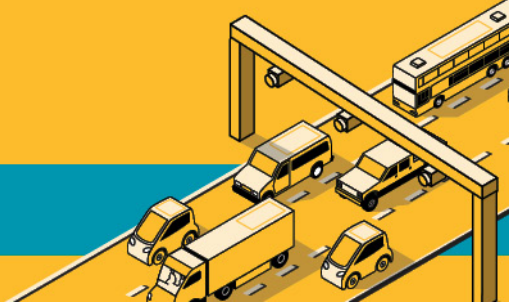


I-205 Toll Project

MEMORANDUM



Date September 1, 2021
To Lucinda Broussard, Robert Hadlow, Carol Snead, and Michael Holthoff (ODOT)
From Ethan Spoo, WSP
Subject Parks, Recreation, and Section 4(f)/6(f) Methodology Memorandum
CC

INTRODUCTION

This memorandum describes the methods that will be used in the I-205 Toll Project (Project) Environmental Assessment (EA) analysis to evaluate impacts of the Project alternatives on parks, recreation, and properties protected under Section 4(f) of the U.S. Department of Transportation Act and/or Section 6(f) of the Land and Water Conservation Fund (LWCF) Act. The analysis and results will be documented in the EA that will be developed to comply with federal guidelines and regulations, including the National Environmental Policy Act (NEPA) and local and state policies, standards, and regulations.

The parks, recreation, and Section 4(f)/Section 6(f) analysis will evaluate impacts from the construction, operations, and maintenance of the Project and will identify mitigation measures if needed.

LEGAL REGULATIONS AND STANDARDS

Laws, Plans, Policies, Regulations, Guidance

The following is a list of federal, state and local laws, regulations, plans, policies, and guidance documents that guide or inform the assessment of parks, recreation, and Section 4(f)/6(f):

- NEPA (42 U.S.C. 4331[b][2])
- Section 4(f) of the U.S. Department of Transportation Act of 1966
- Section 6(f) of the LWCF Act of 1965
- Title 42 U.S.C. Section 4601, Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended
- Section 106 of the National Historic Preservation Act of 1966
- 23 U.S.C. Section 138 Preservation of Parklands
- 23 CFR 774 Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites (Section 4(f)) (Revised 2018)

- 36 CFR 800 Protection of Historic Properties (Revised 2004)
- 49 U.S.C. Section 303 Policy on Lands, Wildlife and Waterfowl Refuges, and Historic Sites
- Section 4(f) Policy Paper (2012)

Park and recreational facilities in the project area are owned and managed by the Cities of West Linn and Oregon City as well as Clackamas County. State law requires each agency to maintain a comprehensive open-space plan that establishes policies and regulations relating to acquisition, development, and operations of parks and recreational resources. In addition, Metro coordinates open-space planning region-wide and also owns and manages natural spaces and trails throughout the Portland metropolitan area. Metro's 2016 Parks and Nature System Plan prioritizes acquisition, development, and restoration efforts for Metro-owned lands. The analysis of these plans will consider both existing and planned park and recreation resources.

AREA OF POTENTIAL IMPACT

An area of potential impact (API) is a geographic boundary within which impacts to the human and natural environment could occur. The API for parks, recreation, and Section 4(f)/Section 6(f) resources can vary depending on the direct or indirect impacts being analyzed. Direct long-term and short-term impacts to parks, recreation, and Section 4(f)/6(f) resources could occur within 100 feet of the existing I-205 right-of-way between SW Stafford Road and Oregon Route 213. Direct impacts within this area could include permanent Project improvements, construction staging areas, and any other areas of ground disturbance (Figure 1).

Potential indirect impacts to parks, recreation and Section 4(f)/Section 6(f) resources could occur stemming from changes to access, travel routes, and noise, air, or visual impacts to users of these resources along local streets where observed changes in traffic volume would exceed plus or minus 10 percent. The parks, recreation, and Section 4(f)/Section 6(f) API, therefore, also encompasses parks, recreation and Section 4(f)/Section 6(f) resources adjacent to (within 100 feet) of roadways forecast to experience changes in traffic volumes plus or minus 10 percent and with an annual average daily traffic (AADT) increase or decrease of at least 100 or more vehicles, as shown on Figure 2.

