



Welcome!

CUG Environmental Summit

VIRTUAL attendees: To receive attendance credit in Workday, you must enter your first and last name in the chat.

IN-PERSON attendees: Lunch orders accepted until 9:30am.

Day 2 Order #: 56272

littleloisafe.com/GroupOrderSubmission.php or (503)362-8422

Day 2 Agenda

9:00 am	Cultural: - Built Environment - Archaeology	Larissa Rudnicki, Architectural Historian Roy Watters, Archaeologist & Tribal Liaison
10:00 am	Biology: - Early Coordination and FAHP Programmatic - Fish Passage - Migratory Bird Treaty Act	Tom Loynes, ODOT/NOAA Liaison Allen Gillette, Aquatic Biology & Fish Passage Program Coordinator Nicholas Testa, ODOT Region 2 Senior Biologist
11:00 am	BREAK – Informal Networking	
11:15 am	Wetlands & Waters - Mitigation - Fill-Removal Permitting	Brad Livingston, Statewide Wetlands Program Lead
11:45 am	401 Certification & Mutual Agreement and Order	Cory Engel, Water Resources Program Coordinator
12:05 pm	1200-CA-Protecting Surface Waters of the State	Magnus Bernhardt, Interim Erosion Control & Roadside Development Program Coordinator
12:35 pm	LUNCH – Informal Networking! Order from Little Lois Cafe using group number 56272 until 9:30 am.	
1:35 pm	Air Quality	Natalie Liljenwall, Air Quality & Noise Program Coordinator
2:00 pm	Noise Abatement	Rob Schiavone, Region 1 Air Quality & Noise Specialist
2:20 pm	BREAK – Informal Networking	
2:35 pm	Question & Answer Open House Staff will be at marked tables for you to ask questions	ODOT Environmental Staff
3:30 pm	Recap, Closing Comments and End of Day Feedback <i>Adjourn 3:45 pm</i>	Tiffany, Ryan, and ODOT Environmental Managers

Built Environment & Archeology



Larissa Rudnicki, M.S.

Architectural Historian

- 13+ years with ODOT
- 7+ years as Adjunct Professor at UO
- 2+ years serving as Interim Co-Director of the UO Historic Preservation Program



Authors cultural reports (determinations of eligibility, intensive level surveys, historic structure reports, etc.) as well as assesses and determines the level of effect of transportation projects on built environment historic properties. Represents FHWA and ODOT in coordination with Certified Local Governments, Historic Preservation interest groups, community representatives and/or planners, as well as the public regarding the development of projects and, if necessary, any mitigation obligations.

Advocate for mobile homes, bowling alleys, roller skating rinks, mimetic architecture, drive-in movie theaters, and dingbat buildings, in addition to unraveling the true origin(s) of cribbage.



Roy Watters, M.A.

Archaeologist & Tribal Liaison

- 10 years with ODOT
- 20+ years as an Anthropologist
- Professional Certificate in Tribal Relations
*Institute for Tribal Government and Center for Public Service,
Mark O. Hatfield School of Government at Portland State
University.*



Works with federally recognized tribes to address resource issues including archaeology, traditional cultural properties (TCPs), tribal gathering areas, and treaty rights. Represents ODOT and FHWA in government-to-government consultation with tribal staff, committees, and councils related to the development of transportation projects.

Private sector experience in cultural resource management and corporate anthropology. Academic researcher and teaching faculty experience. Primary areas of interest include anthropology, history, Native America, Latin America, and ecosystem services.



Built Environment & Archeology Takeaways

1. Coordinate early with ODOT Archaeologist and Architectural Historian to ensure consultant work matches ODOT needs.
2. Consultant deliverables early in the project delivery timeline are key for ODOT to have sufficient time to accommodate Section 106/4(f) timelines.
3. Communication is key to all aspects of our work with consultants, tribes, consulting parties, and State Historic Preservation Office (SHPO).



Presentation Overview

- National Historic Preservation Act (Section 106)
 - ❖ Our inter-agency process for compliance
- Historic Property (Resource) Types
- Archaeology Resource Types
- Timeline for Geotechnical Compliance
- Establishing the Area of Potential Effects
- Consultation with Tribes and other Consulting Parties
- Coordination between Cultural Resource Firm and ODOT CR Specialists
- Compliance Documentation
(Cultural Resource Firm and ODOT CR Specialist Responsibilities)

National Historic Preservation Act (NHPA)

Section 106

Three basic concepts:

1. Consultation
 - ODOT Cultural Resource Specialists
2. Identification
 - Local Agency's Cultural Resources Firm*
3. Effects
 - ODOT Cultural Resource Specialists
 - SHPO Concurrence
 - FHWA Oversight



*** Firms MUST have Secretary of the Interior (SOI)-qualified staff in each respective discipline doing the work (Archaeology and Architectural History - They are DIFFERENT with different standards!)**



The Ever-Procedural Section 106 of the NHPA

Follow these “steps”

Initiate Review*

Agency identifies undertaking as well as any potential historic properties

Evaluate Historic Properties (Identification)*

Agency evaluates any historic properties for National Register of Historic Places eligibility and gauges if an effect is likely

Assess Effects*

Determine if undertaking will adversely affect historic properties

Resolve Adverse Effect(s)*

Develop and implement measures to avoid, minimize, or mitigate impacts

*Meaningful consultation is **REQUIRED** at every step - engage with preservation officers, tribes, and interested parties

Historic Property (or Resource) Types: Buildings





Historic Property Types: Objects

Historic Property Types: Sites



* One of two options for
Cultural Landscapes

Historic Property Types: Structures



* One of two options
for Linear Resources

Historic Property Types: Districts



* One of two options
for Cultural Landscapes



* One of two options
for Linear Resources



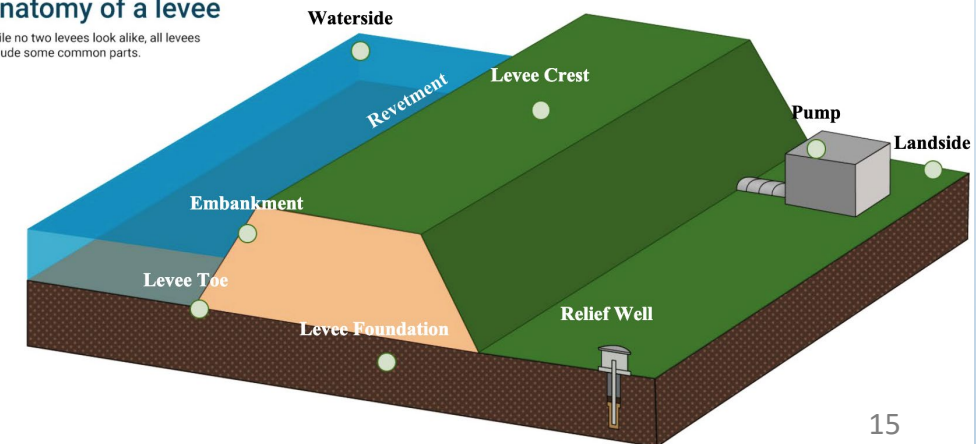
Linear Resources

- Railroad Grades
- Historic Roads and Trails
- Irrigation Canals and Ditches
- Telegraph and Telephone Lines (Transmission)
- Transportation-related Canals
- Linear Containment Structures



Anatomy of a levee

While no two levees look alike, all levees include some common parts.

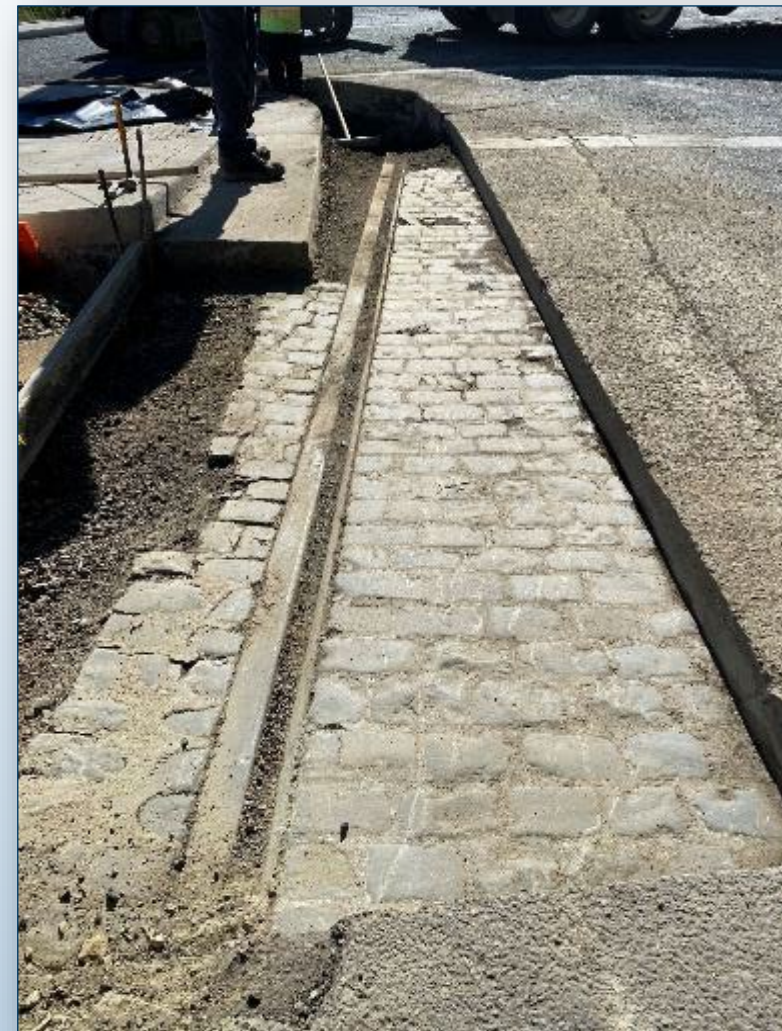


Types of Archaeological Sites



50 (federal) or **75** (state) years of age

Trolley tracks in Astoria and Portland



Archaeological Sites & Confidentiality



Archaeological site locations are confidential



Exempt from federal and state Freedom of Information Act



Site information is collected and stored at Oregon's State Historic Preservation Office



Only qualified archaeologists and Tribal cultural staff can access site information



Qualifications are defined in state law and federal law

Programmatic Agreement (PA)

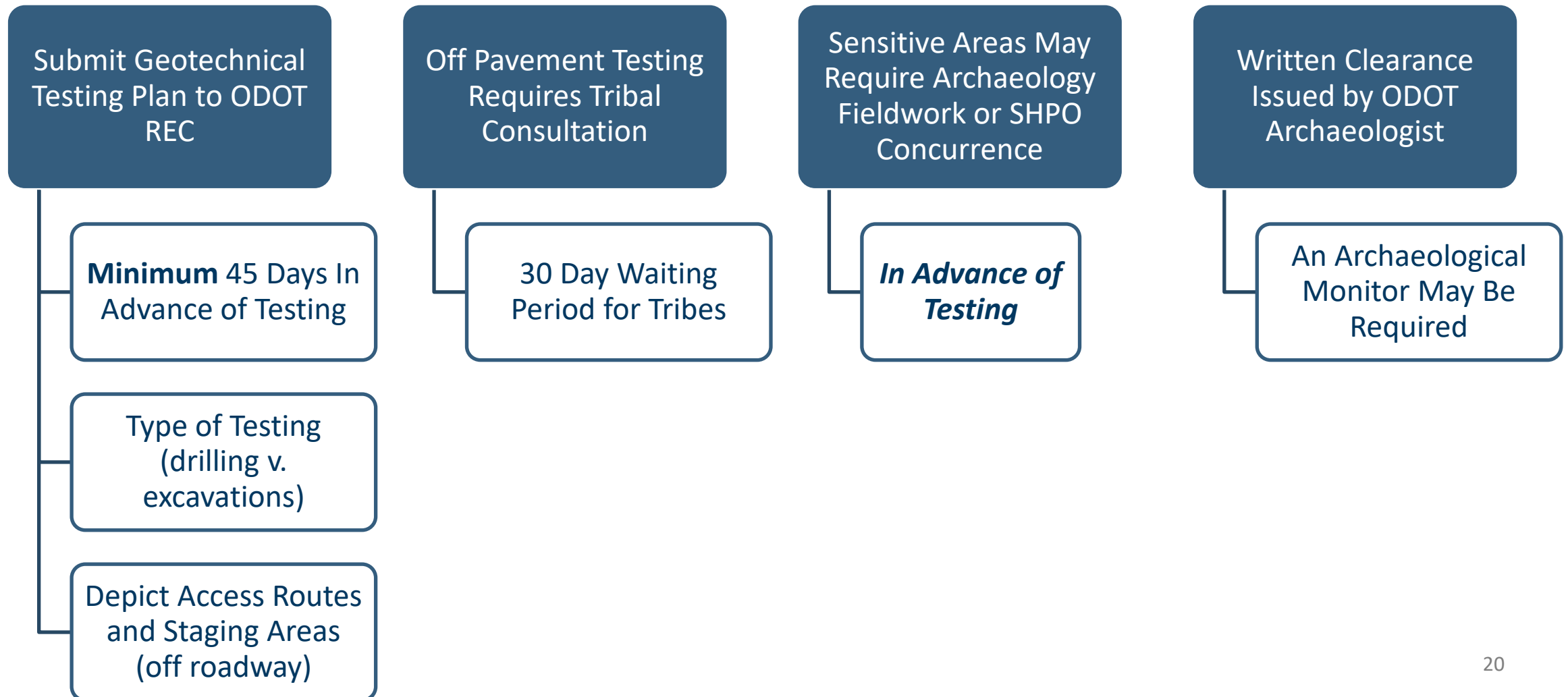
Streamlines Section 106 (NHPA) process for Federal-Aid Highway Program in Oregon

Partners: ODOT, FHWA, Oregon SHPO & ACHP

- ODOT CR Specialists delegated FHWA Section 106 Responsibilities
- PA Applies to No Effect Findings (No Resources Present)
- Effects to Historic Resources triggers traditional Sec 106 process

Many Local Agency Projects Cleared Under PA

Requirements for Geotechnical Explorations



Area of Potential Effects (APE)

Project Footprint (API)
is key to developing APE

Cultural Resources Firm
develops APE

- Depicted on maps and spatial data in GIS shapefile/kmz

ODOT REC and CR Staff
review and concur

- Verifies the area that needs to be evaluated and avoids remobilization

APE covers limits of potential
effects for archaeology and built

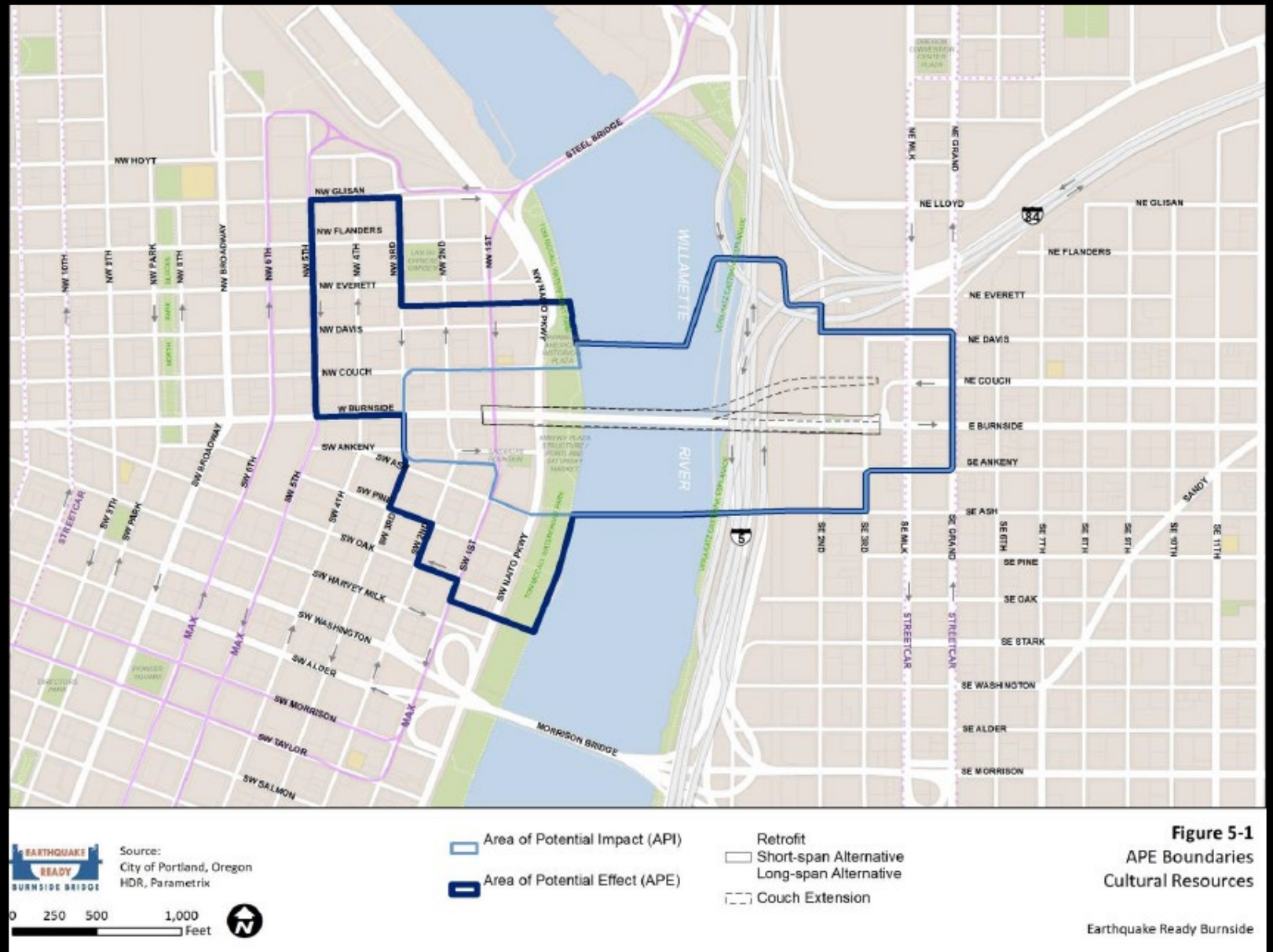
- Project footprint for archaeology v. adjacent tax lot boundaries for built
 - Will often have different APEs since focused on different resources

