

APPENDIX C. SECTION 4(F) DOCUMENTATION

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Clackamas Elementary School Recreation Field: *De Minimis* Findings and Attachments

Camp Withycombe Section 106 Document and SHPO Concurrence

Planned Trails Section 4(f) Supporting Documents

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Clackamas Elementary School Recreation Field: *De Minimis* Findings and Attachments

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Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

August 25, 2010

Michelle Eraut, Environmental Program Manager
Federal Highway Administration
Oregon Division
530 Center Street, NE, Suite 100
Salem, Oregon 97301

FILE CODE:

RECEIVED

AUG 26 2010

FHWA
OREGON DIVISION

**Subject: REVISED Proposed *De Minimis* Finding for Recreation Area
Clackamas Elementary School Recreation Field
Sunrise Project I-205 to Rock Creek Junction
Southeast of Portland between I-205 and OR 212/224 Interchange and
Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal-Aid No. C005(046)**

Dear Ms. Eraut:

This letter requests FHWA approval of a Section 4(f) *de minimis* finding for the Clackamas Elementary School Recreation Field associated with the Sunrise Project. The proposed project would address the existing congestion and safety problems in the Oregon 212/224 corridor between its interchange with I-205 and Rock Creek Junction. The project would also serve the growing demand for regional travel and access to the state highway system. The proposed project would provide a new east-west oriented, limited access highway connecting I-205 and OR 212/224. From I-205 to Rock Creek Junction the highway would have six lanes plus auxiliary lanes. A midpoint interchange would connect the highway to the existing OR 212/224 highway. East of Rock Creek Junction, the highway would narrow to six lanes with no auxiliary lanes. At SE 172nd Avenue the highway would narrow to five lanes. There would be no local street access to the proposed Sunrise Project.

The project purpose is based on addressing the following needs:

- OR 212/224 between Interstate 205 and Rock Creek Junction is currently experiencing unacceptable levels of congestion and delay during the peak travel periods. In 2030, the projected traffic volume will far exceed the volume that the existing four-lane arterial can be expected to handle at an acceptable level of service.
- By 2030, the numbers of households and jobs in the area served by this section of OR 212/224 are expected to increase by 136 percent and 85 percent respectively.

- The northbound and southbound weave sections of I-205 between SE 82nd Avenue and OR 212/224 are approaching capacity, resulting in frequent stop-and-go movements, difficulty in changing lanes, and long queues forming because of minor incidents. By the year 2015, this section of I-205 will exceed its design capacity and the length of these stop-and-go movements will continue to grow if no action is taken. Traffic traveling on the Milwaukie Expressway (OR 224) heading east on OR 212/224, as well as the reverse direction, must either use the above section of I-205 or the currently congested SE 82nd Drive.
- OR 212/224 near I-205 is ranked in the top 10 percent of state routes for vehicle crash rate. Over 500 vehicle collisions were reported for this area during the five-year period from 1998 through 2002. The high crash rate is attributed to severe congestion and roadway deficiencies. Inadequate bicycle and pedestrian facilities reduce the safety and connectivity for these modes of travel in the project area.
- OR 212/224 is designated as a statewide and regional freight route with 12 percent of the traffic on the project section of this highway being trucks. OR 212/224 serves the Clackamas Industrial Area, which is a major freight distribution center for the Northwest. This area is expected to nearly double its employment by 2015. Long delays are currently reported for trucks accessing I-205 from the distribution center.

Right-of-Way Impacts: The Sunrise Corridor Project would require the conversion (use) of a portion of the southwest corner of the Clackamas Elementary School recreation field for transportation purposes. The build alternative right-of-way impact is estimated to be 0.18 acres, or 7,925 square feet (four percent) of the recreation field located at its southwest corner. In addition, the new right-of-way would impact the following elements of the recreation field (See figure in Attachment 1):

- Remove several mature trees located along the west property line.
- Remove a portion of the perimeter jogging trail at the western edge of the property.
- Set future right-of-way line either adjacent to the western softball backstop or the backstop will be moved.

Estimated Noise Impacts: The proposed project is expected to increase the sound levels at the modeling receiver locations along I-205 between 1 A-weighted decibel (dBA) and 3 dBA if noise abatement is not implemented. Noise modeling at three noise receivers located at the Clackamas Elementary School site experience existing average (Leq) noise levels ranging from 66 dBA to 70 dBA (Sunrise Noise Technical Report, February 2008). The noise levels at these locations are predicted to increase from 1 to 3 dBA over the existing noise levels with the implementation of the Sunrise project. For the majority of human observers, a 3 dBA, or less, increase in noise levels is generally imperceptible (FHWA 1995).

Table 1. Estimated Sound Levels at Clackamas Elementary School

Location	Receiver	Existing Leq	Build Leq	Change
South of School Site	I-59	68 dBA	70 dBA	2 dBA increase
On Site, SW Corner	I-60	70 dBA	73 dBA	3 dBA increase
On Site, Mid-South	I-61	66 dBA	67 dBA	1 dBA increase
On Site, Play Structure	I-62	66 dBA	69 dBA	3 dBA increase

Source: FHWA 2008

Measures to Mitigate Impacts: There are three mitigation measures included in the project to minimize the impacts of the Sunrise Project on the Clackamas Elementary School recreation field. The combined effect of these measures will result in a reduction in the impacts to the school recreation field and over all improvement in the quality of the recreational experience at this site. These mitigation measures are (1) to move the softball backstop playing area to the east, (2) move the jogging trail to the east, and (3) build a sound wall to buffer the site from the noise of I-205. With the proposed sound wall, the estimated sound levels at the recreation field would be approximately 62 dBA to 63 dBA.

There is enough space on the Clackamas Elementary School recreation field to move the jogging trail and the softball backstop and playing area to the east without impacting the other uses of the site. Sunrise Project noise modeling has indicated that a sound abatement wall would reduce noise levels below those currently present on the recreation field. A noise abatement wall will be included in the project. The noise wall will provide a 3 dBA to 8 dBA decrease from current levels.

Coordination with North Clackamas School District: ODOT coordinated with North Clackamas Elementary School on potential impacts to the recreation field. A letter from ODOT dated March 3, 2010 was provided to the Assistant Superintendent for Operations at North Clackamas School District. The letter explained the *de minimis* determination, potential impacts, and proposed mitigation measures for the recreation field. It was requested that the District sign the letter and return it to ODOT as indication of agreement with this determination. That response letter, signed and dated March 9, 2010, is provided in Attachment 3.

A NEPA Environmental Impact Statement is being prepared for this project. A Supplemental Draft Environmental Impact Statement (SDEIS) was issued in October 2008. The comment period on the SDEIS occurred between September 28, 2008 and November 28, 2008. No comments on the Section 4(f) *de minimis* finding for the Clackamas Elementary School Recreation Field were received.

Description of the Facility: The Clackamas Elementary School recreational field is a level field located to the south and west of the Clackamas Elementary School building (Figure 1). The recreation field's western boundary is located between 100 and 175 feet east of the edge

of the existing I-205 right-of-way. A line of mature trees is located on the western edge of the recreation field and provides some visual screening of the I-205 facility. The recreation field is open to the public and is predominantly used for informal recreation uses. As indicated in Question 10 of the FHWA Section 4(f) Policy Paper (FHWA, March 2005), when a school playground is open to the public and provides for organized, or community walk-on, recreation purposes, it is subject to Section 4(f) requirements.

The recreation field occupies approximately 4.6 acres of the 6.6 acre school site. It includes the following recreation facilities (See figures in Attachment 1):

- Paved play area and basketball area on the east side of the site.
- Playground with equipment and covered play area adjacent to the School Building.
- Play structure located west of the playground.
- Two softball backstops and playing fields located at the southwest and southeast corners of the site.
- Bark dust jogging path around the perimeter of the grassy portion of the site.

Other Section 4(f) Resources in the Project: In addition to the Elementary School, the Draft Section 4(f) Evaluation in the SDEIS identified four other Section 4(f) resources in the project corridor: KEX Transmitter Facility, Camp Withycombe National Guard Facility, Southern Pacific Railroad Willamette Valley Main Line, and the Frank A. Haberlach House and Silverthread Kraut and Pickle Works. Since preparation of the Sunrise SDEIS (October 2008) the following actions regarding these resources occurred:

- The project was modified to avoid impacts to the KEX property;
- It was determined that Camp Withycombe is no longer eligible for the National Register as a historic district;
- The project will not affect the Southern Pacific Railroad Willamette Valley Main Line; and,
- The project will not affect the Haberlach House and Pickle Works Factory.

Two other resources were evaluated in the project area, Foster-Mather House and the Clackamas Cemetery. For these resources, it was determined that the project will have no Section 4(f) use of the Foster-Mather House or the Clackamas Cemetery.

Resources not subject to Section 4(f): The Sunrise SDEIS (October 2008) noted several trails in the project area planned by the North Clackamas Parks and Recreation District and Metro. Subsequent to the SDEIS, in support of the FEIS, the status of these trails were reviewed and it had been determined that the trails did not meet criteria for designation as Section 4(f) resources. This determination was based on review of the FHWA Section 4(f)

Policy Paper (FHWA 2005) which provides guidance on defining Section 4(f) resources. In summary, this guidance indicates that:

- Trails must be on public property and Section 4(f) does not apply to trails on private land.
- Trails on public land must show evidence of formal designation such as inclusion in a city or county Master Plan.

Appendix A of the Section 4(f) Policy Paper further provides that if a project can be constructed to preserve a trail, then no “use” of the trail by the project would occur.

ODOT held meetings with Metro and North Clackamas County on January 13, 2010; March 22, 2010; and April 29, 2010 to discuss planned trails in the project area and the determination regarding Section 4(f) applicability. As a result of these meetings, it was determined that trail plans are generally conceptual in nature and consist only of rough alignments. No property has yet been acquired for the trails, and most of the proposed alignments would occur on private property. Although portions of some trails are included in plans such as the *North Clackamas Parks District Master Plan* (2004), other planned alignments are not formally identified. Despite the conceptual nature of the trails, ODOT indicated to parks staff that the proposed Sunrise Project would not preclude future construction of the proposed trails in the project area.

Based on these considerations, it was determined that Section 4(f) would not apply to the planned trails at this time. Both North Clackamas and Metro provided signed letters agreeing with this determination, copies of which appear in Appendix C of the FEIS. Additional support for this determination, including maps and data on the trails, potential trail area within the proposed project area, and trail ownership is provided in Appendix C.

Archaeological Work associated with the Sunrise Project: Background research, a pedestrian survey, subsurface exploration, and testing were conducted for the project. These efforts identified eight archaeological sites and four isolates within, or adjacent to, the project area. A portion of Site 35CL330 is recommended eligible for listing in the National Register of Historic Places. ODOT redesigned the project to avoid subsurface impacts to this portion of the site. Based on these findings, a Finding of No Adverse Effect on Historic Properties for the Sunrise Corridor was recommended by ODOT. The State Historic Preservation Office provided concurrence with this recommendation in June 2010. A copy of the signed concurrence request is attached.

This submission includes the following attachments: (1) Maps of the 4(f) property in association with proposed project; (2) Summary of public involvement activities and outcomes associated with proposed *de minimis* finding; (3) Written correspondence from the official with jurisdiction regarding *de minimis* finding; (4) FHWA 4(f) *de minimis* reporting

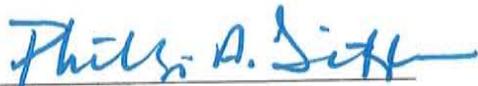
information; and (5) Section 106 concurrence letter. If there are questions about this statement, please contact Jeff Buckland, ODOT Region 1 Environmental Project Manager, at (503) 731-4804. Please send a signed copy of this statement, in pdf format, to: jeffrey.g.buckland@odot.state.or.us.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

The FHWA makes a 4(f) *de minimis* finding for the Clackamas Elementary School Recreation Field, for the Sunrise Project, as described in this document.



Phillip A. Ditzler
Oregon Division Administrator
Federal Highway Administration

9/1/2010

Date

Attachments:

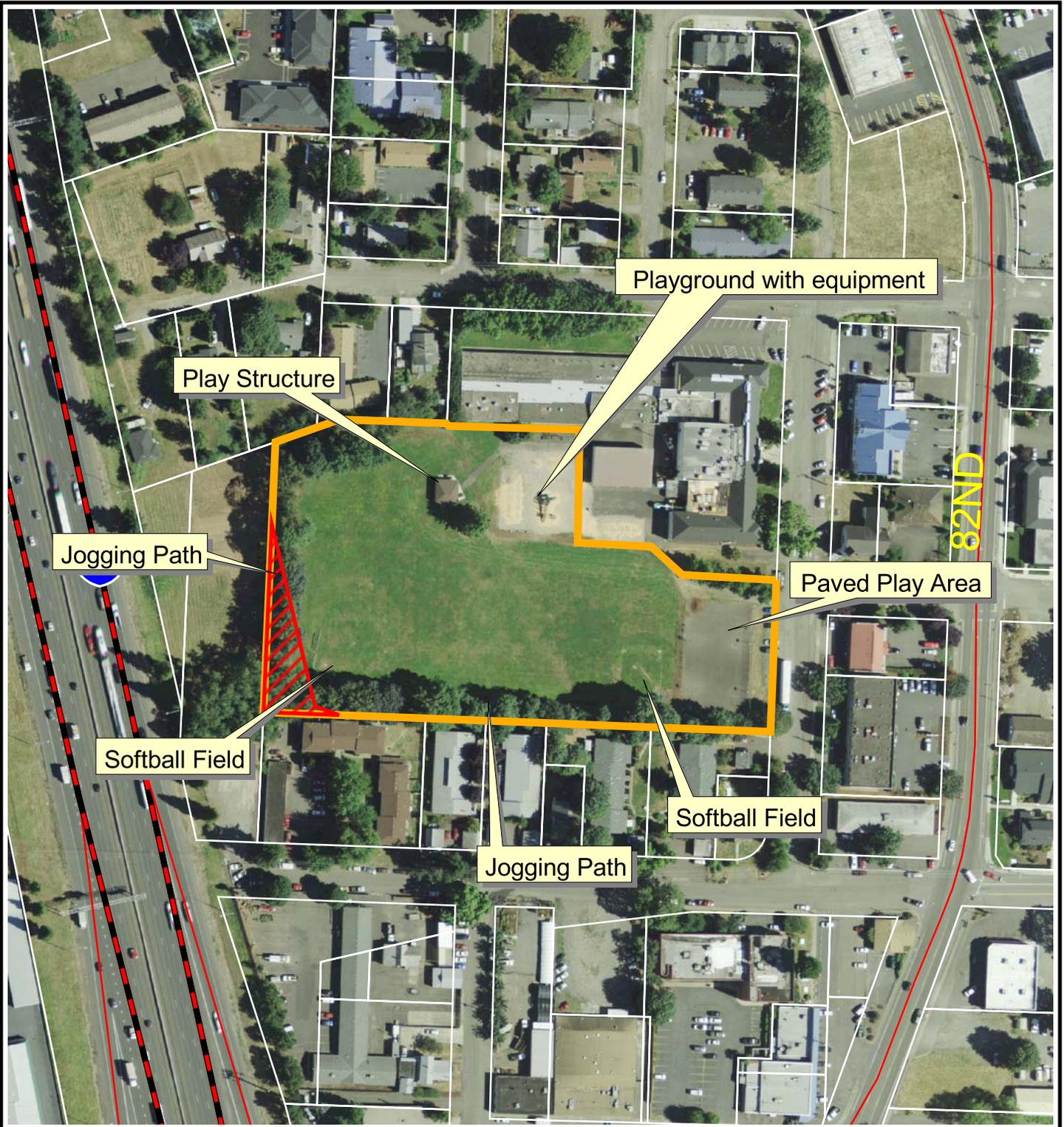
- (1) Maps of 4(f) property which includes attributes and features and clearly indicates which portion of the property will be incorporated into the transportation project.
- (2) 4(f) *de minimis* Public Outreach Summary
- (3) Written support from Official with Jurisdiction for proposed 4(f) *de minimis*.
- (4) FHWA Reporting Information for 4(f) *de minimis*
- (5) Section 106 concurrence letters

