

I-205 Toll Project

MEMORANDUM



Date February 11, 2021
To Lucinda Broussard, Mandy Putney, Robert Hadlow, Ben White, and Michael Holthoff (ODOT)
From David Sacamano, WSP
Subject Parks, Recreation, and Section 4(f)/6(f) Methodology Memorandum – Draft #4
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2 INTRODUCTION

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

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

13 LEGAL REGULATIONS AND STANDARDS

14 Laws, Plans, Policies, Regulations, Guidance

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

- 17 • NEPA (42 U.S.C. 4331[b][2])
- 18 • Section 4(f) of the U.S. Department of Transportation Act of 1966
- 19 • Section 6(f) of the LWCF Act of 1965
- 20 • Title 42 U.S.C. Section 4601, Federal Uniform Relocation Assistance and Real Property
21 Acquisition Policies Act of 1970, as amended
- 22 • Section 106 of the National Historic Preservation Act of 1966
- 23 • 23 CFR 774 Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites
24 (Section 4(f)) (Revised 2018)
- 25 • 36 CFR 800 Protection of Historic Properties (Revised 2004)

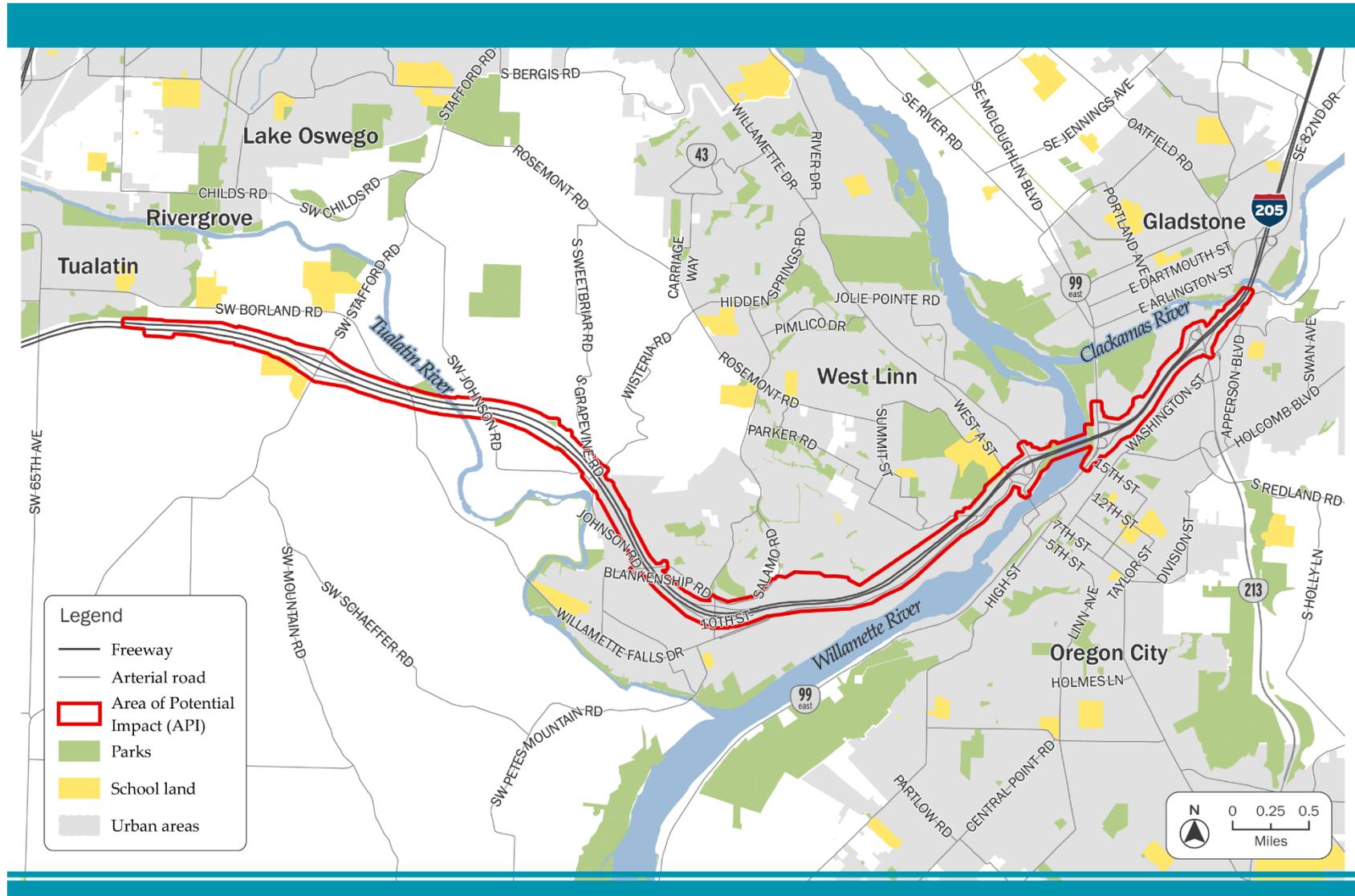
1 Park and recreational facilities in the project area are owned and managed by the Cities of West
2 Linn and Oregon City as well as Clackamas County. State law requires each agency to maintain
3 a comprehensive open-space plan that establishes policies and regulations relating to
4 acquisition, development,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