APE may expand for visual effects,
historic districts, tribal sites (TCP)

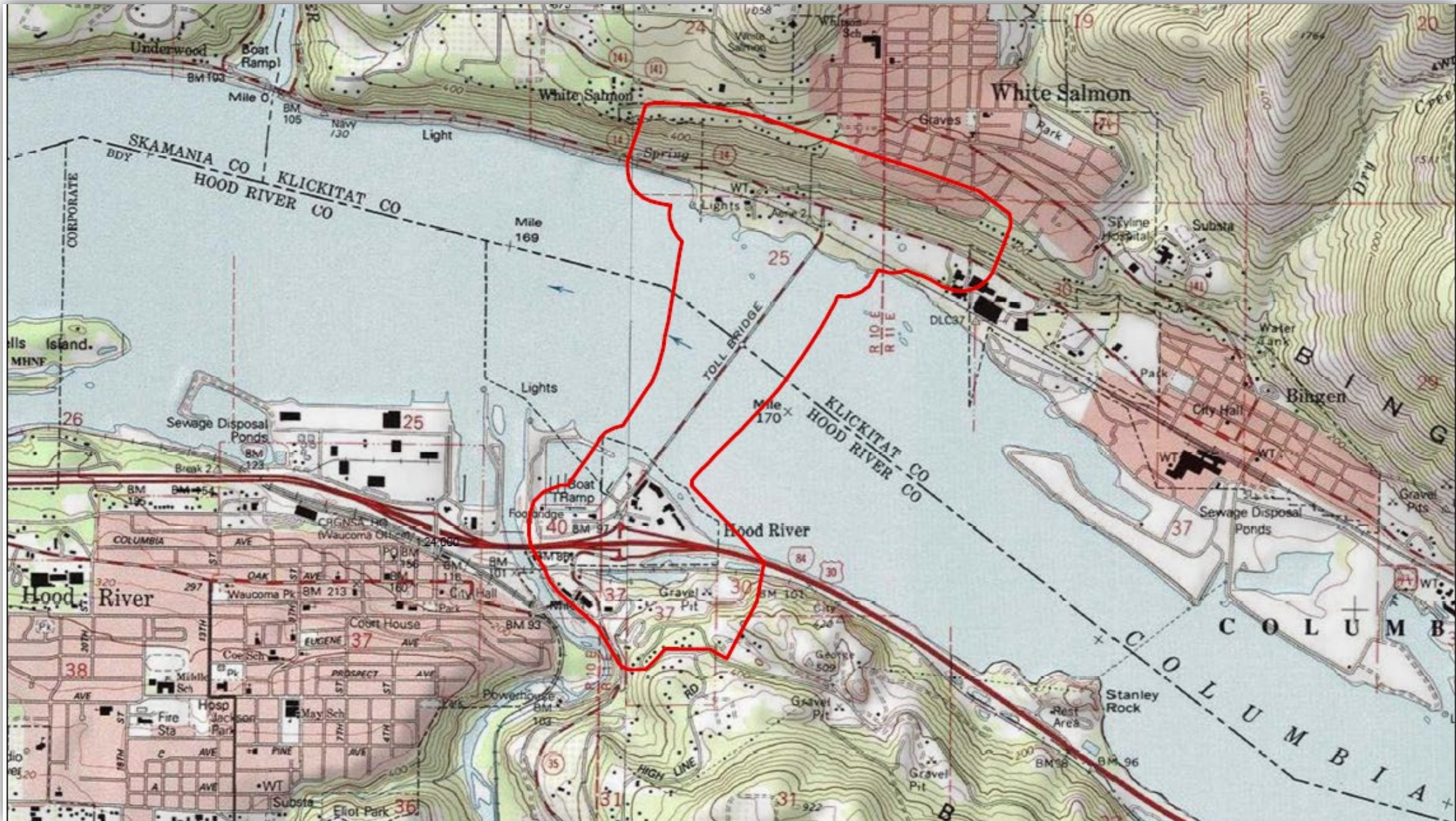
Streets Project



APE Expanded



Expansive APE



Consultation with Tribes and other Consulting Parties

- ODOT Archaeologist Consults with Federally-Recognized Tribes
 - Tribes are sovereign nations with Government-to-Government relationship
- ODOT Architectural Historian identifies any other Consulting Parties
- ODOT Archaeologist and Architectural Historian consult with SHPO Liaison
- Responsibilities Delegated from FHWA to ODOT CR Specialists
- Cultural Resources Firm role is coordination
 - SHPO Permits, Research in Tribal Archives, Research with key Stakeholders
- Cultural Resources Firm's Deliverables (APE, reports) are part of Consultation

Cultural Resource Firm and ODOT Specialists Coordinate

Agency and Consultant
coordination is key to
success

- Especially important when historic resources are present

Joint meetings and site
visits may be required to
navigate process

Coordination with
CR Specialists reduce
unnecessary work and costs

Coordinate on the APE early
in project development

Archaeological site data is protected
from public disclosure by law

- Should limit the distribution chain of archy reports
- Local agency and consultants should keep records secure

Compliance Documentation Responsibilities: Cultural Resource Firm

- Archaeological Survey
 - Baseline
 - Phase 1
 - Phase 2 (testing)
- Built Environment Baseline
- Determinations of Eligibility (Built)
- Resource-Level Findings of Effect (Built)
 - One per resource
- May assist with development of project-level MOA or PA to resolve Adverse Effects

Compliance Documentation Responsibilities: Cultural Resource Firm

A yellow CAT excavator is shown working on a dirt slope at a construction site. The excavator is positioned in the center-left of the frame, with its arm extended. The background shows a large, steep dirt embankment and some distant construction equipment. The overall scene is hazy, suggesting a dusty or foggy environment.

Much of OUR work cannot begin until the
Cultural Resource Firm finishes their work!

Compliance Documentation Responsibilities: ODOT CR Specialist

- PA Clearance (Archy and Built)
 - Project-Level (or Joint) Finding of Effect (Archy and Built)
 - Memorandum of Agreement (MOA)
 - Triggered by an Adverse Effect (primarily Built)
 - Takes minimum of nine months for development and execution
 - Inadvertent Discovery Plan (primarily Archy)
- Section 4(f) Documentation (primarily Built)
 - *De minimis*
 - Temporary Occupancy
 - Historic Bridges Programmatic Evaluation
 - Triggered by an Adverse Effect to a Historic Bridge
 - Takes a minimum of three months for development and execution
 - Cannot be signed by FHWA until MOA is fully executed

Questions?

Larissa Rudnicki, M.S.

Architectural Historian

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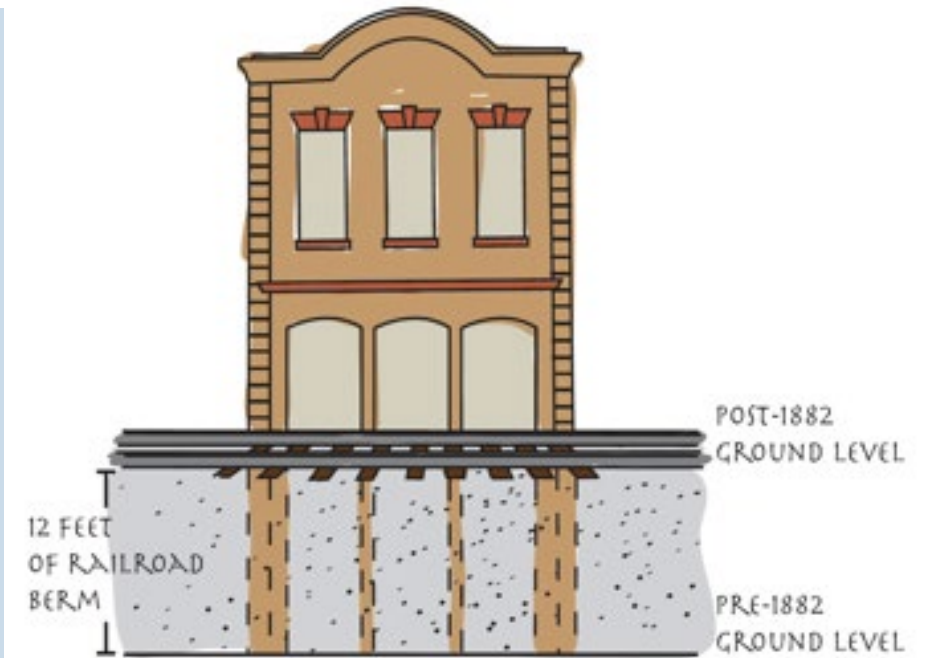
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Roy Watters, M.A.

Archaeologist & Tribal Liaison

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Biology

also known as

Early Coordination



Tom Loynes

ODOT/NOAA Fisheries Liaison

- ODOT National Oceanic and Atmospheric Administration (NOAA) Fisheries Liaison – Endangered Species Act/Federal-Aid Highway Program (FAHP)
- 25 years with ODOT

Tom came to ODOT with 14 years of experience serving as a fish Habitat Biologist for the Oregon Department of Fish and Wildlife. Tom's areas of expertise include Fish Biology, Fish habitat, and Endangered Species Act.



Biology Takeaways

1. Early Coordination is the key to success.
2. Many laws and regulations can impact scope, schedule, and budget.
3. For projects with In-water work, TWM will be an area of high risk.



Biology – Projects using the Federal Aid Highway Programmatic "FAHP"



Elements that can negatively affect: Scope, Schedule and Budget

Early Coordination



Early determination of ESA pathway:
FAHP vs BA and BO

Determine the high-risk elements
e.g. DSM, SW deficit, existing ROW needs

Several project types and elements where
early coordination is essential.

Proper QC procedures prior to FAHP
submittal

Stormwater

- Delineating the CIA
- Determination of triggers
- Developing credits
- Using credits if available
- Exemptions
- Potential needs for ROW easements
- Proprietary BMP's



Temporary Water Management



Note: New chapter is currently being drafted for the ODOT hydraulics manual.



Pre-TWM meeting



Gravity flow vs pumping



Obtaining temporary easements



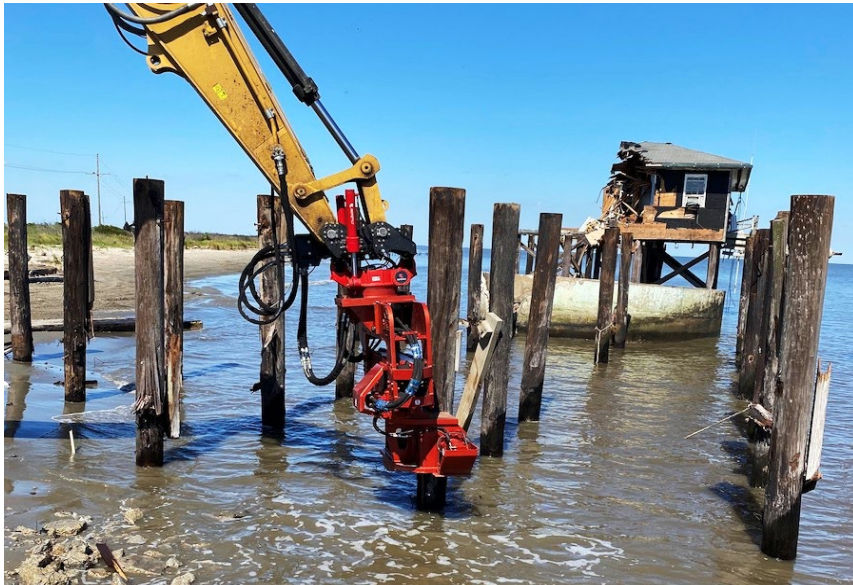
Maintaining Fish Passage



Implementing TWM and coordinating fish salvage

Project Changes – IWW Extensions

- IWW Extensions
- Contractor track record during construction
- Agency Coordination



Pilebuck.com



Nativefishsociety.org

Bridge Replacements and Seismic Retrofits

- Ground Improvements –
ISM or DSM work
- Not meeting the Fluvial standard
- Early surveys of ACW



Marine Mammal Protection Act

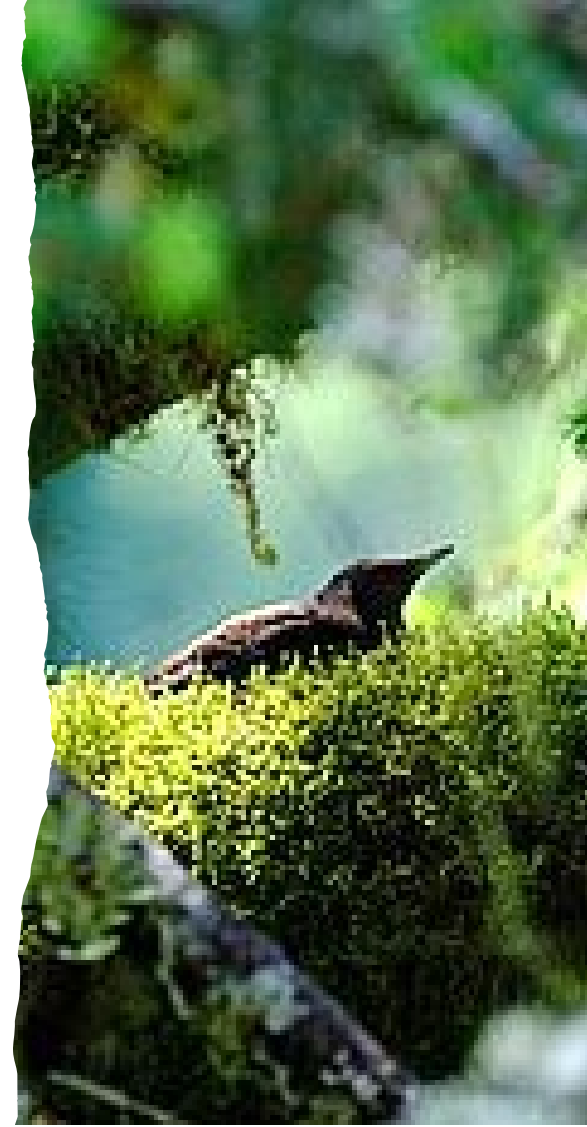
- Coastal Estuaries, Columbia River, Willamette River
- Letter to the file
- IHA or a LOA
- Coordination with NMFS Silver Spring staff
- Monitoring and stop work costs



FAHP Coverage for USFWS Species



- Northern spotted owl & marbled murrelet are our two most common
- Habitat removal requires assumed presence or multiple years of monitoring to determine no presence.
- Mitigation credits for NSO & MAMU habitat removal are available at ~\$80K an acre.
- Noise & timing restrictions without habitat removal can keep a project in NLAA determination or even potentially a no effect.





FAHP Coverage for USFWS Species

- Streaked horned lark thrives in sparsely vegetated areas, grasslands and even in large construction zones with freshly cleared vegetation.
- Bull trout are a species to consider in some parts of the state for in-water work and stormwater effects.
- Consider any ESA listed plants early in design, determine optimal survey time periods and find a reference population nearby if possible.