Copies to:

Jeff Buckland, ODOT Environmental Project Manager
Thomas Picco, ODOT Principal Planner
Robert Hadlow, Ph.D., ODOT Senior Historian
Christopher Bell, ODOT Cultural Resource Program Coordinator

ATTACHMENT 1
Sunrise Project, I-205 to Rock Creek Junction
Clackamas Elementary School Recreation Field
Key No. 12454
Federal Aid No. C005(046)

4(f) *de minimis* Property and Project Map
Figure 21: Recreation Field Facilities and Right-of –Way Area to be acquired
for Proposed Project



-  Impacted School Recreation Area
-  School Recreation Field
-  Taxlots
- Arterials
-  Freeways
-  Major Streets



Figure 21

Clackamas Elementary
Recreation Field Facilities

0 200 Feet



ATTACHMENT 2
Sunrise Project, I-205 to Rock Creek Junction
Clackamas Elementary School Recreation Field
Key No. 12454
Federal Aid No. C005(046)

4(f) *de minimis* Public Notice:

- **SDEIS Notice of Availability from Federal Register**
- **October 2008 Public Newsletter pages with notice of EIS Release, Public Comment Forms and Public Hearing Locations and Dates**
- **November Newsletter Public Hearings Reminder (Note: Two *de minimis* findings were identified at the time of the SDEIS. Since then, the project has been revised with no impacts to the Haberlach House and Pickle Works Factory. Therefore, the FEIS would include only the proposed *de minimis* for the Clackamas Elementary School Recreation Field).**
- **Public Notice for Local Newspaper**

Public Outreach Events Summary:

- **SDEIS Page ES-34 Summarizing Public Involvement Activities**

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-8586-5]

Environmental Impact Statements and Regulations; Availability of EPA Comments

Availability of EPA comments prepared pursuant to the Environmental Review Process (ERP), under section 309 of the Clean Air Act and Section 102(2)(c) of the National Environmental Policy Act as amended. Requests for copies of EPA comments can be directed to the Office of Federal Activities at 202-564-7146.

An explanation of the ratings assigned to draft environmental impact statements (EISs) was published in FR dated April 6, 2008 (73 FR 19833).

Draft EISs

EIS No. 20080309, ERP No. D-TVA-E65082-00, Mountain Reservoirs Land Management Plan, Implementation, Proposes to Develop a Plan for Managing Nine Mountain Reservoirs: Chatuge, Hiwassee, Blue Ridge, Nottely, Ocoees 1, 2, and 3, Apalachia, and Fontana Reservoirs, Fannin, Towns, and Union Counties, GA; Cherokee, Clay, Graham, and Swain Counties, North Carolina; and Polk County, TN.

Summary: EPA expressed environmental concerns about shoreline development and potential water quality impacts. Rating EC2.

EIS No. 20080315, ERP No. DA-BLM-K67011-NV, Betze Pit Expansion Project, Development of New Facilities and Expansion of Existing Open-Pit Gold Mining, Eureka and Elko Counties, NV.

Summary: EPA expressed environmental concerns about impacts from tailings closure and cessation of mine dewatering, which could include soil salinity accumulations, saline and/or alkaline runoff conditions, accelerated eolian or surface water erosion, fire, and cheatgrass or other weed infestations. Rating EC2.

EIS No. 20080239, ERP No. DS-UAF-A10051-MA, Pave Paws Early Warning Radar Operation Project, Continued Operation of the Solid-State Phased-Array Radar System (SSPARS), also known as Pave, Phased Array Warning Systems (PAWS), Cape Cod Air Force Station, MA.

Summary: EPA does not object to the proposed project. Rating LO.

Final EISs

EIS No. 20080245, ERP No. F-FHW-140181-UT, I-15, Corridor Project,

Transportation Improvement from Utah County to Salt Lake County, UT.

Summary: EPA continues to express environmental concerns about wetland and air quality impacts.

EIS No. 20080317, ERP No. F-FHW-E40815-00, Interstate 73 North Project, Construct on New Alignment, from I-95 to Future I-74 in NC, Funding, U.S. Army COE Section 404 Permit, Dillon and Malboro Counties, SC, and Richmond and Scotland Counties, NC.

Summary: EPA continues to have environmental concern about wetland impacts and the compensatory mitigation plan.

EIS No. 20080323, ERP No. F-CGD-A99225-00, Rulemaking for Dry Cargo Residue (DCR) Discharges in the Great Lakes, To Regulate Nonhazardous and Nontoxic DCR Sweeping from Vessels in the Great Lakes that fall under the Jurisdiction of the United States.

Summary: EPA does not object to the proposed project.

EIS No. 20080335, ERP No. F-BLM-E60016-00, Alabama and Mississippi Resource Management Plan, Analyzes Management Alternatives for the Public Land and Resources, in Portions of the States of Alabama and Mississippi.

Summary: EPA continues to have environmental concerns because the FEIS presented minimal discussion of how the preferred disposal method will affect the ground water resources, including the Southern Hills Regional Sole Source Aquifer.

Dated: October 7, 2008.

Robert W. Hargrove,
Director, NEPA Compliance Division, Office of Federal Activities.

[FR Doc. E8-24172 Filed 10-9-08; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-8586-4]

Environmental Impacts Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information (202) 564-1399 or <http://www.epa.gov/compliance/nepa/>.

Weekly Receipt of Environmental Impact Statements Filed 09/29/2008 Through 10/03/2008 Pursuant to 40 CFR 1506.9

EIS No. 20080401, Draft Supplement, FHW, OR, Sunrise Project, Proposes to Build a New East-West Oriented,

Limited-Access Highway between I-205 to Rock Creek Junction, Funding and U.S. Army COE Section 404 Permit, Clackamas County, Oregon, Comment Period Ends: 11/28/2008, Contact: Thomas Picco 503-731-8230.

EIS No. 20080402, Final EIS, AFS, MT, Whitetail-Pipestone Travel Management, Develop Site-Specific Travel Management Plan, Jefferson and Butte Ranger Districts, Beaverhead-Deerlodge National Forest, Jefferson and Silver Bow Counties, MT, Wait Period Ends: 11/10/2008, Contact: Terry Sexton 406-287-3223.

EIS No. 20080403, Final EIS, FHW, UT, Layton Interchange Project, Improvements on I-15 (Exit-330) to Provide Unrestricted Access Across the Unicon Pacific Railroad and to Address Traffic Congestion on Gentile St. in West Layton, Layton City, UT, Wait Period Ends: 11/10/2008, Contact: Doug Atkin 801-963-0182.

EIS No. 20080404, Draft EIS, DOI, 00, Grand Staircase-Escalante National Monument (GSENM), Draft Monument Management Plan Amendment & Draft Rangeland Health, Implementation, Portions of Kane and Garfield, Utah and Coconino County, AZ, Comment Period Ends: 01/08/2009, Contact: Paul Chapman 435-644-4309.

EIS No. 20080405, Draft Supplement, COE, LA, Inner Harbor Navigation Canal (IHNC) Lock Replacement Project, Proposal for Relieving Navigation Traffic Congestion Associated with IHNC Lock, Located between the St. Claude Avenue and North Claiborne Avenue Bridge, Orleans, LA, Comment Period Ends: 11/25/2008, Contact: Richard E. Boe 504-862-1505.

EIS No. 20080406, Final EIS, BIA, MT, Absaloka Mine Crow Reservation South Extension Coal Lease Approval, Proposed Mine Development Plan, and Related Federal and State Permitting Actions, Crow Indian Reservation, Crow Tribe, Bighorn County, MT, Wait Period Ends: 11/10/2008, Contact: Rick Stefanic 406-247-7911.

EIS No. 20080407, Draft EIS, AFS, CA, Moonridge Animal Park Relocation Project, Application for a Special-Use Permit to Construct and Operate a Wild Animal Park and Associated Facilities, Mountaintop Ranger District, San Bernardino National Forest, San Bernardino County, CA, Comment Period Ends: 11/24/2008, Contact: Paul Bennett 909-382-2819.

EIS No. 20080408, Draft EIS, COE, GA, Fort McPherson Project, Disposal and

Sunrise Project, I-205 to Rock Creek Junction



Comment Form Draft Supplemental Environmental Impact Statement

The Sunrise Project welcomes your comments on the Supplemental Draft Environmental Impact Statement or any other aspect of the project or process. Thank you for participating – your input is important to us. Use additional sheets of paper if necessary.

IF MAILING:

- Cut form along center of page
- Fold and tape with JLA Public Involvement address showing
- Affix postage and mail

YOU MAY ALSO:

- Fax to 503-230-4877
- Email to comments@sunrise-project.org

COMMENTS MUST BE RECEIVED BY FRIDAY, NOVEMBER 28, 2008

TELL US ABOUT YOURSELF:

What is your name and address (optional)?

What is your home zip code? You work zip code:

Do you (check all that apply):

Live in project area? Work in project area? Own a business in the project area? Other:

Comments:

The process is reaching an important milestone with the release of the Supplemental Draft Environmental Impact Statement (EIS) on October 13, 2008. The EIS describes why the project is being proposed, the project alternatives, examines the potential social, economic and environmental impacts of the alternatives, and the proposed avoidance, minimization and/or mitigation measures.

EIS Released

For several years, Clackamas County and the Oregon Department of Transportation (ODOT) have been working together with the community to study a proposed new limited-access highway, the Sunrise Project. The project would extend from the Milwaukie Expressway at I-205 and reconnect to Highway 212 and 224 near the Rock Creek Junction.

How You Can Review the EIS

Copies of the EIS are available for review at these locations (for a complete list, please visit www.sunrise-project.org):

- Clackamas County Planning Department
Sunnybrook Service Center
9101 SE Sunnybrook Boulevard
Clackamas, OR 97015
- City of Happy Valley
12915 SE King Road
Happy Valley, OR 97236
- City of Damascus
19920 SE OR 212
Damascus, OR 97015
- Clackamas Corner Library
(near Clackamas Town Center)
11750 SE 82nd Avenue, Suite D
Portland, OR 97266
- Camp Withycombe
10101 SE Clackamas Road
Clackamas, OR 97015
- North Clackamas Chamber of Commerce
7740 SE Harmony Road
Milwaukie, Oregon 97222

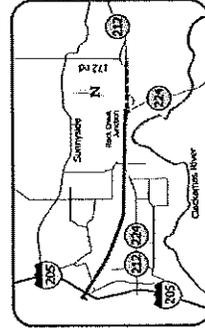
The entire EIS, technical reports and executive summary can also be viewed at www.sunrise-project.org.

To request a CD of the EIS or a hard copy of the EIS executive summary, contact Stacy Thomas at stacy@latraverse.com or 503-235-5881, ext. 118.

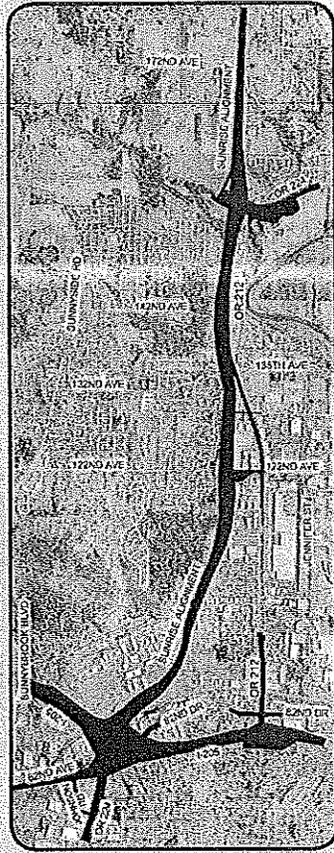


Sunrise Project, I-205 to Rock Creek Junction

Clackamas County
Department of Transportation and Development
9101 SE Sunnybrook Blvd
Clackamas, OR 97015



Attend a Public Hearing on the EIS
November 12th or 13th (See Inside)



Public Comment and Review – We Need Your Input

A formal public review and comment period accompanies the release of the EIS. It runs from October 13th to November 28, 2008. Comments received during the comment period will be used to aid in the selection of a preferred alternative and will be formally responded to in the Final EIS, expected to be published in Summer 2009.

Current traffic conditions and projected growth are driving the need for the proposed Sunrise Project. Key area roadways experience multiple hours of congestion and delay each weekday, which adversely affect system reliability, efficiency and safety.

Public Hearings and Open Houses

You are invited to learn more about the project and share your comments at two public hearings held in conjunction with informational open houses. Oral and written comments will be received at any time during both events.

