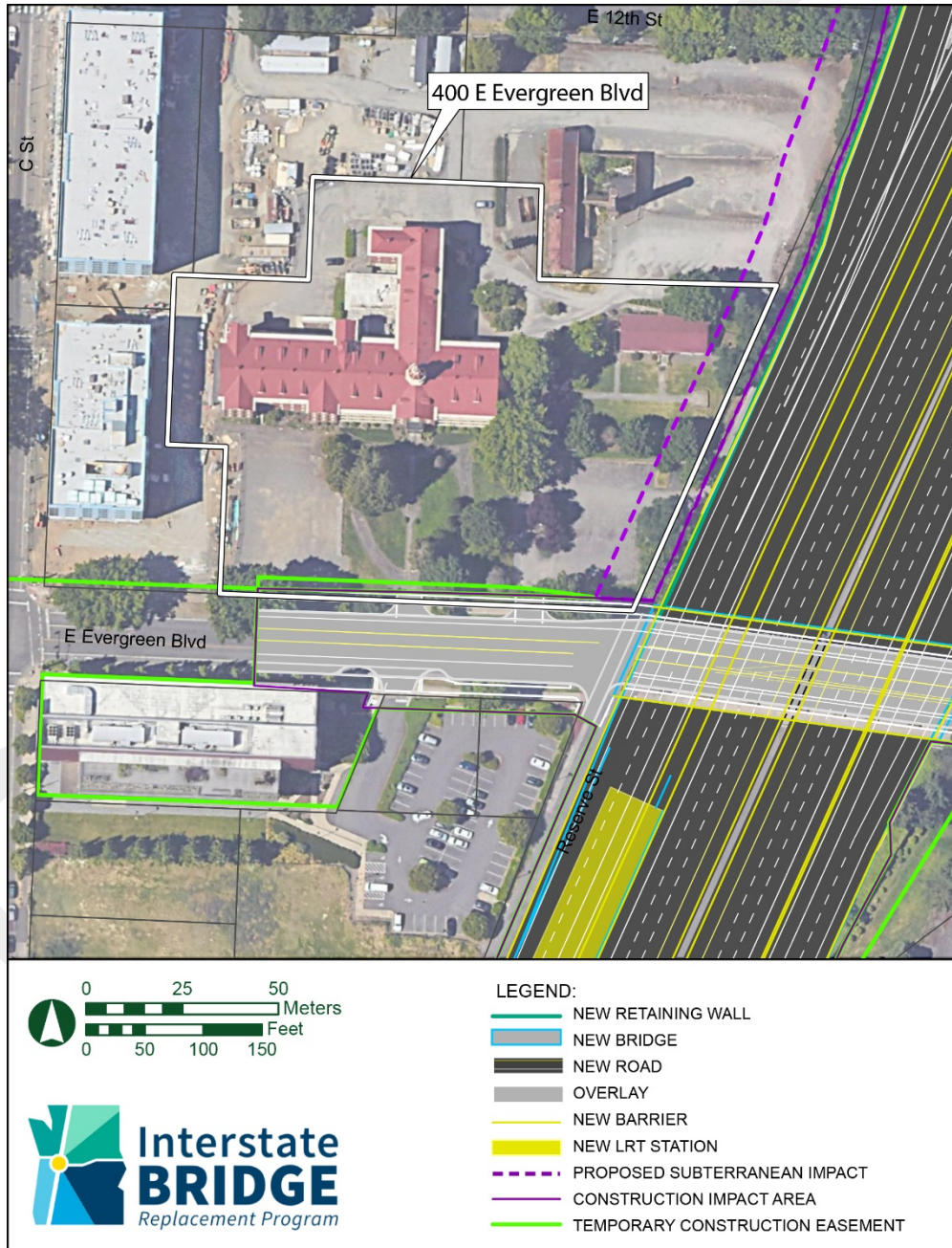


Figure 5. Aerial map showing the subject property and proposed Program activities in the vicinity. This map depicts the Modified LPA without the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard.