Questions?

Tom Loynes

ODOT/NOAA Fisheries Liaison

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Fish Passage



Allen Gillette

ODOT Aquatic Biology and Fish Passage Program Coordinator

- 7 Years with ODOT

Allen came to ODOT with 10 years of experience serving as a Fish Biologist for the Oregon Department of Fish and Wildlife, Tribes, and the Private Sector. Allen's area of expertise include Fish Biology, Fish Habitat, and Fish Passage Restoration.



Fish Passage Takeaways

1. Early and Often Coordination.
2. Fish Passage criteria can impact scope, schedule, and budget.
3. Fish Passage can be complex. Ask questions and lean on resources.



Fish Passage

- Oregon has unique Fish Passage Laws.
- These laws require EARLY (Scoping Phase) coordination with regulatory agencies.
- Regulatory Agencies determine if the law is “triggered” by project actions.
- ODFW, NMFS, and USFWS have criteria that can result in larger road stream crossing structures, more R/W needs, and instream work.



Oregon's Fish Passage Law



- Regulated by ODFW
- Oregon Administrative Rules updated in 2023
- Work near water + Fish use = “Trigger”
- Culvert and bridge repair / replacement, scour repair, and other work in, over, or near waters of the state
- Triggers can occur regardless of planned, unplanned, or emergency work



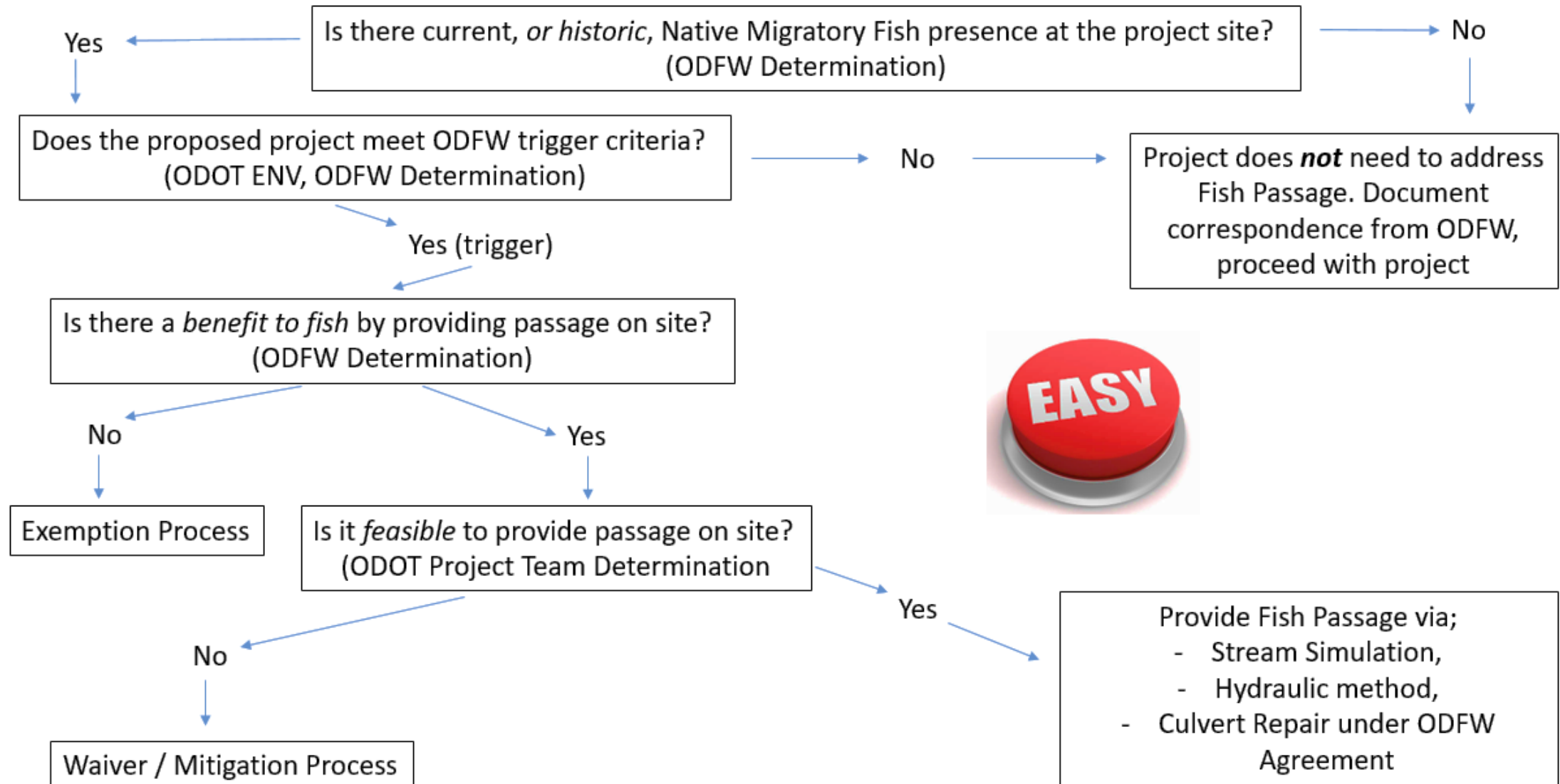
How to Address Fish Passage

1.) Early and Often Coordination:

- ODOT REC
- Regulatory Liaisons
- Hydraulic Engineers
- PDT

2.) See bullet 1

Fish Passage Process



Incorporating Fish Passage Criteria into Projects

- New road stream crossing structure size based on Stream Size Width X 1.5 or 2.2
- Increased capacity for high flows, wood and sediment transport
- Channel work to match surrounding conditions (In Water Work Window)
- Providing fish passage during construction
 - Easements
 - Gravity Bypass
 - Partial Isolation
- Post Construction Monitoring (5 years)



Fish Passage QC Review

- Ensures applications are complete AND meet criteria
- Completed by Qualified Biologist
- Completed before submittal to Agencies
- Plan for this during contract Scope and Task Development



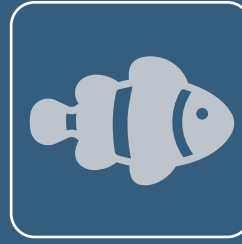
QC Checklist for Fish Passage Application Plan for Road-Stream Crossing

Project Name:		Key Number:
QC Preparer ¹ Name	QC Reviewer ¹ Name	Date of Peer Review

¹QC Review should be completed by a qualified ODOT Biologist. Qualification includes more than 5 years of experience in reviewing fish passage designs and working knowledge of State and Federal Fish Passage Statutes and Oregon Administrative Rules (Section 635-412).

		Yes	No	N/A
1.	Is the Project Location information section filled out and accurate?	☐	☐	☐
2.	Is the existing Crossing Information table filled out and accurate?	☐	☐	☐
3.	Are all of the applicable metrics in the stream table filled out and accurate?	☐	☐	☐
4.	Is the information in the Proposed Crossing section filled out and accurate?	☐	☐	☐
5.	If the application seeks to obtain fish passage approval utilizing the hydraulic method, does the application package include drainage area and proposed project modeling clearly showing how the proposed project meets state and or federal fish passage criteria?	☐	☐	☐
6.	Does the application package clearly meet fish passage criteria as outlined in OARS 615-412, NOAA criteria, and/or Large Scale Crossing Design Guidance (ODFW 2008)?	☐	☐	☐

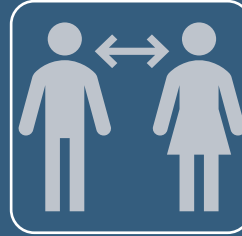
Fish Passage Tips and Tricks



Consider the need to address fish passage at Scoping.



Incorporate appropriate tasks during contract development.



Early and often coordination with ODOT REC.



Stay engaged with PDT throughout design and construction to understand criteria and project implications.

Questions?

Allen Gillette

ODOT Aquatic Biology and Fish Passage Program Coordinator

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Migratory Bird Treaty Act

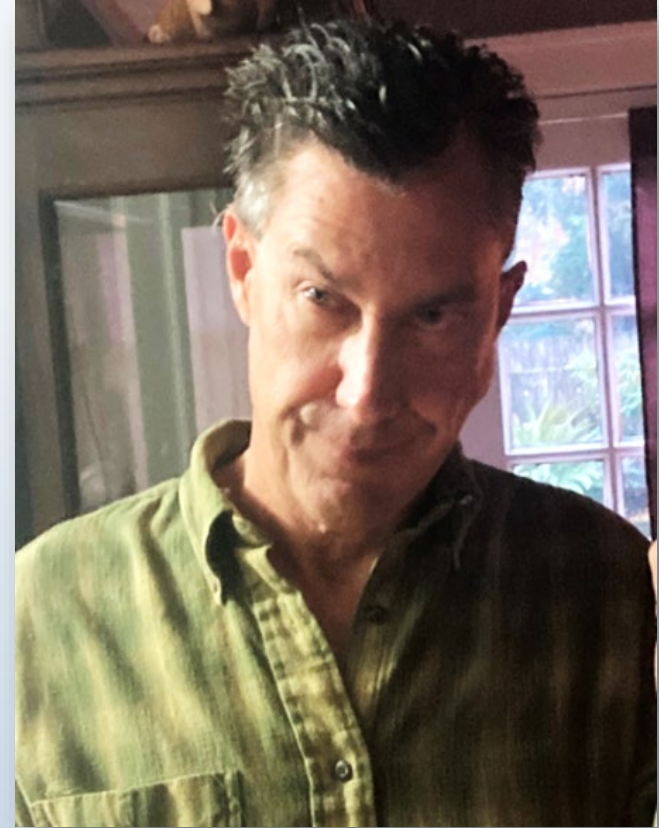


Nicholas Testa

ODOT Region 2 Senior Biologist

Nick started with ODOT in 1993 as a biologist and has been with ODOT environmental since that time.

He conducts biological/botanical analysis, biological permitting, and the design of mitigation sites and post construction monitoring for ODOT



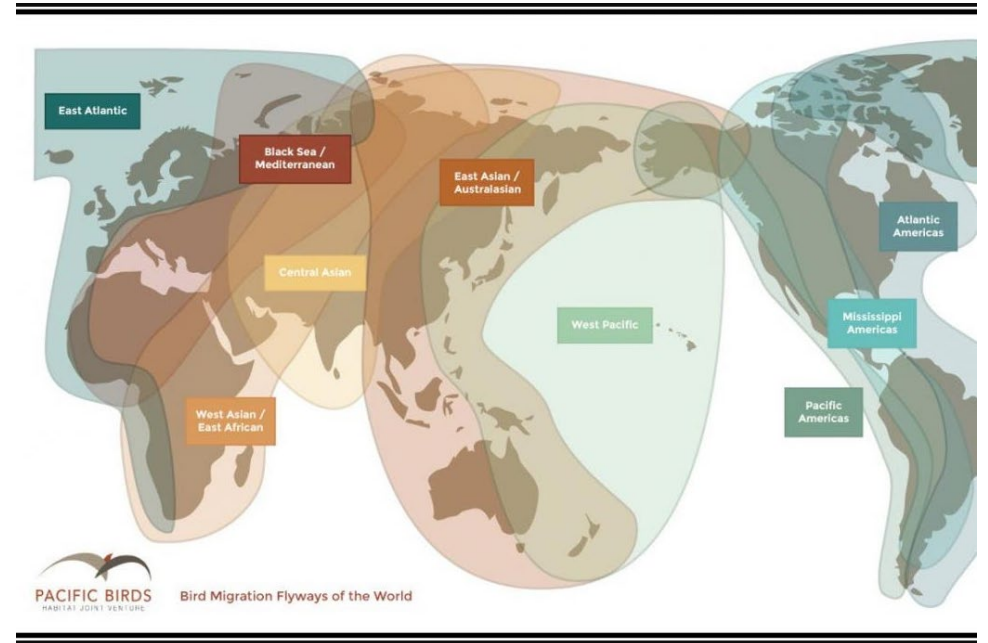
Migratory Bird Treaty Act Takeaways

1. Identify and coordinate early to minimize risk
2. Migratory birds are a common issue for projects that can impact schedule and budget
3. MBTA Issues are easy to solve during project development
 - not construction



MBTA – A Brief History

- 1800's overharvest of birds for ornamental feathers for hats, unregulated hunting, egg collecting, and habitat loss led to declines of migratory birds and drove several bird species to extinction.
- 1918, Congress enacted the MBTA to implement treaties between the United States and other nations for the conservation of migratory birds.
- Treaties between nations necessary since several bird species migrate along major flyways that intermix at the poles.
- The MBTA Protects:
 - Migratory Birds
 - Nests
 - Eggs, hatchlings, and chicks



MBTA – Common on transportation projects

...and can affect project delivery if not identified early

- Federal law protects migratory birds and nests with eggs and young (active nests)
- Comes up when project work includes:
 - Vegetation Clearing
 - Bridge, Culvert, or Structure Work
 - Contractor equipment, temporary work bridges, and scaffolding.



Early Coordination minimizes risk to schedule and budget!



MBTA – Where MBTA Issues Occur

Potential Conflict Points

- Tree removal, pruning, and shrub clearing
- Bridge replacement, widening, rehabilitation, or painting
- Sign or light pole upgrades or replacements
- Culvert work including retrofits, extensions, or replacements
- Staging areas and contractor equipment and temporary work structures

Common Species Encountered

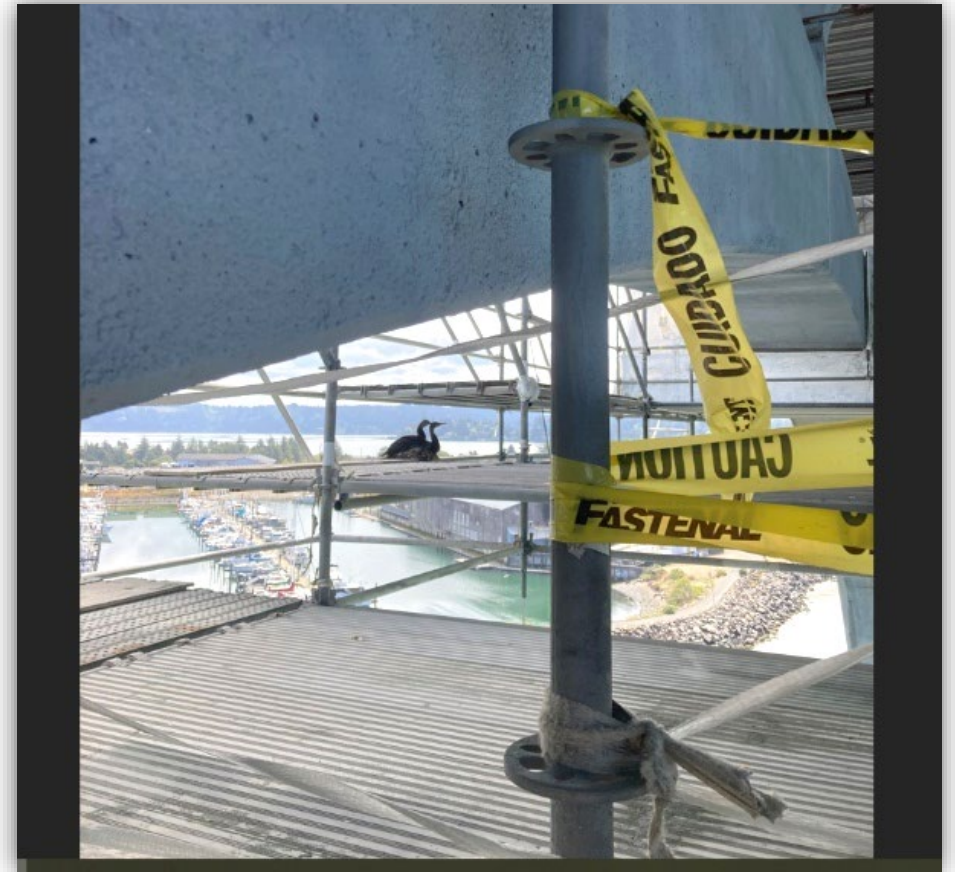
- Swallows, Robins, songbirds
- Killdeer, Osprey, gulls, and cormorants

MBTA – Project Delivery Risks

Active nests discovered after construction begins might result in:

- Work restrictions, need to establish buffers, and avoidance areas
- Delayed work like a pause in vegetation clearing
- Nest monitoring cost to determine when birds fledge and work can resume
- Additional nest surveys
- Contractor standby costs
- Project resequencing

Late discovery often costs more than early planning.