Wednesday, November 12, 2008
4:00 p.m. – 7:00 p.m.
Milwaukie Center
5440 SE Kellogg Creek Drive
Milwaukie, OR 97222

Thursday, November 13, 2008
6:00 p.m. – 9:00 p.m.
Clackamas High School
14486 SE 122nd Avenue
Clackamas, OR 97015

Can't Attend a Public Hearing?

If you are not able to give your comments in-person at one of the hearings, there are several options you have to comment:

ONLINE

www.sunrise-project.org

EMAIL

comments@sunrise-project.org

FAX

503-230-4877

MAIL

JLA Public Involvement
Attn: Stacy Thomas
1110 SE Alder Street, Suite 301
Portland, Oregon 97214

Schedule

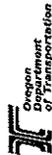
Public review of EIS	October 13– November 28
Public hearings on EIS	November 12 & 13
Select Preferred Alternative	Winter 2009
Study Preferred Alternative, respond to comments	Winter 2009
Local jurisdictions adopt Preferred Alternative	Spring 2009
Complete the Final EIS	Summer 2009
FHWA Record of Decision	Fall 2009
Complete final design, permitting, right-of-way acquisition	2010-2012
Begin construction (pending approval and funding)	2013 at the earliest

Contact Info:

Ron Weinman
Project Manager
Clackamas County
(503) 553-4533
ronw@co.clackamas.or.us

Stacy Thomas
Public Involvement and Outreach
JLA Public Involvement
(503) 235-5881, ext. 118
stacy@jlaunvolve.com

Clackamas County and the Oregon Department of Transportation (ODOT) are jointly managing the Supplemental Draft EIS process.

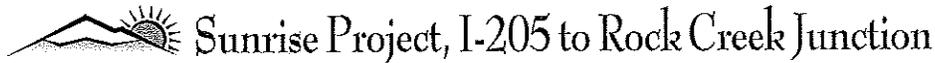


Project Website: www.sunrise-project.org

AFFIX
POSTAGE
HERE

JLA PUBLIC INVOLVEMENT
ATTN: STACY THOMAS
1110 SE ALDER STREET, SUITE 301
PORTLAND, OR 97214

Comments on the EIS must be received
by Friday, November 28, 2008.



Public Hearings Reminder

Two public hearings are scheduled for the Sunrise Project to provide project information and receive public comment on the Supplemental Draft Environmental Impact Statement (SDEIS). Oral and written comments will be received at any time during both events.

Wednesday, November 12, 2008

4:00 p.m. – 7:00 p.m.

Milwaukie Center
5440 SE Kellogg Creek Drive
Milwaukie, OR 97222

Thursday, November 13, 2008

6:00 p.m. – 9:00 p.m.

Clackamas High School
14486 SE 122nd Avenue
Clackamas, OR 97015

The Sunrise project is a proposed new limited-access highway – the project would extend from the Milwaukie Expressway at I-205 and reconnect to Highway 212 and 224 near the Rock Creek Junction. The SDEIS was released on October 13th and the public comment period runs through November 28, 2008.

Two Section 4(f) de minimis impact findings are proposed for the Sunrise Project. You will have the opportunity to comment on these minimal impacts to the affected resources at the hearings.

Visit the project web site: www.sunrise-project.org

For more information, contact Stacy Thomas at
stacy@jlainvolve.com or 503-235-5881



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Be sure to include your phone number so potential buyers will be able to reach you. State the time you can be reached. You want to make it as easy as possible for the potential customer to reach you.

3. DON'T ABBREVIATE
Have you ever tried to read an ad with abbreviations? It's difficult to decipher, and most readers won't take the time to figure the ad out. Spell it out!!

Unit number and name to be auctioned: C-27 Angela Ross, D-117 Patricia Kenner, C-72 Victoria Yates, D-109 Geoffrey B. Forman, F-23 James L. Harding, B-66 Kimberly Jo Kufner, F-57 Chris Shoemaker.

Request for Bids Information & Specifications for a Pumper-Tender Vehicle Bids Due November 6th 2008

Notice is hereby given that sealed bids will be received by the Monroe Rural Fire Protection District, up to the hour of 4:00 pm on November 6th 2008 for the construction, delivery & purchase of one (1) 3000 gallon pumper tender, as outlined in the following specifications. Bids should be clearly marked in the lower left-hand corner, "Pumper-Tender Vehicle Bid". Bid specifications may be obtained by request at 680 Commercial Street, in Monroe, Oregon 97456, or by calling (541) 847-5170.

The District reserves the right to reject any or all bids or to accept any and all bids, to waive irregularities and/or informalities in any bid, and to make an award in any manner consistent with law, deemed in the best interest of the Fire District.

Bids must be addressed to Rick Smith, Fire Chief, Monroe Rural Fire Protection District. Bids must be received by 4 p.m. on Thursday, November 6, 2008, at the District office, 680 Commercial Street, in Monroe, Oregon 97456. Bids will be publicly opened in the Board conference room at 6:00 pm Thursday, November 6, 2008.

SUNRISE PROJECT: I-205 to Rock Creek Junction

The Oregon Department of Transportation (ODOT) and Clackamas County propose to build a new, east-west oriented, limited-access highway called the Sunrise Project from Interstate 205 (I-205) to the Rock Creek Junction in Clackamas County.

The Sunrise Project Supplemental Draft Environmental Impact Statement (SDEIS) is now available for public review and comment. The comment period is open until November 28, 2008. Two Section 4(f) *de minimis* impact findings are also proposed for the Sunrise Project.

Two public hearings will be held to receive public comment and testimony: Wednesday, November 12, 2008, at the Milwaukie Center, 5440 SE Kellogg Creek Drive, Milwaukie, OR 97222 from 4:00pm-7:00 pm; and Thursday, November 13, 2008, at Clackamas High School, 14486 SE 122nd Avenue, Clackamas, OR 97015, 6:00pm-9:00pm.

To download and review the SDEIS, please see the project website: <http://www.sunrise-project.org/>.

For additional information, contact Emily Moshofsky at (503) 731-8535; or emily.a.moshofsky@odot.state.or.us.

I've advertised a lot of things in another publication and even though they have pictures, my items don't

503-235-5122
NOVEMBER 13, 2008 at 11:30 A.M.
Individual Bids on Units:
#0025 - Shalyna M. Curry
#0142 - William George Moore

STORAGE AUCTION

BASELINE MINI STORAGE
18375 SW Baseline Rd
Beaverton OR, 503-531-9388
NOVEMBER 6, 2008 @ 1:00 PM

For the following Units:
#111 - Jonajhan Huster
#143 - Kymberli Phelps
#172 - Eddie Kalleck
#199 - Jerry Richards
#284 - Kerry Campbell
#344 - Autumn Tamura
#348 - Robert Stewart Hardy Jr.
#364 - Rachel Henson
#457 - June Wilkinson

Surplus Property Sale Portland Public Schools

Blanchard Education Service Center (BESC)
501 North Dixon Street
Portland, Oregon 97208

Lot review and sealed bid submission
Thursday, Oct 30th 8am 3:30pm
Friday, Oct 31st 8am 9:45am

Bid opening: 10:30am Fri, Oct 31st

Category of items offered include but are not limited to: VHS Educational Media, Textbooks, Office Furniture, Shop Supplies, Facilities Equipment, School Locker Doors, Food Service Utensils/Fixtures, Musical Instruments, Carpet Rolls, and 60-foot Storage Units.

Three Sisters Irrigation District is requesting bids for HDPE pipe or Phase II (two) of the McKenzie Canyon Irrigation Pipeline Project. This phase of the piping project is estimated to be 2.6 miles in length. The bid is for materials only.

Contract forms, complete project specifications and materials worksheet may be picked up at the District office, 68000 W. Hwy. 20, Sisters, OR 97759 or they can be mailed upon request by calling the District office at (541) 549-8815.

Contact person is Marc Thalacker, District Manager, who will accept bids until 2 p.m. on Wednesday, November 12, 2008, at the address provided above. Late bids will not be accepted. Bids will be publicly opened immediately following the bid submission deadline.

Three Sisters Irrigation District may cancel this procurement or reject any or all bids in accordance with ORS 279B.100.

INFORMATION & EDUCATION

CLASSIFICATIONS 10-35

Lost and Found 10

IF YOUR PET IS LOST OR MISSING

FOUND DOG: Pug/Female, 10/27 on NE 92nd near Jason L. Grade School. 503-254-5472

FOUND juvenile black and white cat, S. E. Portland, early October. 503-701-4096

FOUND kids 20" bike, at Gran Park. Call to ID 503-265-8349

★ **LOST AUSTRALIAN SHEPHERD DOG, SOPHIE.** Lost October 24 near NE 11th & Dekum. Family pet, female, black tricolor, white stripe on nose. Has rabies tag, microchip. New incision from surgery. Very shy. Needs TLC when found. Please call. 503-314-6360

LOST CAT (Pixie Bob, tawny w/ black markings) near NE 31 & Thompson Wed, Oct 22. Mike 503-288-3570, Karin 503-997-1980
• \$250 REWARD •

LOST Nikon digital camera, vic Cick Twn Ctr 10/26. 541-905-4325

★ **LOST SMALL BEAGLE!** 23 lb female, white face, missing since 10/20 near N. Killingsworth/N. Vancouver Microchipped, no collar. (503)286-5535 CASH REWARD

LOTS DOG, blk male Lab, neut 90 lbs, 10/26 N. Albina/Morgan, "Otto", needs med, microchip, 503-285-8032, 503-968-2360 x12

Ticket Exchange 14

BLAZERS 2 season LL, sec 110, row M, #16-17. Face val \$484 ea or \$968/2. 503-257-2230 ext 1219

Family Services 21

ALCOHOL OR DRUG Questions? Problems?

Toll-free, statewide A & D HelpLine
For information and referral: 1-800-923-HELP (4357)
Portland Area: 503-244-1312
En Espanol, Gratis 1-877-515-7848
Oregon Partnership

IF YOU WANT TO DRINK that's your business. If you want to stop, that's ours.
Call ALCOHOLICS ANONYMOUS 503-223-8569 24 hrs

NEEDED stable and caring parents, married or single to provide foster care to children of all ages and ethnic backgrounds. Please help the children of our community by becoming a foster parent. Call Services to Children and Families, 1-800-331-0503.

PREGNANT? Confidential advice & help. See our complete list of referrals every Friday in this classification.

PROFESSIONAL child, adolescent and family counseling, child sexual abuse treatment and family support services in Clark County

Oregon's ethnic, cultural, and geographic diversity. We are recruiting for a variety of positions including:

**CLAIMS ADJUSTERS
CLAIMS ADJUSTER TRAINEES**

Portland, Oregon

www.saif.com



An Equal Opportunity Employer

Portland Development Commission

The Urban Renewal Agency for the City of Portland, Oregon

Portland is internationally recognized for its quality of life, distinctive neighborhoods, and robust transit system. Playing a key role in keeping Portland, Oregon, one of America's most livable cities is the Portland Development Commission's mission. PDC is the City's urban renewal agency, charged with bringing together resources to achieve Portland's vision. We're currently looking for qualified individuals to complement our workforce for the following positions:

**General Counsel
Business Systems Analyst II**

We offer a generous host of benefits as part of our efforts to keep PDC a positive, healthy and productive place to work. PDC values diversity in its work force and is committed to Equal Employment Opportunity and Affirmative Action.

Apply online at www.pdc.us/jobs
Portland Development Commission, 222 NW 5th Ave.,
Portland, OR 97209
Jobline: 503.823.3463

Public Notice

Sunrise Project: I-205 to Rock Creek Junction

The Oregon Department of Transportation (ODOT) and Clackamas County propose to build a new, east-west oriented, limited-access highway called the Sunrise Project from Interstate 205 (I-205) to the Rock Creek Junction in Clackamas County.

The Sunrise Project Supplemental Draft Environmental Impact Statement (SDEIS) is now available for public review and comment. The comment period is open until November 28, 2008. Two Section 4(f) de minimis impact findings are also proposed for the Sunrise Project.

Two public hearings will be held to receive public comment and testimony: Wednesday, **November 12, 2008**, at the Milwaukie Center, 5440 SE Kellogg Creek Drive, Milwaukie, OR 97222 from 4:00pm-7:00 pm; and Thursday, **November 13, 2008**, at Clackamas High School, 14486 SE 122nd Avenue, Clackamas, OR 97015, 6:00pm-9:00pm.

To download and review the SDEIS, please see the project website: <http://www.sunrise-project.org/>.

For additional information, contact Emily Moshofsky at (503) 731-8535, or emily.a.moshofsky@odot.state.or.us.

@portlandobserver.com

**Oregon Institute
Village for Sustainable Living
Student Housing
Bids due 2:00 P.M.
Advertisement**

Bid Package 3 - All Work as shown. Excludes previously awarded Structural Concrete, Survey,

HSW Builders, LLC., Constructive (CM/GC) requests subbids for on behalf of the Oregon Institute Village for Sustainable Living.

Subbids will be received via fax to CM/GC, located at 730 Bonneville 97701 @ 541-388-2898 (fax) time, November 13th, 2008. Package # 3 - OIT, Sustainable Living on the forms bound in the considered for award, the CM satisfactorily comply with all CM requirements outlined in the

Bidding Documents for the Soderstrom Architects, Portland bid package may be obtained with a \$ 100 deposit for a full set Builders Exchange, Central Oregon Builders Exchange, Medford Contractors Exchange, Contra DJC in Portland or HSW Builders available online at www.plansc.com made available October 29th.

Questions shall be directed to Robk@hswbuilders.com) or fax are directed to **NOT** contact the consultants directly with questions, substitutions, exception, or exc

All bids shall be in compliance with which went into affect July, 200

All successful bidders must furnish Bond in an amount equal to Subcontractor sum as security the Subcontract and also as security persons performing labor and Subcontract. The performance provided within five (5) days of may be awarded to the next res

Bidders must be currently registered the Oregon Construction Contractors of bid.

HSW Builders is an equal opportunity bids from all qualified firms including women, and emerging small business 162215

Public and Agency Involvement

The Federal Highway Administration (FHWA) is the lead federal agency and ODOT is acting as an agent for FHWA in preparing the document. Both ODOT and Clackamas County are the two main public agencies managing the project. A Project Management Team includes staff from Clackamas County, Metro, ODOT, FHWA, Happy Valley, Damascus, and the technical team.