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Property Name: House of Providence/Providence Academy (WA 150)	WISAARD Property ID: 18827
Street Address: 400 East Evergreen Boulevard	City, County, State: Vancouver, Clark County, Washington

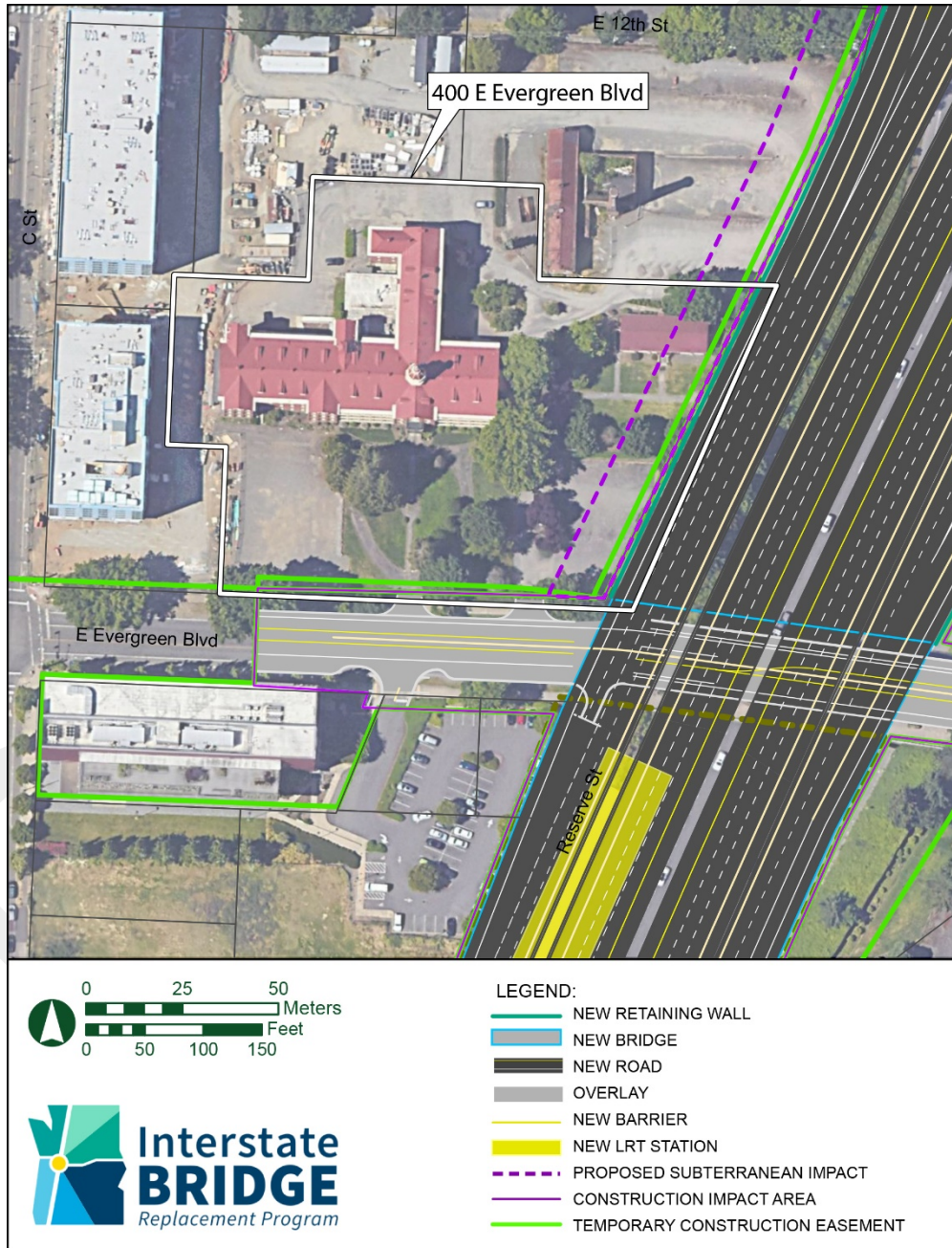


Figure 6. Aerial map showing the subject property and proposed Program activities in the vicinity. This map depicts the Modified LPA with the option to shift the I-5 mainline and ramps up to 40 feet west between SR 14 and Mill Plain Boulevard.