MBTA – Early Coordination = Easy Compliance

MBTA is Usually Simple When Addressed Early

Best Practices

- Identify bird habitat and conflicts like vegetation clearing timing or structure work during project scoping
- Coordinate with REC during design to determine potential conflicts and develop a plan
- Determine if bird surveys are needed during project development to identify nesting conflicts and develop a bird management plan
- Schedule veg clearing work before or after the nest season (General Nesting Season is March 1-August 31)
- Identify who will be doing bird management (normally done by USDA Animal and Plant Health Inspection Service (APHIS) – Wildlife Services)



Most MBTA issues are solved during project development – not construction.

MBTA – Take Permit



Authorizes the take of active nest (nest with eggs, hatchlings, or chicks) provided that reasonable avoidance and minimization measures were implemented

A few activities that show avoidance and minimization:

- Remove minimum amount of nesting habitat necessary for project implementation and do so outside of the nesting season
- Prevent migratory birds from nesting in habitat slated for removal/demolition during nesting season (e.g. exclusion)
- Inspect habitat for nest prior to clearing, avoid disturbing active nest until the young have fledged
- Consult project Biologist or REC on issues that arise during the project implementation

MBTA Take Permit does not replace planning but is a tool for situations where active nests cannot be avoided despite reasonable efforts

MBTA – Three Key Takeaways

1) Identify Needs and Coordinate Early

- Identify potential MBTA conflicts during scoping and incorporate avoidance measures during project development (i.e., schedule vegetation clearing outside of the nesting season)

2) MBTA Can Impact Schedule and Budget

- Active nests can create delays and additional costs
- Take of active nest is only authorized by permit and when avoidance and minimization measures have been implemented and failed.

3) MBTA is Easy to Incorporate When Addressed Early

- Most impacts are avoidable through planning and coordination



Bald & Golden Eagle Protection Act of 1940

B&GEPA protects eagles and their habitat, similar to the ESA protections.

Best Practices

- Identify early in project development if eagle nests are present within or adjacent to the project corridor and if a disturbance permit is needed.
- Proximity of an eagle nests to the project area may trigger seasonal work restrictions and/or noise restrictions may apply
- Key to avoid disturbance or modification of eagle habitat
- Allow time for field survey to validate nest location data and coordination with USFWS when necessary



Image from www.cityofsalem.net

Eagle issues are uncommon but can create significant project delays if discovered late.

Bats in Bridges, Culverts, and Structures



Several bat species in Oregon are conservation priorities.

Best Practices

- Identify early in project development if bat colonies (maternity, day or night roosting) are using any bridges, culverts, or structures.
- Prevent destruction of bat colonies through project timing or by installation exclusionary devices.
- Consider designing bat habitat into bridge, culvert, or structure to allow continued use post project as feasible.

Questions?

*Presented by Nicholas Testa on behalf of Paul Benton.
Please reach out to Paul Benton going forward.*

Paul Benton

Terrestrial Biology Program Coordinator

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Break Time



Wetlands & Waters Program



Brad Livingston

Statewide Wetlands Program Lead

- Region 3 Wetland Specialist (2003-2010)
- Wetland & Permitting Program Coordinator (2010 – Present)



Wetlands & Waters Takeaways

1. Early Coordination with DSL & Corps
2. Avoidance and Minimization is key to success
3. Mitigation (if not purchasing credits) can impact scope, schedule and budget.





Waters of the US and State Regulatory Considerations

Alternatives analysis

Avoidance-Minimization-Mitigation

Site Restoration

Permitting Pathways

Compensatory Mitigation

Alternatives Analysis

Avoidance

- Alignment, detour locations, steepening slopes; adding guardrail, retaining walls, full spans, containment, interchange/intersection configuration, staging areas, etc.

Minimization

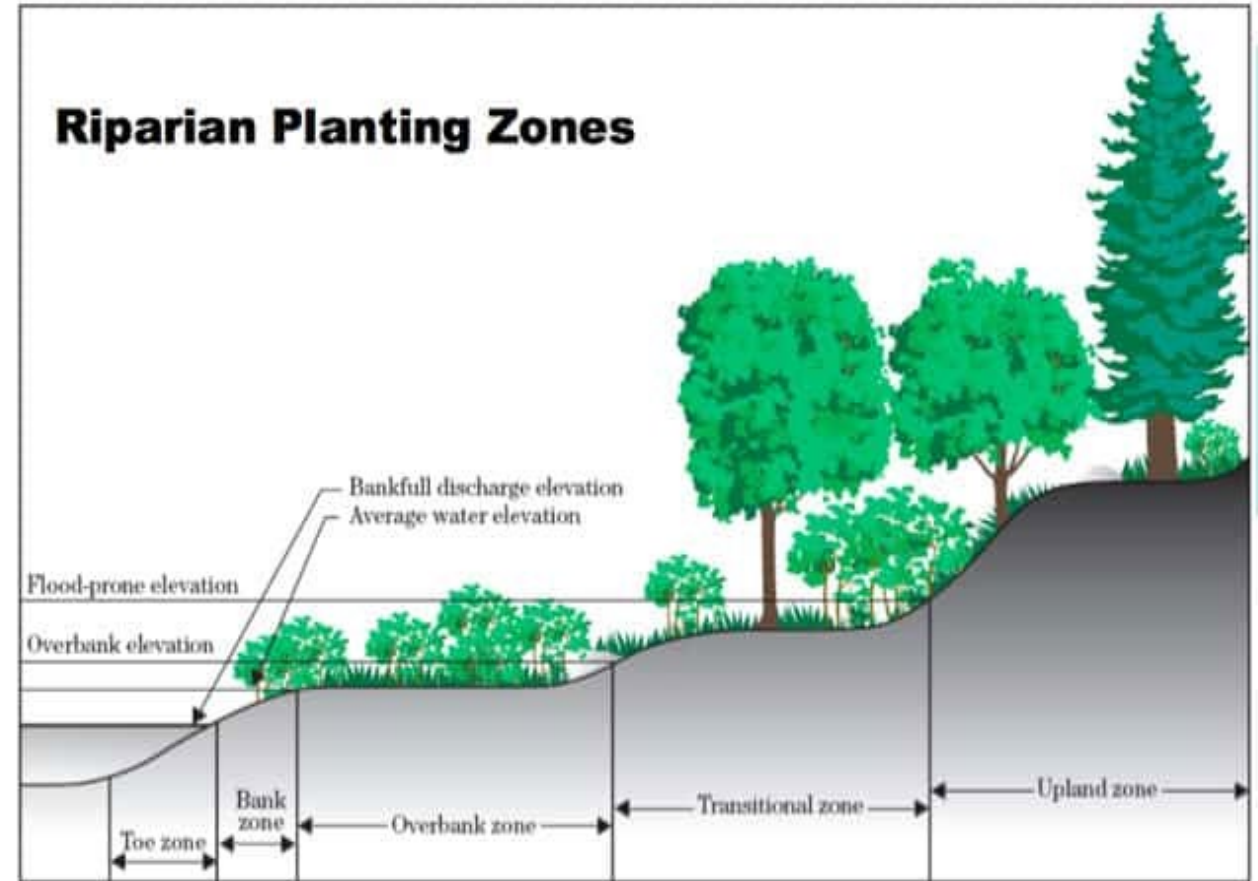
- Narrowing footprint, shortening duration of in-water work, drilled shafts vs. spread footings, erosion and sediment control, factors noted in Avoidance, etc.

Mitigation

- Site restoration, incorporating nature based design, adding large wood and channel complexity, aquatic life passage, purchasing bank/advanced compensatory mitigation credits

Site Restoration

- Riparian site restoration most common
- Restoration of temporary wetlands/waters impacts
- 3-5 year post-construction monitoring for success
- Budget



Source: US Department of Agriculture

[This Photo](#) by Unknown Author is licensed under [CC BY-ND](#)

Permitting Pathways

- USACE Nationwide Permits

- Most Common, 85%+
- SLOPES vs. FAHP
- Section 401 WQC
- Coast guard, section 408, oh my!
- Non-notifying nationwides are rare but useful at times
- Individual permits are rare

- ODSL: General Permits

- Most Common, 85%+
- Conditions align with fish passage and FAHP
- ODOT Liaison, Single POC
- Prepare for fee shock
- General Authorizations are rare but useful at times
- Individual permits are rare

WE SUPPORT ADVANCED MITIGATION, WHY?



 OREGON DEPARTMENT OF TRANSPORTATION
ODOT Vernal Pool Bank
CH Perspective

0 750 500 3,000 4,500 6,000 7,500
Feet

DISCLAIMER
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Users of this information should review or consult the primary
and information sources to ascertain the usability of the data.



Eco-Logical: An Ecosystem Approach

Long Term Planning

- Population and transportation growth projections
- Market Analysis/Needs Assessment
- Local Consistency (MPO's)

Conservation Integration

- Rare habitats &/or watershed priorities
- Wildlife action plans, connectivity and adjoining land uses
- Collaborate with natural resource groups

- Eco-logical
- Enables project delivery
- Upfront compliance

COMPENSATORY MITIGATION @ ODOT

Over 100 Legacy sites

1 Codified Conservation Bank

2 “Conservation sites”

6 Active Wetlands Banks (single user)

5 Active Permittee Responsible Wetlands Sites

2 Advanced Mitigation Sites



STREAM MITIGATION @ ODOT

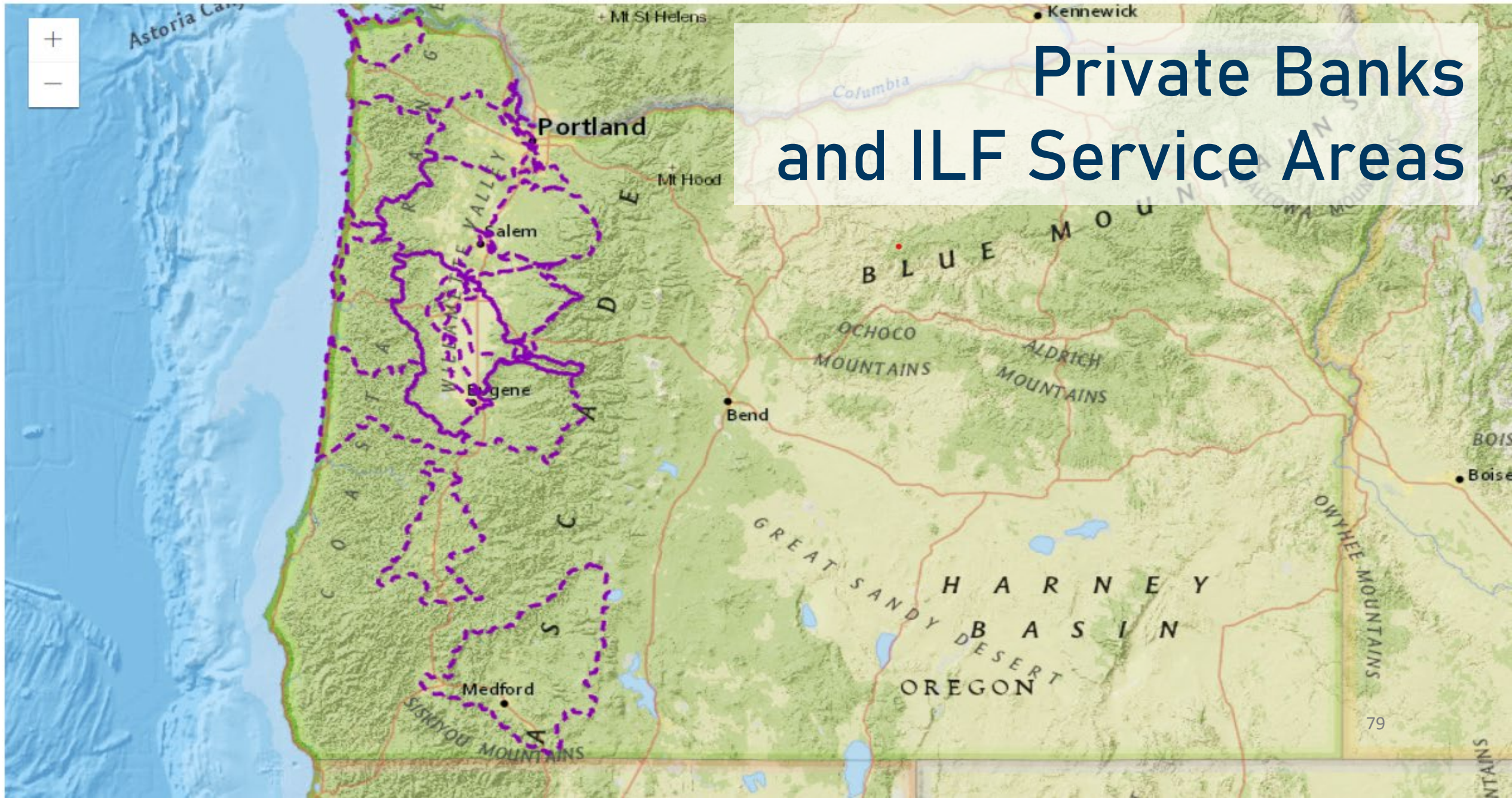
7 Active Permittee Responsible Sites

Programmatic Permit Conditions =
“Self Mitigating”