A Project Advisory Committee with 18 stakeholders from neighborhoods, businesses, the cities of Happy Valley and Damascus, TriMet, Metro, environmental groups, FHWA (a non-voting member), and service providers met ten times between 2004 and 2006. Their next task will be to review the SDEIS and forward their comments to the Policy Review Committee.

The Policy Review Committee has senior representatives from Clackamas County, ODOT, Metro, and FHWA (which has a non-voting, advisory role) and elected officials from affected cities and Clackamas County. The Policy Review Committee's final task will be to recommend a Preferred Alternative to the official decision-making bodies.

Appendix A of the SDEIS contains member lists of the Project Advisory and Policy Review committees and CETAS.

Public and agency involvement initially started in connection with the Sunrise Corridor project in the late 1980s and early 1990s. For more information on the public involvement program prior to 2004, contact ODOT at the address provided at the beginning of this document.

Public Involvement Activities since 2004

The Project Advisory Committee, composed of citizens representing neighborhoods, business and civic advocacy groups, emergency services, and other stakeholder agencies throughout the corridor area, is the central focus of the public involvement effort. Its meetings are open to the public and an average of 30 people regularly attend its meetings.



Working out design alternatives at an open house

Public involvement efforts for the proposed Sunrise Project SDEIS began in 2004. Open houses in June 2004, October 2005, and September 2006 have attracted 100 to 200 attendees. More than 100 people also attended the two-day design workshop held in December 2004. Several focused

community meetings have been held in different locations in the project area. Newsletters and postcards have been distributed to approximately 5,000 addresses (in 2004) and more than 9,000 addresses (March 2008). Other outreach included flyers, community meetings, and presentations at the Board of County Commissioners' meetings. Newspaper coverage, a website, and e-mail distribution lists have rounded out the public involvement effort.

ODOT has also targeted outreach to affected tribes. A discussion of outreach is contained in Appendix B of the SDEIS.

Project Schedule

The Sunrise Project began in 2004 with defining the scope of analysis for this SDEIS. From 2005 through mid-2007, the project activities were:

- Establishing the purpose and need;
- Establishing goals and objectives;
- Developing and refining the project alternatives;

ATTACHMENT 3
Sunrise Project, I-205 to Rock Creek Junction
Clackamas Elementary School Recreation Field
Key No. 12454
Federal Aid No. C005(046)

**Written Support from Official with Jurisdiction for 4(f) *de minimis*: Letter
from North Clackamas School District**



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Region 1

123 NW Flanders St.

Portland, OR 97209-4037

(503) 731-8200

FAX (503) 731-8259

March 3, 2010

Ron Stewart, Assistant Superintendent for Operations
North Clackamas School District
12451 SE Fuller Road
Milwaukie, OR 97222

RECEIVED

MAR 08 2010

File Code:

SUPERINTENDENT

RE: Clackamas Elementary School Recreation Field – Section 4(f) *de minimis*
Concurrence with Finding of No Adverse Effect from Sunrise Project

Dear Mr. Stewart:

Two years ago, the Oregon Department of Transportation (ODOT) contacted you about the proposed Sunrise Corridor project in Clackamas County. The proposed project would build a new, east-west oriented, limited access highway from Interstate 205 (I-205) to Rock Creek Junction in Clackamas County. Among potential impacts of the proposed project, the need to acquire a small portion (approximately 0.18 acres) of the recreation field at Clackamas Elementary School has been identified.

Under Section 4(f) of the U.S. Department of Transportation Act of 1966, actions which may require the use of publicly owned land from public park and recreation areas must be avoided, or include all possible planning to minimize harm to these facilities. These measures would apply to the Clackamas Elementary School recreation field. Under Section 4(f) regulations, impacts to recreation areas that will not adversely affect the features, attributes, or activities qualifying the property for Section 4(f) protection are identified as *de minimis* impacts. It has been determined that the proposed use of the Clackamas Elementary School recreation field will be identified as a *de minimis* impact.

The proposed project would require the use of a sliver of the southwest corner of the school recreation field. The right-of-way impact is identified as approximately 0.18 acres (7,925 square feet) at the southwest corner of the field. Additionally, a number of mature trees located along the west property line would be removed; a portion of the perimeter jogging trail would be removed at the western edge of the property; and the future right-of-way line would be either adjacent to the western softball backstop, or the project would remove the backstop. The proposed project would also result in a potential increase in noise levels along I-205 of between 1 dBA and 3 dBA, if noise abatement is not implemented.

As potential mitigation for impacts on the Clackamas Elementary School recreation field, three measures would be available: 1) move the softball backstop playing area to the east; 2) move the jogging trail to the east; and 3) build a sound wall to buffer the site from the noise of I-205. There is enough space on the recreation field to move the jogging trail and the softball backstop to the east without affecting other uses. Noise modeling has indicated that a sound wall would reduce the noise levels below those currently present on the recreation field and has been recommended for inclusion in the proposed Sunrise Corridor project. With the proposed mitigation measures, no adverse effect under Section 4(f) regulations would occur to the recreation field.

A Supplemental Draft Environmental Impact Statement (DEIS) was issued for the Sunrise Project in October 2008, and a Final Environmental Impact Statement is currently being prepared by ODOT, in collaboration with the Federal Highway Administration and Clackamas County. During preparation of the October 2008 Supplemental DEIS, in compliance with the Section 4(f) evaluation process, ODOT requested a letter from North Clackamas School District concerning the potential *de minimis* impact on the recreation field and the Finding of No Adverse Effect as a result of the Sunrise Corridor project. In response to that request, you provided a letter from North Clackamas School District, dated December 18, 2007 (copy enclosed). This letter was included in the October 2008 Supplemental DEIS document.

At FHWA's direction, ODOT has been instructed to obtain an updated letter regarding this project from North Clackamas School District for inclusion in the Final EIS. The Final EIS will include evaluation of impacts and mitigation measures for the Clackamas Elementary School recreation field under the Preferred Alternative for the Sunrise Corridor project. As with the Supplemental DEIS, the potential impacts on the recreation field would continue to be identified as *de minimis* impacts under Section 4(f) regulations. Impacts and mitigation measures are expected to be the same as those identified in the Supplemental DEIS, and described above.

Based on this information, if you agree that this determination is correct, please sign and return a copy of this letter to the address below. If you have questions about the project or this request, please contact Thomas Picco, Principal Planner at (503) 731-8230. Thank you for your attention to this request.

Sincerely,



Thomas Picco, Principal Planner

Oregon Department of Transportation
123 NW Flanders St.
Portland, OR 97209

Enclosure: December 2007 letter from North Clackamas School District to ODOT

Replacing the backstop when relocating may be necessary.

	<u>3-9-2010</u>
Name and Title	Date
<i>Ron Stewart, Assistant Superintendent of Operations</i>	

ATTACHMENT 4
Sunrise Project, I-205 to Rock Creek Junction
Clackamas Elementary School Recreation Field
Key No. 12454
Federal Aid No. C005(046)

FHWA Reporting Information for 4(f) *de minimis*

Route.	OR 212/224 between I-205 and Rock Creek Junction.
Project Name.	Sunrise Project, I-205 to Rock Creek Junction.
Project Length in Miles.	Approximately 5 miles.
Has the project received Transportation Enhancements funds? Has an application for TE funds for this project been submitted? Or is it planned?	No.
Type of project (bridge, intersection, new alignment, safety, widening). Select only one.	New alignment.
Complete project cost.	Approximately \$1.5 billion.
NEPA Class of action.	Environmental Impact Statement.
Number of 4(f) resources in the project.	One.
List of all 4(f) resources in the project.	Clackamas Elementary School Recreation Field.
<i>De minimis</i> mitigation (includes purchase of right-of-way consistent with the Uniform Act).	The existing softball backstop and jogging trail would be moved to the east. A sound wall would be constructed to the west to buffer noise from I-205.
<i>De minimis</i> impacts (e.g. will remove 5 existing parking spaces from 250 space parking lot; will convert x.x acres of Monument land to highway easement, will use 50 sq. ft of the SE corner of the property).	Project will require 0.18 acres (7,925 square feet) of the recreation field. Right-of-way acquisition would affect the softball field, a jogging trail, and existing trees along the western edge of the property. Noise levels at the field are expected to increase from 1dBA to 3dBA, if not mitigated.
Size of the <i>de minimis</i> use in acres.	0.18 acres (7,925 square feet)
Type of <i>de minimis</i> resource (Historic, Park, Recreation or Wildlife Refuge). Select only one.	Recreation.
Project status (general schedule—bid opening, completion of the environmental process).	Final EIS preparation.
Anticipated construction start.	2013
Anticipated construction completion.	2017

ATTACHMENT 5
Sunrise Project, I-205 to Rock Creek Junction
Clackamas Elementary School Recreation Field
Key No. 12454
Federal Aid No. C005(046)

Section 106 Concurrence Letters



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

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

FILE CODE:

DATE: June 3, 2010

TO: Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Don Day, Cultural Resource Site Protection Monitor, Confederated Tribes of the Grand Ronde Community of Oregon
Robert Kentta, Cultural Resources Director, Confederated Tribes of Siletz Indians
Roberta Kirk, Review and Compliance Coordinator, Geo Visions, Confederated Tribes of Warm Springs
Johnson Meninick, Cultural Resources Manager, Confederated Tribes and Bands of the Yakama Nation
Eirik Thorsgard, Cultural Protection Coordinator, Confederated Tribes of the Grand Ronde Community of Oregon
Thomas Picco, Region 1 Principle Planner, ODOT
Jeff Buckland, Region 1 Environmental Program Manager, ODOT
Kurt Roedel, Archaeologist, ODOT
Michelle Eraut, Environmental Protection Specialist, FHWA
Key Number 12454, File Type C

FROM: Rebecca Littau, Geo-Environmental Administrative Staff *RL*

SUBJECT: Request for Concurrence
Finding of No Adverse Effect for Historic Properties Affected (Archaeology)
Sunrise Corridor, I-205 - 172nd Section EIS Project
Clackamas County, Oregon
Key Number 12454, Federal Aid Number C005(46)PN/PE, C005(61)PE
ODOT EA: PE000900-091-G24

Attached is the signed Request for Concurrence from the State Historic Preservation Office for the above referenced project, approved on June 1, 2010.



Oregon

Theodore R. Kulungoski, Governor

Department of Transportation
Transportation Building
355 Capitol St. NE
Salem, Oregon 97301

JUN 03 2010

May 17, 2010

FILE CODE:

Roger Roper
Deputy State Historic Preservation Officer
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97310-1271

Damascus & Gladstone Quadrangles

*T1S, R2E, Sec. 33
T2S, R2E, Sec. 4, 5, 9-12, 16,
T2S, R3E, Sec. 7*

**Subject: Request for Concurrence
Finding of No Adverse Effect for Historic Properties Affected (Archaeology)
Sunrise Corridor, I-205 - 172nd Section EIS Project
Clackamas County, Oregon
Key Number 12454, Federal Aid Number C005(46)PN/PE, C005(61)PE
ODOT EA: PE000900-091-G24**

Dear Mr. Roper:

The Oregon Department of Transportation (ODOT) proposes to construct a new six-lane limited-access expressway to address traffic congestion and safety problems along the OR212/224 corridor between I-205 and Rock Creek Junction.

Archaeological Investigations Northwest, Inc. (Smits et al. 2007, 2010) conducted background research, pedestrian survey, subsurface exploration, and testing, identifying eight archaeological sites and four isolates within, or adjacent to, the project area (Table 1).

Table 1. Summary of Archaeological Resources Identified for the Proposed Project.

Resource Number	Resource Description	NRHP Eligibility Recommendation	Management Recommendation
Site 35CL253	Precontact camp	Determined Not Eligible	None
Site 35CL306	Historic	Recommended Not Eligible	None
Site 35CL100	Precontact	Recommended Not Eligible	None
Isolate 90/22-7	Precontact	Recommended Not Eligible	None
Site 35CL305	Historic rock wall	Recommended Not Eligible	None
Site 35CL329	Historic homestead/refuse scatter	Recommended Not Eligible	None
Isolate 06/1328-5	Precontact flake	Recommended Not Eligible	None
Isolate 06/1328-6	Precontact flake	Recommended Not Eligible	None
Isolate 06-1328-7	Precontact flakes	Recommended Not Eligible	None
Site 35CL330	Precontact camp	Portion Recommended Eligible	Avoidance/Protection
Site 35CL341	Precontact lithic scatter	Unevaluated	Avoidance
Site 35CL367	Precontact lithic scatter	Unevaluated	Avoidance

A portion of Site 35CL330 is recommended eligible for listing in the National Register of Historic Places (Smiths et al. 2010:58). ODOT redesigned the project to avoid subsurface impacts to this portion of the site. Attachment 1 details potential construction activities and minimization efforts ODOT is undertaking within Site 35CL330.

Preliminary application of Section 106 Criteria for Identification and Evaluation of Historic Properties [36 CFR 800.4(d)] indicates a finding of "No Adverse Effect on Historic Properties" for the Sunrise Corridor, I-205 - 172nd Section EIS Project, based on the findings outlined above. ODOT, acting as an agent of the Federal Highway Administration (FHWA), requests your concurrence with a FINDING OF NO ADVERSE EFFECT ON HISTORIC PROPERTIES (Archaeology) for the project.

Please contact Michelle Eraut, Environmental Protection Specialist, FHWA, at 503-587-4716, or James Norman, Environmental Planning Unit Manager, ODOT, 503-986-3514, if you have any questions.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

The State Historic Preservation Office concurs that the Sunrise Corridor, I-205 - 172nd Section EIS Project will have **No Adverse Effect on Historic Properties (Archaeology)**.



SHPO Official

6/1/10

Date

Copies with attachments:

Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Don Day, Cultural Resource Site Protection Monitor, Confederated Tribes of the Grand
Ronde Community of Oregon
Robert Kentta, Cultural Resources Director, Confederated Tribes of Siletz Indians
Roberta Kirk, Review and Compliance Coordinator, Geo Visions, Confederated Tribes of
Warm Springs
Johnson Meninick, Cultural Resources Manager, Confederated Tribes and Bands of the
Yakama Nation
Eirik Thorsgard, Cultural Protection Coordinator, Confederated Tribes of the Grand
Ronde Community of Oregon
Key Number 12454, File Type C

Copies without attachments:

Thomas Picco, Region 1 Principle Planner, ODOT
Jeff Buckland, Region 1 Environmental Program Manager, ODOT
Kurt Roedel, Archaeologist, ODOT
Michelle Eraut, Environmental Protection Specialist, FHWA

References Cited:

Smits, Nicholas J., David V. Ellis, Jason M. Allen, and Todd B. Ogle

2007 *Sunrise Project: I-205 to Rock Creek Junction Archaeological Resources Technical Report*. Report No. 1844. Archaeological Investigations Northwest, Inc., Portland, Oregon. Prepared for David Evans and Associates, Inc., Portland, Oregon. Submitted to Oregon Department of Transportation, Salem. 26 November.