**INTERSTATE BRIDGE REPLACEMENT PROGRAM  
SECTION 106 LEVEL OF EFFECT FORM  
Continuation Sheet**

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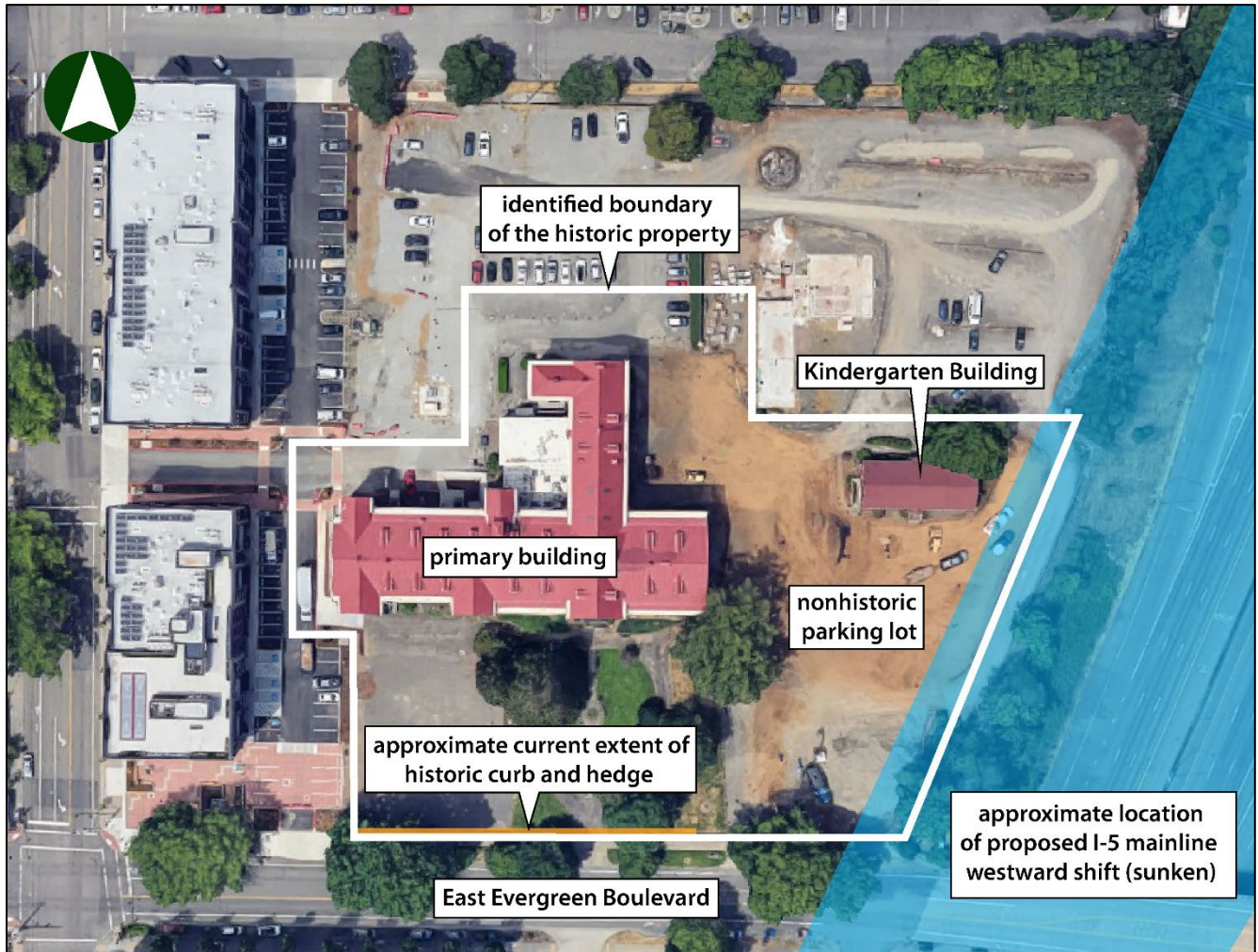


Figure 7. Aerial map showing the subject property, the approximate extent of the extant historic curb and hedge along East Evergreen Boulevard, and the approximate location of the proposed I-5 mainline westward shift relative to the identified boundary of the historic property (ARG, November 2023).