Culvert Repair Agreement for Fish Passage



Mitigation Banks Map



Notable ODOT Sites

FIGURE 1: NOTABLE ODOT MITIGATION/CONSERVATION SITES

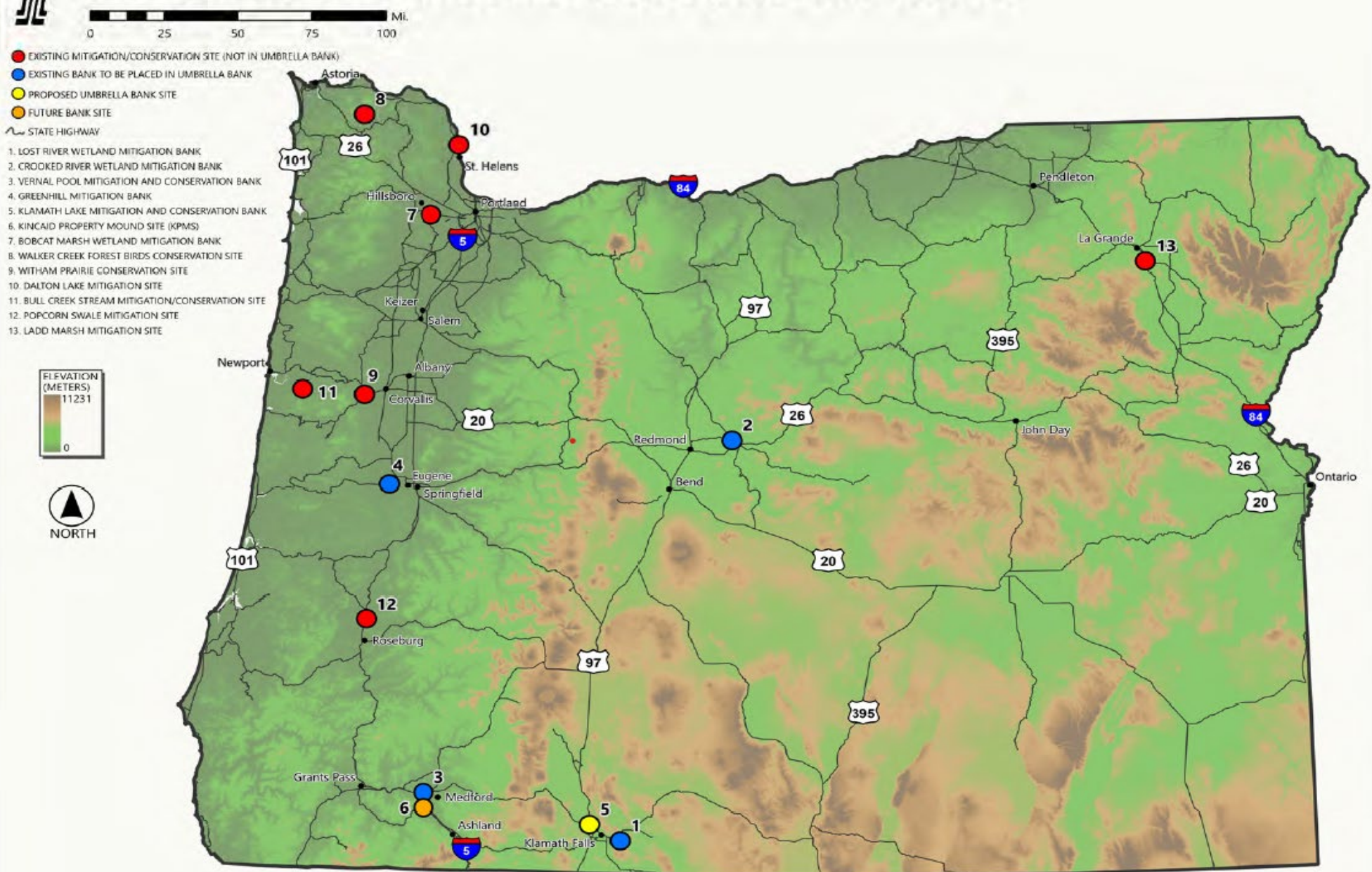


Illustration 1



Illustration 2



Illustration 3



Illustration 4

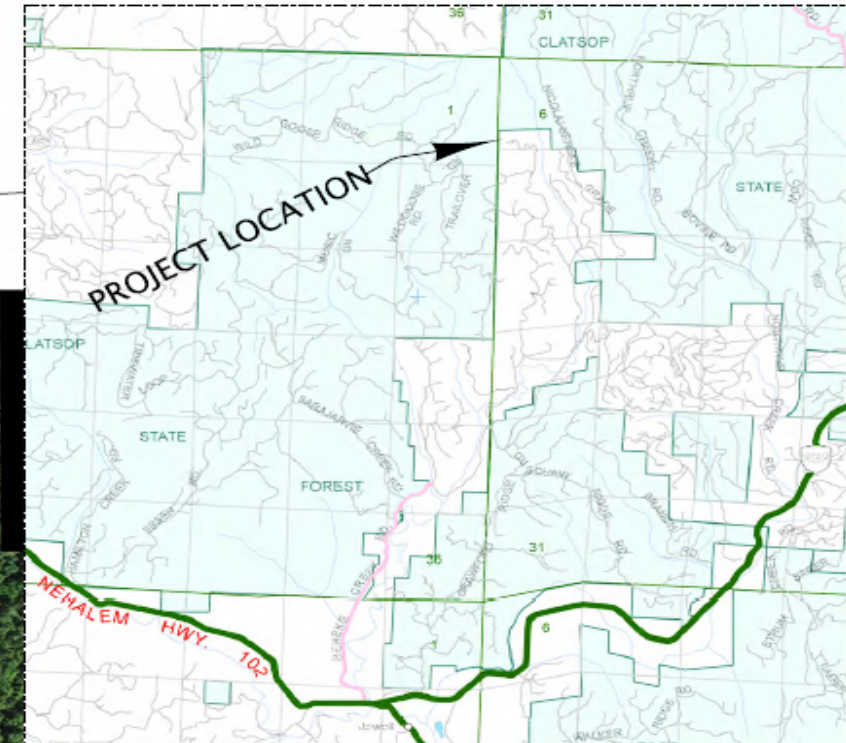
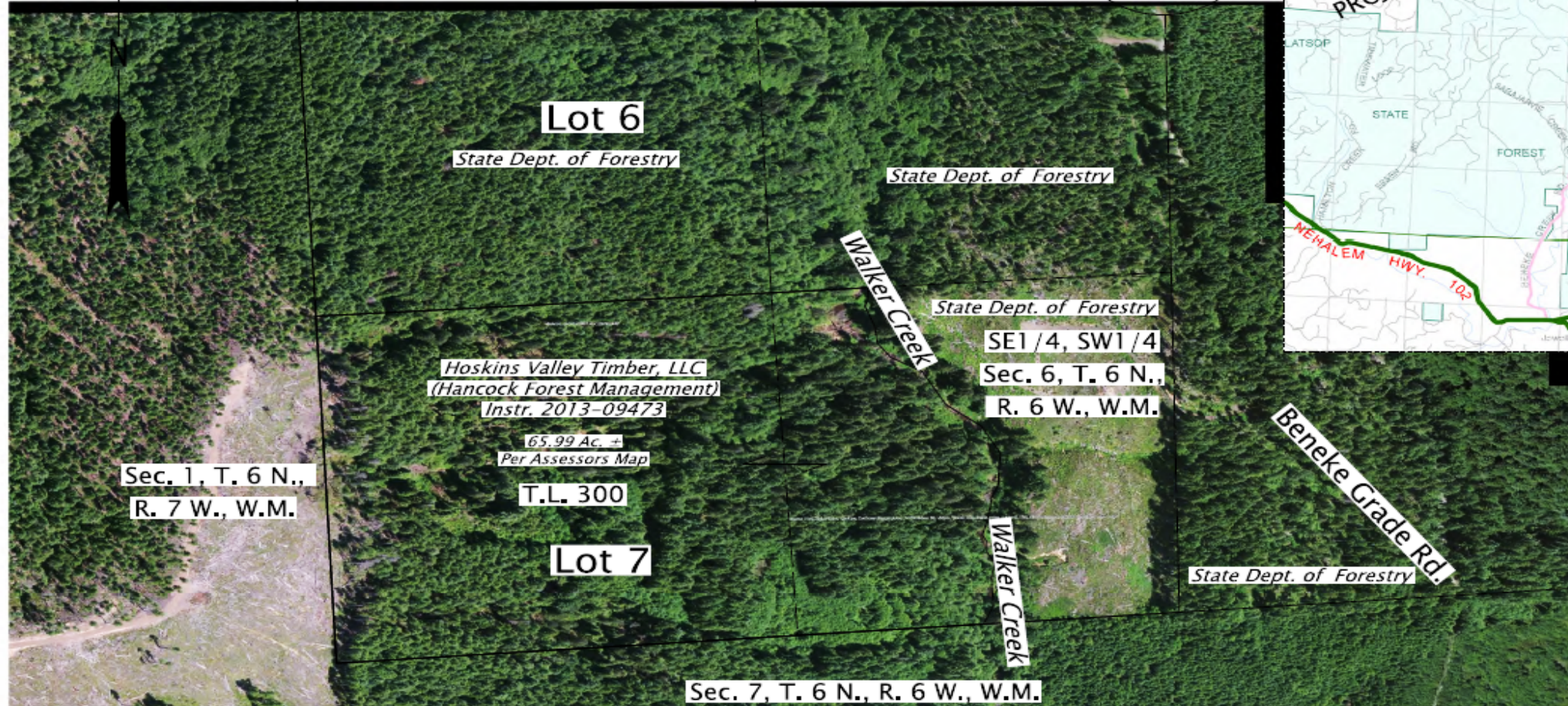




Illustration 5

Right of Way Drawing

6



**PRELIMINARY
DRAWING**
THE R/W NECESSARY TO SUPPORT
THE PROJECT DESIGN HAS NOT BEEN
FULLY DETERMINED
SUBJECT TO CHANGE



OREGON DEPARTMENT OF TRANSPORTATION

SECTION	WALKER CREEK PARCEL CONSERVATION BANK	CAD FILE NAME	S_9237_WALKER_CREEK_rw_WRK.dgn
HIGHWAY	N/A	SCALE	1" = 400'
COUNTY	CLATSOP	DATE	JANUARY, 2017
PURPOSE	CONSERVATION BANK	PROJ. NO.	9237

**RIGHT OF WAY
DRAWING**

REVISION HISTORY
DATE NAME DESCRIPTION

86

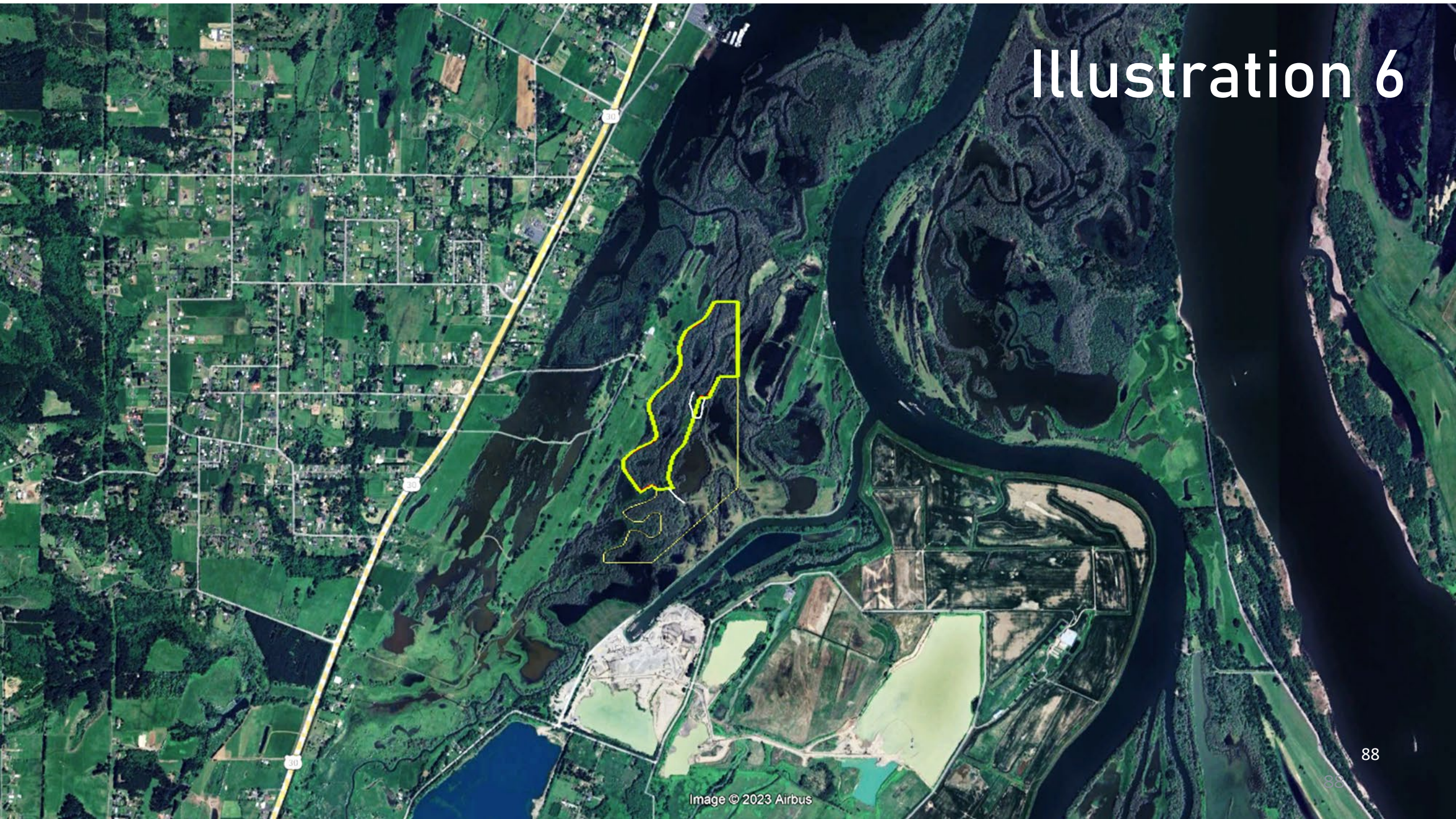
PLACE DESCRIPTION OF REVISION HERE

Project Site Location

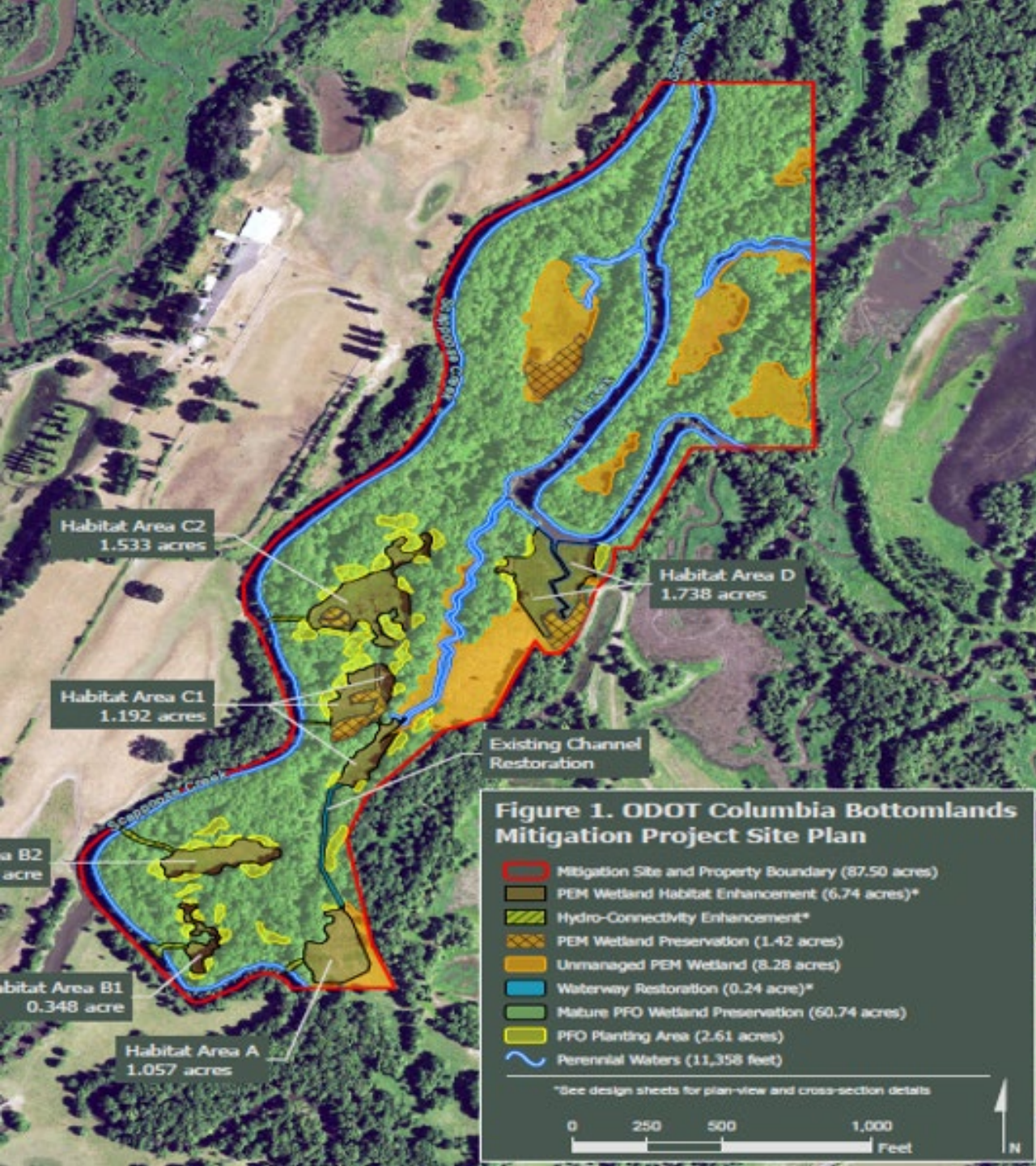
- The 88-acre site is in Columbia County, near Scappoose.
- Accessed by Hogan Ranch Road.
- The site is composed of PEM wetland (16.76 ac.), mature PFO wetland (60.73 ac.), and approximately 10 acres of low gradient tidal channels.
- Scappoose Creek forms the western boundary of the site.
- Teal Creek flows through the northern part of the site with Scappoose Bay ~1 RM north/downstream.



Illustration 6



Mitigation Project Site Plan



Questions?

Brad Livingston

Statewide Wetlands Program Lead

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401 Certification & Mutual Agreement and Order (MAO)



Cory Engel

Water Resources Program Coordinator

- 15 years as a water resources permit regulator
- 10 years as an ODOT project permit specialist
- 8 years as ODOT Water Resources Program Coordinator



401 Certification Takeaways

1. DEQ's 401/MAO process seeks to protect water quality by imposing practices that avoid and minimize water pollution
2. Triggered by Corps and DSL permits
3. Scheduling: usually ~3 months, sometimes 8-12+ months



Introduction and Purpose

HANDOUT 11



What are Section 401
and the MAO?



The Triggers



The Key Players

Key Process Steps

STEP	401 CERTIFICATION	MAO
Pre-filing meeting request	Required for individual permits only	Early coordination recommended
Obtain land use approvals	Required	Required
Submit application	Via Your DEQ Online	Via e-mail
Completeness review	Required	Required
Public Notice (PN)	No PN for many nationwide-covered projects	All submittals regardless of project size
Neighboring jurisdiction review	Required	Not required
Duration	Usually < 3 months, but DEQ is allowed to take up to a year	Usually < 3 months, but the law doesn't limit DEQ

Stormwater Management Plans



SWMP is a key part of the Certification or MAO request



SWMP required when the project constructs or reconstructs any impervious surfaces.