Smits, Nicholas J., John L. Fagan, and Michele L. Punke

2010 *Archaeological Investigations for the Sunrise Project: I-205 to Rock Creek Junction, Clackamas County, Oregon*. Report No. 2415. Archaeological Investigations Northwest, Inc., Portland, Oregon. Prepared for David Evans and Associates, Inc., Portland, Oregon. Submitted to Oregon Department of Transportation, Salem. 30 April.

ATTACHMENT 1

SITE PROTECTION MEASURES FOR SITE 35CL330

SITE PROTECTION MEASURES FOR SITE 35CL330

ODOT has proposed to avoid and/or minimize impacts to Site 35CL330 during construction activities for the Sunrise Corridor: I-205 – 172nd Section EIS Project.

Figure 1 shows AINW's test locations at 35CL329 and 35CL330 and the portion of site 35CL330 recommended eligible for listing in the National Register of Historic Places (NRHP). Within this portion of the site, the upper 30 centimeters (cm) (12 inches [in]) of archaeological deposits lack integrity due to previous disturbance and therefore do not contribute to the site's eligibility. In other words, the portion of site 35CL330 that is recommended eligible for listing in the NRHP is within the boundary shown on Figure 1 and beneath a depth of 30 cm (12 in) below the surface. The remainder of site 35CL330 does not contribute to its eligibility.

Potential construction activities that may occur outside of the eligible portion of Site 35CL330 include the following:

- Excavation for concrete footings (piers) for a proposed flyover structure
- Drilling of 1.2 to 1.8-meter (4- to 6-foot) diameter shafts for concrete foundation piers
- Construction of scaffolding and falsework for cast-in-place flyover structure
- Operation of concrete trucks to pour columns and a possible deck
- Operation of large cranes for beams, drilled shafts, etc.
- Operation of a front loader for placement of rock pads
- Operation of contractor vehicles, i.e., pickup trucks
- Stockpiling (temporary storage) of materials
- Foot traffic of construction workers

Potential construction activities proposed within the eligible portion of site 35CL330 include the following:

- Construction of scaffolding and falsework for cast-in-place flyover structure
- Operation of a front loader for placement of rock pads
- Foot traffic of construction workers

ODOT proposes geotechnical borings to test the soil at site 35CL330 for suitability for construction. The methods of constructing the proposed scaffolding and falsework within the eligible portion of site 35CL330 would depend upon the suitability of the soil. ODOT would direct contractors to develop a falsework plan that does not extend below the ground surface within the eligible portion of site 35CL330. Based on the results of the geotechnical borings, if it is determined that the soil is suitable for being built upon, the following options would be possible for construction of the falsework.

- Geotextile fabric and a layer of crushed rock could be placed over the eligible portion of site 35CL330 for construction of the falsework. The layer of rock would be later removed.
- An above-ground cribbing plan could be developed to support the falsework.

If it is determined that the soil is not suitable for being built upon, then the following option would be possible.

- A falsework construction plan, supported by beams that span the site, could be developed
- An alternative structure span, possibly steel, could be used to span the eligible portion of site 35CL330

To date, ODOT's efforts to minimize impacts to site 35CL330 have focused on adjusting the design of the proposed flyover structure in order to relocate the concrete footings (piers) outside of the portion of the site that is recommended eligible for listing in the NRHP. Figure 2 shows the portion of site 35CL330 that is recommended eligible (shaded yellow), the two original pier locations (pink circles), and the revised pier locations (green circles) for the flyover structure. These two piers were moved to the southwest to avoid the significant portion of 35CL330.

The proposed piers would be constructed by first drilling deep shafts measuring 1.2 to 1.8-meters (4 to 6-feet) in diameter, which would serve to anchor the concrete piers in the ground. The depth of the drilled shafts would depend upon the results of the geotechnical borings. Spoils from the drilling would be placed outside of the eligible portion of site 35CL330, and all equipment necessary for drilling the shafts and constructing the piers would be directed to stay outside of the eligible portion of site 35CL330.

Additional measures to consider as part of a site protection plan should include the following:

- Archaeological monitoring of construction activities
- Use of construction fencing to delineate and protect the portion of the site that is recommended eligible for listing in the NRHP. Fencing should be placed outside of the significant portion of the site and should include a 5-meter (16-foot) buffer wherever possible
- Use of construction mats and/or geotextile cloth and/or layers of crushed gravel or fill dirt in areas where vehicles and equipment would travel over the eligible portion of site 35CL330
- Development of a vegetation management plan, in consultation with the Confederated Tribes of the Grand Ronde Community of Oregon, to prevent future disturbance and looting of the site. Mature plant roots should not extend below a depth of 30 centimeters (12 inches) below the ground surface, which is the depth to which the site has been previously disturbed. Placement of a layer of shallow fill may be another option to allow for deeper plantings

This page intentionally withheld due to confidentiality of archaeological information.

This page intentionally withheld due to confidentiality of archaeological information.



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

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

FILE CODE:

DATE: July 29, 2010

TO: Robert W. Hadlow, Senior Historian, ODOT Region 1, Portland
Thomas Picco, Principal Planner, ODOT Region 1, Portland
Jeff Buckland, Environmental Project Manager, ODOT Region 1, Portland
Becky Crockett, Environmental Unit Manager, ODOT Region 1, Portland
Michelle Eraut, Environmental Program Manager, FHWA—Oregon Div.,
Salem
Jeff Graham, Operations Engineer, FHWA—Oregon Div., Salem

FROM: Rebecca Littau, Geo-Environmental Administrative Staff *RL*

SUBJECT: Request for Concurrence on a
Section 106 Level of Effect for Historic Resources
Sunrise Corridor, Interstate 205—Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal-Aid No. C005(046)

Attached is the signed **Level of Effect** from the State Historic Preservation Office for the above referenced project, **approved on 7/26/2010.**



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation
Transportation Building
355 Capitol St. NE
Salem, Oregon 97301

RECEIVED
JUL 28 2010

July 19, 2010

FILE CODE:

Christine Curran
Associate Deputy State Historic Preservation Officer
Oregon State Historic Preservation Office
725 Summer Street NE, Suite C
Salem, OR 97301

RECEIVED

JUL 20 2010

OR SHPO

**Subject: Request for Concurrence on a
Section 106 Level of Effect for Historic Resources
Sunrise Corridor, Interstate 205—Rock Creek Junction
Clackamas County, Oregon
ODOT Key No. 12454
Federal-Aid No. C005(046)**

SHPO CASE# 08-1709; 08-086;
10-0040; 10-084

Dear Chrissy,

I am writing you at the request of the Federal Highway Administration's Oregon Division regarding the Sunrise Corridor Project's overall Section 106 level of effect on above ground historic resources. At present, we are about to issue a Final Environmental Impact Statement and would like to include your concurrence that the project will have No Adverse Effect on historic resources.

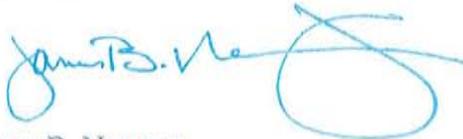
Below, I have listed the historic resources identified during the course of project development. All of them, except for the Clackamas Cemetery, are called out in the project's "Cultural Resources Technical Report," prepared by Archaeological Investigations Northwest, Inc., in 2007. I have noted each resource's eligibility for the National Register and the preferred alternative's level of effect.

- **Southern Pacific Railroad Willamette Valley Main Line**—determined eligible for the National Register, 2008; finding of no historic properties adversely affected, 2008.
- **Clackamas Elementary School**—determined eligible for the National Register, 2008; finding of no historic properties adversely affected, 2008.
- **Frank A. Haberlach House and Silverthread Kraut and Pickle Work**—determined eligible for the National Register, 2008; not within the preferred alternative's area of potential effect.
- **Mather-Foster House**—determined eligible for the National Register, 2009; finding of no historic properties adversely affected, 2009.
- **KEX Transmitter Facility**—eligible for the National Register, with boundary adjustment in 2009, finding of no historic properties adversely affected, 2009.

- **Camp Withycombe**—no longer eligible for the National Register as a district, 2010; extant features are outside of the preferred alternative's area of potential effect.
- **Clackamas Cemetery**—determined eligible for the National Register, 2010; finding of no historic properties adversely affected, 2010.

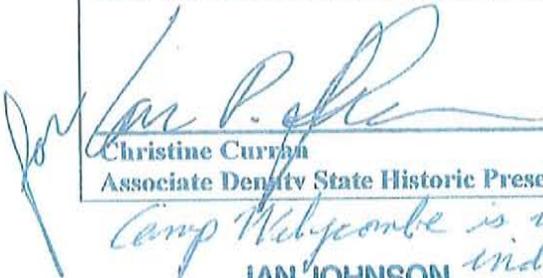
Please contact Robert W. Hadlow, Ph.D., Sr. Historian, if you have any questions regarding this coordination request. You can reach him at (503) 731-8239.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

The State Historic Preservation Office concurs that the proposed Sunrise Corridor Project will have No Adverse Effect on historic resources.



Christine Curran
Associate Deputy State Historic Preservation Officer

7/26/2010
Date

Camp Withycombe is no longer eligible as a district but individual properties outside the APE are potentially individually eligible

IAN JOHNSON
503-986-0678
ian.johnson@state.or.us

Copies to:

- Robert W. Hadlow, Senior Historian, ODOT Region 1, Portland
- Thomas Picco, Principal Planner, ODOT Region 1, Portland
- Jeff Buckland, Environmental Project Manager, ODOT Region 1, Portland
- Becky Crockett, Environmental Unit Manager, ODOT Region 1, Portland
- Michelle Erant, Environmental Program Manager, FHWA—Oregon Div., Salem
- Jeff Graham, Operations Engineer, FHWA—Oregon Div., Salem

Camp Withycombe Section 106 Document and SHPO Concurrence



Oregon

Theodore R. Kulongski, Governor

Department of Transportation

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

FILE CODE:

DATE: April 20, 2010

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

FROM: Rebecca Littau, Geo-Environmental Administrative Staff

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

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



Oregon

Theodore R. Kulongoski, Governor

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

www.oregonheritage.org

RECEIVED

APR 15 2010

ODOT
GEO-ENVIRONMENTAL



April 14, 2010

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

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

Dear Mr. Norman:

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

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

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

Sincerely,

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

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





Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

March 12, 2010

FILE CODE:

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

ATTENTION: Ian Johnson, Historian

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

Dear Mr. Roper,

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

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

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

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



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

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

Sincerely,



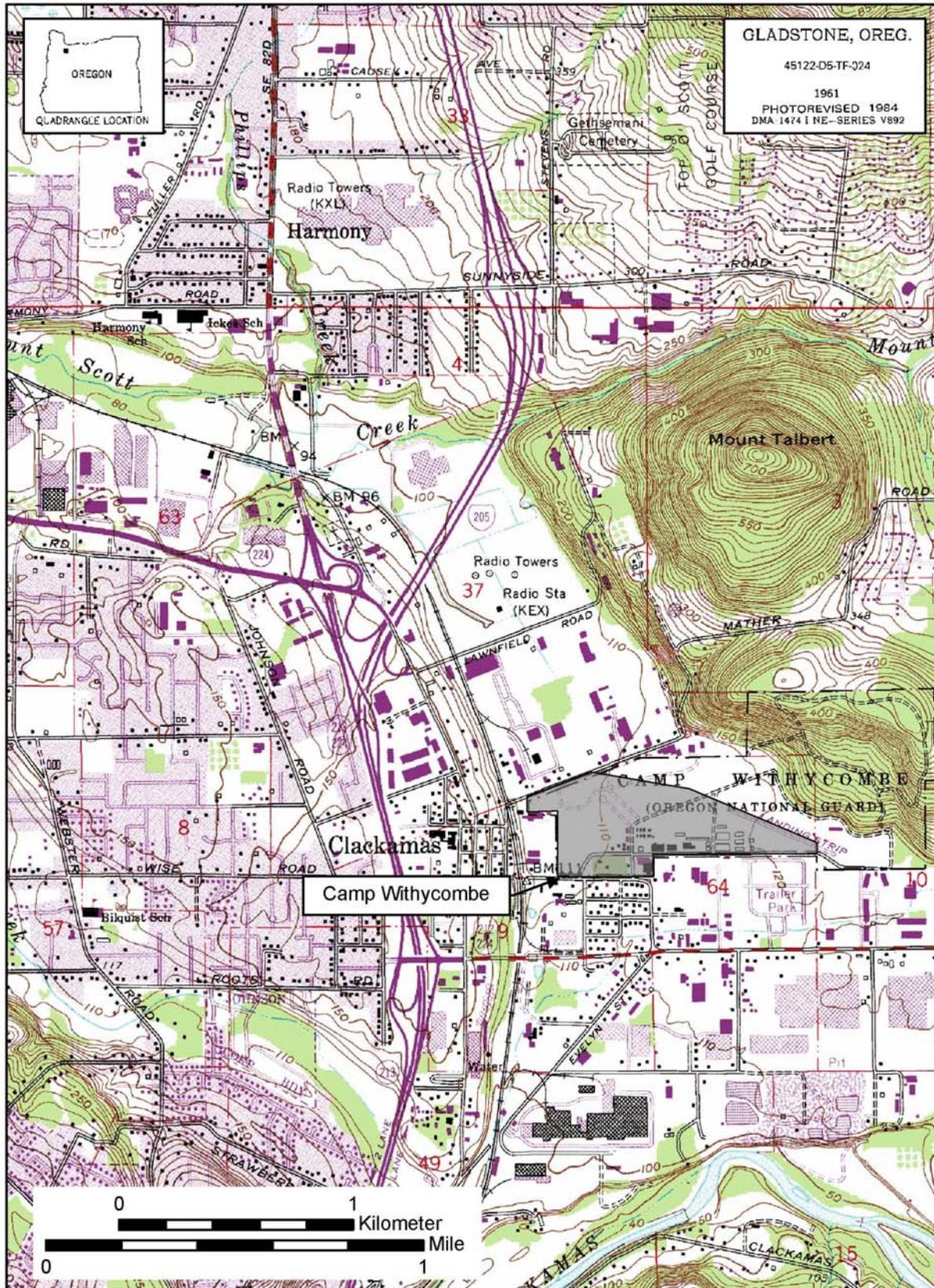
James B. Norman
Environmental Planning Manager