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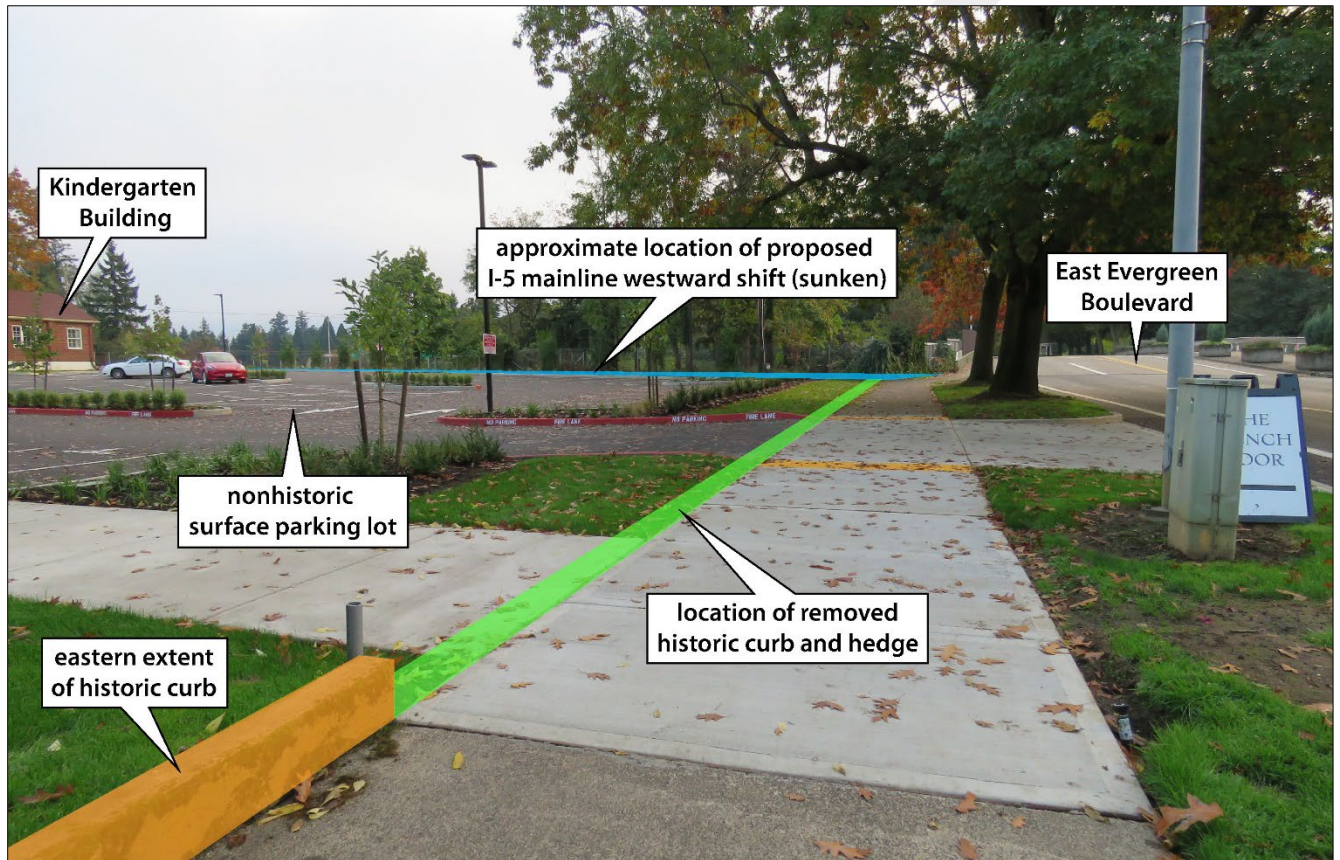


Figure 8. View of the southeast corner of the House of Providence property, facing northeast (ARG, October 2023). This view shows the sidewalk and parking lot along East Evergreen Boulevard, with the Kindergarten Building just visible at the left edge of the frame. The orange shading indicates the eastern extent of the extant historic curb, and the green shading denotes the location of the historic hedge and curb section that have been removed. The blue shading denotes the approximate location of the western edge of the I-5 right of way that is contemplated as a design option of the Modified LPA.

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