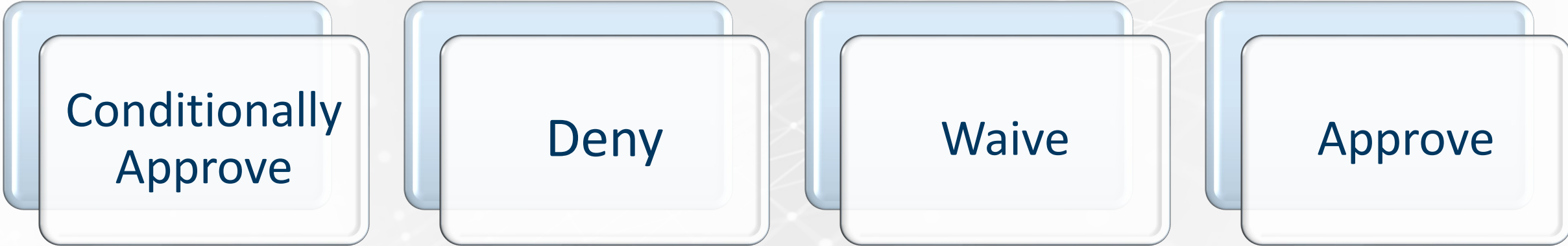


Describes the project's strategy for preventing the discharge of stormwater pollutants emanating from the project's contributing impervious area. It tells the story of the raindrop.



Persuades DEQ that the project's stormwater management measures will be adequate to prevent damage to receiving waters. It's an opportunity to—without fibbing—present the project in a positive light.

Possible Outcomes



Conditionally
Approve

Deny

Waive

Approve

Certification Conditions

Construction erosion and sediment control

Deleterious waste & spills

Turbidity limits & stop-work thresholds

Post-construction stormwater management & maintenance

Resources

- **DEQ's 401 page**
 - <https://www.oregon.gov/deq/wq/wqpermits/Pages/Section-401.aspx>
 - DEQ's Stormwater Management Plan Guidelines
 - SWMP Template
- **USACE's NWP permitting page**
 - <https://www.nwp.usace.army.mil/Missions/Regulatory/Nationwide/>
- **ODOT's Water Resources page**
 - <https://www.oregon.gov/odot/geoenvironmental/pages/water.aspx>
 - Water Resources Specialist Manual
 - ODOT's SWMP Template (adapted from DEQ's general template)

Questions?

Cory Engel

Water Resources Program Coordinator

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1200-CA – Protecting Surface Waters of the State



Ulf Peter Magnus Bernhardt

*Region 1 Landscape Architect and
Interim Statewide Program Lead
for ESC and Roadside Development*

Magnus Bernhardt is a licensed landscape architect and has been with ODOT for 19 years.

Previously he worked as a consultant on private and public projects.

He enjoys working in teams to develop the best possible projects that protect the environment and leverage opportunities for sustainable solutions.





National Pollution Discharge Elimination System (NPDES)

1. Created in 1972 – Clean Water Act (CWA)
2. Administered by The U.S. Environmental Protection Agency (EPA)
3. 1200-CA – Specialize Programmatic for Public Agencies administered by Oregon Department of Environmental Quality (DEQ)
4. New 1200-CA Permit Update 2027

The Cuyahoga River 1952
Cleveland State University Library

1200-CA – Protecting Surface Waters of the State

Takeaways

1. Why the 1200-CA is required: Legally required under the Federal Clean Water Act (402)

2. Permit Trigger(s): 1 Acre of disturbance including potential staging areas

3. It's about the relationships: Managing the Permit during design and construction



McKenzie River by Adam Spencer.

What Triggers the 1200-CA Permit?

- ≥ 1 Acre Disturbance:
- Phased Projects:
- Component Infrastructure:
- High Pollution Risk:

The 1200-CA, our plans, specifications and details are in place to prevent:

Turbid Discharge



Erosion



Sediment



Projects that Disturb 1 acre or more

- ODOT calculates the threshold of 1 acre of disturbance at 0.7 acres.
- Assume 0.3 acres of disturbance for contractor staging area.
- Constructor responsible for acquiring 1200-C permit for non-Agency land use.



Phased Projects

Small project phases <1 acre

Part of a larger common project that total >1 acre

In the same watershed.



Big Sur US101 - Caltrans

Infrastructure Component Projects



Construction activities like utility installation or trenching that result in a final project which crosses the 1-acre

High Pollution Risk Projects



Any size project



**Likely to contribute
pollutants – high risk**



**Near wetlands or
surface waters**



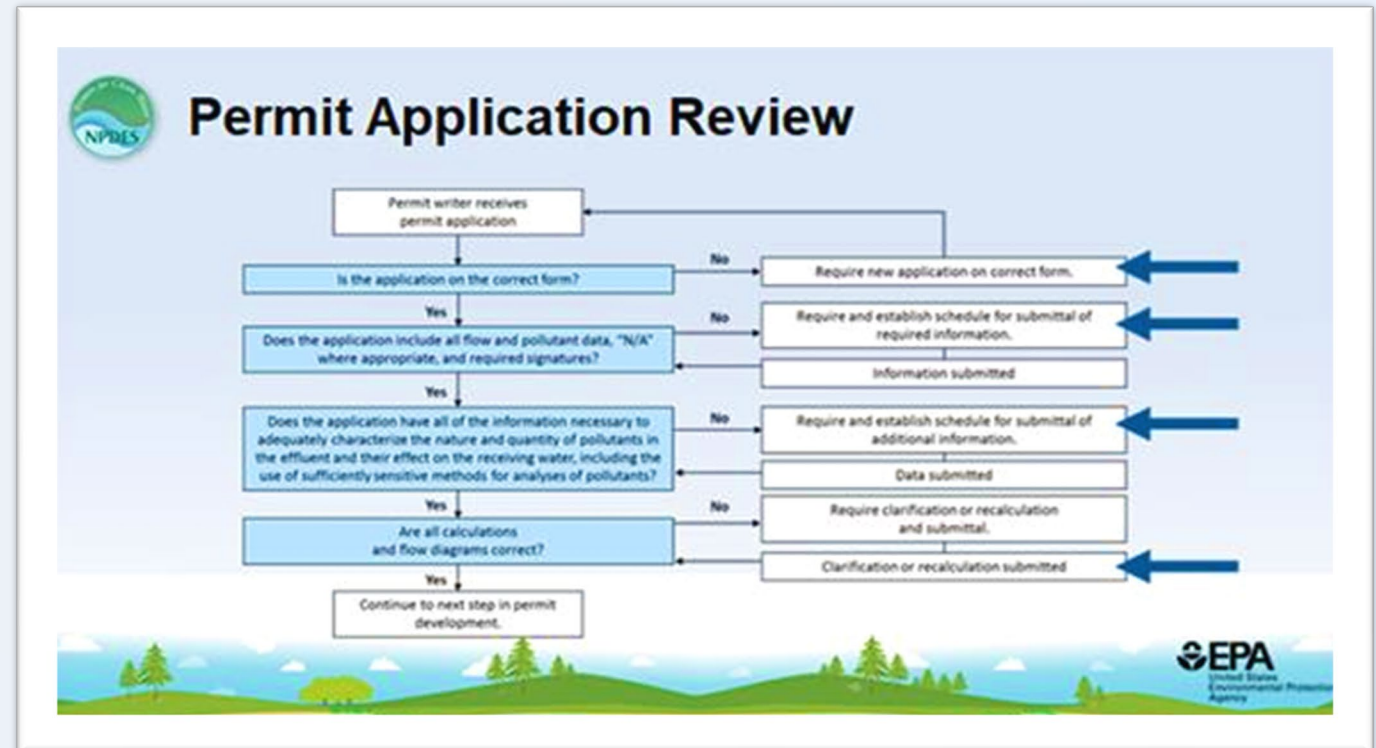


What This Permit Does Not Cover

- In-water work (fill or dredging)
- Industrial discharge
- Post-construction runoff
- Discharge to underground injection control systems

1200- CA Permit Anatomy

- **Schedule A** –
ESC Design and Special Requirements
- **Schedule B** –
Inspections, Monitoring, and Recordkeeping/Logbooks and Digital Compliance
- **Schedule D** –
Permit hierarchy and definitions
- **Schedule F** –
Legal Framework & Agency Liability





Schedule A – ESC Design and Special Requirements

- The ESCP Plan Development
- Design Priority
- Phasing Check
- Contamination Risk

An aerial photograph of a highway construction site. A large white crane with a long black boom is positioned on a dirt area, lifting a large metal structure. An orange excavator is also visible. The highway curves through a hilly, forested area. Several cars are on the road. The background shows a residential area with houses and trees.

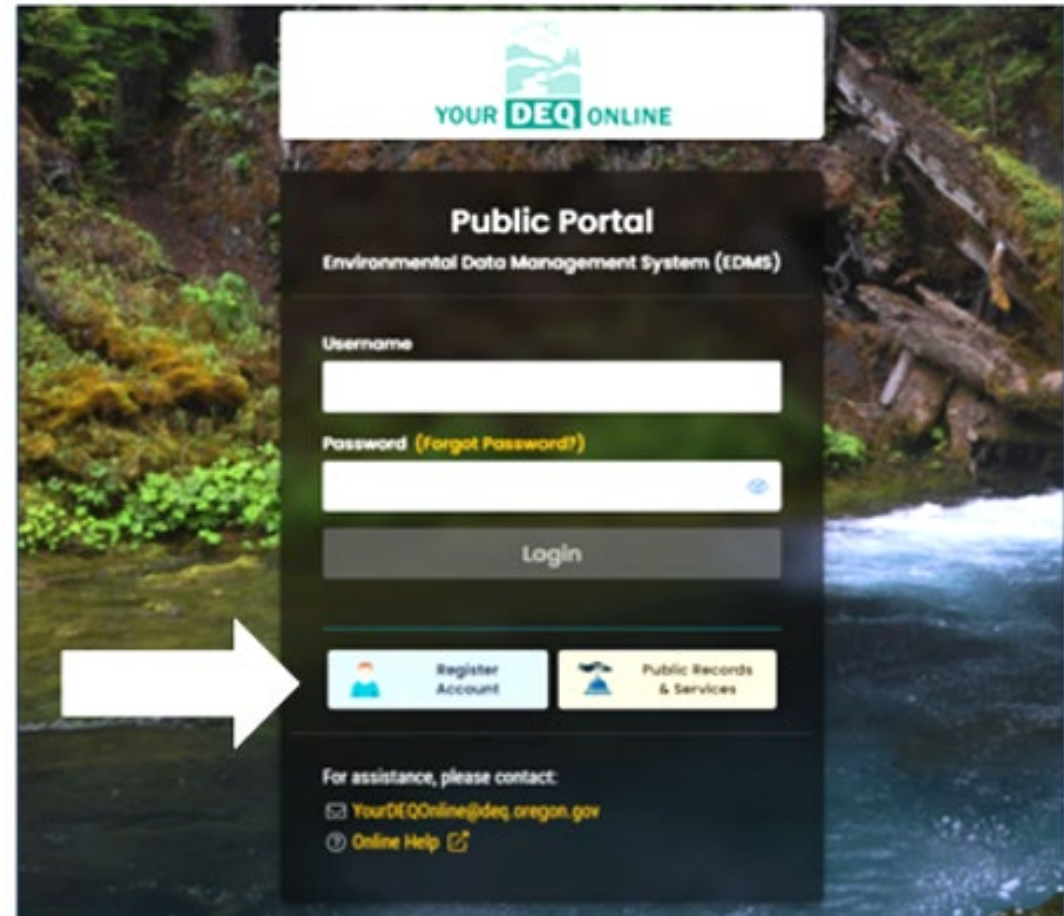
Schedule B – Minimum Monitoring and Inspection Requirements

- Quality Assurance
- Credentials
- Project Logbook

Digital Compliance & Your DEQ Online

Navigate to the [Your DEQ Online Public Portal](#). Select "Register Account."

- Digital Application to Your DEQ Online (YDO)
- Account Delegation
- All Submittals to DEQ Must Be Sent Through the Electronic YDO Portal, including
- Cover Sheets: next slide



[illegible]



Schedule D – Permit Hierarchy and Definitions

Special Conditions

Permit Specific Definitions

Schedule F – Legal Framework & Agency Liability

- Section A –
Standard Conditions
- Section C –
Monitoring and Records
- Section D –
Reporting Requirements



Ben Crump Law

PM Checklist for Project Success with 1200-CA

- ✓ Pre-Bid: Schedule A
- ✓ Pre-Con: Schedule A and B
- ✓ Mid-Project: Schedule B and F
- ✓ Closeout: Schedule B and F

How to keep meetings short



“If you don't have time to do it right, when will you have time to do it over?” John Wooden

Summary

Proactive Oversight: Use the permit to help manage and design the project.

Top 3 Takeaways:

1. Why the 1200-CA is required:
Legally required under the Federal Clean Water Act (402)
2. Permit Trigger(s):
1 Acre of disturbance including potential staging areas.
3. It's about the relationships:
Managing the Permit during design and construction.



Questions?



Magnus Bernhardt

**Interim Erosion Control and Roadside Development
Program Lead – Region 1 and HQ Landscape Architect**

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Recommended Websites:

ODOT Geo/ENV

<https://www.oregon.gov/ODOT/GeoEnvironmental/Pages/index.aspx>

DEQ YDO

<https://www.oregon.gov/deq/permits/pages/your-deq-online.aspx>

DEQ 1200 CA Stormwater Permit March 2023 (Guide)

<https://www.oregon.gov/deq/wq/Documents/wqp1200caGuidance.pdf>



Lunchtime



Air Quality Overview



Natalie Liljenwall

Air Quality Program and Noise Program Coordinator

Natalie came to ODOT in 2009 with 11 years of experience in Air Quality and Noise Analysis from CH2M Hill.

Natalie is a technical expert in transportation air quality analysis, air emission and dispersion modeling, and noise modeling. She leads air quality conformity for ODOT.



Air Quality Takeaways

1. Why projects need transportation air quality analysis.
2. What types of projects need analysis and in which areas.
3. What types of projects don't need analysis.



Transportation Air Quality Regulations



Federal

- **1990 Clean Air Act Amendments**
 - National Ambient Air Quality Standards
 - Transportation Conformity Rule 40 CFR 93
- **National Environmental Policy Act**
 - FHWA Mobile Source Air Toxics (2023)



State

- **State Ambient Air Quality Standards**
- **State Conformity Rule**

Maintenance Areas

Area Name	Pollutant	Current Designation/Classification	End Conformity Requirements
Eugene-Springfield	PM ₁₀	Maintenance	6/10/2033
Klamath Falls	PM _{2.5} (2006 NAAQS)	Nonattainment	-
Lakeview	PM ₁₀	Maintenance	7/19/2026
La Grande	PM ₁₀	Maintenance	7/19/2026
Medford-Ashland	PM ₁₀	Maintenance	8/18/2026
Oakridge	PM ₁₀	Maintenance	9/21/2042
Oakridge	PM _{2.5} (2006 NAAQS)	Maintenance	9/21/2042
Salem	CO	Maintenance	3/2/2029

Maintenance Areas with no Conformity Requirements

Area Name	Pollutant	Current Designation/ Classification	Conformity End Date
Portland	CO	Maintenance	10/2/2017
Portland	Ozone	Maintenance	6/15/2005
Eugene-Springfield	CO	Maintenance	2/4/2014
Klamath Falls	CO	Maintenance	11/19/2021
Medford	CO	Maintenance	9/23/2022
Grants Pass	CO	Maintenance	10/30/2020
Grants Pass	PM ₁₀	Maintenance	12/26/2023

Project Level Conformity Analysis Triggers

Required for:

- Projects needing federal funding or federal approval
- Projects located in nonattainment or maintenance areas, or
- Projects that are part of Environmental Assessment or Environmental Impact Statement
- Non-exempt projects (exempt: bicycle/pedestrian, bus shelter)
- Can be qualitative or quantitative

Exempt Projects

Safety

- Shoulder improvements
- Adding medians, fencing

Air quality project

- Bicycle and pedestrian facilities
- Rideshare

Mass Transit

- Purchase of replacement buses
- Bus shelters
- Mass Transit

Others

- CNG fuel station

Traffic signal synchronization projects (40CFR 93.128)

**NO ANALYSIS
REQUIRED!**
40 CFR 93.126

Check out Air Quality Manual Appendix E for full list!