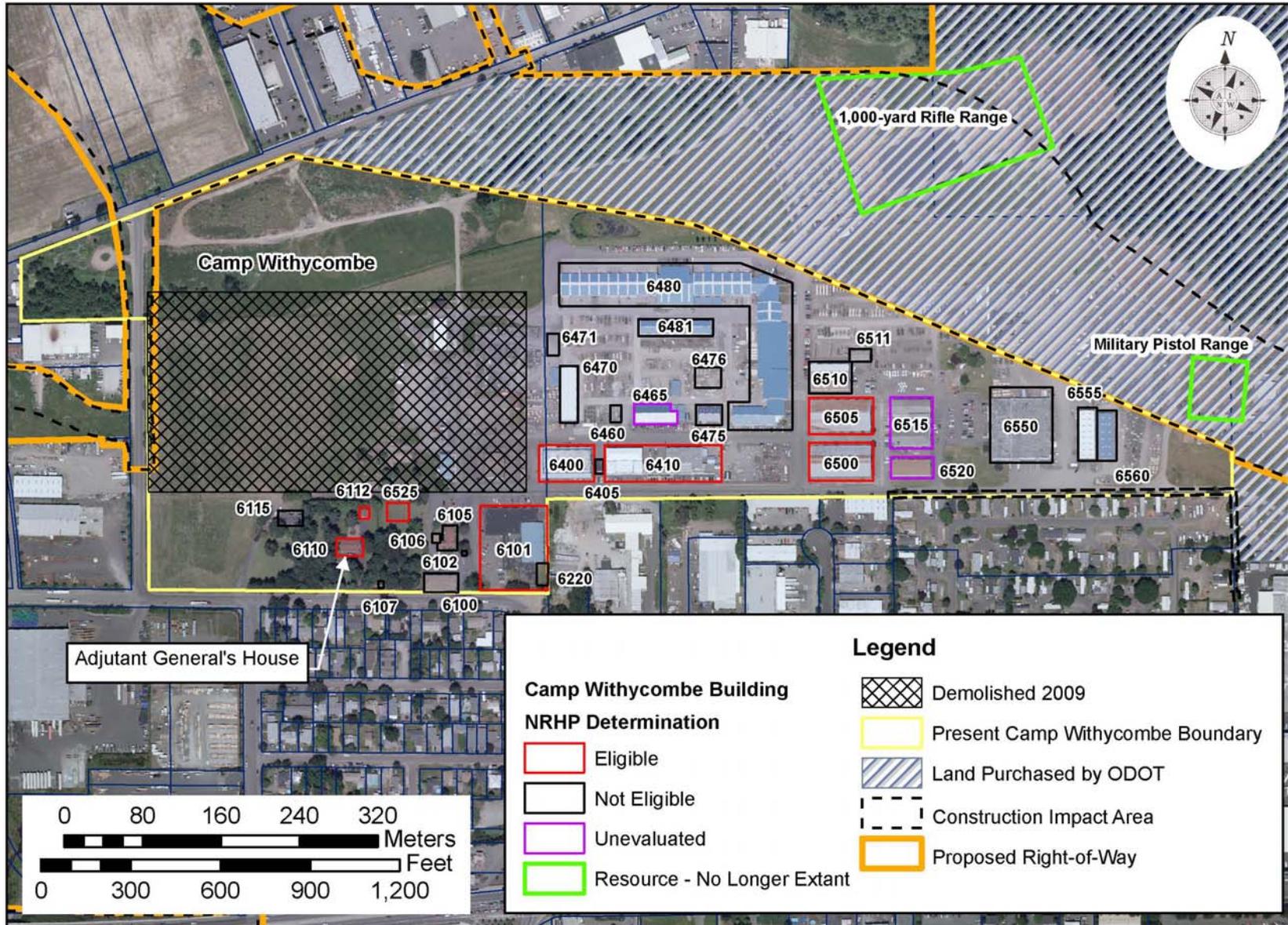
Attachment:

Section 106 Documentation Form, Camp Withycombe Historic District

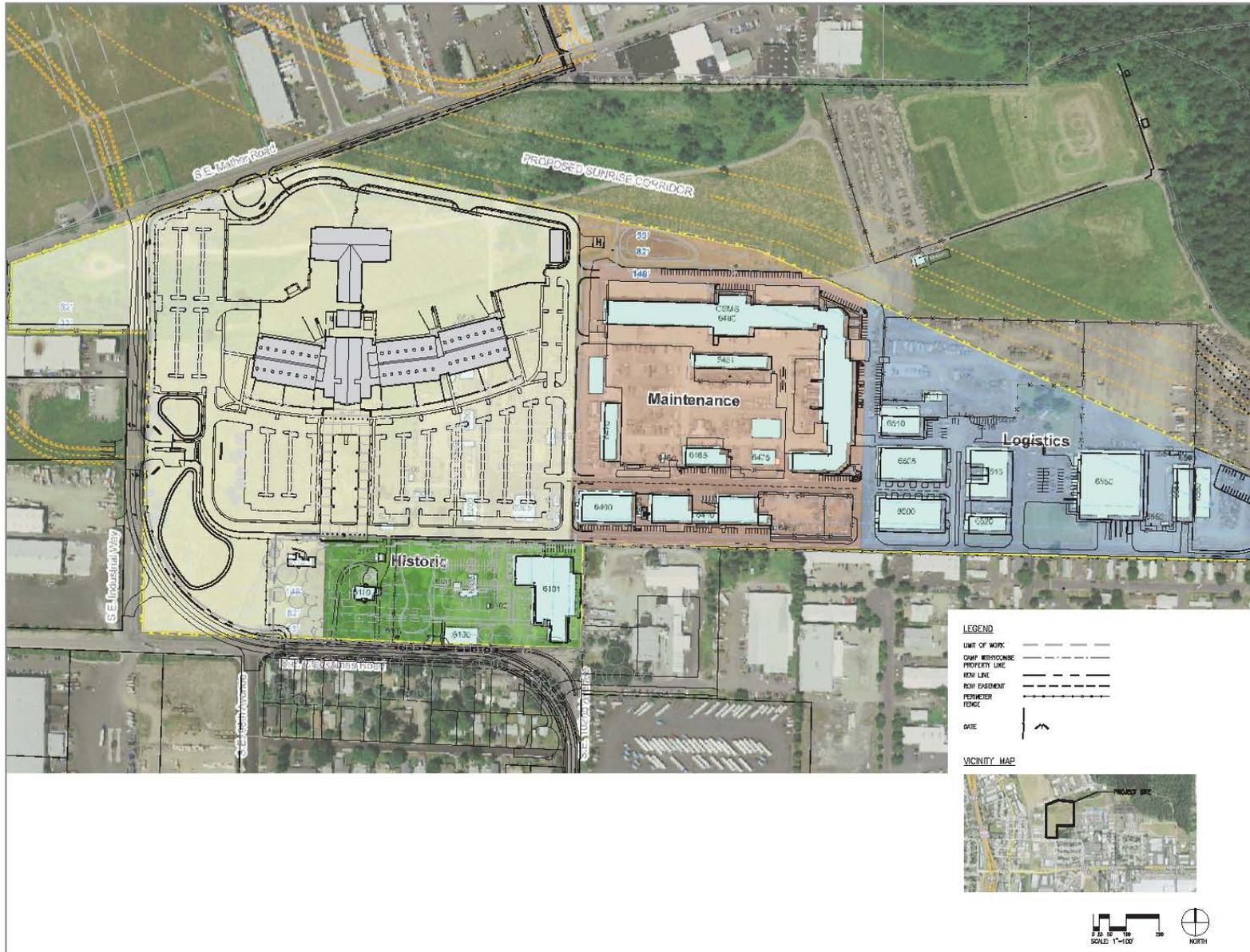
Copies with attachments:

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





2008 Aerial Photography provided by Metro.



41 Infantry Division - AFRC
 Camp Withycombe, Clackamas, Oregon

CAMP PLAN + AERIAL PHOTOGRAPH

ARCHITECTS
 BARRENTINE
 BATES LEE AIA



L1.1

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

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

Agency/Project: Oregon Department of Transportation/OR212/224: Sunrise Corridor (I-205 to Rock Creek) ODOT Key No. 12454, Fed.-Aid No. C005(046)	
District Name: Camp Withycombe Historic District	<input checked="" type="checkbox"/> Potential <input type="checkbox"/> Listed
Boundary Description: The potential district is bound by ODOT lands and proposed right-of-way to the east and north, SE Industrial Way to the west, and Clackamas Road to the south. See attached map for boundary location.	City, County: Clackamas, Clackamas County
USGS Quad Name: Gladstone, Oreg. 1961, Photorevised 1984	Township: 2S Range: 2E Sections: 9 and 10
Construction Date Range: 1912 to 2009	Approximate Acreage / Number of Resources: 78 acres/ 31 buildings, 1 object
Architectural Classifications / Resource Types: Colonial Revival, Art Deco, Vernacular, and Utilitarian buildings	
Alterations & Approximate Dates: Camp buildings are currently being reconfigured after a 2002 Base Closure and Realignment law recommended that a new Armed Forces Reserve Center be constructed on the parcel. Once completed, the project will have required the demolition of approximately 25 buildings within the current camp boundary to construct new facilities and upgrade existing utilities and roadways. Firing ranges historically associated with the camp were sold to ODOT in the 1990s for the Sunrise Corridor. The ODOT-owned land, which comprises 178.26 acres, forms the northern boundary of the present-day Camp Withycombe, which is now 78 acres.	
Outbuildings and Landscape Features: The camp is largely devoid of landscape features. A small waterway runs along the northern portion of the parcel, and a stand of trees (which will not be impacted by the base realignment project) is associated with Building 6110. Numerous temporary structures have been placed on the parcel since the 1990s, and serve as storage facilities for various items, including hazardous waste. These temporary structures were not included in the overall resource count for the potential historic district, and are not noted on the attached map.	
Overall Condition: <input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor	Overall Integrity: <input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input checked="" type="checkbox"/> Poor
	
The south (main) entrance to Camp Withycombe. The view is towards the north-northeast.	
Preliminary National Register Findings: <input type="checkbox"/> National Register listed <input type="checkbox"/> Potentially Eligible <input checked="" type="checkbox"/> Not Eligible: <input type="checkbox"/> In current state <input checked="" type="checkbox"/> Irretrievable integrity loss <input type="checkbox"/> Lacks Distinction <input type="checkbox"/> Not 50 Years	
State Historic Preservation Office Comments: <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur: <input type="checkbox"/> Potentially Eligible <input type="checkbox"/> Not Eligible Signed _____ Date <u>4/14/2010</u> Comments: _____	

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

District Name: Camp Withycombe Historic District

City, County: Clackamas, Clackamas County

Architects, Builders or Designers (if known): Various

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

General Description of Resources

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

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

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

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

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

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

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

District Name: Camp Withycombe Historic District

City, County: Clackamas, Clackamas County

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

Significance Statement

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

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

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

Sources

Carter, Liz

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

CH2M Hill

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

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

District Name: Camp Withycombe Historic District

City, County: Clackamas, Clackamas County

Finley, Aimee, and Bill R. Roulette

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

Hadlow, Robert W.

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

National Guard Bureau

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

Norman, James

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

Oregon Military Department

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

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

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

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106: SUPPLEMENTAL PHOTOGRAPHS

District Name: Camp Withycombe

City, County: Clackamas, Clackamas County



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



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

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Continuation Sheet

District Name: Camp Withycombe

City, County: Clackamas, Clackamas County



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



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

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

District Name: Camp Withycombe

City, County: Clackamas, Clackamas County



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



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

Planned Trails Section 4(f) Supporting Documents:

- Metro Regional Trails Map
- North Clackamas Parks & Recreation District Map
- Letters from ODOT to Metro and North Clackamas Parks and Recreation Department
- Sunrise Project Typical Cross-Sections