Figure 1. Parks, Recreation, and Section 4(f)/Section 6(f) Direct Impacts API

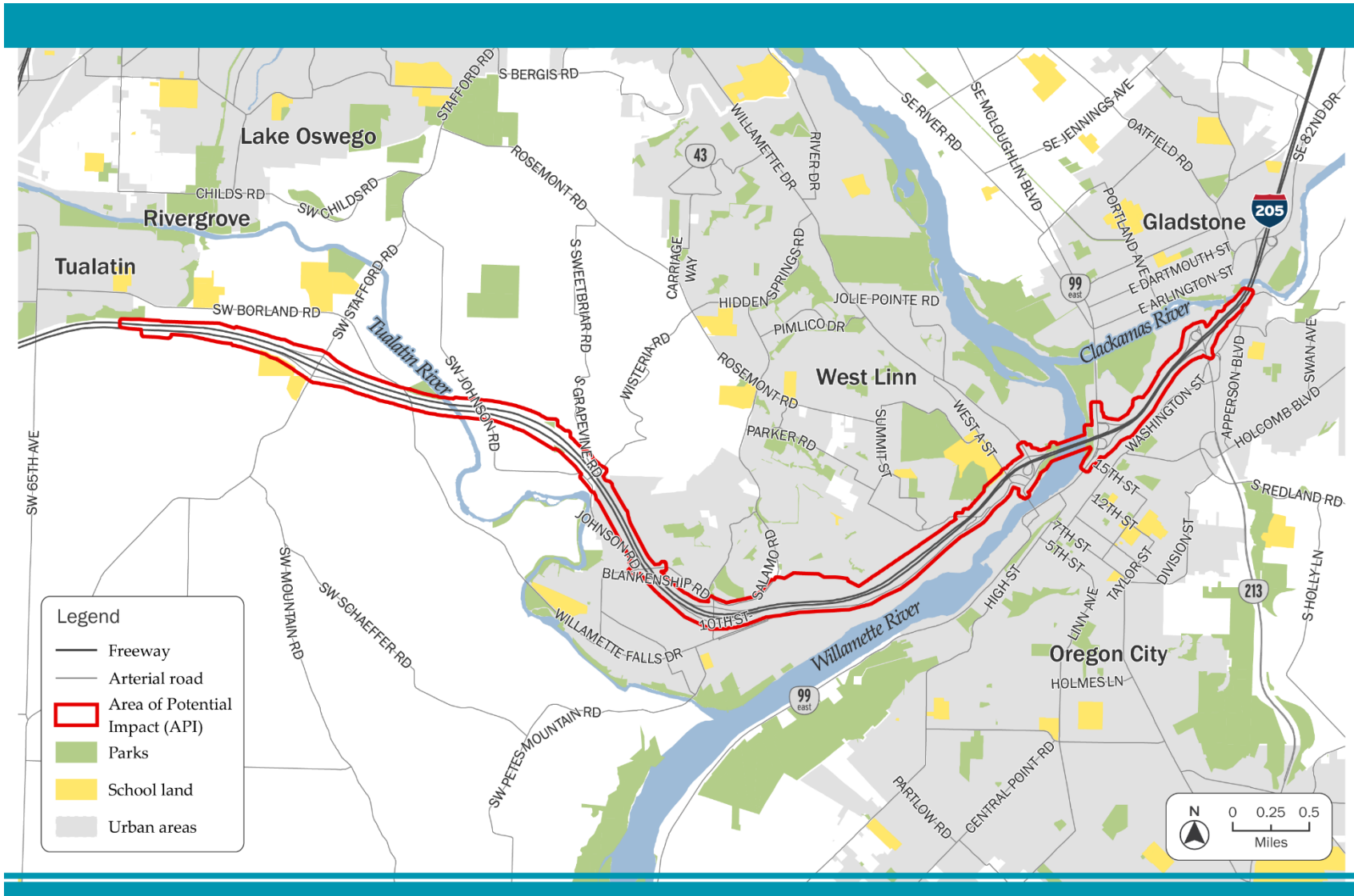
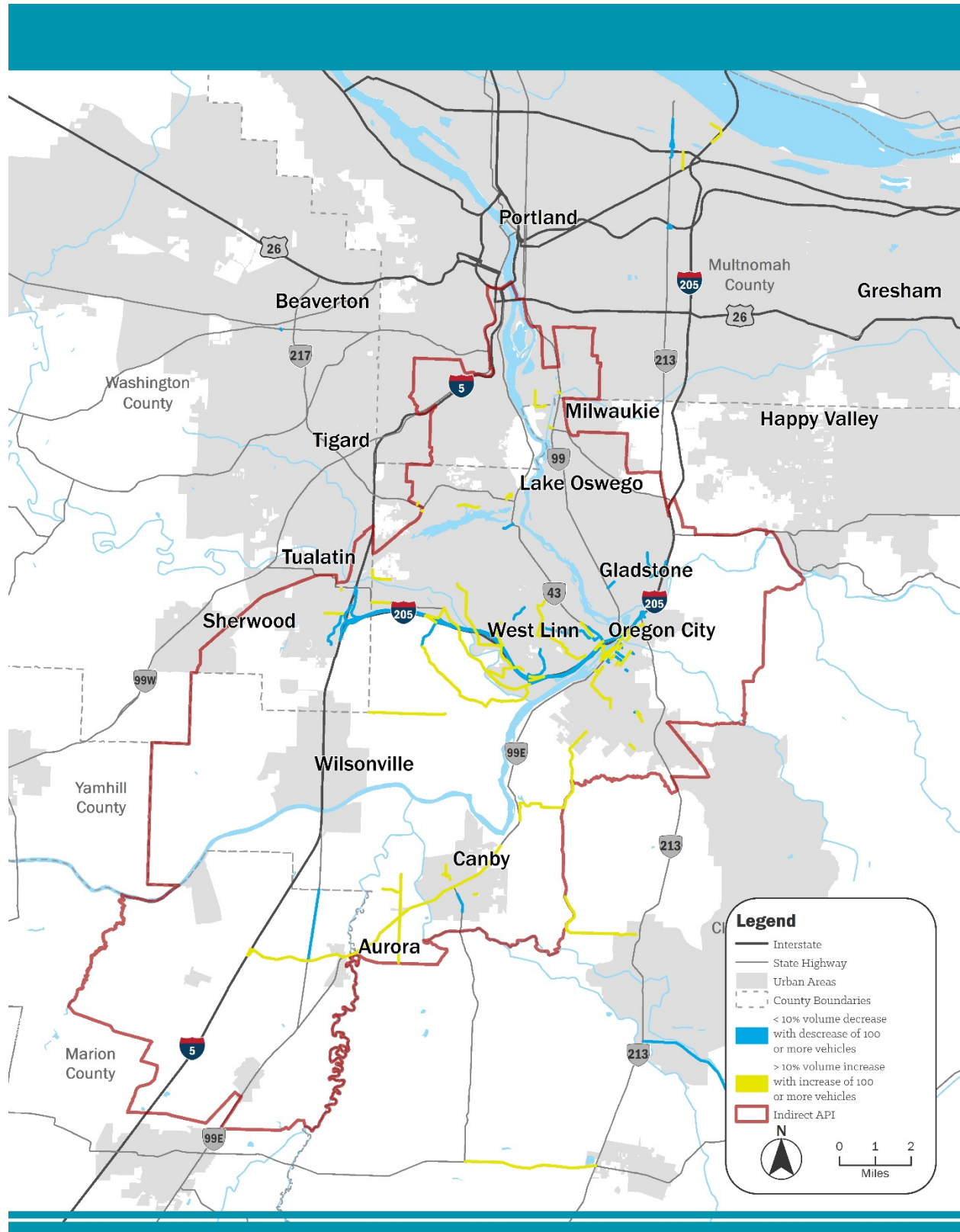