Air Quality Conformity Consultation

40 CFR 93: EPA Transportation Conformity Rule

OAR-340-252: State Transportation Conformity Rule

OAR-340-252-0060: Consultation

- Federal - FHWA, FTA, EPA
- State - DEQ, Lane Regional Air Pollution Agency (LRAPA), ODOT
- Local – MPO, local agencies and project sponsors

OAR-252-0060(1)(d)(E)(iii): ODOT responsible for convening air quality technical review meetings on specific projects when requested by other agencies or, as needed



Questions asked in Conformity Consultation

- Why are no build and build volumes the same with added lanes?
- What model was used or version?
- Include 'Opening year' for conformity analysis
- What is % diesel now and future % diesel?

- How is traffic circulating outside project area?
- When does construction start and end?
- Is funding secured?
- What stage of NEPA?
- What is operational year?
- Project figures need labels
- Included RTP and TIP?

PM10 and PM2.5 Conformity Analysis

- Quantitative analysis only required for projects is a **‘Project of local air quality concern (POAQC)’**
- POAQC is a very detailed and time-consuming process
- Typically, AADT >125,000 and 8% heavy duty diesel or more
- Consultation must concur to confirm status as a POAQC
- Traffic inputs and project details are needed to determine status



PM₁₀ and PM_{2.5} Areas by Region

ODOT Region	Maintenance Areas
Region 2	Eugene- Springfield PM10 Oakridge PM10 and PM2.5
Region 3	Medford-Ashland PM10
Region 4	Klamath Falls PM10 and PM2.5, Lakeview PM10
Region 5	La Grande PM10

PM10 and PM2.5 Project Checklist

PM₁₀ and PM_{2.5} PROJECT LEVEL CHECKLIST

The purpose of this checklist is to provide the required PROJECT LEVEL documentation to aid the interagency consultation group in the determination of project type, i.e.

- 1) **Exempt** - Exempt from PM10 or PM2.5 project-level conformity determination,
- 2) **Not Exempt, Not of Concern**- Not Exempt, but not of local air quality concern (does not require further analysis), or
- 3) **Of Concern** - Of local air quality concern and, therefore, requiring a hot-spot analysis.

This checklist is only intended as a tool to assist with the PM_{2.5} project-level conformity determination and does not replace regulatory requirements in the Transportation Conformity Rule (40 CFR Part 93), nor associated guidance. Any decisions regarding a particular conformity determination or hot-spot analysis will be made based on the statute and regulations, after appropriate public input. A statement regarding the PM_{2.5} hot-spot consideration should be included as an element in NEPA documentation. This completed and signed checklist, along with a copy of the PM_{2.5} project-level conformity determination, if required, should also be included. Additionally, proof of interagency consultation and public involvement, if required, as well as any other supporting documentation, should be included.

Use the “Tab” or “Page Down” key to maneuver within this document.

STEP 1: PROJECT IDENTIFICATION

A. STIP Number: 20209

Project Name/Short Description: OR-126B: 54th St Improvement: This is a safety project.

PM₁₀ and PM_{2.5} Conformity Analysis Cont.

- Project of local air quality concern (POAQC) analysis is complicated
- Traffic data is needed before consultation can be held
- Traffic data needed for opening year and design year, build and no build
- Both highway and intersection data is needed
- Be patient – consultation takes time



TRAFFIC DATA MATTERS



Project Conformity, MTIP and STIP

- Project must have same design concept and scope as in the MTIP and STIP.
- Design concept- type of facility, e.g. freeway, arterial, etc.
- Design scope- design aspects that relate to facilities impact on regional emissions, e.g., number of lanes, length, number and location of interchanges.

MTIP and STIP Amendments

- Amendments can be administrative or full
- Projects adding capacity will be examined in more detail
- Consultation group is responsible for determining if a project is regionally significant (adding capacity and air quality impacts).
 - Serves as access to and from outside of region (e.g. major activity centers, new malls, and sports complexes), and would normally be included in the modeling of a metropolitan area's transportation network.

Air Quality Mitigation



ODOT Standard specifications Section 290.30(c)

- Truck staging areas, vehicle and equipment idling, dust control and permits



DEQ construction rule for contractors OAR 340-208

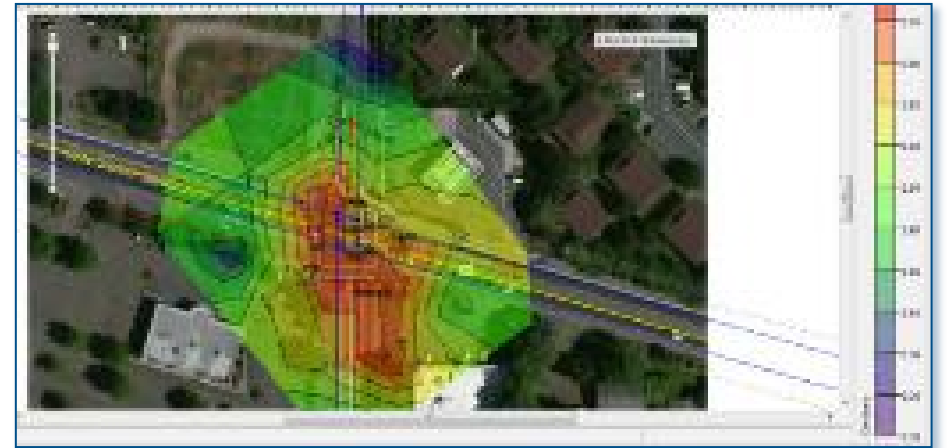


Clean Diesel Construction Standard OAR 731-149-0020

- ODOT Clean Diesel rule OAR 731-005-0800
(5 specified projects and heavy highway projects).
- Outlined in Special Provision Boilerplate documents.
<https://www.oregon.gov/odot/business/pages/special-provisions.aspx>

Air Quality Analysis Overview

1. Contracting - Statement of Work(SOW) (ODOT webpage)
2. Traffic Data – obtain early(ODOT or consultants)
3. Methodology--Interagency consultation
4. Air Analysis (qualitative or quantitative)
5. Construction (mitigation in Standards Specs)
6. Documentation (see Manual and SOW)
7. Review (ODOT Air Quality Specialist) 1-3 weeks



Questions?

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Environmental Training – Noise Abatement



Robert Schiavone

Region 1 Air Quality and Noise Specialist

- 7 years with ODOT
- FHWA's Traffic Noise Model (TNM) Certification
- FTA's Transit Noise and Vibration Impact Assessment Certification
- USDOT's Quarry Noise Model (QNM) Certification



Rob came to ODOT with roughly 20 years RF waveform analysis and computer modeling experience at Intel's Research and Development Labs working on next generation Wi-Fi and Bluetooth standards.

He currently evaluates air quality and noise effects of road construction to verify current and future construction will comply with federal, state, and local regulations. Estimates current and future noise using RCNM, QNM, TNM and other modeling programs.



Environmental Training – Noise Abatement Takeaways

1. Know when a Noise Study is required
2. The noise specialist needs to be engaged early in the process
3. Roadway, Traffic, and Right of Way need to be involved



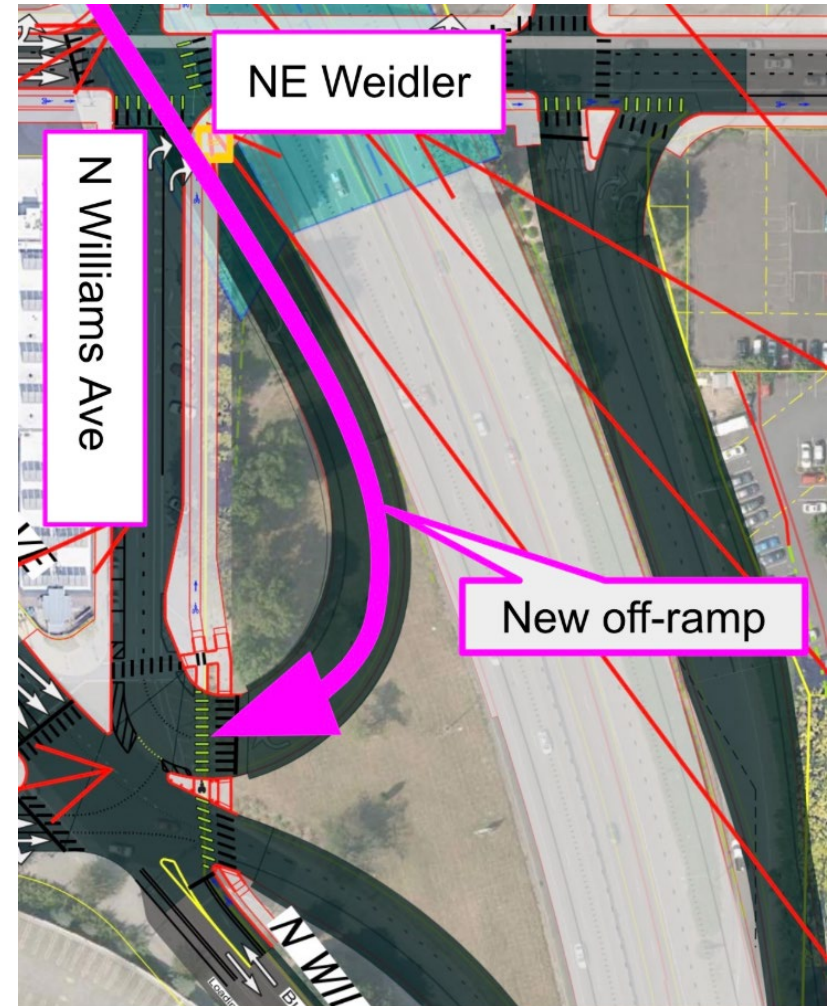
Why do we care about noise?

Federal-Aid Highway Act of 1970

- 23 CFR 772 FWHA highway traffic noise regulation
- *“To provide procedures for noise studies and noise abatement measures to help protect the public's health, welfare and livability, to supply noise abatement criteria, and to establish requirements for information to be given to local officials for use in the planning and design of highways approved pursuant to title 23 U.S.C.”*
- Must be a Type I (or Type II) project that will receive Federal funding or requires FHWA approval
- Provides noise analysis guidelines including:
 - noise sensitive receptor categories
 - defines maximum sound levels per category
 - allows states to define noise abatement (ex. walls or berms) requirement criteria with FWHA approval
 - provides feedback to local officials for future development noise impacts

What is a Type I project?

- *This is what triggers a noise analysis or noise screening*
- Roadway construction at a new location (including adding an interchange)
- Increases the number of through lanes (via construction or striping) or creates an auxiliary lane longer than 2500 feet
- *Significant* alteration of an existing highway
 - Horizontal change: Halves the distance to a noise sensitive location (receptor) horizontally
 - Vertical change: Changes the elevation, or removes a land feature, which then places a receptor in line-of-sight to the roadway



What is a Type II project?

An optional set of criteria that allows for abatement consideration which is developed by the state and approved by FWHA.

This allows for Federal funding for noise abatement when it would otherwise not be considered.

Oregon does not have a Type II program.

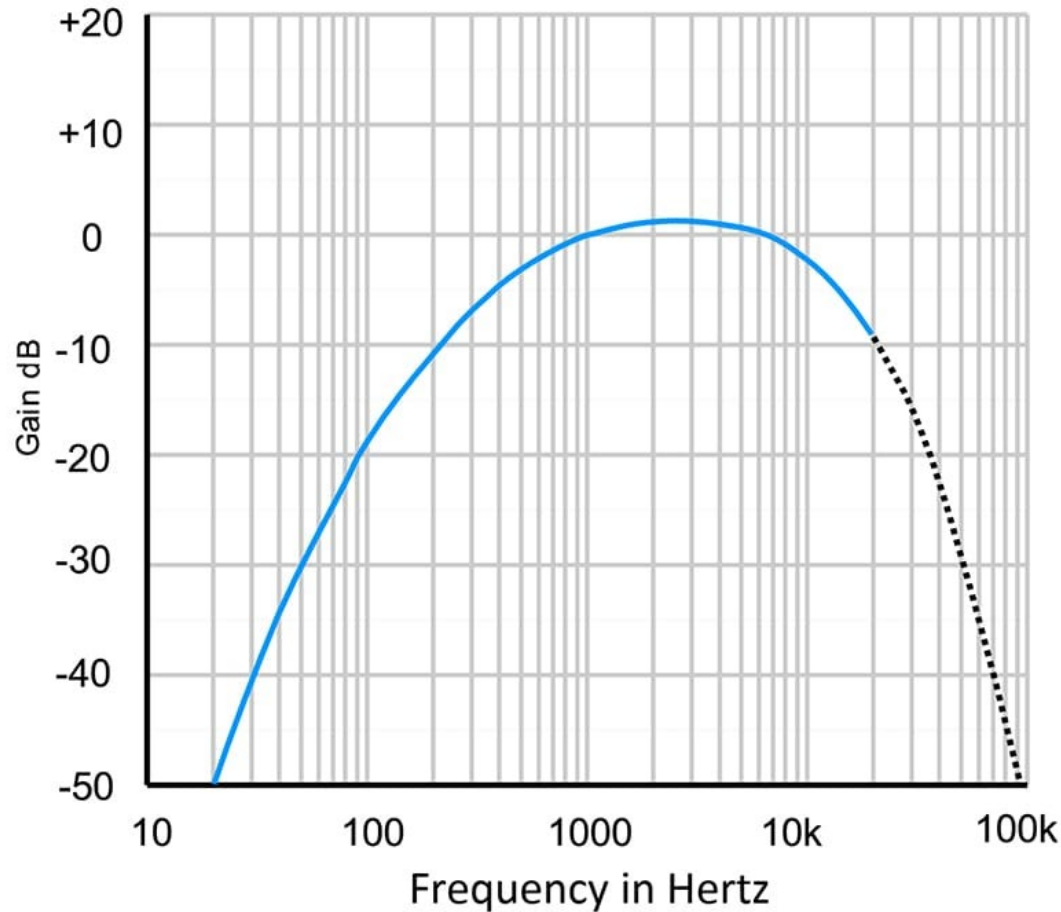


What is a NAAC?

- Noise Abatement Approach Criteria
- Oregon's interpretation of the Federal Noise Abatement Criteria (NAC)
- Measured in decibels in a logarithmic scale

Activity Category	Activity Criteria ^a		Evaluation Location	Land Use Activity Description
	Leq (h)			
	FHWA NAC ^b	ODOT NAAC ^c		
A	57	55	Exterior	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where preserving those qualities is essential if the area is to continue to serve its intended purpose.
B ^c	67	65	Exterior	Residential
C ^c	67	65	Exterior	Active sports areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings
D	52	50	Interior	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios
E ^c	72	70	Exterior	Hotels, motels, offices, restaurants/bars, and other developed lands, properties, or activities not included in A–D or F
F	—	—	—	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical), and warehousing
G	—	—	—	Undeveloped lands that are not permitted

What is a decibel?