9 **AREA OF POTENTIAL IMPACT**

10 An area of potential impact (API) is a geographic boundary within which impacts to the human
11 and natural environment could occur. The API for direct long-term and short-term impacts to
12 parks, recreation, and Section 4(f)/6(f) resources is defined as the area within 100 feet of the
13 existing I-205 right-of-way between SW Stafford Road and Oregon Route 213 to capture areas of
14 permanent Project improvements, construction staging areas, and any other areas where
15 ground disturbance may occur as part of Project construction as shown in Figure 1. Prior to
16 preparation of the EA, this API may be modified once the alternatives to be studied in the EA
17 have been identified and projected traffic volumes have been refined.

18 Beyond the boundaries of the API, potential indirect resource impacts will be analyzed for the
19 project vicinity once the alternatives to be studied in the EA have been identified and projected
20 traffic volumes have been estimated. If applicable, minor adjustments to the API will be made
21 for indirect impacts to parks, recreation, and Section 4(f)/Section 6(f) resources that could result
22 from changes in traffic patterns near these resources.

1 **Figure 1. Preliminary Parks, Recreation, and Section 4(f)/6(f) API**



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1 **DESCRIBING THE AFFECTED ENVIRONMENT**

2 **Published Sources and Databases**

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

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

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

18 **Contacts and Coordination**

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

- 25 • City of West Linn
- 26 • City of Oregon City
- 27 • Clackamas County
- 28 • Metro Regional Parks and Natural Areas
- 29 • Oregon State Historic Preservation Office

30 In the unlikely event that impacted Section 6(f) properties are identified within the API, the
31 Oregon Parks and Recreation Department (OPRD) LWCF program will be contacted. If
32 necessary, the impacts to potentially affected sites will be identified and mitigation measures
33 will be coordinated with OPRD.

34 The consulting parties may change as tolling alternatives are finalized.

1 **Field Surveys or Testing**

2 No field survey or testing is required.

3 **IMPACT ASSESSMENT METHODS**

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

6 **Long-Term Impact Assessment Methods**

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

15 **Short-Term Impact Assessment Methods**

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

21 **Indirect Impacts Assessment Methods**

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

26 **Cumulative Impacts Assessment Methods**

27 The analysis of cumulative impacts to parks, recreation, and Section 4(f)/Section 6(f) is described
28 in the I-205 Toll Project Cumulative Impacts Methodology Memorandum.

29 **MITIGATION APPROACH**

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

32 **PERFORMANCE MEASURES**

33 1 presents a preliminary list of performance measures identified to evaluate how the
34 alternatives compare in terms of impacts and benefits to parks, recreation, and Section 4(f)/6(f).

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

Performance Measure	Tool and/or Data Source used for Assessment of Measure
Physical changes to park and recreation resources	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.
Changes to access to park and recreation resources located near roadways affected by vehicle rerouting	Information obtained from traffic model showing forecasted changes in traffic volumes that would result from tolling on roadways adjacent to park and recreation resources.

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

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