Metro Regional Trails Map

North Clackamas Parks & Recreation District Map

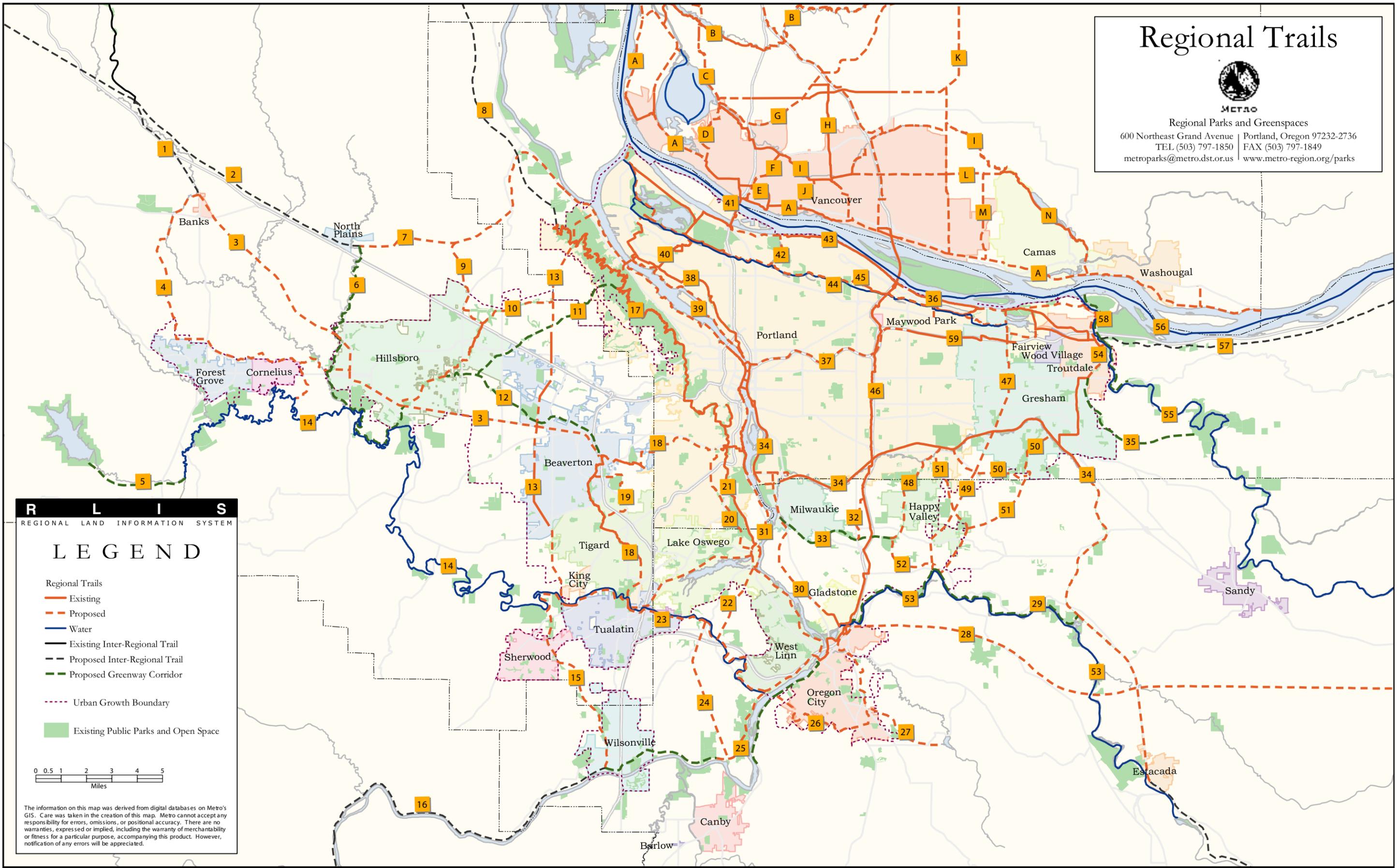
Regional Trails



METRO

Regional Parks and Greenspaces

600 Northeast Grand Avenue | Portland, Oregon 97232-2736
TEL (503) 797-1850 | FAX (503) 797-1849
metroparks@metro.dst.or.us | www.metro-region.org/parks



R L I S
REGIONAL LAND INFORMATION SYSTEM

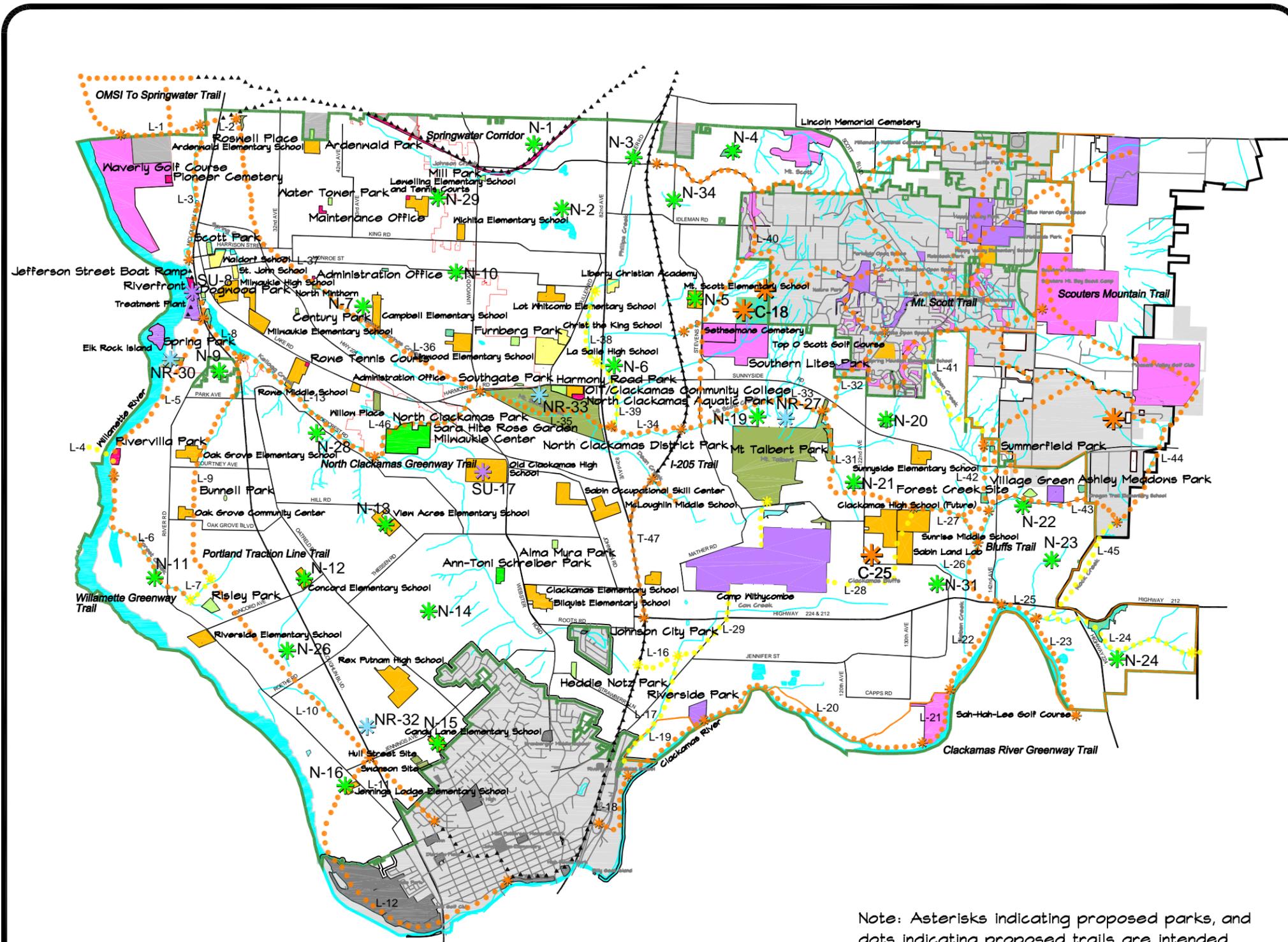
LEGEND

- Regional Trails
 - Existing
 - Proposed
- Water
- Existing Inter-Regional Trail
- Proposed Inter-Regional Trail
- Proposed Greenway Corridor
- Urban Growth Boundary
- Existing Public Parks and Open Space



The information on this map was derived from digital databases on Metro's GIS. Care was taken in the creation of this map. Metro cannot accept any responsibility for errors, omissions, or positional accuracy. There are no warranties, expressed or implied, including the warranty of merchantability or fitness for a particular purpose, accompanying this product. However, notification of any errors will be appreciated.

North Clackamas Parks & Recreation District



Note: Asterisks indicating proposed parks, and dots indicating proposed trails are intended to show a general location only. The actual location will be based on land availability, acquisition cost, and the owner's willingness to sell.

Legend:

- Planning Area Boundary
- Park District Boundary
- Urban Growth Boundary
- Neighborhood Parks
- Community Parks
- Special Use Areas
- Natural Resource Area
- Undeveloped Parkland
- Miscellaneous Open Space
- Other Public Land
- Private Facilities
- Public Schools
- Private Schools
- ▲▲▲ Existing Multi-Use Trails
- Proposed Linear Park Segment (High Priority)
- Proposed Linear Park Segment (Very Long Term)
- ★ C- Proposed Community Park
- ★ N- Proposed Neighborhood Park
- ★ SU- Proposed Special Use Facility
- ★ NR- Proposed Natural Resource Area

Figure 4.3
Facilities Plan
2002 Master Plan Update



**Letters to Metro and North Clackamas Parks and
Recreation Department from ODOT**



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Region 1
123 NW Flanders
Portland, OR 97209-4019
(503) 731-8200
FAX: (503) 731-8259

April 29, 2010

Michelle Healy, Parks Planning Supervisor
Clackamas County Business and Community Services
150 Beaver Creek Road
Oregon City, OR 97045

File Code:

Mel Huie, Regional Trails Coordinator
Parks Planning and Development
600 NE Grand Avenue
Portland, OR 97232

Re: Section 4(f) Not Applicable to Proposed Trails

Dear Ms. Healy and Mr. Huie:

Thank you for attending the meeting on the proposed Sunrise Corridor project in January. Subsequent to our discussion of designated (planned) trails in the proposed project area, Federal Highway Administration (FHWA) guidance on Section 4(f) has been reviewed regarding the Section 4(f) status of proposed trails located near the project corridor (I-205 to Rock Creek Junction). During the meeting held at the Oregon Department of Transportation (ODOT) building on January 13, 2010, you provided the following points regarding planned trails in the project corridor:

- Metro Council adopted a regional "Trails and Greenways" Concept Map in the 1990's which was last updated in October 2008.
- The trails shown on the enclosed map and listed in the table below (as provided at the January meeting) are an interconnected system of trails located within the Sunrise project corridor. .
- Some of the trails shown on the map and in the table below are included on Metro's RTP bicycle and/or pedestrian system map(s) and the RTP's Financially Constrained list which prioritizes them for funding.
- Proposed designated trails within the Sunrise Corridor project area are generally conceptual in nature and consist of rough alignments.
- No property has yet been acquired for any of the planned trails.
- Most of the trail alignments are on private property.
- Master planning for Scouters Mountain / Mt. Scott Loop Trail will occur in 2011.
- Most of the trails are not expected to be constructed within the next 10 to 20 years.



Designated (Planned) Trails in Project Area	Included on Metro Regional Trails and Greenways Map	Included in NCPRD Master Plan	Included on Metro RTP bike/ped system maps	Included on Metro RTP Financially Constrained list
Clackamas Bluffs Trail*	√			
Clackamas River Greenway Trail	√	√		
Clackamas River Trail	√			
Scouters Mountain/Mt. Scott Loop Trail	√		√	√
North Clackamas Greenway Trail	√	√	√	
East Buttes Power Line Corridor Trail**	√	√	√	√
Phillips Creek Trail	√	√	√	√
Camp Withycombe Trail***		√		
I-205 Trail to Unnamed Trail		√		
Unnamed Trail****		√		

*This connects to and shares a common segment with the Scouters Mtn./Mt. Scott Loop Trail

**Called the Sieben Creek Trail in NCPRD Master Plan shares common alignment.

*** This joins up with and shares a common segment of the Clackamas Bluffs Trail alignment as a segment of Scouter Mountain/Mt. Scott Loop Trail

****Same conceptual

FHWA's Section 4(f) Policy Paper (FHWA 2005) provides the following guidance regarding the applicability of Section 4(f) protection to trails:

Q&A #14 Trails, Answer B states, "Section 4(f) does not apply to trails on privately owned land. Section 4(f) could apply where a public easement that permits public access for recreational purposes exists. In any case, it is FHWA's policy that every reasonable effort should be made to maintain the continuity of existing and designated trails."

Q&A #17, Planned 4(f) Resources, states, "Section 4(f) applies when the land is one of the enumerated types of publicly owned lands and the public agency that owns the property has formally designated and determined it to be significant for park, recreation area, wildlife and waterfowl refuge purposes. Evidence of formal designation would be the inclusion of the publicly owned land, and its function as a 4(f) resource, into a city or county Master Plan. A mere expression of interest or desire is not sufficient. When privately held properties of these types are formally designated into a Master Plan, Section 4(f) is not applicable. The key is whether the planned facility is presently publicly owned, formally designated, and significant. When this is the case, Section 4(f) would apply.

Based on these points, the trails shown on the attached map and listed in the table above are not being considered as Section 4(f) resources at this time. Therefore, Section 4(f) is not applicable for proposed trails within the project corridor of the Sunrise Project (I-205 to Rock Creek Junction)..

Since these trails have strong support and are likely to be built every effort will be made to proactively involve Metro and NCPRD in the planning, acquisition, funding, design, permitting and construction phases of the proposed Sunrise Project so that the regional and local trails and other bike/pedestrian improvements, including the multi-use path, can be successfully integrated. Opportunities will be provided for the proposed trails to cross the Sunrise Project alignment via planned under-crossings designed to accommodate local roads (SE 135th Avenue, SE 142nd Avenue, SE 152nd Avenue, and SE 162nd Avenue) and a multi-use path (near SE 122nd Avenue).

To confirm your understanding and agreement with this determination that Section 4(f) does not apply to the planned trails, as listed in the table above and depicted on the enclosed trails map, please have the appropriate party at your respective agencies sign this letter and return to me at the address above. If you have questions about the project or this request, please contact Thomas Picco, Principal Planner at (503) 731-8230. Thank you again for your interest in this project.