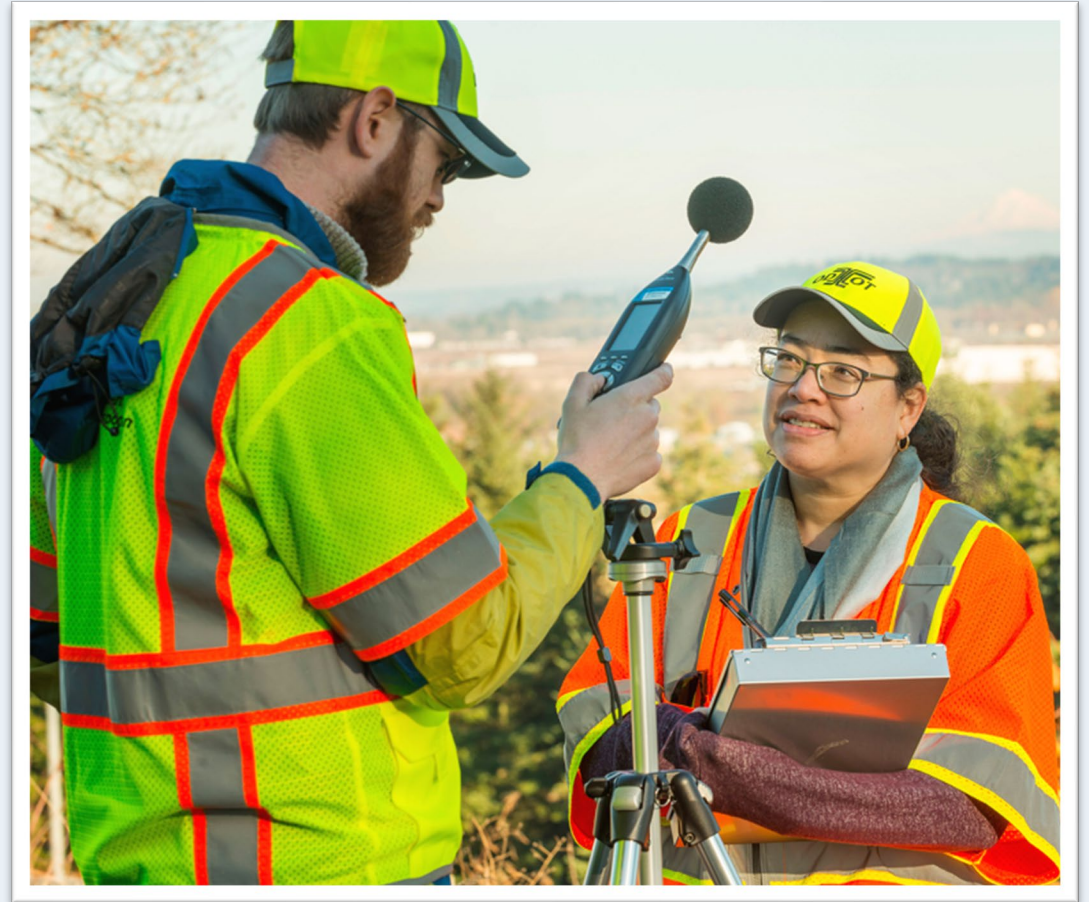


- Based upon a longitudinal pressure wave
- 3dB is the smallest perceivable difference (also the doubling of the *sound pressure*)
- 10dB is what humans perceive as a doubling of sound
- We use an “A weighted” scale for decibels (dBA)
- The Leq is the “average-ish” of the sound levels over a time period, usually 15 minutes
- I.e. 60 dBA + 70 dBA = 67.4 dBA

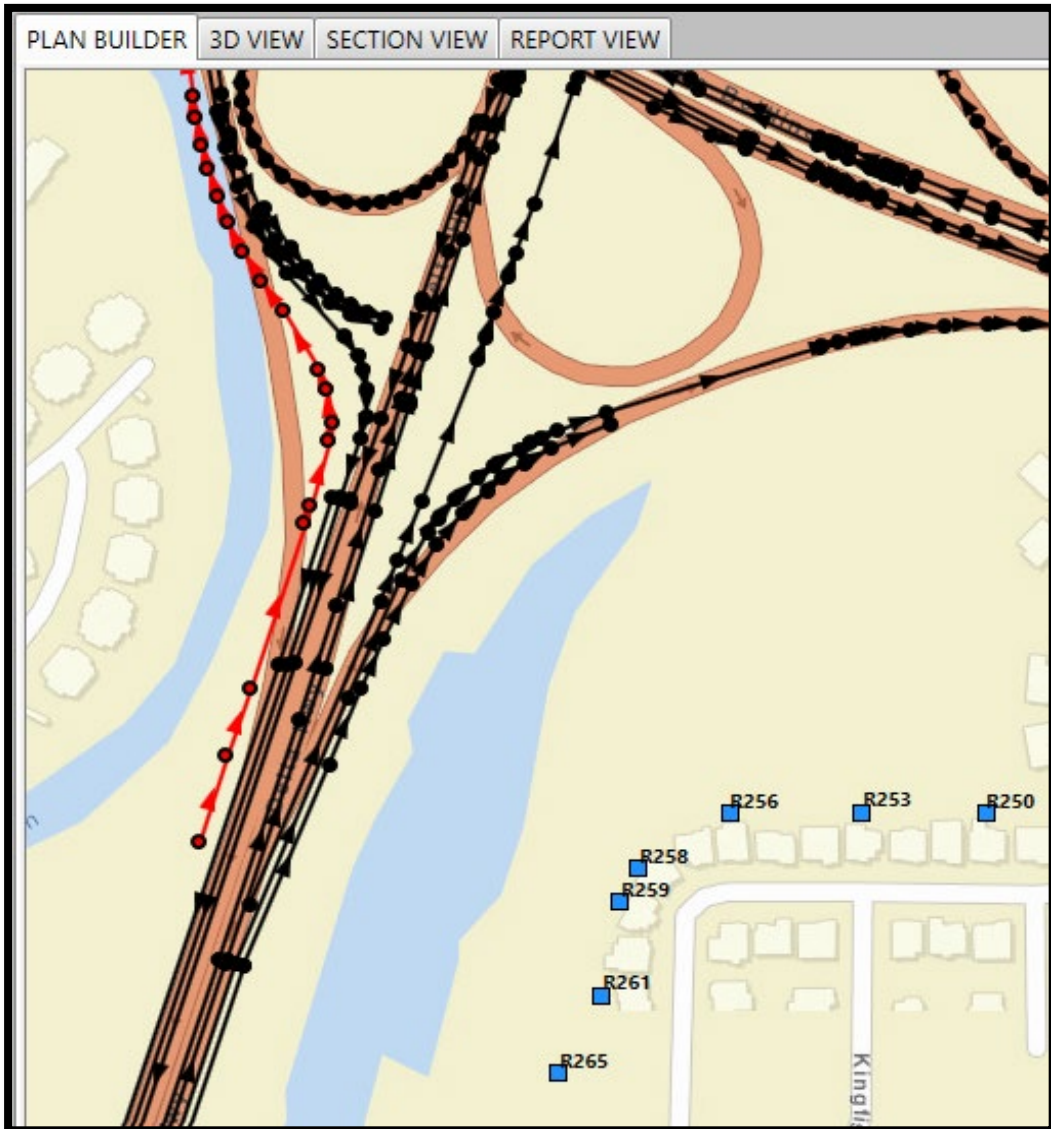
$$dB_{avg} = 10 \cdot \log_{10} \left(\frac{1}{n} \sum_{i=1}^n 10^{\frac{dB_i}{10}} \right)$$

What is a Noise Study? (Part 1)

- Noise specialist determines receivers based on land usage, specific noise sensitive locations (recording studios, hospitals, etc.), and existing noise complaints
- *Receivers are also based on development permits up to the date of public knowledge*
- Representative Calibration sites are chosen to verify that the computer model will reasonably match reality
- The noise specialist will take sound measurements and count the traffic observed during the measurement
- The Calibration traffic will be placed into the Existing geospatial model, and it must match within 3 dB of the measurement



What is a Noise Study? (Part 2)



- Models are run for Existing, No Build, Build, and Build Truck using data from Traffic
- If there are Impacted receivers then Barrier modeling is performed
- Equal or greater than the NAAC
- 10 dB between Existing and Build
- Undeveloped land is modeled every 50 feet to find where it passes the NAAC
- The Noise Technical Report (NTR) is written and given to the Project team
- A letter is sent to local officials with information on undeveloped land NAAC distance

Feasible and Reasonable

(when a noise wall is required)

Feasibility

- A simple majority must get a 5 dB reduction
- Engineering concerns (barrier height, utilities, access, safety, etc.)

Reasonability

- The residents want a wall (a majority votes for it)
- At least one property gets a 7dB reduction
- Cost must be equal or less than \$37,500 per benefitted receptor
 - Based on \$30 per square foot up to 16 foot high, \$37.5 for 17 to 25 feet high

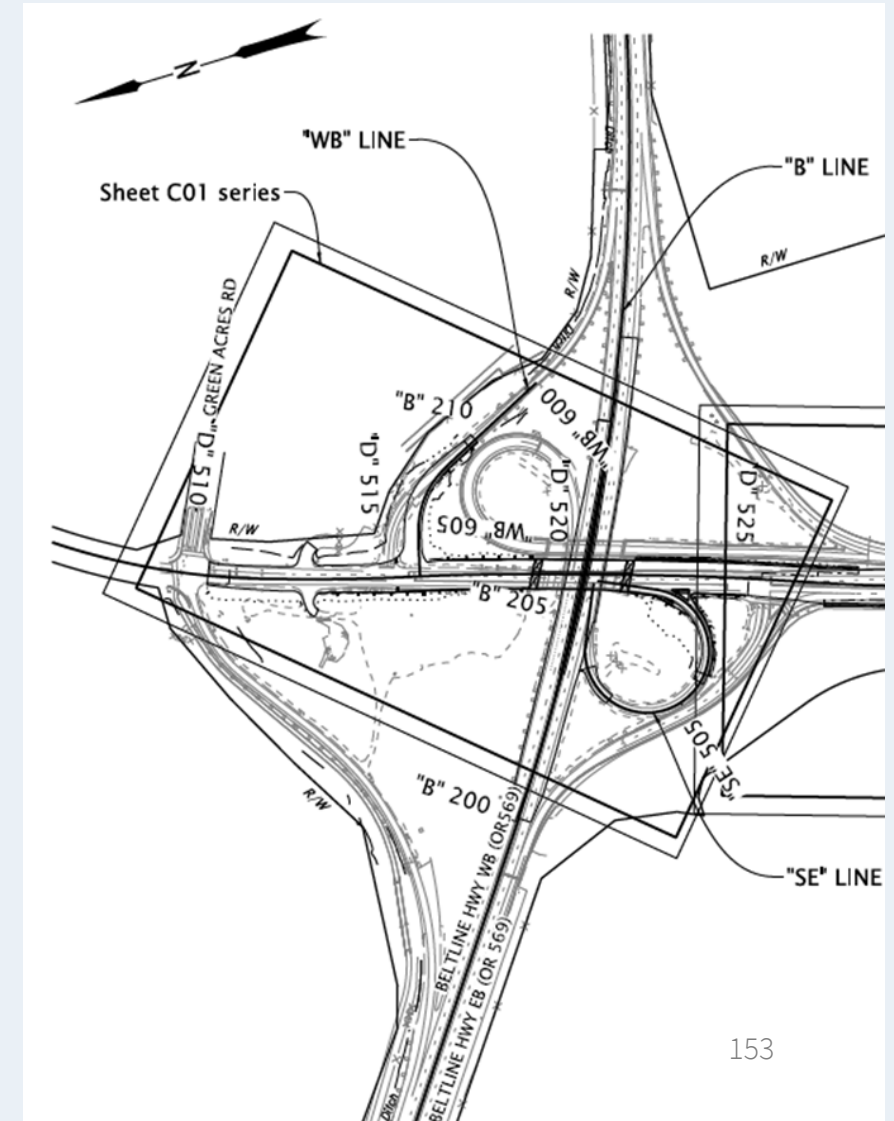
Optional reasonableness criteria increases it to \$52,500 per benefitted receptor

- Exposure to higher absolute highway noise levels (70 dBA)
- Large noise increases between Existing and Build conditions

What the Noise Specialist Needs from You

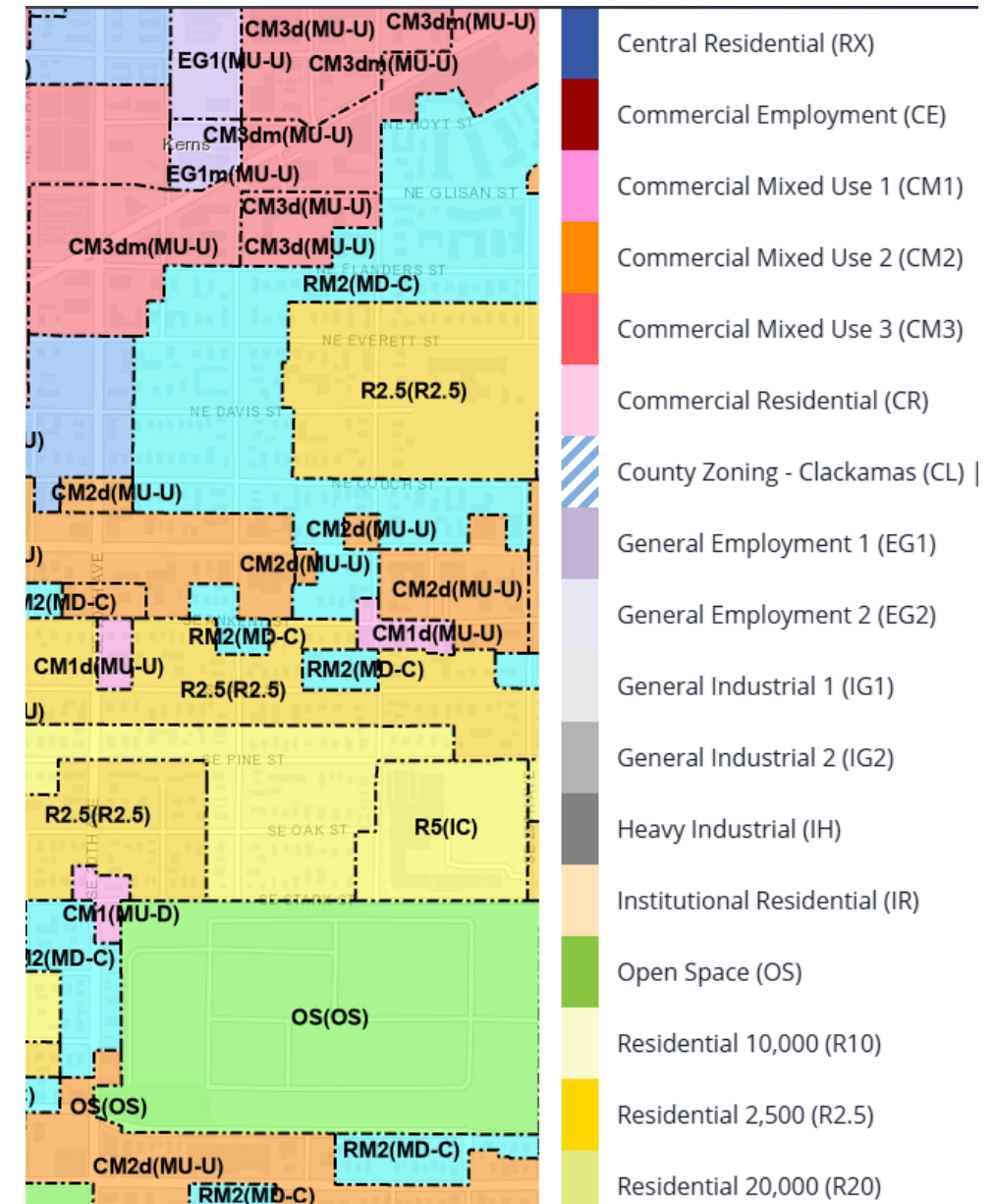
(Part 1)

- ***The earlier the better!***
- The plans need to be given to the noise specialist as soon as possible as they need to get modeled
- IF a noise wall is warranted, the details need to be given to structural and geohydro engineers for their consideration ASAP (*noise modeling only determines height and location*)
- Financial needs to add in the cost (from the above engineers)
- The noise barrier needs to be added into the plans for consideration by the rest of the project team



What the Noise Specialist Needs from You (Part 2)

- Right of Way needs to be contacted to get access to properties to perform Calibration noise measurements
- Information on the purposes of property and buildings are needed to determine the Activity Category (NAAC)
- Traffic needs to be engaged early to provide the data for the models
- Roadway needs to be engaged to get elevations and roadway centerlines



Robert Schiavone

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Natalie Liljenwall

Statewide Air Quality and Noise Program Coordinator

503-798-0800

natalie.liljenwall@odot.oregon.gov

Recommended Websites:

<https://www.oregon.gov/odot/GeoEnvironmental/Pages/Acoustics.aspx>

<https://www.fhwa.dot.gov/environment/noise/>

<https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-772>

$$L = L' + 10 \lg \left(1 - 10^{-0.1(L' - L_{\text{res}})} \right) \text{ dB} + \delta_{\text{sou}} + \delta_{\text{met}} + \delta_{\text{loc}}$$

Questions?





Take a break.

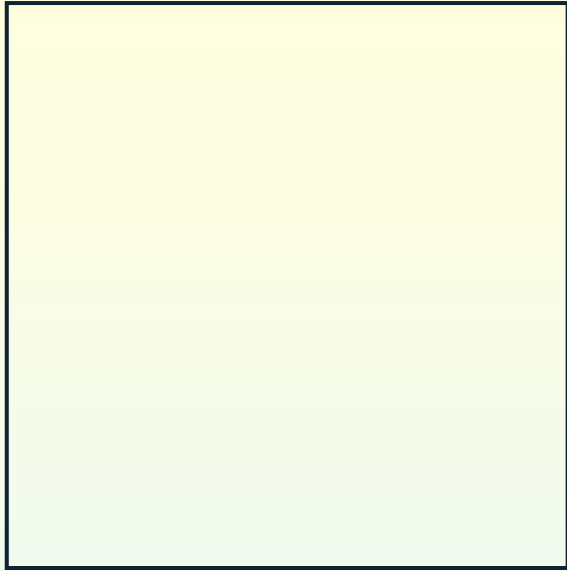


OPEN HOUSE



Insights Day 2





Menti.com
6203 4415

**WE WANT TO HEAR
FROM YOU!**