Figure 2. Parks, Recreation, and Section 4(f)/Section 6(f) Indirect Impacts API



DESCRIBING THE AFFECTED ENVIRONMENT

Published Sources and Databases

Data used in the 2018 Documented Categorical Exclusion (DCE) prepared for the I-205 Improvements Project will be reviewed to confirm its relevancy and applicability to this study. The following is a list of the data that will be used to determine and describe parks, recreation, and Section 4(f)/Section 6(f) resources/existing conditions:

- Google Earth
- Metro's regional information system for parks and open space properties and planning documentation
- Clackamas County CMap GIS
- Cities of West Linn and Oregon City park mapping and planning documentation
- Metro Parks and Nature System Plan
- National Parks Service LWCF grant database
- Section 4(f) and Section 6(f) discipline technical memorandums from the I-205 Improvements Stafford Rd to OR 213 Project

Analysis of Section 4(f) historic sites will rely on information collected and documented in the Historic Properties section of the EA.

Contacts and Coordination

Existing parks, recreation, and Section 4(f)/Section 6(f) resources will be evaluated to determine their presence and characteristics through a desktop analysis of existing data sources. Future planned resources will also be identified. The presence of sensitive existing or proposed resource findings discovered during this evaluation will be confirmed (if needed) through coordination with the applicable agencies responsible for the establishment and management of each resource. These agencies include:

- City of West Linn
- City of Oregon City
- Clackamas County
- Metro Regional Parks and Natural Areas
- Oregon State Historic Preservation Office

In the unlikely event that the Project identifies impacted Section 6(f) properties within the API, ODOT will contact the Oregon Parks and Recreation Department (OPRD) LWCF program. If necessary, ODOT will identify the impacts to potentially affected sites and coordinate mitigation measures with OPRD.

The consulting parties may change as tolling alternatives are finalized.

Field Surveys or Testing

No field survey or testing is required.

IMPACT ASSESSMENT METHODS

The impact analysis will address the long-term and short-term impacts upon parks, recreation, and Section 4(f)/Section 6(f) resources for each of the Project alternatives.

Long-Term Impact Assessment Methods

The analysis of direct long-term parks, recreation, and Section 4(f)/Section 6(f) impacts resulting from the Project will consider potential impacts directly related to the development and operation of toll gantries and associated utility connections and signage. Long-term impacts could include acquisition of right-of-way from park, recreation, and Section 4(f)/6(f) properties; permanent changes in access to these facilities; changes to travel patterns that front these facilities; and/or permanent changes in noise, air, and/or visual experience of users of these facilities. Because the gantries would likely be located on existing state right of way, long-term impacts to parks, recreation, and Section 4(f)/6(f) resources are anticipated to be minimal, if any.

Short-Term Impact Assessment Methods

The analysis of direct short-term parks, recreation, and Section 4(f)/Section 6(f) impacts resulting from construction of the toll gantries and associated utility connections and signage will evaluate the potential for any impacts to these resources during construction. These impacts would include change in access; change in travel routes to park and recreation facilities; and noise, air, or visual impacts to users of park and recreation facilities, etc.

Indirect Impacts Assessment Methods

Beyond the boundaries of the API, potential indirect resource impacts from rerouting of traffic avoiding the toll gantries will be considered once the alternatives to be studied in the EA have been identified, and projected traffic volumes have been estimated. Indirect impacts are not anticipated to be measurable.

Cumulative Impacts Assessment Methods

In accordance with ODOT guidance (ODOT 2010), the cumulative impacts assessment will consist of an eight-step process to identify and evaluate cumulative impacts. The long-term, short-term, and indirect impacts identified for parks, recreation and Section 4(f)/Section 6(f) will be used in Step 1 to identify whether the Project has the potential to contribute to cumulative impacts on parks, recreation and Section 4(f)/Section 6(f) resources when considered in combination with other past, present, and future actions. For those resources studied in the cumulative impact assessment, the direct and indirect impacts identified in the respective technical analysis will also be used in Step 4: "Identify direct and indirect impacts that may contribute to a cumulative impact." See the I-205 Toll Project Cumulative Impacts Methodology

Memorandum for additional details on the eight-step process and cumulative impacts methodology.

MITIGATION APPROACH

If any parks, recreation, and Section 4(f)/Section 6(f) impacts are identified, mitigation will be determined in coordination with the agency with jurisdiction.

PERFORMANCE MEASURES

Table 1 presents a preliminary list of performance measures identified to evaluate how the alternatives compare in terms of impacts and benefits to parks, recreation, and Section 4(f)/6(f).

Table 1. Preliminary Park, Recreation, and Section 4(f)/6(f) Performance Measures

Performance Measure	How	Tool and/or Data Source used for Assessment of Measure
Physical changes to park, recreation, and Section 4(f)/Section 6(f) resources	Quantitative	Presence of park and recreation resources within the limits of construction and an assessment of short-term and long-term direct impacts to the identified resources. Impacts could include changes in access or travel routes, noise, air, or visual impacts to park, recreation, and Section 4(f)/Section 6(f) resources as documented in the air quality, noise, and visual quality sections of the EA.
Changes to access to park, recreation, and Section 4(f)/Section 6(f) resources located near roadways affected by vehicle rerouting	Qualitative	Information obtained from traffic model showing forecasted changes in traffic volumes that would result from tolling on roadways adjacent to park and recreation resources.

Additional performance measures may be identified during the course of analysis.

REFERENCES

Oregon Department of Transportation (ODOT). 2010. Environmental Impact Statement Annotated Template, Chapter 4: Cumulative Impacts.