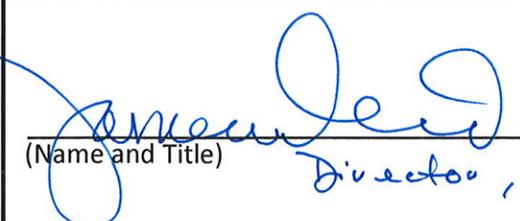
Sincerely,

for 

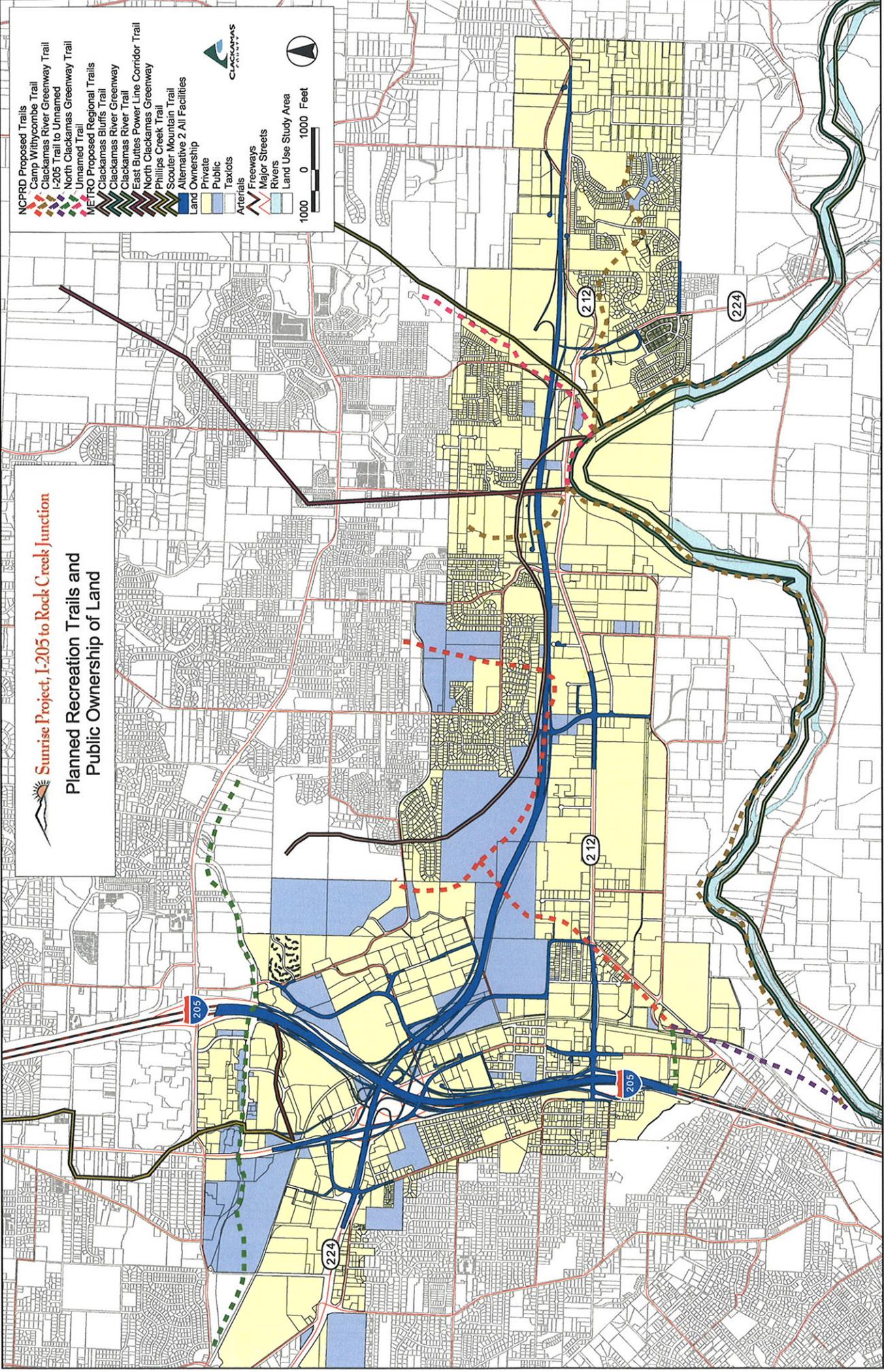
Becky Crockett
ODOT Region 1 Environmental Manager

CC: Thomas Picco, ODOT
Jeff Buckland, ODOT
Larry Conrad, Clackamas County
Michelle Eraut, Federal Highway Administration
Attachment : Planned Trails Map

Signature Block

 _____ (Name and Title) <i>Director, Metro</i>	<u>4.30.10</u> (Date)
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Sunrise Project, I-205 to Rock Creek Junction
Planned Recreation Trails and Public Ownership of Land



Legend:

- NCPDRD Proposed Trails
- Camp Withycombe Trail
- Clackamas River Greenway Trail
- I-205 Trail to Unnamed
- North Clackamas Greenway Trail
- Unnamed Trail
- METRO Proposed Regional Trails
- Clackamas Bluffs Trail
- Clackamas River Greenway
- Clackamas River Trail
- Clackamas River Trail
- East Buttes Power Line Corridor Trail
- North Clackamas Greenway
- Phillips Creek Trail
- Scoutier Mountain Trail
- Alternative 2 All Facilities
- Land Ownership
- Private
- Public
- Taxlots
- Arterials
- Freeways
- Major Streets
- Rivers
- Land Use Study Area

Scale: 1000 0 1000 Feet

North Arrow

CLACKAMAS COUNTY



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Region 1
123 NW Flanders
Portland, OR 97209-4019
(503) 731-8200
FAX: (503) 731-8259

April 29, 2010

Michelle Healy, Parks Planning Supervisor
Clackamas County Business and Community Services
150 Beaver Creek Road
Oregon City, OR 97045

File Code:

Mel Huie, Regional Trails Coordinator
Parks Planning and Development
600 NE Grand Avenue
Portland, OR 97232

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Sincerely,

for Jeff Buckland

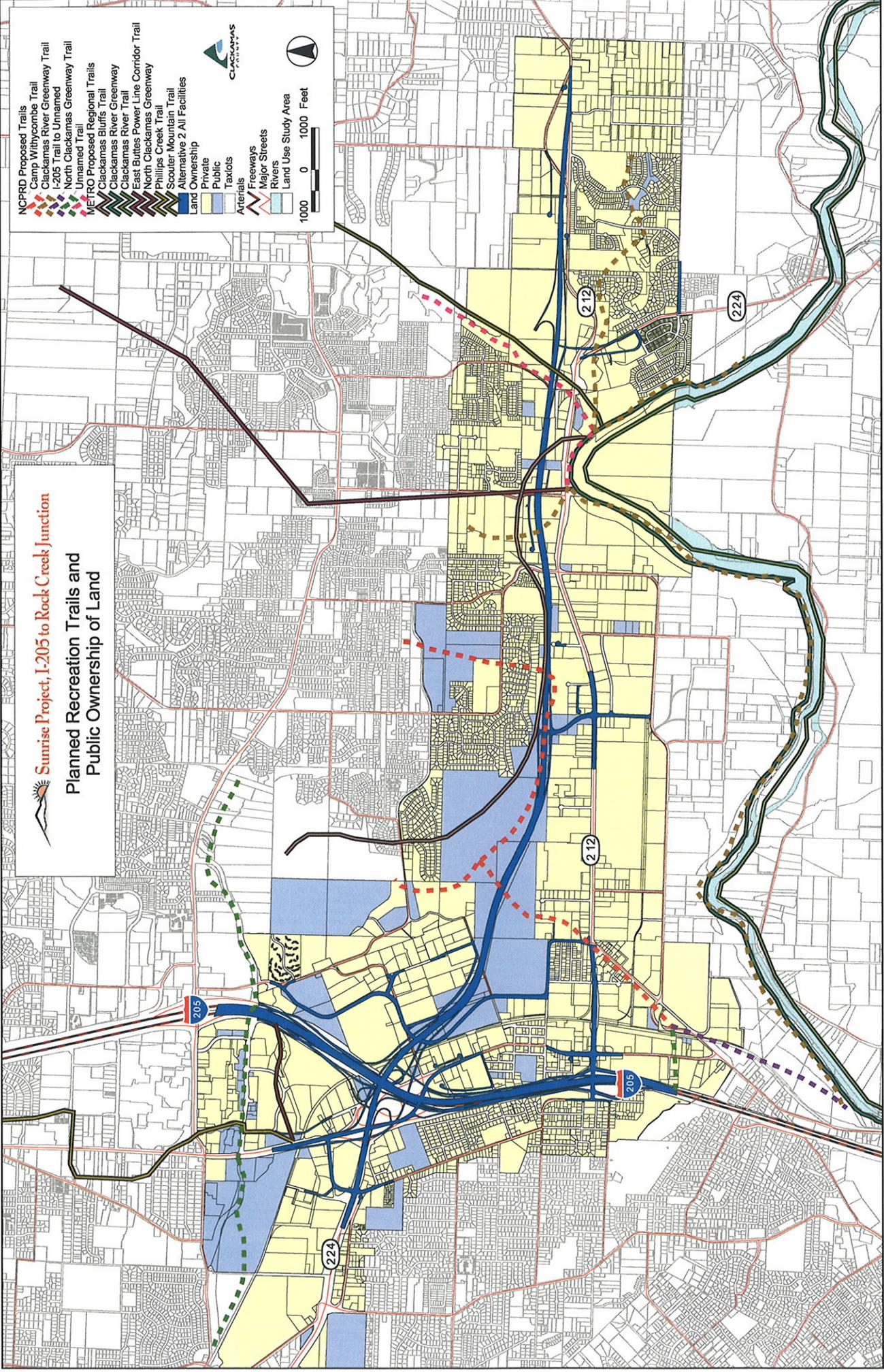
Becky Crockett
ODOT Region 1 Environmental Manager

CC: Thomas Picco, ODOT
Jeff Buckland, ODOT
Larry Conrad, Clackamas County
Michelle Eraut, Federal Highway Administration
Attachment : Planned Trails Map

Signature Block

 (Name and Title)	<u>Director BCS</u>	<u>4/29/10</u> (Date)
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Sunrise Project, I-205 to Rock Creek Junction
Planned Recreation Trails and Public Ownership of Land



Legend:

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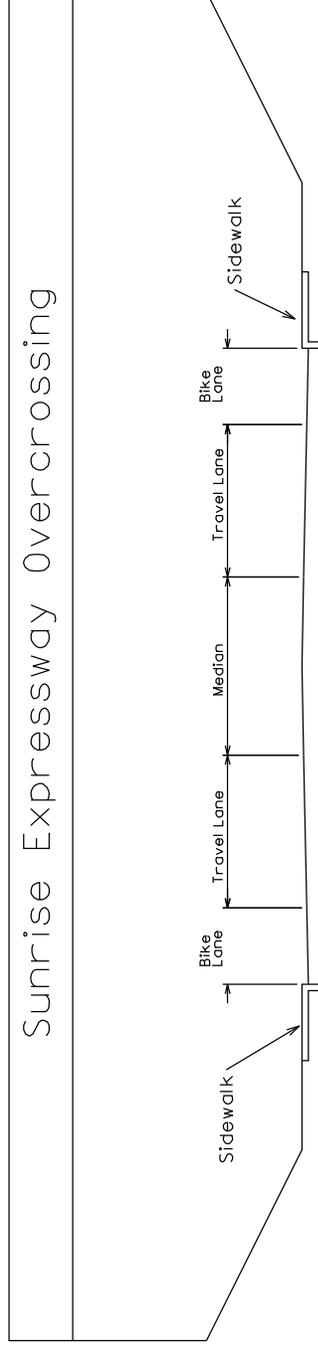
Scale: 1000 0 1000 Feet

Clackamas PARTNERSHIP

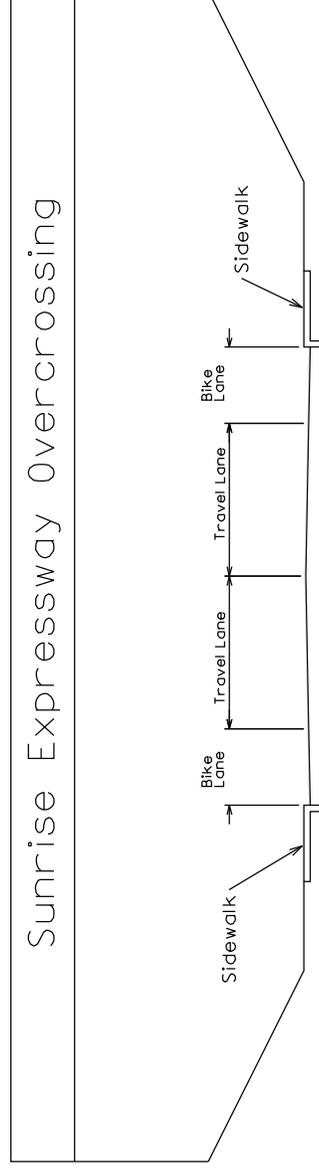
Sunrise Project Typical Cross-Sections

Sunrise FEIS Typical Sections -

Individual locations may vary



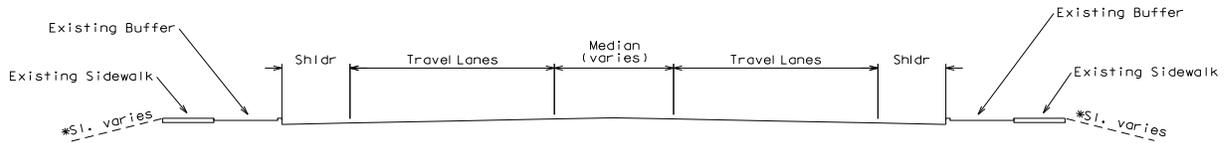
Typical Section - 135th & 142nd Ave Undercrossings
(See County Std for Minor Arterial)



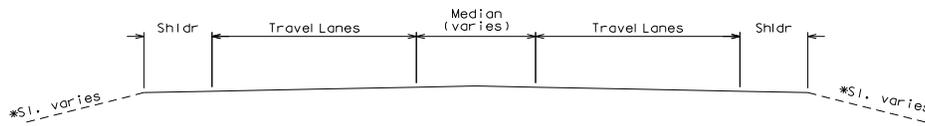
Typical Section - 152nd Ave Undercrossing
(See County Std for Collector)

Sunrise FEIS Typical Sections -

Hwy 212/224 (Individual locations may vary)

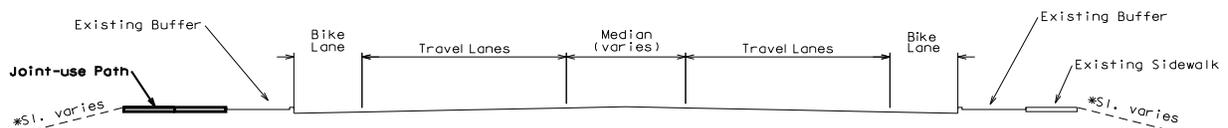


Existing Typical -
212/224 from 122nd Ave to 135th Ave

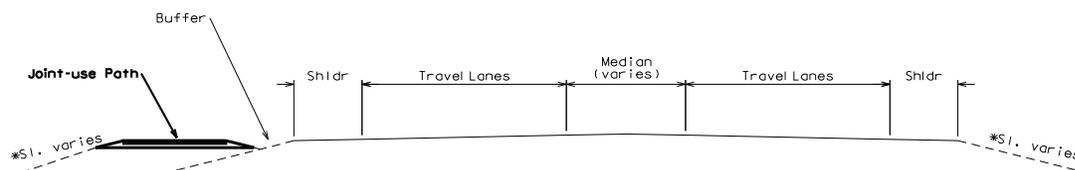


Existing Typical -
212/224 from 135th Ave to Rock Creek

* Slopes and distance to the Sunrise Expressway vary based on location



Proposed Typical -
212/224 from 122nd Ave to 135th Ave



Proposed Typical -
212/224 from 135th Ave to Rock Creek

* Slopes and distance to the Sunrise Expressway vary based on location

